

# Chromewell Engineering Private Limited

## Policy on Tooling Practices

POLICY NO: CW-ENV-001 | VERSION: 4.0

ISSUE DATE: JAN 2026 | NEXT REVIEW: JAN 2027 | SUPERSEDES: V3.0 (JUNE 2025)

**Table of contents**

Table of contents .....	2
1. Document Information:.....	2
2. Purpose.....	2
3. Scope .....	3
4. Policy Commitments .....	3
5. Prohibited Tooling Practices .....	3
6. Policy Review Mechanism .....	4
7. Formal Approval and Sign-Off.....	4

**• Document Information:**

Document Details		Governance
<b>Policy Owner:</b> Head of Finance & Compliance	<b>Scope:</b> All Chromewell Engineering Pvt Ltd operations including tooling procurement, tooling quotations, supplier interactions, commercial negotiations, customer billing, purchase orders, invoices, certifications, and related documentation across all manufacturing locations, warehouses, offices, and business operations.	<b>Reviewed &amp; Approved By:</b> CEO & CFO
<b>Secondary Owner:</b> HR HOD / Compliance Executive	<b>Applies To:</b> All employees, officers, directors, consultants, contractors, agents, procurement teams, finance personnel, tooling teams, and suppliers acting on behalf of Chromewell Engineering Pvt Ltd.	<b>Review Cycle:</b> Annual – Once a year

**• Purpose**

Chromewell Engineering Pvt Ltd is committed to conducting all tooling procurement, commercial dealings, supplier interactions, customer quotations, invoicing, certifications, and related business activities with honesty, integrity, transparency, and compliance with applicable laws and ethical business standards.

This Policy on Tooling Practices establishes Chromewell’s commitment to ethical and transparent tooling-related practices across all operations and business relationships. The policy aims to prevent any practice intended to conceal, manipulate, misrepresent, or inaccurately reflect the true cost of tooling, tooling-related services, quotations, invoices, certifications, or commercial arrangements.

- Chromewell recognises that responsible tooling and commercial practices are critical to maintaining customer trust, regulatory compliance, financial integrity, and the organisation’s reputation in global automotive supply chains. This policy provides governance principles and compliance expectations for all employees, contractors, consultants, suppliers, agents, and third parties acting on behalf of Chromewell.
- This policy is aligned with:
  - Chromewell Code of Conduct and Ethics
  - Applicable Indian laws governing fraud, corruption, commercial documentation, taxation, and financial

reporting

- Customer contractual and commercial compliance requirements
- Ethical sourcing and responsible business conduct principles
- Internal Finance, Procurement, Compliance, and Governance Policies
- Whistleblower Protection and Speak-Up Mechanisms
- Corporate governance and internal control requirements applicable to Chromewell Engineering Pvt Ltd.

### 3. Scope

---

This policy applies to:

- All Chromewell Engineering Pvt Ltd manufacturing operations, warehouses, offices, procurement activities, finance functions, logistics operations, and commercial business activities across all owned, leased, and operated locations.
- All employees, officers, directors, consultants, contractors, temporary workers, agents, and representatives acting on behalf of Chromewell Engineering Pvt Ltd.
- All tooling-related activities including tooling procurement, tooling quotations, commercial negotiations, supplier bidding processes, customer pricing submissions, invoices, purchase orders, certifications, program management charges, rebates, and tooling cost recovery mechanisms.
- All departments involved in tooling-related transactions including Procurement, Finance, Operations, Program Management, Sales, Commercial, Compliance, and Supply Chain functions.
- All suppliers, tool shops, subcontractors, service providers, lower-tier suppliers, and third parties engaged in tooling manufacturing, tooling services, engineering support, or commercial arrangements with Chromewell.
- All records, contracts, quotations, certifications, invoices, purchase orders, commercial documents, and financial transactions associated with tooling or tooling-related services.

### 4. Policy Commitments

---

Chromewell must honour its commitment to act with honesty and integrity in all our dealings. We must respect both the letter and spirit of Chromewell's Code of Conduct and Ethics and all applicable Chromewell policies and laws. This policy applies to Chromewell Engineering Private Limited and any of its joint ventures and subsidiaries. (Collectively, "Chromewell"). This policy also applies to all persons who act on Chromewell's behalf, including employees, officers, directors, consultants and agents.

### 5. Prohibited Tooling Practices

---

Any practice that is intended, or has the effect of hiding the true cost of making a tool is prohibited, including practices that involve arrangements with a tool shop or other third party, such as:

- **Engineering Service Fees, Program Management Fees and Similar Fees** - where a Chromewell division receives payment from a tool shop for engineering services, program management or other services which are not actually provided by the Chromewell division.
- **Tooling Rebates (or their equivalent)** - where a Chromewell division requests and/or accepts an unearned or unjustified "rebate" or "discount" payment (either a fixed amount or a percentage) from a tool shop before or after the Chromewell division has paid the tool shop for manufacturing tooling for a program.
- **Requesting False Invoices, Purchase Orders or Other Documents** - where a Chromewell division requests that a tool shop create a false invoice, purchase order or other document or alter an existing invoice, purchase order or other document so as to make it false.

- **Coordination of Bids/Quotes among Lower Tier Suppliers in a Deceptive Manner** - where a Chromewell division coordinates bids and/or quotes among lower tier suppliers (including tool shops) in a manner intended to deceive a customer.
- **Fictitious Line Items in Bids/Quotes** where a Chromewell division includes (or instructs a third party to include) in its bid and/or quote costs that the Chromewell division knows will not be incurred.
- **Charging Customers for Tooling or Related Services Not Provided** - there being any situation in which the Chromewell division charges a customer for tooling or related services that the Chromewell division does not actually provide to the customer.
- **Creating False Invoices, Purchase Orders or Other Documents** - where a Chromewell division creates a false invoice, purchase order or other document or alters an existing invoice, purchase order or other document to make it false; or
- **Signing False Certifications or Other Documents** - where a Chromewell division signs a certification or other document which contains a false statement and then provides it to a customer.

## 6. Policy Review Mechanism

This policy is reviewed annually by the Head of Finance & Compliance and the HR HOD / Compliance Executive, with formal approval from the CEO & CFO. Interim reviews may be triggered by compliance violations, audit findings, customer complaints, regulatory changes, or changes in tooling and commercial practices. Any revisions to the policy shall be communicated to all relevant employees and stakeholders. The review ensures continued alignment with Chromewell’s Code of Conduct, applicable laws, customer requirements, and internal governance standards.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14,2026	Compliance Executive/CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

## 7. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
<b>Name:</b> Ms. Meghna Hazra <b>Designation:</b> Compliance Executive <b>Date:</b> Jan 2026 <b>Signature:</b> 	<b>Name:</b> Ms. Risha Naik <b>Designation:</b> CFO <b>Date:</b> Jan 2026 <b>Signature:</b> 	<b>Name:</b> Mr. Amardeep Mardhekar <b>Designation:</b> CEO <b>Date:</b> Jan 2026 <b>Signature:</b> 

**FOR FURTHER INFORMATION:**

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.