

Sansera Environmental Social & Governance (ESG) Policy

Objective

Sansera is a responsible corporate that endeavours to create a positive impact on society and the environment through its core business. The Environment, Social & Governance (ESG) policy lays down the principles based on which ESG is implemented at Sansera. The ESG policy objectives include:

1. Ensure compliance to all relevant local, Indian, and global regulations with respect to the Company's multi-country operations.
2. Aim to be consistently above or at par with industry standards and best practices on ESG in key industries such as automotive, aerospace, medical devices, etc.

Purpose

The purpose of the ESG Policy is to embed ESG considerations into corporate strategy, capital, and resource allocation to proactively manage risks and build resilience within the organization.

ESG risks and opportunities can arise from areas including but not limited to the following:

1. Industry trends and Customer buying behaviour.
2. Local, National, and international laws and regulations
3. Supply chain and vendor relations
4. Climate change and resource management including energy, water, and waste.
5. Investor preferences
6. Employee and labour relations
7. Communities in the areas of operations

Applicability

The ESG Policy is applicable to the Company and all individuals working at all levels and grades, including directors, senior management, officers, and employees. The scope of the Policy is also applicable in relevant areas for customers, investors, suppliers, community, and other stakeholders. The ESG Policy shall be read in conjunction with the following policies that already in force at the Company:

1. Quality Policy
2. EOHS Policy
3. Energy Policy
4. Sustainable Procurement Policy
5. Anti-Bribery Policy, Whistle-blowing Policy, and other Governance related policies
6. Code of Business Conduct
7. Business Ethics, Working condition and Human Rights policy guidelines.

Scope

The Scope of the ESG Policy includes the following:

1. Conducting periodic materiality surveys with key stakeholders, either internally or through through-part consultants. Frequency of such surveys is recommended once in three years.
2. Benchmarking Sansera with industry peers as well as key OEMs on key material topics on a periodic basis.

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3. Identification, documentation, and incorporation of material ESG risks and opportunities in the Company strategy and operations, through research and stakeholder engagement.
4. Development of an ESG Strategy and Roadmap with ESG goals, Key Performance Indicators (KPIs), ESG targets, initiatives, and capacity building plan.
5. Conducting trainings and awareness programs to sensitize employees and workers, and building capacity of Sansera to address key ESG issues such as GHG emissions, product quality, etc.
6. Implementation of ESG data capture, tracking and reporting systems to accurately measure and internally report progress on ESG metrics.
7. Publicly disclosing and reporting ESG metrics across mandatory and chosen voluntary frameworks in a fair, transparent, and comprehensive manner. Mandatory framework shall include the Business Responsibility & Sustainability Report (BRSR). Voluntary frameworks include GRI, CDP, etc.
8. Represent Sansera in relevant national and international fora on ESG.

Responsibility

The ESG Policy within Sansera shall be implemented by the ESG Working Group. The ESG Working Group shall report progress on a periodic basis to the ESG Committee of the Board. The ESG Working Group shall comprise of nominees from the following departments:

1. Finance
2. Legal & Secretarial
3. Human Resources
4. Quality & Customer Service
5. EHS
6. Manufacturing
7. Sales & Marketing
8. IT

Procedure

The ESG Committee of the Board shall review and approve the ESG Policy and provide oversight for its implementation within the organization. It shall also approve the constitution of the ESG Working Group for implantation within the Company. The ESG Working Group shall be headed by the Chief Sustainability Officer (CSO) of the Company. In the event of the CSO position being vacant, the ESG Working Group shall elect a Chairperson, who in turn would represent the ESG Working Group at the ESG Committee meetings.

The ESG Working Group shall also be responsible for the following:

1. Report to the ESG Committee on a periodic basis to appraise on progress on ESG goals as well and management of key ESG risks. The periodicity of such reporting is recommended to be once in three months.
2. Review and implement the Scope as defined in the Policy.

This policy was approved on July 12, 2023.