



BHARAT GEARS LIMITED

PRODUCT USE & LIFE CYCLE MANAGEMENT POLICY

Introduction:

At Bharat Gears Limited (BGL), we recognize that our responsibility as a manufacturer extends beyond production, encompassing the environmental impact of our products during use and at end-of-life. We are committed to minimize the environmental footprint of our products across their full lifecycle.

The Policy will undergo annual reviews, or whenever significant alterations in processes or management approaches occur, to guarantee its ongoing suitability and alignment with our operations and changing stakeholders expectations.

Scope of the Policy:

This policy is applicable to:

- Bharat Gears Limited, Kausa Shil, Mumbra, Thane-400612, Maharashtra
- Bharat Gears Limited, 20 K.M. Mathura Road, P.O. Amar Nagar, Sarai Khwaja, Faridabad-121003, Haryana
- Bharat Gears Limited, Lonand, Taluka Khandala, Satara-415521, Maharashtra
- Suppliers, subsidiaries, distributors, business contacts, agents, advisors, and business associates, including current and potential clients, customers, and others acting on the Company's behalf

Roles and Responsibilities:

- The leadership team ensures this policy is integrated into the Company's overall strategy and business decisions.
- The EHS head leads the execution of the policy across all facilities and departments.

Policy Description:

We are committed to design and develop products that support the environmental goals of our customers and end-users. This includes:

1. Developing durable, high-efficiency components that contribute to reduced energy consumption, lower emissions, and improved driveline performance in the vehicles and machinery they power.
2. Collaborating with our OEM customers to align with their sustainability and emission-reduction requirements, including supporting the transition to hybrid and electric vehicle platforms.
3. Continuously improving material selection and product design to reduce environmental impact during the operational life of our products.
4. Designing products that minimize the use of hazardous substances and maximize material recoverability at end-of-life.
5. Promoting material transparency across our supply chain to support customers in meeting their own end-of-life and circular economy obligations.
6. Progressively working towards lifecycle assessment of our key product lines to better understand and reduce end-of-life environmental impacts. We aim to perform life cycle assessments on 100% of our products by 2040.

- non-retaliatory in nature. The Company strictly prohibits retaliation against any individual who raises a concern in good faith, and ensures protection against any form of discrimination or adverse action.

All reported grievances are reviewed and investigated in a timely manner, and appropriate corrective and preventive actions are taken by designated committees or authorities under applicable policies.

22. REMEDIATION AND CORRECTIVE MEASURES

The Company is committed to address and remediate any identified or reported violations related to labour practices, human rights, working conditions, or ethical conduct, instances of child labour, forced labour, human trafficking, discrimination & harassment, and unsafe working conditions, or any other issues impacting employees.

The Company implements remediation procedures as an operational-level, non-judicial process to identify, address, and mitigate adverse impacts on affected individuals. These procedures are designed to ensure timely and appropriate corrective actions and support for impacted stakeholders.

The Company ensures that remediation processes incorporate the following:

- Appropriate corrective and remedial actions are determined based on the nature, severity, and impact of the violation, ensuring fair and effective resolution.
- The Company maintains transparent communication with relevant stakeholders, while respecting confidentiality, regarding the nature of the issue and the actions taken to address it.
- The Company establishes mechanisms to monitor the effectiveness of corrective and remedial actions, including follow-up reviews and continuous improvement measures to prevent recurrence.

Where applicable, the Company works with internal teams and external stakeholders, including suppliers and partners, to implement corrective actions and strengthen systems and controls to mitigate future risks.

SUMMARY:

This policy has been framed by the Company out of respect for human rights and to ensure there is no violation of human rights within the organization.

NOTE:

The Executive Committee reserves the right to amend / alter / modify and/or rescind the above.

Date	01-04-2022
Rev. No	03
First date of revision	01-04-2023
Second date of revision	01-04-2024
Third date of revision	11-08-2025



Executive Director – Operations