Simic Electronics Private Limited

Responsible Minerals Sourcing Policy

Purpose:

Simic Electronics Private Limited is committed to conducting business in an ethical and responsible manner. As part of our commitment to human rights and corporate social responsibility, we have adopted this Responsible Minerals Sourcing Policy. The policy is designed to ensure that the materials used in our mica capacitors are sourced in a way that does not contribute to conflict, human rights abuses, or environmental degradation in conflict-affected regions, particularly in the Democratic Republic of Congo (DRC) and its adjoining countries.

Scope:

This policy applies to all materials, components, and subcomponents that are used in the manufacturing of mica capacitors, with a specific focus on the sourcing of tin, tungsten, tantalum, and gold (also known as 3TG), as well as mica.

Policy Statement:

Simic Electronics Private Limited recognizes the importance of avoiding the use of conflict minerals in our supply chain. We are committed to sourcing our materials from responsible suppliers who share our values of integrity and respect for human rights. We will make every reasonable effort to avoid the sourcing of minerals that directly or indirectly finance armed groups involved in human rights violations in conflict-affected areas, including the DRC and surrounding countries.

Supplier Expectations:

We require our suppliers to:

- 1. **Comply with applicable laws and regulations** related to the use of conflict minerals, including the Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502, which mandates disclosure of the use of conflict minerals.
- 2. **Provide transparency** in their supply chain regarding the sourcing of 3TG minerals and any other relevant materials used in their products.
- 3. Take steps to trace the origin of the minerals used in their products and ensure that they do not source from conflict-affected regions or from suppliers who support armed groups involved in violence and exploitation.
- 4. **Engage with their suppliers** to promote ethical practices, and work toward sourcing conflict-free materials.
- 5. **Submit annual conflict minerals reports** as necessary, disclosing the steps taken to ensure the traceability and responsible sourcing of materials.

Due Diligence Process:

To ensure compliance with this policy, Simic Electronics Private Limited will:

1. **Conduct due diligence** on our supply chain to understand where the minerals used in our mica capacitors originate. This includes requiring suppliers to complete a Conflict Minerals Reporting Template (CMRT) or similar documentation as part of our sourcing process.

- 2. **Engage with suppliers** who are unable to provide the necessary traceability and documentation to determine the source of the minerals, encouraging them to take corrective actions or seek alternatives.
- 3. **Maintain records** of our due diligence efforts, including information on suppliers and their conflict minerals reporting status.
- 4. **Provide training** to relevant employees and stakeholders on conflict minerals issues, ensuring awareness and understanding of the importance of responsible sourcing practices.

Risk Management and Mitigation:

In the event Simic Electronics Private Limited identifies that materials are sourced from or contribute to conflict financing, human rights abuses, or environmental degradation, we will:

- 1. Work with suppliers to identify the source of the conflict minerals and assess the risk associated with the use of these materials.
- 2. **Collaborate with industry initiatives,** such as the Responsible Business Alliance (RBA) and the Conflict-Free Sourcing Initiative (CFSI), to find alternative sources of responsibly mined materials and support efforts to improve the traceability and transparency of the supply chain.
- 3. **Make changes** in our supply chain, if necessary, to exclude materials that are found to be contributing to conflict, and seek alternatives that meet our ethical standards.

Communication and Reporting:

We are committed to keeping our customers, stakeholders, and the public informed about our progress in implementing this policy. We will respond to customer inquiries regarding our conflict minerals practices and provide any relevant information on our efforts to ensure responsible sourcing.

Accountability:

Simic Electronics Private Limited takes its responsibility to ensure conflict-free sourcing seriously. We will monitor the effectiveness of this policy and its implementation, and take corrective action as needed. Failure to comply with this policy by our suppliers may result in a review of the supplier relationship and potential termination of the business arrangement if non-compliance persists.

Review and Updates:

This policy will be reviewed annually and updated as necessary to reflect changes in the law, industry best practices, or our business operations. We are committed to continuous improvement in this area.

Conclusion:

By adopting this Responsible Minerals Sourcing Policy, Simic Electronics Private Limited strives to contribute to the global effort to reduce the impact of conflict minerals on human rights and to promote sustainable, ethical business practices throughout our supply chain.

Ashok Mishra Managing Director May 30, 2025