



***RESTRICTED
SUBSTANCES AND
RESPONSIBLE SOURCING
POLICY***

Chandigarh, India

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1. Purpose

At Sark Group, we are committed to promoting environmental sustainability and ensuring that our products comply with the **Restriction of Hazardous Substances (RoHS)** Directive and other global environmental regulations. This policy outlines our commitment to responsible sourcing, conflict-free material procurement, and strict adherence to hazardous substance limitations in all raw materials and components used in our manufacturing processes.

2. Scope

This policy applies to all employees, suppliers, contractors, and business partners involved in the procurement, production, and handling of raw materials and components used by Sark Group.

3. RoHS Compliance and Restricted Substances

Sark Group strictly ensures that all materials used in our products comply with the RoHS Directive and other applicable regulations. The following hazardous substances are restricted to the specified maximum allowable limits:

- **Lead (Pb):** < 1000 ppm
- **Mercury (Hg):** < 1000 ppm
- **Cadmium (Cd):** < 100 ppm
- **Hexavalent Chromium (Cr-VI):** < 1000 ppm
- **Polybrominated Biphenyls (PBB):** < 1000 ppm
- **Polybrominated Diphenyl Ethers (PBDE):** < 1000 ppm
- **Bis (2-Ethylhexyl) Phthalate (DEHP):** < 1000 ppm
- **Benzyl Butyl Phthalate (BBP):** < 1000 ppm
- **Dibutyl Phthalate (DBP):** < 1000 ppm
- **Di-isobutyl Phthalate (DIBP):** < 1000 ppm

4. Responsible Sourcing and Conflict-Free Materials

- **Ethical Procurement:** Sark Group is committed to responsible purchasing practices and strictly prohibits the use of conflict minerals, including tantalum, tin, tungsten, and gold, from regions associated with human rights violations.
- **Supplier Requirements:** All suppliers must provide valid RoHS declarations, certificates of conformity, and material composition reports to verify compliance.
- **Traceability:** We maintain detailed records of supplier certifications, test reports, and material declarations to ensure traceability and transparency in our supply chain.

5. Quality Control and Compliance Verification

- **Regular Testing:** Sark Group conducts periodic **third-party lab testing** and internal audits to verify that all materials and components meet RoHS compliance standards.
- **Non-Conformance Management:** In the event of non-compliance, the affected materials will be immediately quarantined, and suppliers will be required to implement corrective actions.
- **Documentation and Reporting:** All compliance-related documentation will be systematically recorded and made available for internal and external audits.

6. Employee Training and Awareness

- **Training Programs:** Employees involved in procurement, quality control, and manufacturing processes will receive regular training on RoHS requirements and responsible sourcing practices.
- **Awareness Initiatives:** Internal awareness campaigns will be conducted to reinforce the importance of adhering to RoHS and conflict-free sourcing standards.

7. Continuous Improvement and Audits

- Sark Group will conduct **routine audits** to monitor compliance with this policy and identify areas for improvement.
- We are committed to continuously updating our practices in line with evolving regulatory requirements and industry best practices.

8. Review and Revision

This policy will be reviewed periodically to ensure its ongoing relevance and effectiveness. Necessary revisions will be made to reflect changes in regulations, industry standards, or internal business practices.