

CONFLICT MINERAL POLICY

FLAMMER'S AIM OF THE REGULATIONS OF CONFLICT MINERALS



FLAMMER



1ST APRIL 2024

DOC. NO. FTPL/HRD/P/13

FLAMMER TECHNOLOGIES PRIVATE LIMITED



1 Objective:

Flammer supports 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. As a result of the violence and violations, the 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". Conflict minerals refer to tin, tantalum, tungsten and gold (referred to as "3TG"), regardless of where they are sourced, processed or sold.

These rules apply to manufacturers who file periodic reports with the SEC and who manufacture or contract to manufacture products containing conflict minerals that are necessary to the functionality or production of those products. These manufacturers are required to make inquiries as to the origin of these conflict minerals and file a report with the SEC to describe and disclose the results of their inquiries. The intent of this new requirement is to further the humanitarian goal of ending violent conflict in the DRC and the surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

2 Policy:

- **Flammer** shall not use Conflict Minerals originating from the Covered Countries in our products. All CAE employees should strive to achieve this result.
- **Flammer** will determine whether there are any Conflict Minerals that are necessary to the functionality or production of a product manufactured or contracted to be manufactured by us.
- **Flammer** will not specify or negotiate contractual terms with a manufacturer or other sub-component supplier so as to exercise a degree of influence over the manufacturing of the product to dictate the use of Conflict Minerals unless their use represents a special technique or requirement as deemed necessary by Engineering. Engineering must notify GSS each time it makes such a determination so that GSS is able to ensure the procurement then follows this CAE policy. In such special cases **Flammer** GSS will ensure these Conflict Minerals are "conflict free" meaning they are proven by our suppliers to have an origin outside the Covered Countries.
- **Flammer** must ensure our manufacturing limits the use of Conflict Minerals to applications where no substitute exists to achieve the following:
 1. does not intentionally include a Conflict Mineral in the product's production process, other than if it is included in a tool, machine or equipment used to produce the product (such as computers, power lines, drill machines & bits, soldering irons, welding electrodes, and hand tools);
 2. does not include a Conflict Mineral in the product; and



3. does not necessitate the use of a Conflict Mineral to produce the product

3 Our Commitment:

- To support the aims and objectives of the SEC rules and regulations related to the supply of conflict minerals.
- To ensure that any 3TG metal are sourced from mines & smelters outside the Conflict region either directly or indirectly
- To ensure compliance with these requirements and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that the specified 3TG metals are only being sourced from Mines and smelters outside the Conflict Region
- To ensure that any grievance from a supplier or other stakeholder regarding our approach to conflict minerals is addressed via our internal Program (the programs are available in our Supplier Code of Conduct)

In support of this policy **Flammer** will:

- Exercise due diligence with relevant suppliers.
- DRC linked suppliers to be blacklisted
- Ensure suppliers are giving declaration of country of origin during each supply
- Collaborate with our suppliers and others in industry-wide solutions to ensure specified 3TG metals are only being sourced from Mines and smelters outside the Conflict Region
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.

s/d

Director

Flammer Technologies Pvt. Ltd.

Director

Flammer Technologies Pvt. Ltd.

Director