MANUFACTURERS & EXPORTS OF :
STAINLESS STEEL, NICKEL ALLOY,
TITANIUM, SUPER ALLOY, COBALT ALLOY
& NON-FERROUS METALS & ALLOYS

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Roopam Steel
"No Substitute for Trust"

IEC : 0311048404
GSTIN : 27AAQPS3473D1ZC

Responsible Minerals Sourcing Policy

Roopam Steel is committed to the ethical sourcing of minerals used in our products. We recognize the importance of preventing the use of minerals that contribute to human rights abuses or the funding of armed conflicts, particularly in the Democratic Republic of the Congo (DRC) and its adjoining countries.

This policy applies to all 3TG minerals (Tantalum, Tin, Tungsten, and Gold) and other relevant materials (such as Cobalt or specialized alloys including Inconel and Super Duplex) supplied to Roopam Steel.

Roopam Steel commits to:

- **Due Diligence:** Conducting reasonable country-of-origin inquiries (RCOI) within our supply chain in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.*
- **Supplier Responsibility:** Requiring our primary mills and master distributors to provide valid Conflict Minerals Reporting Templates (CMRT) and/or Extended Minerals Reporting Templates (EMRT).
- **Conflict-Free Sourcing:** Expecting our direct suppliers to source materials from smelters and refiners that have been validated as "Conformant" by an independent third-party audit program, such as the Responsible Minerals Assurance Process (RMAP).

We expect our suppliers to:

- Establish their own responsible sourcing policies.
- Exercise due diligence on the source and chain of custody of minerals.
- Identify the smelters and refiners in their supply chain and ensure they are RMAP-conformant.
- Provide timely and accurate documentation upon request.

Roopam Steel reviews supplier submissions against our internal expectations. If we identify a risk that a supplier is sourcing from non-conformant smelters or high-risk areas, we will engage in corrective action management. Continued non-compliance or failure to address identified risks may result in the termination of the business relationship.

Authorized by:
Management, Roopam Steel
Last Reviewed: April 2026