

VEDANTA LIMITED**STERLITE COPPER****COPPER SUPPLY CHAIN
DUE DILIGENCE REPORT****OECD Step 5 Public Report**

Report parameter	Details
Reporting / assessment period	1 January 2025 to 31 December 2025
Site	Vedanta Limited - Sterlite Copper, Silvassa
Site address	S. No. 1/1/2, Chinchpada, Silvassa - 396230, India
Metal and product in scope	Copper; Copper Rod
Public reporting cycle	Annual
Issue date	01/04/2026

Executive Summary

Vedanta Limited - Sterlite Copper operates its manufacturing facility at Silvassa, India. The facility applies to a risk-based mineral supply chain due diligence system designed around the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The reporting period covered 1 January 2025 to 31 December 2025. An independent site assessment was conducted on 23 and 24 February 2026 against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc – Copper Mark.

During this period, the facility assessed domestic copper suppliers and global suppliers of copper. The assessment considered supplier and site-of-origin information, mineral origin, transport and transit routes, CAHRA indicators, KYC (Know Your Counterpart) information, desktop research, available third-party reports, sustainability disclosures, EITI information and transaction documentation. Red flags were identified in the supply chain, but the enhanced assessments did not confirm any Annex II risks or actual adverse impacts during the assessment period.

The independent assessment concluded that Risk Identification and Risk Management fully met the applicable requirements, while the Due Diligence Management System, Risk Assessment and Public Reporting partially met the requirements. Improvement actions have been incorporated into the revised Supplier Due Diligence System, including a continual-improvement mechanism, broader anti-retaliation coverage, strengthened supplier capacity building, clearer triggers for on-ground assessment, criteria for reliance on third-party assurance reports, and separate assessment of suppliers and sites of material origin.

Performance Snapshot

Indicator	Result for 2025
Raw material suppliers covered by red-flag screening	100%
CAHRA Suppliers (Red Flag Triggered)	32
Suppliers subject to enhanced due diligence	32
Confirmed Annex II risks	0
Actual adverse impacts identified	0
Supply chain grievances received	Nil
Relevant employees trained in the supply chain due diligence	100%

Indicator	Result for 2025
Upstream Assurance Mechanisms Referred for Origin Facilities	1) Responsible Minerals Assurance Process by RMI 2) Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc – Copper Mark 3) The Copper Mark Criteria for Responsible Production

1. About This Report

This report is the annual public disclosure of Vedanta Limited - Sterlite Copper on mineral supply chain due diligence for the period 1 January 2025 to 31 December 2025. It explains the company policy, management system, methodology and results of risk identification and assessment, risk management approach, independent assessment outcomes, and continuous improvement actions.

1.1 Scope

- Vedanta Limited - Sterlite Copper facility at Silvassa, India.
- Copper as the metal in scope and copper rod as the principal product in scope.
- Copper raw materials include blister anode and cathode, and recycled copper inputs.
- Direct suppliers, traders or intermediaries, sites of material origin, and relevant transport and transit routes.
- Due diligence activities undertaken during the assessment period.

1.2 Reporting Basis

The report follows the five-step structure used for mineral supply chain due diligence: establish strong management systems; identify and assess risks; design and implement a strategy to respond to identified risks; support or undergo independent third-party assessment; and report annually on supply chain due diligence.

1.3 Confidentiality

Supplier identities, commercially sensitive contractual information, pricing, shipment-level records and confidential assessment evidence are not disclosed. Aggregate information and material due diligence outcomes are reported without compromising commercial confidentiality or legitimate security considerations.

2. Company Information

Vedanta Limited - Sterlite Copper is the copper business of Vedanta Limited. Its Silvassa facility is having an annual copper rod production capacity of 258,000 Tonnes. The principal processes are

melting, electro-refining and copper rod casting. The raw mix of raw material is predominantly anode, followed by recycled copper and cathode.

3. Step 1: Establish Strong Management Systems

3.1 Sustainable Sourcing Policy

The Sustainable Sourcing Policy, approved by the Director - RM Sourcing, applies to business partners, including supply and service partners and contractors. It commits to responsible sourcing, respect for human rights, prevention of conflict financing, lawful and ethical conduct, and implementation of supply chain due diligence.

The policy addresses serious human rights abuses; direct or indirect support to non-state armed groups; risks linked to public or private security forces; bribery and fraudulent misrepresentation of mineral origin; money laundering; and non-payment of taxes, fees and royalties. It also sets broader environmental, social, governance, health and safety expectations for business partners. The policy can be found at https://www.sterlitecopper.com/vendor_policy/sustainable-sourcing-policy/

The unit also has supplier code of conduct applicable to all business partners. The supplier code of conduct <https://www.vedantalimited.com/eng/investor-relations-corporate-governance.php#Policies>

All policies governing sterlite copper can be found at <https://www.sterlitecopper.com/sustainability/>

3.2 Due Diligence Procedure and Governance

The Supplier Due Diligence System establishes internal management arrangements for identification, assessment and management of potential risks in mineral supply chains. Responsibilities are allocated to the Director - RM Sourcing, Deputy Manager - Sourcing, Sourcing Category Leads, Sustainability Officer, Finance Controller and third-party assessors, as applicable.

Due diligence activity	Primary responsibility	Oversight / authority
Policy development and review	Deputy Manager - Sourcing, with Sustainability input	Director - RM Sourcing
Procedure implementation and review	RM Sourcing	Deputy Manager - Sourcing
Supplier KYC, traceability and engagement	Sourcing Category Lead	Deputy Manager / Category Lead
Red-flag identification and CAHRA determination	Sourcing Category Lead	Director - RM Sourcing

Due diligence activity	Primary responsibility	Oversight / authority
Enhanced due diligence and risk assessment	Sourcing Category Lead	Director - RM Sourcing
Risk management plans	Sourcing Category Lead	Director – RM Sourcing
Internal monitoring and evaluation	Deputy Manager - Sourcing	Director - RM Sourcing
Public reporting	Deputy Manager - Sourcing	Director – RM Sourcing

3.3 Resourcing, Training and Records

The system provides for trained competent personnel or external expertise, defined responsibilities, management oversight, budget allocation and controlled retention of due diligence records. Training covers policy expectations, reporting routes, response to identified risks, roles and responsibilities, and recording and tracking requirements. All employees completed mandatory training covering Code of conduct, POSH Act, with completion recorded. 7 number of sourcing function and sustainability function employees underwent training on supplier due diligence management system to ensure effective implementation of the due diligence system. Vendor contracts and purchase orders include reference to code of conduct and supplier code of conduct imposing binding obligations.

Due diligence information is registered, documented and tracked with controlled access, including KYC records, supply chain and transaction information, red-flag and risk-assessment outcomes, mitigation actions and monitoring records.

3.4 Internal Controls and Traceability

- Ownership and beneficial ownership information through vendor onboarding and KYC.
- Material type, including mined or recycled classification.
- Quantities received and relevant transaction records.
- Country and site of material origin.
- Transport and transit countries, routes and handover points.
- Supplier due diligence practices and relevant assurance status.
- Chain-of-custody evidence such as origin documents, contracts, waybills, receipts, surveyor reports and import-export records.
- Material input-output reconciliation through mass-balance controls.

3.5 Supplier Engagement and Contractual Controls

The policy is communicated to direct mineral supply chain business partners and is incorporated into contracts or written agreements, as applicable. Supplier conformance is monitored through information requests, assessments, audits and engagement. The company seeks to build supplier capacity and encourages participation in recognized responsible sourcing assurance programs.

3.6 Grievance Mechanism

Supply chain stakeholders may report incidents or suspected incidents related to the risks covered by the Sustainable Sourcing Policy through the channels described in the guidance document for raising grievance at https://www.sterlitecopper.com/vendor_policy/guidance-document-for-raising-grievance/

The business partner grievance redressal policy prohibits any sort of retaliation against employees, suppliers, contractors, transit operators, business partner employees and other external stakeholders who raise concerns in good faith or participate in investigations. The policy is accessible at https://www.sterlitecopper.com/vendor_policy/grievance-redressal-policy/

Grievances are addressed as per the facility specific procedure of grievance management in a timely manner, with the resolution communicated to the supplier or transit operator. Feedback on the resolution is requested, recorded and integrated into the risk-identification process to test control adequacy and prevent recurrence. The facility specific grievance management procedure is drafted with careful consideration, embedding the principles requirement of the grievance mechanism stated in UN Guiding Principle 31 such as Legitimate, Accessible, Predictable, Equitable, Transparent, Rights Compatible, A source of continuous learning and based on dialogue and engagement with stakeholders.

Supply chain grievances received during 2025: 0

Supply chain grievances closed during 2025: 0

3.7 Monitoring and Continuous Improvement

The due diligence system is internally monitored and evaluated annually, or sooner if its effectiveness comes into question. An annual management review evaluates supplier and transit-operator feedback, identified risks, regulatory developments, supplier coverage, assurance status and improvement priorities.

Following the 2026 independent assessment, the system was revised to require measurable improvement objectives over successive cycles. These include provision to progressively increase risk-based on-ground assessment coverage and increase the proportion of suppliers or origin sites with current conformance under recognized upstream assurance programs. Results, reasons for unmet objectives and related resource needs, are recorded in management review minutes and reflected in the following year's budget.

4. Step 2: Identify and Assess Risks

4.1 Information Collection and Supplier Mapping

The facility assesses the direct supplier or trader separately from the site of material origin. Supplier-level review covers legal identity, ownership and beneficial ownership, sanctions and adverse-media

screening, and the entity's history of red flags or grievances. Site-level review covers CAHRA and subnational classification, site-specific Annex II indicators, transport and transit route risk, and site-specific assurance status. Where one supplier sources from multiple origin sites, each site is individually assessed.

4.2 CAHRA Determination and Red Flags

Country-level CAHRA screening uses the RMI Due Diligence Risk Scorecard, the Democratic Republic of the Congo and its nine adjoining countries under Section 1502 of the Dodd-Frank Act, and the EU indicative and non-exhaustive CAHRA list. The company's RMI threshold treats overall risk scores of 4.99 or below as high or extreme risk. Sanctions information available through the RMI scorecard is also considered.

Where a country-level trigger is identified, subnational research is undertaken using RMI and EU resources and, where needed, additional credible government, media, civil-society, industry or research sources. A supplier or site is red flagged when the relevant subnational assessment confirms CAHRA association or when a broader risk cannot be reliably localized.

Suppliers or sites triggering red flags: 32

4.3 Enhanced Due Diligence

Red-flagged supply chains are subject to enhanced due diligence to establish the factual circumstances and assess potential presence of Annex II risks. For domestic counterparts, third party CAHRA assessment is carried out investigating presence of risks cited in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). For imports, the process includes Sustainable Supply Chain KYC Questionnaire, desktop review, qualitative assessment, transaction and payment verification, review of sites and routes in CAHRAs, and evaluation of upstream parties, including the mine, smelter or processing site supplying the material.

- Supplier and beneficial ownership information.
- Country and site of origin, material type, and route information.
- Responsible sourcing and sustainability policies and reports.
- EITI reports and tax-transparency information were relevant.
- Available site-specific JDDS, Copper Mark, RMAP or equivalent reports.
- Third-party on-ground assessment reports and corrective-action status.
- Voluntary Principles on Security and Human Rights information, where relevant.
- Credible public sources, sanctions checks and adverse-media information.
- Shipment, receipt, survey, inspection and customs documentation.

4.4 Trigger for On-Ground Assessment

An on-ground assessment is required where desktop and qualitative assessment information is insufficient to demonstrate the absence of Annex II risks or where allegations of Annex II risks are identified. In such circumstances, the procedure requires completion of an on-ground assessment within two years of determining a supplier or site having Annex II of the OECD Due Diligence

Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, unless a current and suitable recognized assurance report is accepted as an alternative.

Third-party or recognized assurance reports are reviewed for direct coverage of the actual supplying site, validity and recency, scheme status, audit scope, Annex II relevance of non-conformances, and closure of corrective actions. Open non-conformances relevant to Annex II risks do not close a red flag and require further verification.

4.5 Calendar Year 2025 Risk Assessment Results

The independent assessment confirmed that all domestic recycled copper suppliers and global mined copper suppliers were assessed against the defined CAHRA indicators. The risk-identification process resulted in red flags within the supply chain. Enhanced assessment was undertaken for 100% of suppliers identified as CAHRA-linked based on material origin or transport route.

The assessment reviewed KYC records, desktop assessment results, supplier disclosures, EITI information, credible secondary sources, transaction documentation, site-specific assurance reports and available on-ground assessment information. For certain recycled copper suppliers located in Indian regions classified as CAHRA under the applied indices, third-party on-ground assessment was undertaken and did not identify Annex II risks. For mined suppliers, desktop due diligence and available site-specific information were considered sufficient to conclude that additional on-ground assessment was not required during the period.

No Annex II risks, potential adverse impacts requiring mitigation, or actual adverse impacts were confirmed during the assessment period.

Assessment outcome	2025 result
Supply chains assessed for red flags	100%
Suppliers Triggering Red Flag	28
Enhanced due diligence assessments completed	28
Desktop assessment (Import Suppliers)	10
Independent verification of CAHRA risk (Domestic Direct Suppliers)	18
Qualitative assessment report (Import origin sites)	15
Substantiated Annex II risks identified (Count)	0

5. Step 3: Design and Implement Risk Management

5.1 Risk Management Strategy

Where risks are confirmed, the company develops and monitors a documented risk management plan in consultation with the relevant business partner and affected stakeholders, where applicable. The plan includes mitigation actions, performance objectives, qualitative or quantitative indicators, responsibilities, timelines and monitoring arrangements.

- Continue trade while implementing measurable mitigation and monitoring.
- Temporarily suspend trade while time-bound mitigation is pursued.
- Immediately suspend or disengage where there is a reasonable risk of serious human rights abuses or direct or indirect support to non-state armed groups.
- Disengage after failed mitigation attempts within reasonable timescales, including the six-month period defined for applicable risks.

5.2 Application During the Reporting Period

No Annex II risks were confirmed during the 2025 assessment period. Accordingly, no supplier-specific Annex II risk management plan was required. Preventive controls continued through supplier commitments, contractual provisions, KYC, desktop assessment, supplier consultation, capacity building, assurance-program engagement, internal review and escalation arrangements.

Corrective action or preventive improvement plans raised with suppliers: Nil

Plans closed during the reporting period: Nil

5.3 Monitoring Effectiveness

Where a risk management plan is activated, progress is tracked through agreed indicators and periodic reviews. Results are reported to senior management, and follow-up assessments are undertaken at defined intervals or when there are material changes in suppliers, origin sites, routes, regulatory conditions or risk information.

6. Step 4: Independent Third-Party Assessment

An independent assessment against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc was conducted at the Silvassa site on 23 and 24 February 2026 by the authorized assessment firm. The assessment covered due diligence activities from 1 January 2025 to 31 December 2025 and used a risk-based methodology involving document review, interviews, site observation and triangulation of evidence.

Criterion	Rating	Summary
1. Due Diligence Management System	Partially Meets	System established and implemented; improvements identified for continual improvement, grievance effectiveness and supplier capacity building.

Criterion	Rating	Summary
2. Risk Identification	Fully Meets	Supplier information, CAHRA determination, red-flag identification and supply chain mapping were found appropriate and credible.
3. Risk Assessment	Partially Meets	Enhanced assessment was implemented; procedure required clearer on-ground triggers, report-review criteria and supplier/site distinction.
4. Risk Management	Fully Meets	Risk management framework was proportionate and consistent with identified risk; no Annex II risk plan was required for the period.
5. Public Reporting	Partially Meets	Previous report did not provide complete annual coverage after 3 June 2024 or sufficient disclosure of assessment methodology and outcomes.

6.1 Conformance to the independent assessment observation

The facility has revised its sustainable supply chain management procedure to align with the requirements of due diligence management system, risk assessment and public reporting. This detailed report is covering the public reporting requirement.

7. Step 5: Public Reporting and Performance

This report addresses the public-reporting gap identified in the independent assessment by providing annual coverage for 1 January 2025 to 31 December 2025 and disclosing the CAHRA methodology, red-flag and Annex II outcomes, risk management approach, assessment results and continuous improvement actions.

7.1 Key Performance Indicators

KPI	2025 result	Next-cycle target
Mineral suppliers screened for red flags	100%	100%
Origin sites assessed where applicable	100%	100% of identified sites

KPI	2025 result	Next-cycle target
Red-flagged suppliers / sites	28	Not predetermined; risk-based
Enhanced due diligence completion	100% of red-flagged suppliers	100% of red-flagged supply chains
On-ground assessments	Nil	Risk-based and time-bound
Confirmed Annex II risks	0	0
Actual adverse impacts	0	0
Supply chain grievances	Nil	Timely closure of all cases
Employees trained from relevant function on supply chain due diligence	100%	100%
Conformance to JDDS criteria	2 (Fully Meets) 3 (Partially Meets) 0 (Does Not Meet)	100% Fully Meets

7.2 Continuous Improvement Actions

Improvement area	Action incorporated / planned	Status
Performance evaluation and improvement	Set measurable annual objectives for progressive on-ground assessment and assurance coverage; review achievement and resource needs through management review.	Completed
Grievance mechanism	Extend anti-retaliation protection to external stakeholders and align the mechanism with legitimacy, accessibility, predictability, equitability, transparency, rights compatibility, dialogue and continuous learning.	Completed

Improvement area	Action incorporated / planned	Status
Supplier engagement	Introduce a structured, risk-based capacity-building programme with differentiated frequency and effectiveness evaluation.	Planned and continuous
Risk assessment	Define on-ground triggers, criteria for relying on assurance reports, and separate supplier and origin-site assessment requirements.	Completed
Public reporting	Publish an annual Step 5 report with the assessment period, CAHRA methodology, red flags, Annex II outcomes, mitigation and improvement progress.	Addressed through this report

8. Challenges and Limitations

- Visibility beyond the direct supplier may depend on cooperation by traders, origin sites and upstream entities.
- Availability, recency and site specificity of independent assurance reports can vary.
- Public-source information may have different update cycles and may not always be available at subnational level.

These limitations are managed through triangulation of sources, supplier engagement, contractual information rights, escalation, recognized assurance mechanisms, targeted on-ground assessment and periodic management review.

9. Feedback and Grievances

Questions, feedback or concerns relating to this report or the mineral supply chain may be submitted through the following channel:

Channel	Contact details	Remarks
Director – Sourcing	k.arthy@vedanta.co.in	Direct sourcing grievance channel
Whistleblower email	Vedanta.whistleblower@vedanta.co.in	Custodian: Vedanta Management Assurance Head
Telephone - India	1800 1030 269	Third-party managed helpline
Telephone - outside India	+91 124 4900 485	Third-party managed helpline
Web-based portal	www.vedanta.ethicshelpline.in	Third-party managed portal

Vedanta Limited - Sterlite Copper prohibits retaliation against persons who raise concerns in good faith or participate in an investigation. Reports are handled in accordance with applicable confidentiality, investigation and grievance-management requirements.

10. Glossary

Term	Definition
Annex II risks	Serious human rights abuses; support to non-state armed groups; security-force risks; bribery and fraudulent origin claims; money laundering; and non-payment of taxes, fees and royalties.
CAHRA	Conflict-Affected and High-Risk Area.
EITI	Extractive Industries Transparency Initiative.
Enhanced due diligence	Additional investigation undertaken following a red flag to establish factual circumstances and evaluate potential adverse impacts.
JDDS	Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc.
KYC	Know Your Counterparty, covering identity, ownership, legality and relevant risk information.
OECD Guidance	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
Red flag	An indicator that potential adverse impacts may be present and that additional due diligence is required.
RMAP	Responsible Minerals Assurance Process.
Site of material origin	The specific mine, smelter or processing facility from which the supplied material originates.
Supplier / trader	The direct legal entity from which Vedanta Limited - Sterlite Copper purchases material.

End of report