

Sansera Business Ethics, working condition and Human rights policy guideline to Enhance Sustainability

Based on the Global automotive Sustainability Guiding Principles, Sansera works with its supply chain towards the issues related to sustainability.

Purpose: The purpose of this policy is to complement the principles with more information and examples of actions that organization could perform in an attempt to improve overall sustainability performance.

This Policy describes the Principles regarding Business Ethics, Working Conditions and Human Rights. Sansera practice and comply with laws, regulations and with individual standards, codes, policies and contractual arrangements set by the customers.

- Sansera will follow local legislation; will use as a reference point the company specific standards/ policies/ codes and contractual arrangement, the industry practices and international frameworks.
- Sansera will ensure to assuring compliance, will always use as a reference point those laws, regulations, practices, international expectations, and company standards/ policies/ codes that set the highest standards.

Business Ethics

Responsible Sourcing of Materials:

- Sansera will ensure to conduct due diligence to understand the source of the raw materials used in their products.
- Sansera will ensure its products does not containing raw materials that contribute to human rights abuses, bribery and ethics violations, or negatively impact the environment.
- Sansera will ensure to use validated conflict free smelters and refiners for procurement of tin, tungsten, tantalum and gold contained in the products they produce.

Anti-Corruption:

- Sansera will ensure to comply with the anti-corruption laws, for example US Foreign Corrupt Practices Act and the U.K. Bribery Act etc. that apply to its operations and those of the Countries in which they do business.
- Sansera will ensure to have a zero-tolerance policy for all forms of bribery, corruption, extortion and embezzlement.
- Sansera will ensure to prohibit promising, offering, authorizing, giving, or accepting something of value, either directly or indirectly through a third party, in order to Obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

Privacy:

- Sansera will ensure to comply with privacy and information security laws and regulatory requirements in addition to the contracted terms & conditions. Sansera will ensure cascaded these principles and contractual obligations in relation to data privacy to any sub- contractors or Tier 2 suppliers who will be processing the personal data.
- Sansera will ensure to refrain from using personal data for any purposes beyond the scope of the business arrangement.
- Sansera will ensure to put in place appropriate measures to respect privacy and to protect personal data against loss and unauthorized access or use, including confidential, proprietary and personal information.
- Reasonable actions could be, but are not limited to the implementation of policies prohibiting forwarding personal data such as addresses, salary information or photos without permission of affected persons etc.

Fair Competition/ Anti-Trust:

- Sansera will ensure to uphold standards of fair business and competition including, but not limited to, avoiding business practices that un- lawfully restrain competition; improper exchange of competitive information; and price fixing, bid rigging, or improper market allocation.

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Fair Market behavior:

- Our business partners respect fair and free competition. Therefore, we require our business partners to comply with the applicable competition and antitrust regulations. In particular, they must not enter into anticompetitive arrangements or agreements with competitors, suppliers, customers or other third parties and do not abuse a possible market dominant position. Business partners must ensure there is no exchange of competitively sensitive information or any other behaviour that restricts or could potentially restrict competition in an improper manner.

Financial Responsibility/Accurate Records:

- Sansera will ensure to accurately record, maintain, and report business documentation including, but not limited to, financial accounts, quality reports, time records, expense reports, and submissions to customers or regulatory authorities, when appropriate. Books and records will be maintained in accordance with applicable law and generally accepted accounting principles.
- Sansera will ensure to act in accordance with generally accepted accounting practices, and the accounting records must show the nature of all transitions in a correct and non-misleading manner.

Disclosure of Information:

- Sansera will ensure to disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices and, when applicable, disclose information regarding their labour force, health and safety practices, environmental practices, business activities, financial situation and performance.

Conflicts of Interest:

- Sansera will ensure to make decisions based on solid business judgment unclouded by favoritism resulting from personal relations and opinions.

Counterfeit Parts:

- Sansera will ensure to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products.
- Sansera will ensure to establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials and notify the Original Equipment Manufacturer (OEM) customer and/or law enforcement as appropriate.
- Sansera will ensure to confirm that any sales to non-OEM customers are compliant with local laws and those products sold will be used in a lawful manner.

Export Controls and Economic Sanctions:

- Sansera will ensure to establish appropriate policies and procedures to ensure compliance with applicable export controls and economic sanctions laws and regulations of all relevant countries. These laws and regulations impose restrictions on the export or re-export of goods, software, services, and technology to certain destinations, as well as prohibitions on transactions involving certain restricted countries, regions, entities, and individuals.
- Appropriate policies and procedures may include: a statement of management's commitment to compliance; periodic training for relevant personnel; procedures for screening business partners (including suppliers, customers, service providers, and other relevant parties, as well as their beneficial owners) against applicable government lists of restricted parties; appropriate contractual provisions to ensure business partners comply with such applicable laws and regulations; an audit function; and policies and procedures for reporting and remediating potential violations.

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Protection of Identity and Non-Retaliation:

- Sansera will develop and implement grievance mechanisms.
- Sansera will assure that employees and business associates will not be subject to termination, threats, harassment or other adverse action by reason of making a grievance report.
- Organization will ensure appropriate disciplinary action against those who seek to take retaliatory action against a person "blowing the whistle".

Proprietary Information

- It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Human Rights and Working Conditions

- Sansera will respect internationally proclaimed human rights such as, but not limited to
 - The International Bill of Human Rights.
 - The Core conventions of the International Labour Organization/Organisation
 - International Labour Organization/ Declaration on Fundamental Principles and Rights at work
 - Article 32 of the UN Convention on the Rights of the Child
 - OECD Guidelines for Multinational Enterprises
 - UNGC Guiding Principles on Business and Human Rights
- Sansera will have policies and management systems in place to support compliance with laws, regulations, and industry expectations.
- Sansera will work to reduce the risk of potential human rights violations in their operations and through their business relationships by identifying risks and remediating any non-conformance in a timely manner.
- This includes all workers: full and part time employees, temporary, migrant, student, contract, and any other type of worker.

Child Labor and Young Workers:

- Child labour is not tolerated in Sansera. The age of employment for young workers must meet or exceed company guidelines and local labour laws.
- The use of legitimate workplace apprenticeship and student learning programs, which comply with all applicable laws and regulations, are supported.
- To ensure proper management of student workers, Sansera will maintain accurate student records and protect students' rights in accordance with applicable laws and regulations.
- Sansera will not employ any young workers for any process in the organization process.

Wages and Benefits:

- Sansera will ensure to compensate workers for overtime in accordance with applicable local laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Sansera will ensure to provide workers a wage statement that includes adequate information to verify compensation for work performed for each pay period.
- The use of temporary, outsourced labour will be in accordance with applicable local laws and regulations.

Working Hours:

- Sansera will ensure to comply with all applicable local laws regulating working and resting hours and maximum consecutive days of work.
- Sansera will ensure to make sure that hours worked beyond the normal work week are voluntary, unless a collective bargaining agreement allows for required time under certain conditions and /or, if lawful in exceptional circumstances.

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Forced Labor:

- All work should be voluntary on the part of the employee.
- Sansera and its Labour Contractors will not hold, destroy, conceal, confiscate or deny access to employee identity documents unless required by applicable law.
- Sansera will ensure that workers are not required to pay recruitment fees or related fees of any type for employment.
- Sansera will ensure all workers receive a written contract or ensure they understand the terms of employment in a language well understood by the worker.

Freedom of association

- The basic right of all employees to form trade unions and employee representations and to join them is respected. In countries where this right is restricted by local laws, alternative legitimate options for employee participation shall be supported.

Compensation and benefits & Collective bargaining

- The compensation and benefit paid or received for a normal working week correspond at the very least to the legally valid and guaranteed minimum. Where statutory provisions or collective bargaining agreements do not exist, they are based on industry-specific, customary local compensation and benefit that ensure an appropriate standard of living for the employees and their families.

Human Trafficking:

- Forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, and slavery or trafficking of persons will not be used in the organization. This includes, but is not limited to transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction or fraud for labour or services.

Women's rights

- On the grounds of gender equality, all rights of an Indian woman hold in India will be provided in Sansera also no partiality and discrimination made.
- All around the world, women share the same rights. The right to live a life free from violence and slavery; the right to be educated; the right to earn a fair and equal wage; the right to own property; the right to expression and freedom to vote.

Health & Safety:

- Health and safety related information such as emergency procedures and potential safety hazards will be made known to the worker and will be posted within the facility in a language well understood by the worker.
- Required personal protective equipment will be provided by the company and made easily accessible.
- Sansera will ensure that all required permits, licenses, inspection and testing reports are in place, up to date and available as required by law.
- Sansera will ensure that **emergency exits** as well as **fire detection**, alarm and suppression systems are in place and operational at all times. **Fire and evacuation drills** (Mock drill) will be performed according to local law.
- Sansera will ensure implement a machine-safeguarding program including adequate training for workers.

Harassment:

- Sansera will ensure that there is no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements will be clearly defined and communicated to workers. Employees don't use any Abusive word during inside the company premises, Sansera management will not tolerate, IF any such incident notice, necessary disciplinary action will be taken immediately.

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Non-Discrimination:

- Medical testing or physical examination of any worker or potential worker for the purpose of discrimination will not be permitted in any situation.
- Sansera will ensure not tolerate any form of discrimination in respect of employment and occupation and will provide equal employment opportunities regardless of worker or applicant characteristics such as race, colour, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.

Diversity, Equity, and Inclusion:

- **Sansera ensures and develop** and promote inclusive cultures where diversity is valued and celebrated, and everyone is able to contribute fully and reach their full potential. Sansera will encourage diversity in all levels of their workforce and leadership, including boards of directors.

Rights of Minorities and Indigenous Peoples:

- Sansera will respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups.

Land Rights and Forced Eviction:

- **Sansera** avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.


Private or Public Security Forces:

- Sansera will ensure not commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

ETHICAL RECRUITMENT

- Ethical recruitment is the process of engaging an employee fairly, transparently and on merit. In such a regional market that relies heavily on expat workers, we all need to be aware of recruitment agencies, and their sub-agents, who play such an important role in connecting workers with overseas employers.
- **Assessing candidates without discrimination.** Moving the hiring process forward in a timely manner with a steady cadence. Communicating professionally and sincerely with job candidates
- Ethical recruitment **helps grow a better reputation for businesses** because it stresses communication with candidates, transparency in job postings, follow-up on questions, feedback after hiring, and a whole host of healthy, holistic hiring practices.
- Ethical recruitment and selection can help to **ensure that the organization hires the right employees with the required skills, knowledge, competence, and ethical values that can guarantee its long-term performance and survival.**

Sl No	Issue No	Rev. No.	Revision Date	Reasons for Change	Details of Changes Made
1	1	0	04.08.2017	AS per ESG	New release
2	1	1	14.04.2023	Additional ESG Requirement added	Women rights, Diversity, equity, and inclusion, rights of minorities and indigenous peoples, land rights and forced eviction, private or public security forces, ethical recruitment added
3	1	2	01.10.2023	ED Designation updated	ED & Gr CEO Designation updated


Approved by
B R Preetham
ED & Gr.CEO
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