

Doc Status	Released	TITLE: Sansera- Sustainable Procurement Policy to Enhance Supplier Sustainability	
Document Ref:	SEL-PUR-POLICY-03		
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Sansera – Sustainable Procurement Policy to Enhance Supplier Sustainability

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

Purpose:

This guideline provides a structured approach to integrate **sustainability principles** into Sansera's procurement and supply chain operations.

It aims to ensure that Sansera's suppliers and partners contribute to the company's goals on **environmental stewardship, social responsibility includes labour and human rights, ethical business conduct, and sustainable growth**. Sansera practice and comply with laws, regulations and with individual standards, codes, policies, and contractual arrangements set by the customers.

Objectives

- Embed sustainability into all procurement processes and supplier decisions.
- Evaluate suppliers not only on quality, cost, and delivery, but also on **ESG performance**.
- Support Sansera's journey toward **ESG Performance improvement in line with EGS framework recognition and ISO 20400 alignment**.
- Promote **transparency, traceability, and continuous improvement** in the supply chain.

Scope

Applies to all procurement categories including:

- Raw materials and BOP components
- Machinery, tools, and equipment
- Packaging materials
- Logistics and transport services
- Outsourced manufacturing and contractors
- Professional services- Service providers

Responsible Supply Chain Management

Sansera will select business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles along the supply chain. Sansera will implement a supplier management system that includes the following:

- **Due Diligence:** Sansera will conduct due diligence audit on their direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promote transparency and traceability and use their best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.

Due Diligence Process

Sansera follows the OECD (**Organisation for Economic Co-operation and Development**) five-step framework for responsible mineral sourcing:

OECD Step	Implementation
Step 1: Establish strong management systems.	Develop internal procedures and responsibilities under the Supply Chain & ESG Team, integrate conflict minerals into supplier contracts and SQA manuals & PO terms and condition
Step 2: Identify and assess risks in the supply chain	Obtain necessary applicable supplier CMRT data, evaluate smelter/refiner risk using RMI/RMAP databases.
Step 3: Design and implement a strategy to respond to identified risks	Classify suppliers as low/medium/high risk, apply escalation, mitigation, or phase-out actions.
Step 4: Carry out independent third-party audit of smelter/refiner due diligence practices if necessary	Rely on RMI/RMAP audits or other recognized assurance programs.
Step 5: Report annually on supply chain due diligence	Disclose aggregated findings in Sansera's annual sustainability/ BRSR/ ESG report.



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• **Responsible Sourcing of Raw Materials and Minerals:** Sansera will responsibly source raw materials and minerals used in their products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- Sansera will ensure to conduct supplier audit (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.

SANSERA POLICY ON CONFLICT MINERALS CONTROL

Together we can help prevent the trade in conflict minerals.

SANSERA is committed to responsible sourcing and supports the humanitarian objective of ending ongoing violence funded by the trade of conflict minerals from the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries ("Conflict Region").

Sansera Engineering Limited is committed to responsible sourcing practices and to avoiding the use of minerals that directly or indirectly finance, or benefit armed groups that violate human rights. This policy establishes our framework for identifying, assessing, and managing the risks associated with **Conflict Minerals** — specifically **Tantalum (Ta), Tin (Sn), Tungsten (W), and Gold (Au)** (collectively referred to as **3T1G**), also extended minerals like **Cobalt and Mica** also need to be considered

3TG refers to tin, tantalum, tungsten, and gold, which are known as "conflict minerals" because their trade can finance armed groups and human rights abuses in conflict-affected regions like the Democratic Republic of Congo. These minerals are critical components in electronics, automotive, and other industries due to their unique conductive, corrosion-resistant, and high-density properties. Regulations like the U.S. Dodd-Frank Act and the EU Conflict Minerals Regulation aim to ensure responsible sourcing and supply chain transparency for 3TGs.

Our Commitment

Sansera Engineering Ltd. commits to:

1. **Responsible Sourcing:** Source materials only from suppliers who share our commitment to ethical, sustainable, and conflict-free supply chains.
2. **Transparency:** Conduct due diligence on the source and chain of custody of 3TG minerals in our supply chain.
3. **Legal and Ethical Compliance:** Comply with all applicable national and international regulations, including:
 - OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).
 - Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.
 - Automotive OEM and AIAG Conflict Minerals Reporting requirements.
4. **Supplier Engagement:** Require suppliers to:¹
 - Complete the **AIAG Conflict Minerals Reporting Template (CMRT)** annually.
 - Implement their own conflict minerals policy and due diligence process.
 - Source 3TG only from **smelters and refiners validated as conflict-free** through the **Responsible Minerals Assurance Process (RMAP)** or equivalent programs.
5. **Continuous Improvement:** Support training, awareness, and process enhancement to improve traceability and supply chain transparency.



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Sansera Expectations

Suppliers must:

- Adopt a **Conflict Minerals Policy** aligned with OECD guidelines.
- Complete the **Conflict Minerals Reporting Template (CMRT)** and submit it annually to Sansera.
- Source only from **RMAP-validated conflict-free smelters/refiners**.
- Maintain records for **a minimum of five years**.
- Immediately notify Sansera of any risk of non-compliance or newly identified high-risk sources.
- Participate in audits or reviews if requested by Sansera.

Monitoring and Compliance

- Sansera's **Procurement and ESG teams** will review supplier responses, risk-rate suppliers, and follow up for corrective actions. – PUR-F-05, PUR-F-30 etc.
- **Non-compliance** may result in suspension, disqualification, or removal from Sansera's Approved Supplier List – PUR-F-01,
- Periodic Supplier **audits** and **third-party assessments** may be conducted to verify compliance.

SANSERA expects all its suppliers to comply with the SANSERA Conflict Minerals policy, PO Terms and Conditions relating to conflict minerals and to carry out sufficient due diligence to ensure that their supply chain is conflict- free. The aim is to ensure that only "conflict- free" materials and components are used in products that we procure.

As a leading supplier of Automotive component manufacturing organization, SANSERA is committed to ensuring social responsibility in our supply chain and helping to prevent the trade of conflict minerals which finance, or benefit armed groups in the conflict region.

For further information, please contact purchase1_corp@sansera.in

Supplier Responsible for Sourcing of Natural Raw Materials Policy

Background

Sansera Engineering Limited Group companies are committed to responsible corporate behaviour, and this includes ensuring the natural raw materials we use in our products are produced in a manner that meets or goes beyond applicable laws and regulations, respects human rights, Safeguards Health & Safety, Protects the Environment, and generally supports the contribution of business to achieving sustainable development.

Policy

1. Definition, Policy & Application

Natural raw materials are defined as raw materials that come from nature and include extraction, processing, refining and transportation, but are not limited to, minerals, chemicals, wood, and corrugated box etc.

It is the policy of Sansera Engineering that natural raw materials used in Sansera group companies' products and product packaging are responsibly sourced and are from suppliers that comply with:

1. All applicable laws and regulations; and
2. Sansera's requirements for responsible sourcing of natural raw materials.

This policy applies to on behalf of Sansera Group companies, including at both companies owned / managed facilities and those facilities owned / managed / operated by suppliers, contractors and subcontractors.

2. Requirements for Responsible Sourcing of Natural Raw Materials.

Sansera's requirements as per the below annexure for Responsible Sourcing of Natural Raw Materials sets out general requirements for the sourcing of natural raw materials in line with customer-specific requirements and comply with Water Quality testing and consumption, Air Quality monitoring, Energy consumption and GHG-Greenhouse Gas emission, Waste reduction etc. monitoring and maintenance of the record.

Sansera's Responsible Sourcing of Natural Raw Materials policy is available at www.sanseraindia.com



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3. Implementation

Sansera's Purchasing Head is responsible for distributing and monitoring this policy.

Sansera Group companies globally are responsible for applying it throughout their supply chain, including making suppliers, contractors and subcontractors aware of the policy and their responsibility to comply with it. Suppliers, contractors, and subcontractors should also promote the standards throughout their supply chain. Queries regarding the implementation of this policy should be directed to purchase1_corp@sansera.in

Sansera Sustainable Procurement Policy

Introduction

In the recent years, with worsening climate change, increasing pressure on resources and changes in industry structure caused by evolution of Artificial Intelligence and Internet of Things, the environment surrounding companies is increasing in complexity. Given these changes, companies are expected to work to solve various social issues such as protecting environmental and human rights by creating new value and contributing to achieving a sustainable society (sustainability efforts.)

At the same time, with the globalization of companies, stakeholders are becoming increasingly multinational and diversified, with the expectation to engage in efforts that consider different countries' culture and history.

Based on the Sansera Philosophy, Sansera has been engaging in efforts to fulfil corporate social responsibility (CSR) in a variety of areas including environmental and safety.

With heightened societal expectations for sustainability efforts, it is essential that not only SANSERA, but our suppliers, understand Sansera's philosophy on sustainability and we work together. As one team, we will make efforts to reflect a variety of stakeholders' expectations through transparency of our products, activities and societal commitment.

We intend for these guidelines to help suppliers and Sansera share the same understanding of "sustainability" as we all strive to be a company that society wants to exist. We expect our suppliers to uphold these guidelines and cascade them down their supply chain.

"GO-GREEN" One of the imperative pillars of the Sansera Group's Vision of the organization is Go Green. It is based on the principle of shared value, a concept that promotes policies and operating practices that enhance the competitiveness of a company while also improving economic and social conditions in the communities in which it operates. As part of Go Green, the SANSERA Group aspires to create a more employable workforce, build a greener Mother earth and innovate for good and green products.

SANSERA Group believes that companies can help critical social issues while enhancing their competitive advantage. As part of this vision, we have undertaken numerous CSR initiatives under healthcare, education, environment, renewable energy and vocational training and have adopted sustainability and shared value as an intrinsic part of our business operations in order to achieve our vision of the organization. (Please find details of SANSERA Go Green vision at www.sansera.in)

Sansera has always promoted high ethical standards of professional and personal conduct by our team members and business associates. All of our team members and business associates must be committed to integrity in all aspects of their activities and comply with applicable laws, regulations and internal policies. We have laid down a Code of Ethics and Business Conduct (<http://www.sansera.in>) to improve overall compliance as well as to further the scope of good Corporate Governance with an ethical and transparent process in managing the affairs of the Company. We aim to ensure that our business operations managed in accordance with the Code of Ethics and Business Conduct.

Vision and Mission Statement of Sansera

Vision Statement

"World Class Engineering Corporation that maximizes stakeholder's Value".

Mission Statement

"Building an employee driven and socially responsible global engineering corporation using innovative methods and efficient management for lasting customer loyalty".



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Sustainable Procurement

To achieve our goals and ensure ethical conduct, it is empirical that our suppliers share our values and vision; and raise the sustainability standards in our supply chain. We acknowledge that long-term sustainable development of our suppliers is critical to our joint success, and we value our relationship with suppliers who share the same approach and vision towards doing business.

In line with our commitment, we have developed a Sustainable Procurement Guideline (Guideline), which is an extension of our values and is applicable to all Sansera suppliers. We expect our suppliers to operate in accordance with the principles as outlined in this Guideline and adhere to all applicable laws and regulations. This Guideline goes beyond mere compliance with the law by drawing upon internationally recognised standards to identify and define best practices from across the globe. This Guideline outlines our expectations with regards to ethics, business integrity, human rights, health and safety, environment, the local community and quality of product and operations.

We will periodically review the Guideline to ensure that it continues to help us move towards our vision. We encourage our suppliers to review this information and ensure that the principles and practices outlined in the Guideline will be reflected in your on-going business dealings with us. We expect you to communicate the Guideline throughout your organisation as appropriate. Let us move together towards an ethically driven, socially focused, green inspired and quality centred supply chain.

Sansera Principles to Enhance Sustainability Performance in the Supplier and Service providers.

We endeavour to achieve excellence, innovation, transparency, and performance in a sustainable manner. People and the environment are the automotive/aerospace components manufacturing industry's most important resources. We strongly feel that companies should fulfil their social responsibilities and obligations to realize a healthy and harmonious development between enterprises and employees, enterprises and society, and enterprises and the environment. As part of this, we are working together to attain the highest standards in business integrity and the social and environmental performance of our supply chain.

The automotive industry supply chain has a high degree of complexity; therefore, we believe in the benefits of a common approach and message where possible. These Sustainability Guiding Principles contain certain expectations towards business ethics, working conditions, human rights, health and safety, environmental leadership, and supply chain due diligence for suppliers at all tiers. We expect suppliers to uphold these standards and cascade them throughout their supply chain.

The Guiding Principles are based on fundamental principles of social, environmental and governance responsibility that are consistent with applicable laws and international standards, which may include the UN Guiding Principles on Business and Human Rights, ILO Conventions, OECD Guidelines for Multinational Enterprises, the Rio Declaration on Environment and Development, as well as the Paris Agreement.

The Guiding Principles define common expectations of the signatories for their suppliers. To fulfil the Guiding Principles, automotive/aerospace component suppliers should implement a management system/s – defined as a combination of policies, processes, functions, tools, and internal controls – that help an organization/organisation to control its operations, reach objectives and ensure continuous improvement. The recommendations concerning the practical application of the Guiding Principles are outlined in the Practical Guidance.

Suppliers must always comply with applicable laws and regulations and aim to apply best industry practices. In situations when the Guiding Principles go further than applicable laws and regulations, the Guiding Principles apply only to the extent permissible under applicable mandatory laws and regulations. Individual manufacturers may have their own standards, codes, and policies in addition to the Guiding Principles



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Sustainable Procurement Guideline - Principles

Sansera's procurement decisions shall be guided by the following sustainability pillars:

Pillar	Principle	Application Examples
Environmental	Reduce environmental impact and promote resource efficiency	Preference to ISO 14001-certified suppliers, green packaging, renewable energy use
Social / Human Rights	Respect labor rights and promote employee well-being	Ensure suppliers adhere to ILO conventions, prohibit child and forced labor
Ethical Governance	Promote integrity, transparency, and anti-corruption	Suppliers must follow anti-bribery policies and Sansera's Code of Conduct
Economic Responsibility	Balance cost efficiency with sustainability value	Evaluate life-cycle costs and long-term supplier relationships
Continuous Improvement	Encourage ESG innovation	Partner with suppliers for emission reduction, waste recycling, and digital traceability

Business Ethics:

Suppliers should uphold the highest standards of integrity and operate honestly and equitably throughout the supply chain.

Suppliers should implement a management system for business ethics that includes the following:

- **Anti-Corruption and Anti-Money Laundering:** Suppliers should not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. Suppliers should not facilitate or support money laundering. Suppliers should report any suspicious transactions and be alert for signs of money laundering.
- **Data Protection and Data Security:** Suppliers should respect the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.
- **Financial Responsibility/Accurate Records:** Suppliers should perform their business dealings in a transparent manner and accurately reflect them in the companies' financial reports and filings. Suppliers should confirm an adequate financial reporting system control is in place.
- **Disclosure of Information:** Suppliers should disclose financial and non-financial Information in accordance with applicable regulations and prevailing industry practices.
- **Conflicts of Interest:** Suppliers should ensure that their employees avoid and disclose situations where their financial or other interests' conflict with job responsibilities, or situations giving any appearance of impropriety.
- **Counterfeit Parts:** Suppliers should minimize/minimise the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.
- **Intellectual Property:** Suppliers should respect valid intellectual property rights.
- **Export Controls, Trade, and Economic Sanctions:** Suppliers should comply with Applicable restrictions on the export or re-export of goods, software, services and Technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.
- **Grievance Mechanism:** Suppliers should establish an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.
- **Remediation:** Suppliers should provide for or cooperate in remediation through legitimate processes when their business activities cause or contribute to adverse environmental or social impacts.
- **Non-retaliation:** Suppliers should avoid any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly, and protest their business activities.
- **Ethically Driven:** We conduct our business activities in a fair and transparent manner with honesty, integrity, high ethical & moral standards, and respect for human rights. We strongly believe that high ethical standards are essential for sound business relationships. We expect our suppliers to share this commitment while conducting their business.



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Environment.

Suppliers should develop, implement, and support a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental Carbon footprint of production, goods, and services throughout their life cycle.

Suppliers should implement an environmental management system that includes the following:

- **Carbon Neutrality:** Suppliers should strive to set science-based and time-bound Emission reduction goals and renewable energy objectives that are aligned with the Paris Agreement and put in place measures that drive forward the decarbonisation of the entire value chain.
- **Water Quality, Consumption & Management:** Suppliers should minimize/minimise Water consumption, effectively reuse and recycle water with responsible treatment of Wastewater discharges and prevent potential impacts from flooding because of rainwater run-off, as required by and in accordance with applicable law.
- **Air Quality:** Suppliers should routinely monitor and disclose, appropriately control, Minimize/minimise, and to the extent possible, eliminate emissions contributing to air pollution, as required by and in accordance with applicable law. Suppliers should assess cumulative impacts of pollution sources at their facilities and mitigate their pollution levels accordingly.
- **Responsible Chemical Management:** Suppliers should identify, minimise, or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Companies should also be aware of any use of restricted substances in processes and finished products and actively investigate suitable substitutes to maintain product and environmental stewardship.
- **Circularity:** Suppliers should promote closed loop systems by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.
- **Animal Welfare:** Suppliers should respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in an automotive product.
- **Biodiversity, Land Use and Deforestation:** Suppliers should protect ecosystems, especially key biodiversity areas, impacted by their operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.
- **Soil Quality:** Where appropriate, suppliers should monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination
- **Noise Emissions:** Where appropriate, suppliers should monitor and control the levels of industrial noise to avoid noise pollution.

Human Rights and Working Conditions.

Suppliers must respect the human rights of workers, local communities, and other relevant stakeholders, and prevent and address adverse human rights impacts linked to their business activities, in accordance with the UN Guiding Principles on Business and Human Rights.

Suppliers should implement a management system for human rights and working conditions that includes the following:

- **Child Labor/Labour and Young Workers:** Suppliers must observe the minimum employment age (18) in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labour is not tolerated in any form.
- **Wages and Benefits:** Suppliers must provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages as per minimum wages act 1948, overtime compensation, medical leave and government-mandated benefits.
- **Working Hours:** Suppliers must comply with local laws and collective bargaining agreements (where applicable) regarding working hours or should comply with the ILO Standards on Working Time* in the absence of relevant local regulations.



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- **Modern Slavery:** Suppliers must prohibit any forms of forced, bonded or compulsory labour, including human trafficking.
- **Ethical Recruiting:** Suppliers must not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.
- **Freedom of Association and Collective Bargaining:** Suppliers should allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Companies should respect worker rights to associate freely, to join or not join labour unions, bargain collectively, seek representation and join workers' councils.
- **Non-Discrimination and Harassment:** Suppliers should not tolerate any form of discrimination or harassment in respect of employment and occupation and should provide equal employment opportunities regardless of worker or applicant characteristics such as 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.
- **Women's Rights:** Suppliers should provide equal opportunity in employment and commit to equal pay for equal work.
- **Diversity, Equity, and Inclusion:** Suppliers should develop and promote inclusive cultures where diversity is valued and celebrated, and everyone is able to contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership, including boards of directors.
- **Rights of Minorities and Indigenous Peoples:** Suppliers should 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 consideration for the presence of vulnerable groups.
- **Land Rights and Forced Eviction:** Suppliers should 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:** Suppliers should 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.

Health and Safety.

Suppliers should provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health. Suppliers should implement a management system for a safe and healthy working environment that includes the following:

- **Workspace:** Suppliers should provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.
- **Personal Protective Equipment:** Where applicable, suppliers should provide their workforce with necessary Personal Protective Equipment (PPE) and ensure they understand how and when it needs to be applied.
- **Emergency Preparedness:** Suppliers should reduce the risk of occupational hazards and develop an emergency preparedness and response plan.
- **Incident and Accident Management:** Suppliers should implement hazard and risk analysis systems to minimize/minimise the potential for incidents or accidents at the workplace. An investigation system should drive to determine the root cause, and a corrective action system should ensure all permanent measures have been taken to minimize/minimise the chance of a recurrence.
- **Contractors:** Suppliers should properly manage the health and safety of contractors as part of a company's extended supply chain. Suppliers should coordinate their procurement processes to identify hazards and to



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assess and control risks arising from the contractor's business activity with the supplier, and the company's business activity that impacts the contractors' workers.

Responsible Supply Chain Management

Suppliers should select business partners that comply with the practices of responsible business conduct and cascade the Guiding Principles along the supply chain. Suppliers should implement a supplier management system that includes the following:

- **Due Diligence:** Suppliers should conduct due diligence on their direct suppliers and subcontractors in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct, promote transparency and traceability and use their best efforts to implement the ESG standards further along the supply chain, and cascade the Guiding Principles further along the supply chain.
- **Responsible Sourcing of Raw Materials and Minerals:** Suppliers should responsibly source raw materials and minerals used in their products by developing a management system that promotes supply chain traceability and transparency, and by implementing due diligence measures in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- **Non-Discrimination:** Supplier / Service providers should not tolerate any form of discrimination in respect of employment and occupation and should 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.

Packaging material:

Suppliers should try and take steps to reduce the environmental impact of their packaging material by developing innovative, environment friendly, practical solutions to modify the design and disposal method/process in line with the applicable Acts or Regulations.

Adopting Green Initiatives and Practices

To monitor the environmental performance and to become environmentally friendly, practices to monitor and minimise environmental impact should be imbibed in organisation's processes. We recommend that our suppliers inculcate such practices in their operations and start new initiatives to reduce their impact on the environment.

4 Quality centred ensuring quality and adherence to manufacturing and product standard is of prime importance to us.

a. Quality Management System:

We expect our suppliers to establish quality objectives, policies, manual, and procedures and have in place a Certified Quality Management System by competent authority like ISO 9001, IATF 16949 ISO 14001, ISO 45001, and ISO 50001 etc. The suppliers should comply with local regulations, registrations; have trainings, management reviews and internal audits to ensure that the Quality, EOHs Management System is effective.

b. Facility and Machinery:

We expect our suppliers to give utmost importance to equipment design, installation, and maintenance and ensure validation/verification of the same. The suppliers should have in place proper housekeeping and pest control to ensure hygiene, safety and security of its workforce.

c. Good Manufacturing Practices and Quality Controls:

We expect our suppliers to have in place established good manufacturing practices and packaging operations with proper records along with process controls and finish product release programme.

d. Material Management:

We expect our suppliers to have in place established practices for storage, handling and transportation of raw material and to maximise the risk prevention measures through good warehousing practices and proper handling of rejected/expired items.



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Implementation of Guideline Applicability and Implementation:

We understand that our suppliers fall under different categories in terms of their scale, the product/service they supply, and the raw materials being used by them, their organisation structure, and geographies of operation. Keeping these factors in mind, we have designed the Guideline in a manner that it works for the whole supplier base, although the level and type of compliance will vary depending on the type/location of the supplier and the principles/ Rules/ Regulations applicable to them under various statutes. We expect our suppliers to set in place internal policies, SOPs, governance structures, systems, processes and take any other relevant measures to ensure adherence with the Guideline. The suppliers are expected to disclose to us the goals set by them, and the measures undertaken by them for each of the various principles underlined in this Guideline. We will work with our suppliers to identify issues that do not meet our expectations and help them in addressing the gaps identified, if any. Specifics related to applicability of principles and their implementation is provided in the Sustainable Procurement Guide for Suppliers.

Communication

We expect our suppliers be responsible for:

- Building awareness of this Guideline and sustainable procurement standards through information dissemination and incorporation into routine employee trainings.
- Encouraging employee attendance at internal and external trainings related to sustainability; and
- Encouraging the use of environmentally preferable/sustainable products and services through information dissemination, development of internal procedures, pilot testing, and leading by example.
- **Monitoring and Reporting:** We expect our suppliers to monitor and report the initiatives undertaken by them with regards to ensuring adherence to this Guideline. We recommend our suppliers to place monitoring and reporting mechanisms and management systems, wherever required to effectively implement and manage such initiatives. The suppliers should focus on continuously improving their performance about compliance with the Guideline.

Reporting on Breaches:

We support and encourage those who report actual or suspected breaches without any fear of retaliation. Any failure to comply with this Guideline (including any failure by a team member of Sansera or anyone acting on behalf of Sansera to so comply), of which the supplier is aware, should be immediately reported through our anonymous **whistle-blower process**, details of which can be found on the Sansera website (www.sansera.in). The failure to do so will be a breach of this Guideline.

This Guideline was developed through extensive internal and external consultation, benchmarking against similar organizations and reflects best practices for sustainable procurement.

Note: All the Supplier and subcontractors are request you to sign in Supplier commitment form and forward to us for commitment towards Sustainability

Annexure The following principles, standards and conventions were used in preparing this Sustainable Procurement Guideline and may be a useful source of additional information.

- International Labour Organisation Conventions
- Universal Declaration of Human Rights
- SANSERA Group's Go Green Vision.
- Conflict Mineral policy

Issuing Function: Sansera Purchase function.

Target Audience Suppliers and Service providers to all Sansera Engineering Limited.

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Doc Status	Released	TITLE: Sansera- Sustainable Procurement Policy to Enhance Supplier Sustainability	
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Roles and Responsibility

Function	Key Responsibilities
Procurement Team	Integrate sustainability criteria into sourcing, maintain supplier database
ESG /Procurement Team	Develop sustainability standards, evaluate ESG performance, audit suppliers
Quality Department	Verify supplier compliance with Sansera's standards
EHS Department	Monitor environmental, safety, and legal compliance
Suppliers / Partners	Adhere to Sansera's policy, share data, and implement improvement measures

Key Performance Indicators (KPI)

KPI	Target / Metric	Frequency
% of suppliers completing sustainability SAQ- Self assessment Questionnaire	100% of Tier 1 suppliers - Critical	Annual
% of suppliers with ISO 14001 / 45001 certification	≥70%	Annual
% of procurement spend covered under sustainable sourcing	≥60%	Annual
Number of supplier audits and CAP closures	100% closure rate	Annual
No. of supplier training programs conducted	≥2 per year	Annual

Amendment History

S.no	Rev	Date	Reason for revision	Details of changes made
1	0	04.08.2017	As per ESG	New release
2	1	14.04.2023	Additional ESG requirement added	Business Ethics Added
3	2	01.10.2023	ED designation updated	ED & CEO designation updated
4	3	15.09.2025	Extra Conflict mineral added	Policy reviewed and updated in line Extra conflict mineral, Policy KPI added for better monitoring



Approved by:

B R Preetham

CEO & Executive Director

Date: 15.09.2025, Rev 03