

Corporate Social Responsibility Policy

Corporate Social Responsibility

Contact person- Corporate Social Responsibility.

SANSERA has established a Compliance Committee responsible for implementing and enforcing the Code of Conduct. The Compliance Committee comprises the CMD, JMD, Gr.CEO of SANSERA Group and Head of the Human Resources Division. Where violations take place within the subsidiaries, the relevant Plant Head in the Compliance Committee is involved. If members of the Compliance Committee are affected, they cannot work on their own account within the Compliance Committee. In the subsidiaries, it is the Head of Human Resources who acts as contact in matters of compliance and who is entrusted with the implementation of the Code of Conduct.

Every employee is entitled to approach the Head of Human Resources of his or her plant, the responsible Human Resources Management, or the members of the Compliance Committee on matters concerning compliance. The contact can also be made anonymously. The relevant contact details and further information on the subject of compliance can be found in the Sansera intranet (IMS) and Sansera web site. Employees who report violations of the Code of Conduct or suspected violations to SANSERA will not be penalized for so doing.

Addition: Members of the Compliance Committee: CFO, Gr. VP, AVPs, Plant Head & Legal Advisor.

Working conditions

SANSERA gives its employees fair pay and fair working conditions in compliance with all statutory requirements.

We reject all forms of forced labour and child labour.

Anti-Bribery

Gifts, payments, services: SANSERA observes the rules of fair competition and the free market. SANSERA therefore declines any contract that can only be won by violating the relevant laws. No formal or informal agreements may be reached with competitors that aim at / result in unlawful obstruction to the competition. The same applies to tacit, deliberately concerted practices.

SANSERA will not tolerate any kind of bribery or corruption. All commercial activities must be carried out in thought and deed in a spirit of honesty and responsibility. Any agreements or collateral agreements that directly or indirectly benefit individual people or organizations with respect to the arrangement, award, approval, supply, processing or payment of contracts are therefore prohibited.

The Management Board and employees may not offer, promise, demand, give or accept any gifts, payments or services in the course of business transactions. Exceptions are occasional gifts of low value < 1000 INR. Any offer of gifts or benefits beyond this must be refused, and if appropriate, sent back. The supervisor must be informed about this without fail.

Invitations to events require the prior approval of the local Management Board. If Top Management of subsidiaries are invited to events, they need prior approval from the Management Board of Sansera. Invitations to business meals within the normal limit (2000 INR per person) are permitted in principle.

Business Conduct and Compliance see Code of Conduct

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Compliance

Compliance forms an integral part of our corporate values. We protect our employees, our company, our customers and partners with our code of conduct, which is valid around the world. To this end, we have summarized all relevant statutory and company-internal regulations for our employees in our "Code of Conduct". Prevention and control measures include, among others, the dual control principle, the strict separation of management and control systems, and regular audits. The compliance system also includes a reporting system. Employees, but also business partners and third parties as well, are able to report irregular behaviour to the responsible compliance officer by writing an e-mail or contact Sansera website contact numbers. We ensure that all employees know the basics of compliance and knowhow and to whom they can report violations. It is particularly important that events that indicate a criminal offense (e.g., theft, fraud or bribery) or a systematic violation of laws or internal corporate regulations, e.g., non-compliance with our quality and safety standards, be reported. We have also independently adopted a number of measures to strengthen our compliance of the organization. These include opportunities for management and employees to engage in intensive exchanges on relevant issues. Our goal is to make our compliance a primarily value-based system and not a rule-based one.

Conflict Minerals Reporting

We do not deal in or process any conflict minerals, conflict resources or conflict raw materials, such as Tin, tantalum, tungsten (including its ores), concentrates, gold, diamonds, oil, precious woods, raw materials that are used in manufacture of precision forging and machining components. We do not allow any human rights violations or violations of international law. We do not receive any mineral resources, raw materials, and other goods that are cultivated or promoted in conflict regions.

Conflict Minerals Reporting - Suppliers

We require all of our relevant suppliers to comply with our conflict minerals regulations in accordance with our Purchasing Terms & conditions

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The provisions are extensively described in this Corporate Social Responsibility Policy, which are binding for all our Plants in the SANSERA Group without exception.

Corporate Social Responsibility- Volunteering Engagement

We present ourselves as an attractive employer with a global profile that cooperates with local business organizations and associations. We actively cooperate with such local associations CII, ACMA, SIAM and chambers of industry and commerce.

Data protection and security of information

The global electronic exchange of information is essential for employees to be able to work effectively, and for business success in general. However, side by side with the benefits of electronic communication are associated risks for data protection and security of information. Official documents and data storage media must therefore always be protected from access by third parties.

When using the internet, care must be taken to ensure that no information is ever retrieved or forwarded that, could incite racial hatred, glorify violence or other crimes, or have offensive content. We expect employees to take appropriate care when using company information (Information technology Manual).

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Confidentiality must be maintained concerning in-house matters that have not been disclosed to the public. This also applies to inventions and other types of know-how. This information is essential to the long-term success of the SANSERA Group. Employees must therefore not pass information in any form about new discoveries or trade secrets to third parties. This also applies after termination of employment.

Deriving personal advantage or advantage for others through the use of in-house information is not permitted. The same applies in the case of unauthorized disclosure of such information.

Discrimination

We respect human rights worldwide, and do not tolerate any unequal treatment (discrimination) harassment or disparagement in violation of the law. In particular, we do not tolerate any discrimination on the grounds of race, ethnic origin, gender, religion or philosophy, political opinions, disability, age, or sexual identity.

Compliance with the Code of Conduct / Management and working conditions

The SANSERA management guidelines apply in full to this Code of Conduct. Senior managers are expected to set a good example and not only communicate the rules of the Code of Conduct in an effective manner, but to live by the rules themselves, and require their team members to do the same. Our senior managers are the first contact for their team members in all questions relating to this Code of Conduct. Senior managers are therefore responsible within the framework of the culture of trust espoused by SANSERA for ensuring that no infringements of this Code of Conduct occur within their own area.

Compliance with the Code of Conduct

Reported violations of the ethics escalation policy as well as the number of incidents reported through whistleblowing are recorded.

A whistle-blower is a person who provides important information to the public from a secret or protected source. These typically include such abuses or crimes as corruption, insider trading, human rights violations, data misuse, or general dangers that the whistle-blower experiences at his or her workplace or in other contexts.

Wages

We offer our employees appropriate remuneration that matches local market conditions.

Professional and personal development

People grow with their jobs. "We set individualized development targets with our employees if necessary and depending on the level of training and qualification." Together with our staff, we agree and document-training programmes tailored to the company's needs, and actively monitor success.

Give freedom

We ensure unambiguous responsibilities through a transparent, clear organization of our area of responsibility. We reinforce the personal responsibility of our staff by including them in decision-making processes and delegating challenging tasks to them. Bearing in mind responsibility and expertise, we give staff scope to make their own decisions, express other opinions, and come up with creative solutions. In this way, we promote an open culture of any failure management.

All Permanent Employees given freedom to join any associations.

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Hazardous Substances and Chemicals

All our hazardous substances and chemicals must undergo an approval process and listed in a register. Hazardous substances are stored in authorized rooms. The safety data sheets and the corresponding operating instructions are regularly checked, displayed to ensure that they are up-to-date.

Risk assessment

Our risk assessment procedure systematically identifies and assesses all relevant hazards to which our employees are subjected in the course of their professional activities. The derivation and implementation of all measures necessary to protect safety and health, which are subsequently checked for their effectiveness, are additional tasks. Our aim is to identify hazards at work at an early stage and to counteract them preventively, that is to say before anyone becomes ill or suffers an accident. We outline the possible approaches in our integrated management system.

Business Behaviour and Business Relations

Our code of conduct includes the approaches to our own behaviour in the business and also to the business relationships with our partners.

Health and Safety Audits

See our certified management system: Occupational health and safety measures are adopted in accordance with Occupational Health and Safety Management system ISO 45001, Environment management system ISO 14001

Health and Social Policy

Individual health programs as well as all statutory medical check-ups are carried out at the factory in cooperation with Contracted doctors. Trained internal and external specialists perform factory visits at all locations on a periodical basis

Avoidance of conflicts of interest

SANSERA is keen to make sure that no conflicts of interest or loyalty should arise in the course of their employees' work, in particular in transactions between SANSERA Plants and employees or their close relatives. Any such transactions must be disclosed to the employee's superior prior to conclusion.

If an employee wishes to take up paid work on the side, he or she must obtain written consent from Human Resources Management; in the case of managers, written consent must be obtained from the Board.

SANSERA does not participate in party-political activities. However, we expressly welcome the involvement of our employees in civic and social affairs, as well as their commitment to social and charitable activities. Employees engaging in such activities do so as private individuals, and in such a way as to exclude the possibility of any conflict of interest with their work.

International Material Data System

We together with our suppliers declare the material and chemical compositions of all our components, semi-finished products, and materials in the IMDS. The main benefit that we derive from the use of the IMDS is the ability to safeguard our products and establish legal material regulations for complete vehicles and auto parts. Our aim is to comply with applicable national and international laws, which are subject to standards and legal regulations, including in particular those in the environmental field. For the IMDS, all materials are assigned to a classification in accordance with IATF/VDA/ISO14001/OHSMS 45001 etc.

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CHILD LABOUR

We reject all forms of forced labour and child labour.

Communication

We abide by our communication rules and communicate in a clear, factual and well-structured way, appropriate for the audience. We organize regular staff meetings on information of mutual interest, and co-ordinate activities and procedures. We provide timely and comprehensive information about relevant developments and overarching themes such as changes relating to organization or staff that have an effect on the work of our staff.

Conflict resolution

Active listening, involvement of those concerned, and objectivity are for us the means by which we resolve conflicts as quickly as possible. We follow up complaints and offences in an impartial and thorough way. We process conflicts in a practicable way, and give feedback to all concerned.

Corruption

Refer – Anti bribery policy

Encourage performance

We deploy staff according to their strengths, knowledge and skills; we place our trust in them and provide them with security. We motivate them by acknowledging their achievements and expecting results. We recognize good results and specifically praise them. We make use of the tools available for performance-related pay. We pay attention to process efficiency, maintain standards, and implement decisions consistently.

Focus on performance and results

In all areas, we are focused on performance, results, and customer expectations. We act in a co-operative manner; we are well aware of our scope for action and make active use of it.

Suppliers – Sustainability

- I.) Preference for suppliers who take due account of environmental, social and economic issues (corporate social responsibility) in their production and delivery processes
- II.) Sustainability indicators as criteria for the assessment and selection of suppliers and service providers
- III.) Exclusion of suppliers who violate human rights, working norms, environmental regulations or other legal provisions
- IV.) Fair and open communication with suppliers
- V.) Regular monitoring of supplier compliance with company policy and its performance in light of stakeholder information, achieved status, and other measures.

Selection of suppliers and service providers

The assessment, decision, awarding and processing of a contract must be based on strictly professional criteria, and must be carried out in a transparent manner. Any preferential treatment of suppliers or attempt to obstruct their efforts is forbidden. When selecting business partners, SANSERA demands that they too respect the values contained in this Code of Conduct. Any violation of these values by a partner can lead to a termination of the business relationship.

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Management System: Energy ISO 50001

Every year 3rd party audit will be carried out energy audits, including on-site inspections, at our Sansera plants. This systematic study of the energy input and energy consumption of our facilities, buildings, and systems provides an important basis for improving our efficiency and reducing consumption. We consider recommendations for action from the energy audit report about where we can achieve energy savings.

Management System: Information security measures

We specify the requirements for the establishment, implementation, maintenance, and ongoing improvement of measures in our documented information security management system while taking context into account individual context. In addition, we assess and deal with the information security risks in accordance with our individual needs. We protect all assets in our value chain through the adoption of appropriate security mechanisms. ISMS 27001

Management System: Environmental Management system protection in accordance with ISO 14001

We focus on the implementation of a continuous improvement process as a means of achieving the respectively defined objectives with regard to our environmental performance. This process is based on the PDCA method, namely Plan, Do, Control, and Optimize.

- Plan: Definition of objectives and processes to achieve the implementation of our environmental policy in the organization
- Do: Implementation of a defined process
- Check: Monitoring the process with regard to ensuring compliance with legal requirements and our own regulations as well as the objectives of our environmental policy
- Act: We optimize our processes if required

We have implemented a company environmental policy, an environmental program, as well as a corresponding management system. This helps us to reach our targets for the reduction of waste, wastewater, and emissions, for example. We strive to make continuous improvements through the regular review of objectives, environmental laws, and the environmental management system.

Management System: Accident management

We consistently invest in measures and activities that protect our employees from health hazards. We seek out information on risks and dangers as well as the implementation of appropriate protective measures to avoid injuries and thus permanently reduce our accident rates. Strengthening safety awareness through recurring training as well as motivating employee to exhibit exemplary behaviour are important components of our prevention efforts. We analyse each accident centrally and, if necessary, share the information about the accident, including appropriate actions that need to be taken, with all subsidiaries.

Human trafficking

We categorically reject any form of human trafficking. - Refer QMS Annexure 11

Minimum wage

We pay salaries in accordance with local, country-specific minimum wage laws.

Sustainability Report

We publish an Sansera Sustainability Report covering all locations within SANSERA Group

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Sustainability and Environmental Protection Regulations for Suppliers

Our Sustainability and Environmental Protection Regulations for Suppliers covers the following topics:

Working conditions, remuneration and benefits, health and safety, child labor, combating corruption and bribery, human trafficking, human rights, discrimination prevention, environmental management, freedom of assembly and collective bargaining, and measures to combat compulsory labour.

Our supplier management has implemented appropriate measures to ensure that our suppliers comply with the Sustainability and Environmental Protection Regulations for Suppliers.

Environmental Responsibility

Environmental protection is very important to us. Sustainability therefore forms a part of our corporate governance. We consistently work to further develop environmentally friendly resource use policies on the basis of existing environmental and occupational safety directives. We focus on efficient production processes and environmentally friendly technologies. The production of our products requires the use of valuable resources. We take our responsibility to conserve raw materials and protect the environment very seriously. Because what is ecologically sensible also often makes economic sense, therefore providing surplus value for our customers. Our manufacturing processes have been certified sustainable. We rely on integrated management systems across the Group to help us manage and conserve resources. All production sites are therefore certified according to the environmental management standard. We regularly carry out extensive Environmental & Energy audits at our plants.

Patents, industrial property rights

Employees must not pass on to third parties any new findings or trade secrets in any form whatsoever. Each employee must respect the valid property rights of third parties. No member of staff must acquire or use the secrets of a third party, unless authorized to do so.

Staff recruitment

When recruiting staff, we take both professional qualifications and personal aptitude into account. Mobility and international focus are becoming more and more important for us. When we assemble our teams, we consider diversity, since the best results are guaranteed by using various different perspectives.

Policies

Our globally valid and binding standards are accessible to all employees, suppliers & customers through Sansera web site www.sansera.in . They are described in the company's guidelines, the management guidelines, the Code of Conduct, the Corporate Social Responsibility Guidelines, the organizational context, the Information Security Policy, and the Health, Safety, and Environmental Policy.

REACH - Registration, Evaluation, Authorization and Restriction of Chemicals

As a manufacturer of vehicle interiors, we are a so-called "downstream user" according to REACH. Pre-registration or registration obligations (ECHA) arising from the manufacture and Forged and machined components.

We ensure that our suppliers comply with all requirements governing chemical substances and materials.
Source: REACH and RoHS Declaration of Conformity

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Regulations – Compliance

We ensure adherence by maintaining a regulatory directory and verifying the performance of an annual compliance audit.

RoHS - Restriction of Hazardous Substances

As far as we currently know, our products do not contain substances that have been placed on the market in accordance with RoHS Directive 2011/65/EU of the European Parliament and Council dated June 8, 2011 restricting the use of hazardous substances in electrical and electronic equipment as well as establishing the maximum permissible concentration of cadmium in homogeneous materials as <0.01% by weight. In addition, concentrations of lead, mercury, hexavalent chromium (Cr6+), polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE) that are greater than 0.1% are prohibited according to Annex II of the Directive.

Trainings – Code of Conduct

All employees must read the relevant content via our SANSERA e-Learning Management System and confirm that they accept the Code of Conduct. We commit to regularly verifying our employees' knowledge.

Trainings - Anti-corruption Measures and Ethics

All employees must read the relevant content via our SANSERA e-Learning Management System and confirm that they accept the Code of Conduct. We commit to regularly verifying our employees' knowledge.

Trainings – Understanding of Corporate Social Responsibility/Sustainability

All employees must read the relevant content via our SANSERA e-Learning Management System, acceptance of, and compliance with Corporate Social Responsibility Guidelines. We commit to regularly verifying our employees' knowledge.

Donation and sponsorship

Donations can only be made if they are traceable, in other words, both the recipient and the use to which the donation will be put must be known. Payments to private accounts are not allowed. When donations are made, it is necessary to ensure that they are not being paid close to the time a contract is awarded, and that have nothing to do with the content of the contract. Any kind of donation must be approved by the Chairman of the Board.

Promotion of talent

We recognize our talents, and promote them through focused interdisciplinary development programmes and special challenging tasks, in line with the motto “strengthen strengths”. In this way, we create the basis for a sustainable succession planning. We fill vacant positions globally, preferably from within our company group.

Accident Detection System

Our goal for all locations is zero accidents. We record and analyse accident-free days, types of accidents, the classification of accidents as work or travel accidents, absences from work attributable to accidents, severity of accidents, and accident rate per 1,000 employees. Top analyses are carried out for all accidents involving the areas of technology, organization, and staffing. If accidents are assessed as having a system-related cause, remedial measures are implemented throughout the Group. In addition, independent measures for accident prevention are implemented worldwide.

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Corporate Sustainability

1 Sansera's Sustainable Corporate Management team works on customer focus, ability to innovate and, of course, our constant desire to improve day by day.
2. We want to improve continuously. This aspiration permeates all aspects of our business activity. In addition to the quality of our processes and products, this focus also affects communication with various interested parties such as customers, employees, suppliers, neighbours, and partners.

Support - Give people guidance

Whenever required performance deviates from what is actually achieved (both personal and professional), we are here to offer active support. In doing so, we give security and backing, at the same time as drawing firm but fair consequences where necessary.

Responsibility

I.) We are committed to our employees - They are the basis for our success. This is why employee development plays a decisive role at our company.

II.) How we attract employees and develop them - We seek to hire the best talents and experienced experts as employees. For this, we invest a lot of time in selecting our personnel. We also offer our employees numerous opportunities for individual training. Our goal is to fill management positions largely with people from our company and thus achieve our ambitious growth targets.

III.) Development opportunities for our employees- Our Company stands for attractive career opportunities, diverse development prospects, and equal opportunities in an international environment. That is why we are continually working to achieve a corporate culture in which our employees contribute with mutual respect, courage, and service to ensure the success of our company.

IV.) A healthy working environment is important- We attach great importance to occupational health and safety. In carrying out our SANSERA Group at various locations, we always seek to create a space to nurture and promote mutual exchanges between our employees. We are only able to successfully shape the future of our company with the help of high-performing and motivated employees.

Source: Corporate Social Responsibility

Freedom of Association/Collective Bargaining

We grant the right of our employees to join together for common purposes and objectives and to pursue them together (freedom of association and right of association). This is one of their fundamental rights. However, freedom of association also implies the right not to participate, each employee has the right not to join or to withdraw from a group or association.

Conduct of Senior Managers and Employees

The combination of productivity and humanity is indispensable for a company's sustained success. The economic success of SANSERA is completely dependent on the efforts of our employees all around the world.

Protection of assets

SANSERA requests its employees to protect the tangible and intangible assets of the company. These assets include property, vehicles, production equipment and inventory stocks, securities and cash, office equipment and supplies; information systems, software and patents, trademark rights and expertise. Violations of the law such as fraud, theft, embezzlement and money laundering will result in criminal prosecution.

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Machinery and equipment may only be used for work-related purposes unless private use is expressly permitted.

Willingness to change

We see necessary changes as opportunities and part of our daily business. We critically question our processes and ourselves and are open to new directions and alternatives. In doing so we set priorities, and make them transparent.

Networking

Every member of staff has the right and the duty to gather the information necessary for his or her job. We enable our staff, in compliance with the Code of Conduct, to participate in professional networks so that they can benefit from comprehensive information and expertise.

Role models

As managers, we represent the values of the company in particular ways. We are role models, and we live our lives with a positive attitude, as we expect our staff to live. This includes in particular loyalty, reliability, transparency and accessibility, as well as treating others and ourselves with respect. We assume responsibility, take timely decisions, and accept the consequences of our actions. We are objectively self-critical, and let ourselves be judged by the management guidelines. We motivate and conduct ourselves within a framework of well-balanced time management, leaving space for managerial tasks.

Appreciation

We give regular timely open, fair and constructive feedback on professional performance and personal behaviour. We recognize good work and appreciate success. The achievement of successful learning outcomes are positively emphasized, and we benefit from the associated motivating effect.

Development (source of inspiration)

We promote development and encourage staff to look beyond the horizon. We familiarize them in a focused way with new demands, and encourage work in working groups and networks. We actively invite our staff to participate in the optimization of internal procedures and to develop alternative solutions.

Collaboration with business partners

At the core of all communication and all contractual relations with our business, partners lie a high degree of professionalism, correctness, honesty, transparency and absolute integrity.

Forced labour

We reject all forms of forced labour and child labour.

Set and agree clear objectives

We regularly keep our staff informed about our overarching objectives, and clarify their individual contributions. Together we set achievable goals, have an annual target agreement, and monitor its implementation in a focused way at regular intervals.

POSH- Prevention of Sexual Harassment at work place

Sansera is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone

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involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

Corporate social responsibility (Societal Work)

Sansera believes in Corporate governance, and understands that in order to nurture a better society one must give back to the communities. Being an equal opportunity employer, Sansera believes in providing the platform for skill and talent to flourish. Sansera CSR activities ethics are designed to help in education of mentally challenged/deprived and poor children, also improving their civic responsibilities. This is being achieved by adopting Government Schools in the vicinity of the factory and making its employees to carryout various activities in the adopted school.

SANSERA's CSR programmes support a host of initiatives under the 5 branches with support of its Employees as under:

- Citizen Involvement
- Education
- Healthcare
- Environment
- Infrastructure

CSR at SANSERA is about identifying those areas where a need can be met and devising simple methods of enabling its employees to fulfil that need.