



Conflict Minerals Policy Statement

Introduction

As many of our suppliers and customers have acknowledged publicly, the Dodd-Frank Act¹ created a new expectation for product manufacturers, which may be far removed from the source of the raw minerals in their products.

Aaran 1 is committed to acting in a socially and environmentally responsible manner, to complying with the law, to meeting its customer commitments, and to supporting its customers' businesses.

This document sets forth the policy of Aaran 1 regarding Conflict Minerals.

Overview

As a responsible company, Aaran 1 supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

Aaran 1 will avoid the use of tin, tantalum, tungsten, or gold from the conflicts mines in the Democratic Republic of the Congo (DRC)

Aaran 1 involved in manufacture of precision machined components for aerospace, medical & general engineering sector, Aaran 1 is invariably many levels away from the beginning of the supply chain for the products it distributes.

This Policy shows Aaran 1's commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals.



OUR COMMITMENT:

1. Support the aims and objectives of the Dodd-Frank Act concerning Conflict Minerals sourcing by working to educate the manufacturers of the products we distribute about Conflict Minerals.
2. Help our suppliers understand the due diligence steps they can take to investigate the source of any Conflict Minerals in the products they sell to Aaran 1.
3. Not continue to source from a supplier any product that contains Conflict Minerals if Aaran 1 determines the product is not DRC Conflict Free and the supplier fails to implement reasonable steps to transition to DRC Conflict Free sources.

Commitment to Responsible Sourcing

Aaran 1 supports the humanitarian goals of the Dodd-Frank Act and encourages the manufacturers of the products distributed by Aaran 1 to adopt that same policy for their businesses.

As a manufacturer, Aaran 1 does not directly purchase any raw Conflict Minerals from any source and is many levels removed from the mines, smelters, and refiners that produce the metals used in the products manufactured by Aaran 1's suppliers.

The supply chain for Conflict Minerals is complex and lacks an established structure for product manufacturers to trace the minerals in the finished goods distributed by Aaran 1 back to their source.

Aaran 1 is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals contained in the products they manufacture and sell to Aaran 1.

Supplier Code

Aaran 1 has the following expectations of its suppliers:

- Suppliers should not include in any products sold to Aaran 1 any Conflict Minerals that are not DRC Conflict Free.
- Suppliers should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to Aaran 1; and
- Aaran 1's suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free.



In doing so, suppliers will be expected to:

- implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same;
- put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable.
- use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free and require their direct and indirect suppliers to do the same.
- advise Aaran 1 of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to Aaran 1 are not DRC Conflict Free.
- maintain reviewable business records supporting the source of Conflict Minerals; and
- from time to time, at Aaran 1's request, provide Aaran 1 with information concerning the origin of Conflict Minerals included in products sold to Aaran 1, which Aaran 1 shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chains.

Consequences of Supplier Non-Compliance

Aaran 1 evaluates its relationships with its suppliers on an ongoing basis.

Aaran 1 reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

Aaran 1 reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to Aaran 1.

Suppliers who do not reasonably comply with this Policy shall be reviewed by Aaran 1's supply chain organization for future business.

In the event Aaran 1 determines that a supplier's efforts to comply with this Policy have been deficient [and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Aaran 1 reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier. Nothing in this Policy is intended to in any way grant any additional rights or expectations to a Aaran 1 supplier or in any way modify or otherwise limit in any way any of Aaran 1's contractual or legal rights.



Grievance Mechanism and Reporting

Our employees, suppliers and other parties can report concerns and alleged violations of this Policy as follows:

(i) **Write us at Aaran 1:**

Unit 1: Plot No. 18/B/3, Survey No. 148, Automotive park, kallakal village, toopran mandal, Medak district – 502336, Hyderabad, India

Unit 2: Survey No. 25/3, Gundlapochampally Village Road, Medchal Mandal, Gundlapochampally – 500014, Hyderabad, India

(ii) **Email us at:** info@aaraneengineering.com

Reports can be made anonymously and will be fully kept confidential practicable and allowed by law.

We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

Our suppliers are encouraged to contact info@aaraneengineering.com if they wish to seek guidance on the application of this Policy.

Conclusion

Aaran 1 fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.

Policy Prepared By: Naveen Kumar M S

Policy Approved By: Gavin Price

Title: MR/QA

Title: Managing Director

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SI No.	Revision Number	Reason for revision	Revision date
1	00	New revision	01-01-2027
2	01	New address added, Policy made in-line with Conflict mineral SOP (W-PUR-010)	15-07-2025