



## Our Company Policy of Responsible Minerals Sourcing

R. K. Lighting Pvt. Ltd. (Units 1, 2, 4 & 5), Radhika Opto Pvt. Ltd. (Units 1, 2, 3, 4, 7, 8 & 9) & Cromlux Engineers Pvt. Ltd. is committed to follow the regulatory guidelines of conflict minerals.

### Our Commitment –

- R. K. Lighting products contain mined materials that are integral to maximum electronics industry technologies while we do not procure directly, our suppliers acquire and use minerals from multiple sources worldwide.
- R. K. Lighting is committed to their possible sourcing of minerals, sourcing done in an ethical and sustainable manners that safeguards the human rights of every human being in our global supply chain.
- We have addressed tin, tungsten, tantalum, and gold (also known as 3TG or “conflict minerals”) sourced from the Democratic or related countries as per **Dodd-Frank Section 1502** requirement. R. K. Lighting commitment to responsible sourcing, it is our objective to ensure that there should not be 3TG in our products directly.
- R. K. Lighting has evolved its responsible minerals program and related due diligence practices to address minerals originating from **Conflict-Affected and High-Risk Areas (CAHRAs)**.
- Conduct their business in accordance with R. K. Lighting’s guidelines for supply chain responsibility and transparency. Establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the **OECD** Guidance.
- Establish due industry bases and management systems consistent with the OECD Guidance.
- Extend all these expectations to their own suppliers.
- Exercise due industry with relevant suppliers consistent with the OECD Guidance.
- Provide and require our suppliers to provide due industry information confirming that tantalum, tin, tungsten, gold, cobalt, or other minerals determined to be from CAHRAs are responsibly sourced.
- Collaborate with customers, suppliers, and industry associations such as the Responsible Minerals Initiative (RMI) on long-term solutions to enable responsible sourcing.
- Encourage smelters in our supply chain to undergo a third-party assessment, such as the **Responsible Minerals Assurance Process (RMAP)**.
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.

## Definitions –

- **Dodd-Frank Section 1502** – In 2012, the U.S. Securities and Exchange Commission (SEC) adopted rules mandated by the conflict minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These rules require publicly traded companies to report annually on the source and chain of custody of conflict minerals in products manufactured by the company.
- **Conflict-Affected and High-Risk Areas (CAHRAs)** - Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.
- **OECD** - Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, and related Supplements on Tin, Tantalum and Tungsten and on Gold.
- **Responsible Minerals Assurance Process (RMAP)** - The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP) uses an independent third-party audit of smelter management systems and sourcing practices to validate conformance with current global standards. The audit employs a risk-based approach to validate smelters company-level management processes for responsible mineral procurement.

## Summary of Commitment –

- We fully understands the severity and importance of the requirement of conflict minerals is committed to adhere overall corporate social responsibilities and supply chain initiatives.

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