

## CONFLICT OF MINERALS POLICY

Sigma Electric Manufacturing Corporation Pvt. Ltd . and its Associate Companies, (hereinafter referred to as "Sigma" ) is required to abide by the disclosure requirements under the Dodd-Frank Act , Section 1502 relating to "Conflict Minerals".

"Conflict Minerals" refers to certain minerals and their derivatives, some of which are mined in the Democratic Republic of the Congo ("DRC") and in the adjoining countries ("DRC Region") where revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting in serious human rights and environmental abuses. In July 2010, the United States Congress passed the Dodd-Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. publicly traded companies and their suppliers to disclose their use and sources of Conflict Minerals.

The Act requires SEC-regulated manufacturing to report on whether their products contain metals derived from minerals that originate in the Democratic Republic of Congo ("DRC Region") or any adjoining countries. These "conflict minerals" include columbite-tantalite (coltan, niobium and tantalum), cassiterite (tin), gold and wolframite (tungsten), their derivatives and other metals that may be designated at a later date.

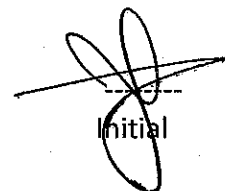
Sigma will make reasonable efforts to ascertain "country of origin" enquiries and due diligence to determine whether "conflict minerals" are used with its suppliers and supply chain.

Sigma fully supports efforts to eliminate the use of Conflict Minerals from improper sources that could support human rights abuses in the DRC Region, to this extent Sigma will routinely make reasonable efforts to obtain information from its metal suppliers concerning the origin of the metals that are used in the manufacture of Sigma's products

Whilst it is expressly known that Sigma does not directly source Conflict Minerals from mines or smelters but uses refined metals in the manufacture of some of its products. Therefore, it relies on the information provided by its suppliers regarding their sourcing of metals.

It therefore becomes the responsibility of Sigma's suppliers and Sigma expects its suppliers to source materials from socially responsible suppliers and that all of its suppliers and their supply chains will comply with the Dodd-Frank Act requirements and provide all necessary declarations and supporting information.

Suppliers must pass these requirements through to their supply chain if they do not source directly from mines or smelters and determine the source of the Conflict Minerals used in the product/metal supplied to Sigma.

A handwritten signature in black ink, consisting of several loops and a horizontal line, is written over the word 'Initial'.

Initial



Sigma will assess future business with suppliers who are not cooperative with the conflict-free sourcing initiative and not compliant with this Policy.

Sigma will continue to regularly perform due diligence and survey its suppliers to verify compliance with this Policy. Sigma is committed to ethical practices and compliance with applicable laws and regulations wherever it does business.

A handwritten signature in black ink, appearing to read 'Viren Joshi', is written over a horizontal line.

Viren Joshi  
Chief Executive Officer and President

A small, handwritten mark or signature in the bottom left corner of the page.