Conflict Minerals & Responsible Minerals Policy

Version 1.0

Approval and Effectiveness

This Policy was reviewed and approved by the Board of Directors of Saatvik Green Energy Limited during its meeting held on 11th December 2025. The Policy is effective from the same date and shall remain in force until amended or replaced by the Board/ ESG Council of Saatvik.

1. Prologue

Saatvik Green Energy Limited and its subsidiaries (collectively referred to as the "Saatvik Group" or "Saatvik") are committed to conducting business responsibly, ethically, and in alignment with the highest standards of sustainability and human rights. As a solar PV module manufacturer operating in global supply chains, Saatvik recognizes that its products/raw materials may contain 3TG and hence, will ensure that minerals used in its products do not directly or indirectly finance armed conflict, human rights abuses, or environmental harm.

This Conflict Minerals & Responsible Minerals Policy ("Policy") establishes Saatvik's commitment, principles, and expectations related to the responsible sourcing of minerals, particularly those originating from conflict-affected and high-risk areas.

2. Objective

The Purpose of this policy is to:

2.1. Prevent the use of minerals that directly or indirectly finance armed groups or contribute to human rights abuses.

2.2. Ensure responsible sourcing of minerals used in Saatvik's products in alignment with international regulations and standards.

2.3. Embed conflict minerals due diligence into Saatvik's sustainable procurement and supplier governance framework.

2.4. Set clear expectations for suppliers regarding transparency, traceability, and responsible mineral sourcing.

3. Scope and Applicability

This Policy shall be read in conjunction with s Saatvik's ESG Policy, Supplier Code of Conduct, and Sustainable Procurement Policy.

By signing or otherwise committing to comply with Saatvik's Supplier Code of Conduct, suppliers automatically agree to adhere to the requirements of this Conflict

Minerals & Responsible Minerals Policy, including all obligations related to responsible sourcing, due diligence, transparency, and cooperation.

Compliance with this Policy is a mandatory condition of doing business with Saatvik and forms an integral part of Saatvik's supplier governance framework. This policy applies to:

- Saatvik Green Energy Limited and all its subsidiaries.
- All employees, directors, officers, and relevant functions, particularly Procurement, Supply Chain, Quality, and Sustainability.
- All suppliers, contractors, and business partners involved in the supply of raw materials, components, or products that may contain covered minerals.

This Policy covers the entire supply chain, including upstream suppliers where relevant.

4. Definitions

4.1. **Conflict Minerals / Covered Minerals**: Minerals defined as tin, tantalum, tungsten, and gold (3TG), their ores and derivatives, as well as other minerals such as cobalt and mica where relevant, that are sourced from conflict-affected or high-risk areas.

4.2. **Conflict-Affected and High-Risk Areas (CAHRAs)**: Regions affected by armed conflict, widespread violence, or human rights abuses, including but not limited to the Democratic Republic of the Congo (DRC) and its adjoining countries.

4.3. **Responsible Sourcing**: Sourcing minerals in a manner that respects human rights, avoids financing conflict, and complies with applicable laws and international due diligence standards.

5. Regulatory and Framework Alignment

Saatvik aligns its approach to responsible mineral sourcing with the following:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1502)

- EU Regulation 2017/821 on Responsible Mineral Sourcing
- UN Guiding Principles on Business and Human Rights
- Responsible Minerals Initiative (RMI)
- Saatvik ESG Policy, Supplier Code of Conduct, and Sustainable Procurement Policy.

6. Policy Commitments

Saatvik commits to:

- Not knowingly sourcing conflict minerals from non-certified or non-responsible sources that contribute to armed conflict or human rights violations.
- All 3TG minerals procured shall originate only from recycled or scrap sources (if applicable).
- Promoting transparency and traceability in mineral supply chains.
- Supporting the responsible sourcing of minerals, including from CAHRAs, where sourced responsibly and in line with OECD guidance.
- Continuously improving its due diligence processes based on evolving regulations and stakeholder expectations.
- Saatvik will ensure to provide trainings to 50% of its suppliers on conflict mineral policy and supplier code of conduct by 2026.
- Saatvik will ask declaration of all its suppliers on conflict minerals by 2027 and ensure complete compliance.

7. Supplier Expectations and Requirements

In line with Saatvik's *Supplier Code of Conduct*, suppliers are required to comply with this Conflict Minerals & Responsible Minerals Policy and demonstrate responsible sourcing practices across their operations and supply chains.

- Signing and complying with the Supplier Code of Conduct shall be deemed as confirmation of the supplier's commitment to this Policy, unless otherwise communicated in writing by Saatvik.
- Establish their own conflict minerals or responsible minerals policies and due diligence processes.

- Conduct reasonable due diligence on their supply chains in line with OECD Guidance.
- Source minerals from smelters and refiners that are conformant or validated under recognised programmes such as RMI (RMAP), LBMA, or RJC.
- Provide accurate, complete, and timely information on mineral sourcing upon request, including conflict minerals declarations or templates where applicable.
- Cascade these requirements to their own suppliers.

Failure to meet these expectations may result in corrective action plans, business restrictions, or disengagement.

8. Due Diligence Process

Saatvik follows a risk-based due diligence approach consistent with OECD Guidance:

- Establish strong management systems – Integration of responsible minerals requirements into procurement, contracts, and supplier onboarding.
- Identify and assess risks – Identification of materials and suppliers that may involve covered minerals and assessment of sourcing risks.
- Design and implement risk response – Engagement with suppliers, corrective action plans, and escalation where risks are identified.
- Independent verification – Participation in or reliance on industry-recognised assurance schemes and audits where applicable.
- Reporting and disclosure – Transparent communication to customers, stakeholders, and through sustainability disclosures.

9. Sustainable Procurement

As part of Saatvik's sustainable procurement framework, the Company:

- Integrates conflict minerals and responsible sourcing criteria into supplier selection, evaluation, and retention.
- Requires critical suppliers to acknowledge and comply with Saatvik's Supplier Code of Conduct and this Policy.
- Conducts supplier ESG risk assessments, with conflict minerals considered a key risk factor.

- Engages suppliers through training, awareness, and improvement programmes on responsible sourcing.
- Monitors supplier compliance through documentation reviews, self-assessments, and audits where required.
- Maintains evidence of supplier declarations, corrective actions, and continuous improvement for ESG ratings and customer assessments.

10. Roles and Responsibilities

- **Board of Directors / ESG Council:** Oversight and strategic direction on responsible sourcing.
- **Procurement & Supply Chain:** Implementation of this Policy in sourcing, contracting, and supplier management.
- **Corporate Sustainability Team:** Monitoring, reporting, and supplier engagement.
- **Suppliers:** Compliance with this Policy and responsible sourcing expectations.

11. Training and Awareness

Saatvik shall provide appropriate training and awareness to relevant employees and suppliers to ensure effective implementation of this Policy.

12. Reporting and Grievance Mechanism

Concerns related to conflict minerals or responsible sourcing may be reported through mechanism established in supplier code of conduct i.e. , supplier_reporting@saatvikgroup.com; All concerns will be reviewed and addressed in a fair and confidential manner.

Any non-compliance with this Policy shall be addressed in accordance with the corrective action, audit, suspension, and disengagement mechanisms defined in Saatvik's Supplier Code of Conduct and applicable supplier agreements.

13. Review and Amendments

This Policy shall be reviewed periodically or in response to regulatory or operational changes. Amendments shall be effective upon approval by the ESG Council / Board of Directors.

Disclaimer:

This Policy does not replace, or duplicate requirements set out in the Supplier Code of Conduct. Instead, it provides detailed guidance and due diligence expectations specific to conflict minerals and responsible mineral sourcing, in furtherance of the principles already established under the Supplier Code of Conduct. Saatvik reserves the right to modify this Policy from time to time.