

Policy Title: Agratas Responsible Battery Partner Policy
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Author: Joe Atkinson/Vyomakesh BM

AGRATAS RESPONSIBLE BATTERY PARTNER POLICY

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List of Acronyms

OECD - Organisation for Economic Co-operation and Development

UNGPs – United Nations Guiding Principles on Business and Human Rights

UN – United Nations

ILO - International Labour Organization

UNGC – United Nations Global Compact

NMC – Nickel Manganese Cobalt (commonly used lithium-ion chemistry for batteries)

LFP – Lithium Iron Phosphate (commonly used lithium-ion chemistry for batteries)

GHG – Greenhouse Gas Emissions

FPIC – Free, Prior and Informed Consent

RSMS – Responsible Sourcing Management System

KYS – Know Your Supplier (KYS Questionnaire)

CAHRAs – Conflict-Affected and High-Risk Areas

EU – European Union

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1) Purpose

The purpose of this Policy is to set out Agratas' global commitments and principles for responsible battery procurement and supply chain due diligence, and to communicate the expectations Agratas places on its Partners to support ethical, sustainable, and transparent sourcing practices.

2) Scope

This Policy applies globally across Agratas' operations and covers Agratas' direct procurement sourcing activities for materials, products, and components necessary to produce batteries, with a focus on raw materials such as cobalt, natural graphite, lithium, nickel, manganese, and chemical compounds based on these raw materials. The Policy applies to Partners, defined as Agratas' direct suppliers that provide these materials, products, or components. Agratas expects Partners to communicate and, where appropriate, cascade equivalent responsible sourcing expectations through their relevant upstream supply chains.

3) Our Commitment

Agratas is committed to ethical business conduct in its own operations and throughout its supply chain. This Responsible Battery Procurement Policy (the "Policy") outlines Agratas' commitment to conducting ongoing due diligence in the battery supply chain and ensuring the responsible sourcing of minerals in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"), the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ("OECD Guidelines"), the UN Guiding Principles on Business and Human Rights (UNGPs), the ILO Conventions, and the Universal Declaration of Human Rights.

This Policy is consistent and must be read in conjunction with Agratas' Responsible Value Chain Partner Code of Conduct (the "Responsible Partner Code") and Tata Code of Conduct.

Agratas' commitment to responsible sourcing is further strengthened in the following key areas:

3.1 Responsible Sourcing Strategy

Agratas integrates a responsible sourcing management system into its business to proactively manage risks across all suppliers. Aligned with relevant international standards and regulations, Agratas is committed to implementing robust policies, procedures, and processes to ensure ethical, sustainable, and transparent sourcing practices throughout its operations.

3.2 Supplier Selection and Evaluation

Agratas will be fair, honest, and transparent in supplier selection and evaluation. We invest in our people and partners, requiring their adherence to responsible sourcing of minerals, and will foster collaborative relationships built on trust and mutual accountability. Agratas expects Partners to apply equivalent responsible sourcing standards to relevant suppliers and sub-suppliers that contribute to the materials, products, or components supplied to Agratas.

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3.3 RFI and RFQ Processes

Agratas is passionate about delivering high-quality standards. We will prioritise partners who demonstrate a commitment to transparency, sustainability, and fair labour practices. We will also prioritise partners that actively work to reduce their impact on people and the planet. Our processes will be fair, transparent, and accessible, enabling our partners to engage with us in a responsible and collaborative manner.

3.4 Documentation and Record-Keeping

Agratas will promote consistent communication to support due diligence policies, procedures, and practices. Agratas commits to enhancing transparency across Partners by storing and maintaining data relating to direct procurement suppliers' due diligence management systems. All direct procurement due diligence data will be retained in line with relevant regulatory requirements, such as the EU Battery Regulation.

3.5 Training and Capacity Building

Agratas is dedicated to supporting capacity building among Partners to enhance their understanding of due diligence and promote best practices. Agratas will facilitate training and education for stakeholders on responsible sourcing of minerals, fostering a culture of continuous improvement and shared commitment to ethical standards across Partners.

4) Responsible Sourcing Principles

4.1 Serious Human Rights Abuses

Recognising the risks of adverse human rights impacts and conflicts associated with the extraction, trade, handling, and export of minerals from conflict-affected and high-risk areas, Agratas will neither accept nor in any way support, contribute to, facilitate, or benefit from any form of human rights violation or abuse by any party in its supply chain. This includes:

- any form of torture, cruel, inhuman, or degrading treatment.
- any form of forced or compulsory labour, meaning work or service exacted from any person under the menace of penalty and for which that person has not offered themselves voluntarily.
- any form of child labour¹
- other gross human rights violations and abuses, such as discrimination, sexual harassment and violence.
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

Agratas will immediately suspend or terminate its relationship with its Partners if it identifies a reasonable risk that a Partner commits, sources from, or is associated with any of the serious human rights abuses or violations listed above.

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4.2 Labour Rights

Agratas will respect labour rights and promote fair working conditions across its supply chain. Agratas expects its Partners to comply with relevant national and international labour laws, regulations, and standards. This includes:

- the right of association, the right to form and join organisations of workers' choice, and the right to collective bargaining, without interference, discrimination, retaliation, or harassment, in compliance with applicable laws;
- working hours, wages, and remuneration.

4.3 Health & Safety

Agratas will comply with all applicable national and international health and safety laws and regulations in its battery supply chain. Agratas and its Partners shall provide a safe and healthy workplace for their workforce, complying with laws and industry standards for health and safety, and adopt measures to prevent accidents, injuries, and illnesses.

4.4 Security Forces and Non-State Armed Groups

Agratas will not accept any direct or indirect support to public or private security forces, non-state armed groups or their affiliates, that illegally control mine sites, transportation routes and upstream actors, or who are involved in illegal taxation or extortion in connection with the extraction, transport, trade, handling, or export of minerals in its supply chain. If any of Agratas' Partners contract with public or private security forces, Agratas expects its Partners to comply with the Voluntary Principles on Security and Human Rights.¹

4.5 Business Conduct

Agratas will not offer, promise, give, request, accept, or receive a bribe, or assist in any form of bribery or other conduct that violates applicable anti-corruption laws. Agratas will resist the solicitation of bribes to conceal, disguise, or misrepresent the origin of minerals or payments to governments and will work to reduce money laundering risks.

Agratas will ensure that all payments related to mineral trade that are due by Agratas are paid to the governments and Agratas expects the same of its Partners regarding mineral extraction, trade, and export. Furthermore, Agratas will ensure that information on such payments is disclosed in line with international standards and good practice frameworks relevant to its trading operations.

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Agratas will engage with Partners and other relevant stakeholders to prevent or mitigate financial crime risks and promote transparency.

4.6 Environment

Agratas will endeavour to conserve natural resources and avoid or minimise environmental damage caused by its business activities. If environmental damage or degradation cannot be avoided or remedied, appropriate compensation will be ensured. Areas of concern under environmental sustainability include but are not limited to the following issues, considering direct, induced, indirect and cumulative effects:

- Measuring, managing and reducing the greenhouse gas emissions (GHG) generated due to a company's operations;
- Safe management of waste and hazardous waste, such as chemicals, industrial waste and other hazardous substances;
- Air pollution, including the prevention of noise and vibration;
- Soil, including soil pollution, soil erosion, land use and degradation;
- Water, including seabed and marine environment, and including water pollution, water use, water consumption, water quantities (flooding or droughts) and access to water;
- Protection of biodiversity including deforestation, damage to habitats, wildlife, flora and ecosystems including ecosystem services;
- Mitigation of environmental risk;
- Energy use including renewable and clean energy sources;
- Resource efficiency and circularity, involving optimally using and managing resources sustainability throughout their lifecycle. Circular economy extends this concept by promoting a closed-loop system where products, materials, and resources are reduced, reused, repurposed, or recycled, involving sustainable practices to minimise water consumption and maximise the recycling of waste materials.

4.7 Community Life

Agratas will strive to preserve and respect local communities, be a neighbour of choice in the communities in which it operates, and contribute to equitable and inclusive development. Agratas will not tolerate, support, or contribute to any abuse or violation of the rights of Indigenous Peoples and other marginalised communities. Agratas requires the Free, Prior and Informed Consent (FPIC) of Indigenous Peoples and local communities to be obtained for projects involving the extraction of resources from Indigenous lands.

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5) Responsible Sourcing Management System

Agratas has established a Responsible Sourcing Management System (“RSMS”) and an overarching Supply Chain Due Diligence Procedure to manage OECD Annex II risks in its supply chain in line with stakeholder expectations, leading industry practices, and the internationally recognised good practice framework of the OECD Guidance – the Five-Step Framework for Risk-Based Due Diligence.

5.1 Establishes a strong Responsible Sourcing Management System

- This Policy and the Agratas Responsible Partner Code, which set out Agratas’ responsible sourcing commitments, requirements, and expectations for Partners across the battery supply chain.
- Internal management structure to support responsible sourcing and supply chain due diligence and efficiently communicate critical information to internal and external stakeholders, communicated in the Agratas Supply Chain Due Diligence Procedure;
- Internal material control and a system of controls and transparency over the battery supply chain, including the identification of upstream actors where applicable, communicated in the Agratas Supplier Risk Assessment Methodology and KYS Questionnaire; and
- Agratas’ grievance mechanism that any affected stakeholder can use to raise anonymous concerns regarding the circumstances of extraction, trade, handling, and export of minerals in Agratas’ supply chain, in compliance with the OECD Guidance and UNGPs.

5.2 Implements a process to identify and assess OECD Annex II Risks in its Mineral Supply Chain

This includes:

- Mapping the battery supply chain and working to achieve full transparency and traceability for battery raw materials such as nickel, cobalt and lithium;
- Conducting ongoing environmental and social risk assessments across its supply chain, which includes identifying red flags associated with material origin.
- When sourcing from conflict-affected and high-risk areas (CAHRAs), conduct enhanced due diligence and verify responsible sourcing practices at choke points² and in the upstream supply chain using on-site assessments, third-party assurance schemes and industry standards.

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Upon request by Agratas, Partners are required to disclose the origin of materials that are used in products supplied to Agratas, to engage in collaboration on due diligence, and to support corrective actions and/or remediation if Agratas identifies potential violations of the principles outlined in this Policy. Partners are also expected, where relevant, to obtain and provide comparable information from their own relevant suppliers and sub-suppliers that contribute to the materials, products, or components supplied to Agratas.

5.3 Designs and implements measures to respond to any identified risks

This includes:

- developing measurable risk mitigation plans in consultation with relevant stakeholders where necessary,
- assigning internal responsibility for the risk mitigation plans within Agratas,
- implementing clear performance objectives with indicators to measure improvement,
- prioritisation of mitigation actions based on risk severity and urgency,
- monitoring processes for the implementation of risk mitigation actions; and
- reporting on the results of social and environmental risk assessments in Agratas' supply chain to senior management.

5.4 Uses risk-based audits and third-party assurance

Agratas may use risk-based audits and available independent third-party assurance schemes, where appropriate, to support due diligence and assess alignment with the OECD Guidance and the EU Battery Regulation. Where such activities identify gaps, Agratas may require time-bound corrective actions and monitor their implementation.

Agratas expects its Partners to participate, where relevant, in recognised industry standards, initiatives, or third-party assurance schemes that support responsible business conduct and the mitigation of upstream risks and adverse impacts across the battery supply chain.

5.5 Reports publicly on responsible sourcing efforts

Agratas will report publicly, at least annually, on its responsible sourcing due diligence efforts, with due regard to business confidentiality and other competitive concerns. The reporting includes the following elements:

- Relevant responsible sourcing and supply chain due diligence policies and practices;
- grievances received and addressed;
- the results of supply chain risk assessments including any critical risks identified; and
- risk mitigation activities, including internal reporting and continuous improvement.

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6) Reporting Violations of this Policy

To support transparent and open communication on responsible sourcing priorities, all internal and external stakeholders are encouraged to use Agratas' grievance mechanism, which allows stakeholders to raise concerns confidentially or disclose any actual or potential violation of this Policy, the Tata Code of Conduct, the Responsible Partner Code, or applicable law.

Agratas does not tolerate any form of retaliation against users who report via this channel. All concerns submitted will be handled in a timely and confidential manner. Partners are expected to adopt similar reporting practices within their organisations and to encourage their employees, relevant suppliers and sub-suppliers, customers, and other stakeholders to report concerns through appropriate grievance channels.

- **Email addresses:** coc@agratas.net; procurement.communications@agratas.net
- **Postal address:** Prestige Tech Cloud, Building -1, Cirrus Survey no 13, Navarathna Agrahara Village, Jala Hobli, Bengaluru North Taluk, Karnataka, India – 562157

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7) Accountability

This Policy will be reviewed periodically and updated as needed. Revisions will follow Agratas' internal governance requirements.

This Policy shall come into force upon its publication date.

If Agratas identifies any of the above responsible sourcing principles risks in its supply chain and depending on the severity of the risks identified, Agratas will engage with its Partners and other relevant stakeholders to prevent or mitigate these risks. This may include suspension or termination of its business relationship with the affected Partner, depending on the severity of risks identified and mitigation actions taken.

The Agratas CPO has overall responsibility for the Policy implementation.

Signed by:

23-Jul-2026 | 14:03 IST
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Karthik Selvan, Chief Procurement Officer

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8) Footnotes

#	Footnote Text
1	As defined in the ILO Convention (No. 182) in 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.
2	The Voluntary Principles on security and human rights, developed in 2000 jointly by governments of the United States and the United Kingdom, companies and non-governmental organisations as part of a dialogue on security and human rights.
3	Choke points are referred to as identified points, meaning, points in the supply chain meeting the following criteria: key points of transformation in the supply chain, stages in the supply chain that generally include relatively few actors that process a majority of the commodity, stages in the supply chain with visibility and control over the circumstances of production and trade upstream, greatest points of leverage of downstream enterprises.

9) Related Documentation

Reference Number	Document Title
AGGL-PO-033	Value Chain Partner Code of Conduct
AGGL-PR-1417	Supply Chain Due Diligence Procedure (Direct Materials)
AGGL-FM-1415	KYS Questionnaire Form
AGGL-TP-1416	Responsible Sourcing Risk Assessment Template
AGGL-TP-1418	Supply Chain Due Diligence Risk Mitigation Guidance

10) Document History

Version	Revision	Change Description	Author(s)	Approved By
1	21/07/2026	Version 1 released for review and publication	Joe Atkinson, Vyomakesh BM	Karthik Selvan