



Corporate Conflict Minerals Policy

INTRODUCTION

We Ashok Leyland Limited, a leading Indian multinational automotive manufacturer of commercial vehicles.

Our Company is committed maintaining utmost standards of transparency, integrity accountability and our business is built on trust and confidence of our customers. AL conducts it's business with the highest standards of corporate governance.

PURPOSE OF THE POLICY

Conflict Minerals include Tantalum, Tin, Tungsten, and gold which are mined and used to influence or finance armed conflict, human rights abuses, and violence.

Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

Conflict minerals can be extracted at many different locations around the world including the Democratic Republic of Congo (DRC). The SEC rules define conflict minerals as 3TG metals, wherever extracted. For example, tin extracted in Canada, Russia or Argentina is considered a conflict mineral by definition.

The purpose of this Policy is to avoid the procurement of such Conflict Minerals and to outline our commitment to responsible sourcing of minerals and to comply with applicable laws and regulations regarding conflict minerals. Ashok Leyland Limited endorses world peace and is extremely sensitive towards any form of violations or abuse to human rights. AL takes ownership and carries out due diligence to avoid the procurement and usage of such Conflict Minerals in our products.

SCOPE AND APPLICABILITY

This Policy applies to all manufacturing plants and individuals working at all levels /grades of Ashok Leyland Limited, its subsidiaries, (collectively referred to as the "Company").

OBJECTIVE

Objectives of the Conflict Mineral Policy are

- To avoid the procurement and usage of conflict minerals.
- Make sure that minerals used in our products are responsibly sourced after due diligence from conflict free regions.
- Deploy responsible procurement practices across our entire supply chain including different tiers (Suppliers).
- To make suppliers undertake reasonable due diligence if not available within their own supply chain.
- No new suppliers will be accepted in our Suppliers Panel, if they cannot guaranty the fulfilment of the related requirements.

POLICY

Ashok Leyland shall

- Avoid the sourcing or use any Conflict Minerals (3TG) from DRC or its surrounding countries.
- Determine whether there are any Conflict Minerals that are necessary to manufacture a product and try to eliminate if the minerals are not essential to be used in producing the products.
- Conduct due diligence and source responsibly.
- Ensure and review compliance to Conflict Mineral Policy.
- Encouraged employees to report any concerns regarding potential violations of this policy.
- Promoting transparency by requiring our suppliers to provide information regarding the source of conflict minerals used in our products.

MONITORING

The Head of Sourcing and Supply Chain has primary responsibility for implementing this policy. Management is responsible for ensuring all concerned are made aware of and understand the gravity of sourcing conflict minerals from Conflict-affected and high-risk areas

If any Supplier or Employee comes across a case of breach of these guidelines, he/she should bring it to the notice of Business or Functional Heads in writing and the respective person shall take immediate and corrective measures.

AMENDMENTS

The Company reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, this Policy, in whole or in part, shall stand modified/amended from time to time, without any further action on the part of the Company, as and when there would be any statutory modification(s) / amendment(s) / revision(s) to the applicable provisions to it.

S. Ganesh Mani

President & Chief Operating Officer