

Doc Status	Released	TITLE: SANSERA-POLICY ON CONFLICT MINERALS CONTROL	
Document Ref:	SEL-PUR-POLICY- 01		
Rev No. / Date	02 / 15.09.2025		
Original Date	10.10.2019		

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 the 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.

Our 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.



Doc Status	Released	TITLE: SANSERA-POLICY ON CONFLICT MINERALS CONTROL	
Document Ref:	SEL-PUR-POLICY- 01		
Rev No. / Date	02 / 15.09.2025		
Original Date	10.10.2019		

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

Objectives- Conflict Minerals Policy

S. no	Materiality Topics	Objectives	UOM	Responsibility
1	Supplier Sustainability	Percentage of suppliers committed under conflict minerals policy	%	SQA/Purchase

Amendment History

S.no	Rev	Date	Reason for revision
1	0	10.10.2019	New Policy
2	1	01.10.2023	Update as per ESG requirement format Number
3	2	15.09.2025	Policy Objectives added & extended minerals like Cobalt and Mica also to be considered in CMRT

Approved by:

B R Preetham

CEO & Executive Director

Date: 15.09.2025, Rev 02

Doc Status	Released
Document Ref:	SEL-PUR-POLICY- 01
Rev No. / Date	02 / 15.09.2025
Original Date	10.10.2019

TITLE: SANSERA-POLICY ON CONFLICT MINERALS CONTROL



Supplier Commitment

Sansera may request that all suppliers who receive the to comply with the "SANSERA Conflict Minerals policy" submit the "Supplier Commitment" form signed by a representative.

By signing this form, the supplier acknowledges having read and accepted all the aforementioned terms and conditions of these guidelines pertaining to all parts, materials or services ordered by or delivered to Sansera.

Supplier name:

Supplier code:

Address:

Signatory's name:

Signatory's function:

Signatory's email address:

Date:

Seal & Signature:

Please return the signed form by mail or the scanned copy by E-mail to: purchase1_corp@sansera.in specified in the attachment.