



## Conflict Minerals Policy

**CORPORATE OFFICE:**

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## 1. Background

Conflict minerals refer to the mineral precursors of the metals tantalum, tin, tungsten, and gold (3TG), which are found in small amounts in virtually all electronic products. Revenue from mining these minerals in the Democratic Republic of Congo (DRC) and nine neighboring countries has been linked to funding for groups engaged in extreme violence and human rights atrocities.

Pursuant to the Dodd–Frank Wall Street Reform and Consumer Protection Act, public companies in the US that make products for which 3TG metals (tantalum, tin, tungsten & gold) are necessary to the functionality or production of that product are required to assess their supply chains and report on the source of these materials.

To help mitigate violence in the Congo, the US congress has passed legislation which is designed to force companies to disclose whether or not their products contain conflict minerals.

## 2. Introduction

Vakrangee is not in the business of manufacturing any products involving minerals neither do we sell any such products directly through our platform. We are primarily in the services business whereby we provide Digital BFSI (Banking, Insurance & Financial services), ATM services, Online Pharmacy, E-commerce and Tele medicine services through our network of Digital Convenience stores called as “Vakrangee Kendra”.

Vakrangee does not directly purchase any raw conflict minerals for products or services it sells. Our Business model as such is Digital Convenience stores whereby, we provide services through our last mile outlets in Rural India thereby promoting Financial, Social & Digital Inclusion.

We are a unique technology driven company focused on building India’s largest network of last-mile retail outlets to deliver real-time BFSI, ATM, e-commerce and logistics services to the unserved rural, semi-urban and urban markets. The Assisted Digital Convenience stores are called as “Vakrangee Kendra” which acts as the “One stop shop” for availing various services and products.

As per our sustainable sourcing policy, Suppliers must ensure that all laws and regulations are complied with in the countries in which the supplier operates. All other applicable international laws and regulations should be complied with including those relating to international trade (such as those relating to sanctions,

export controls and reporting obligations), data protection and anti-trust/competition laws. Also, our vendors/suppliers need to follow quality objectives and policies thoroughly and should be certified by an external authority like ISO.

**ISO Policy** - <https://vakrangee.in/pdf/Policies-PDF/Vakrangee%20ISO%20Flag.pdf>

At Vakrangee we have a policy on Human Rights whereby we recognize that we have an opportunity to promote and respect human rights where we can make a positive contribution and to operate in compliance with all applicable laws wherever we do business.

**Link to Human Rights Policy** – <https://vakrangee.in/pdf/Policies-PDF/Human%20Rights%20Policy.pdf>



### 3. Commitment to Eliminate Conflict Minerals from Products and Supply Chain

Vakrangee commits to eliminate Conflict Minerals from Products and Supply Chain.

Vakrangee's Business model is completely sustainable and focused on enabling Indians to benefit from financial, social and digital inclusion.

Through our vast network of outlets, we are driving financial, digital and social inclusion in rural India. Our ultimate purpose is to ensure that every Indian has the opportunity to benefit from financial, digital and social inclusion and has access to the global marketplace.

Our Entire Business model and the products / services we provide are all sustainability related products and services. Vakrangee Kendra outlets are one stop shops providing key Essential and necessary services to the citizens of the country in Rural India such as –

- Banking Services
- ATM Services
- Online Pharmacy
- Digital Healthcare - Telemedicine health services – Including Unlimited Tele & Video Consultation with expert doctors & Home Blood test facility
- Assisted E-Commerce - Online shopping of Groceries & Other products
- Travel Ticket Booking & Utility Bill Payment services

At our Vakrangee Kendras, we have adopted 'Go Green' initiatives. Our banking processes run on AePS (Aadhaar enabled Payment System) model. Moreover, ATM transactions do not generate printed receipts. The transaction acknowledgments are sent via SMS. We are working towards achieving environmentally sound management of paper through prevention, reduction, recycling, and reuse, in order to minimize their adverse impacts on the environment.

Further, on technology Innovation front, we make use of disruptive technology such as e-KYC (Biometric KYC), interoperability, and real-time transactions. We

use advanced features that are environment-friendly, such as paperless banking, real-time banking, and biometric evaluation. Being digital and paperless in nature we are committed towards Responsible consumption; our Kendras generate negligible paper waste and zero plastic waste.

We take a declaration from all our business partners stating that they do not use any conflict minerals sourced from DRC or its neighboring countries.

As per our sustainable sourcing policy, Suppliers must ensure that all laws and regulations are complied with in the countries in which the supplier operates. All other applicable international laws and regulations should be complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and anti-trust/competition laws. Also, our vendors/suppliers need to follow quality objectives and policies thoroughly and should be certified by the authority like ISO.

We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

**Link to Sustainable Sourcing Policy –**

<https://vakrangee.in/pdf/Policies-PDF/Sustainable%20Sourcing%20Policy.pdf>

**ISO Policy -** <https://vakrangee.in/pdf/Policies-PDF/Vakrangee%20ISO%20Flag.pdf>

## 4. Commitment to Conduct Supply Chain Due Diligence to Assess Risk Exposure

We have a detailed Supplier Monitoring System in place. We commit to conduct thorough due diligence of all suppliers to mitigate any supply chain risk exposure.

We draw reference from the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

We have a governance structure to monitor the compliance of procurement through **Purchase Committee, which is an internal committee**, which includes a team that carries out the monitoring, compliance program and provide oversight and guidance, as necessary.

We engage with suppliers of products we purchase or sell regarding implementation of this policy, including seeking information from them regarding the origin and traceability of minerals in any of the products and providing educational materials to them regarding means to promote increased transparency.

We have taken following steps for Supply Chain Due Diligence:

1. Adequate Steps are taken before signing a contract with Supplier
2. Dedicated Contract Manager is identified for all the suppliers and ensuring and checking adequate compliance by Suppliers
3. Company has set up Supplier Monitoring Mechanism to be followed
4. Adequate supplier chain monitoring techniques are set up. Such as:
  - a. Setting Key Performance Indicators (KPIs) with Suppliers
  - b. Internal Audit
  - c. Regular meetings with Supplier
5. Steps are followed post completion of contract with Supplier

We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

For more details please refer Sustainable Sourcing Policy –

<https://vakrangee.in/pdf/Policies-PDF/Sustainable%20Sourcing%20Policy.pdf>

## 5. Commitment to not source minerals from the DRC and adjoining countries

Vakrangee commits to not source minerals from the Democratic Republic of Congo (DRC) and its adjoining countries.

We also have adequate procedures in place to ensure that all our stakeholders are taking adequate measures to not source mineral from DRC and the adjoining countries:

### Partners

We take adequate steps for ensuring that any of our business partners do not source material from DRC or its neighboring countries:

- While entering new partnerships we do a thorough due diligence on our partners
- We take a self-declaration from our partners that they do not source minerals from the DRC and the adjoining countries
- We ask the business partners to give an annual declaration for not sourcing minerals

### Franchisees

- We do thorough due diligence of our franchisees while onboarding a franchisee in our ecosystem
- Our franchisees source products locally for construction of their outlet for which we give them guidance to not source materials from conflict areas
- We give refresher training to our franchisees on a regular interval

### Suppliers

As per our sustainable sourcing policy, Suppliers must ensure that all laws and regulations are complied with in the countries in which the supplier operates For more details please refer Sustainable Sourcing Policy –

<https://vakrangee.in/pdf/Policies-PDF/Sustainable%20Sourcing%20Policy.pdf>





**Thank You**

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