

## Conflict Minerals Policy Statement

There has been an increased concern that the exploitation and trade of certain minerals originating in the Democratic Republic of the Congo and surrounding countries are helping to finance armed conflict characterized by extreme levels of violence. Tin, Tantalum, Tungsten and Gold, are commonly referred to as "conflict minerals" regardless of their country of origin. The 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act<sup>1</sup> (Dodd-Frank Act) addresses, among other things, trade in conflict minerals. Section 1502 of the act required several U.S. agencies, including the Securities and Exchange Commission (SEC), State, and the U.S. Agency for International Development (USAID), to take certain actions to implement the conflict minerals provisions of the act. Notably, the act required the SEC to promulgate disclosure and reporting regulations regarding the use of conflict minerals from the DRC and adjoining countries (in this report collectively referred to as "covered countries"). In response, the SEC adopted a conflict minerals disclosure rule (SEC disclosure rule) in August 2012. The SEC required companies to file Specialized Disclosure (SD) reports for the first time by June 2, 2014, and annually thereafter by May 31.

SVM is committed to Sourcing Components and Materials from Companies that share our values of Human Rights, Ethics and Environmental Responsibility. We expect all our suppliers to abide by the requirements of our Supplier Code of Conduct, which prohibits Human Rights Abuses and Unethical Practices. We also require all our suppliers to comply with Applicable Legal and Regulatory Standards and Requirements.

We support the Humanitarian goal of ending violence, human rights violations and environmental devastation in the DRC and adjoining Countries (Covered Countries).

SVM has the following expectations of its suppliers of Raw Materials and Components for products that we manufacture or for products that we contract with them to manufacture:

We expect our suppliers to promptly, completely and accurately respond to our informational requests with respect to any 3TG that is necessary to the functionality or production of such products, including by completing and delivering the Conflict-Free Sourcing Initiative, Conflict Minerals Reporting Template or similar survey (the "Survey") when asked to do so.

# svm private limited

An ISO 9001-2015 & ISO 14001-2015 Certified Company

We expect our suppliers to implement policies and management systems to support compliance with these expectations, and require their upstream suppliers to adopt similar policies and systems consistent with OECD Due Diligence Guidance to generate the information required.

## Reasonable Country of Origin Inquiry

We expect our suppliers to file a Form SD disclosing its determination regarding the conflict minerals summarizing the reasonable Country of Origin Inquiry it conducted and the results of that inquiry, Publicly disclose this information on its website (and it must retain the information on the website for one year) and Provide a link to its website on the Form SD.

SVM will assist our Customers in implementing their conflict minerals programs and strive to work cooperatively with our customers and supply chain partners in implementing Conflict Minerals Compliance Programs as per our Integrated Management System.

## Conflict Minerals Report

The Conflict Minerals Report includes:

- A description of the due diligence measures that SVM undertook to determine the source and chain of custody of its conflict minerals, or diligence measures that we undertook in determining that the conflict minerals came from recycled or scrap sources,
- A certification by us that we obtained an independent report from our suppliers and disclose information in the latest Conflict Minerals Reporting Template (CMRT)

Concerns regarding this policy or suspected violations of this policy, can be reported to the following address:

SVM Private Ltd.,  
[www.svmpl.in](http://www.svmpl.in)

- Attn: Legal or Compliance Manager
- Email: [kumaresan@svmpl.in](mailto:kumaresan@svmpl.in)

*N. D. - North*

KANNIVAKKAM  
26.05.2023

GENERAL MANAGER OPERATIONS