

**CONFLICT MINERAL POLICY**

INTEGRA ENGINEERING INDIA LTD (IEIL) is a manufacturer of indian railway signalling relays, power realays, fabricated enclosure and wiring harness. IEIL support ending the violence and human rights violations related to the mining of certain minerals from a location described as the "Conflict Region," which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. IEL have responsibility to respect human rights and conduct reasonable checks in our process and supplychain to avoid sourcing directly / indirectly of congo (DRC) region which partially financed by the exploitation and trade of conflict minerals- tantalum, tin, tungsten and gold originating in the DRC region. IEIL is committed to support their customer to comply with disclosure obligation with reference to Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directed the U.S. Securities and Exchange Commission (SEC) to adopt rules to implement disclosure requirements related to these "conflict minerals".

IEIL takes following measures to ensure that its products and parts do not contain conflict minerals, sources from mines that support conflict within the DRC and adjoining countries.

IEIL's commitment:

- To support the aims and objectives of the SEC rules and regulations related to the supply of conflict minerals.
- Our goal is to ensure that any Tin, Tantalum, Tungsten or Gold that we procure which have originated from the Conflict Region, have been certified as "Conflict Free."
- Update our customers to comply with disclosure obligations
- To ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that the specified metals are only being sourced from:
  - a. Mines and smelters outside the Conflict Region or
  - b. Mines and smelters which have been certified by an independent third party as "Conflict Free" if sourced within the Conflict Region.

This due diligence includes requesting our suppliers to provide written documentation of the results of their due diligence.

The supplier must ensure compliance with product-related requirements, such as REACH, RoHS or conflict minerals, and may be required to declare the material content and origin of product delivered to IEIL.

If we discover the use of conflict minerals produced in facilities that are not considered to be conflict free in any material, parts or components we procure for use in our products, we will use our best efforts to transition the products to be conflict free.

**Grievance process for concern related to conflict of minerals:**

IEIL has established a full proof grivenace mechanisam to ensure correct and valid implementation of the above conflict minerals policy. Any stakeholder (customer or any one from the supply chain) comes across breach of our policy shall contact the below mentioned authorities.

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Mr. Jignesh Chaudhari- Purchase Manager

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Mr. Kaushal Vyas- Continuous improvement manager

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On receiving a grievance report, we will aim to get an accurate report of the grievance or complaint. We will explain our grievance procedure to the individual making the complaint and find out how the complainant would like it to be addressed or resolved. Our approach allows for anonymous reporting of concerns or incidents and the identity of the complainant will not be disclosed. IEIL undertakes to protect reporting parties from retaliation and will treat all reports in a confidential and sensitive manner

Also, we will assess the eligibility of the complaint and, where applicable, decide who should handle it internally.

We will advise the complainant of our decisions or outcomes. Records of complaints received, the internal process followed and outcomes will be kept for at least five years.

REV. 00  
EFFECTIVE FROM: 01.05.2022

APPROVED BY:



CEO