

CONFLICT MINERALS POLICY

Syrma SGS Technology Conflict Minerals policy is to evaluate our supply chain and determine if any Conflict Minerals continue to be supplied to us. Syrma SGS Technology goal is to work with our suppliers to eliminate the Conflict Minerals originated in covered countries from our supply chain.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act imposes requirements on manufacturers if their products contain "Conflict Minerals" (tin, tantalum, tungsten, gold, etc.) originating from the Democratic Republic of the Congo (DRC) or an adjoining country (Angola, Burundi, Central African Rep., Rep. of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia). This legislation requires all manufacturing companies publicly traded in the U.S. to report annually to the Securities and Exchange Commission (SEC) whether they use Conflict Materials that originated from the Democratic Republic of Congo (DRC) or an adjoining country. Companies are required to conduct due diligence inquiries in their supply chains. This will necessitate supplier cooperation to determine whether products contain conflict minerals from the DRC or an adjoining country. It is our intention to do what we can to ensure that the products and components in our supply chain do not contain minerals from those geographic areas which contribute to the armed conflicts in the DRC and adjoining areas.

As a **Syrma SGS Technology** supplier you are required to undertake the following:

- Establish a due diligence process for identifying and managing the (in)direct sourcing of tin, tantalum, tungsten, gold, also referred as Conflict Minerals.
- Implement a Corporate Policy on Conflict Minerals to assure responsible sourcing of tin, tungsten, tantalum, and/or gold.
- Determine which of your products/components contain tin, tungsten, tantalum, and/or gold.
- Identify all the smelters in your supply chain that supply the tin, tantalum, tungsten, and/or gold. If you don't source directly from smelters, you must pass this request on to your suppliers (and they may have to pass it on to their suppliers) and have them inform you of the smelters in your supply chain.
- Gather collected data to be provided to Syrma SGS Technology via the latest version of the EICC-GeSI Conflict Minerals Reporting Template, completing all questions, and ensuring that all products, components, and / or raw materials you supply to Syrma SGS Technology are addressed therein.
- Provide updates to Syrma SGS Technology via the above referenced reporting template as requested, but no less frequent than annually.

Syrma SGS Technology expects all of its suppliers to comply and sustain with the requirements listed above and provide all necessary declarations.

Guidelines for non-responsive suppliers (corrective action management)

Conflict minerals request will be sent to suppliers and acquire response within 30 days. If the declaration not received, continuous reminders will be sent to non-responsive suppliers for next 20 days for necessary compliance. The suppliers' willingness to comply with this initiative will be a factor in our sourcing decisions.

Signature of approval,


Sreedharan N G
President – Operations South

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