



RESPONSIBLE MINERALS POLICY

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PURPOSE

Grupo Antolin is committed to respecting and complying with the principles of Human Rights outlined by the United Nation Convention on the Rights of the Child (UNCRC) and the International Labour Organization’s (ILO’s) eight core conventions. We continually review our approach to ethical and sustainable supply chain management. Grupo Antolin strives to protect human rights and help the environment in conflict-affected regions by establishing a responsible supply chain management system. As part of this commitment, we only source products and services from companies that share our values concerning working conditions, human rights, business ethics and environmental responsibility.

Grupo Antolin considers environmental degradation and human rights violations in conflict areas as serious ethical issues (Conflict Affected High Risk Areas - from now on CAHRAs - , including the Democratic Republic of the Congo). This policy aims to identify and eliminate risks of adverse impacts, which may be associated with extracting, trading, handling, and exporting minerals from CAHRAs. Minerals also refer to “Conflict Minerals” such as Gold (Au), Tantalum (Ta), Tin (Sn) and Tungsten (W) (hereafter 3TGs) and extended minerals as of now Cobalt (Co) and Mica. In addition, we will also manage and monitor inclusion of any new mineral apart from above stated that has raised concerns regarding human rights violations or environmental destruction.

COMMITMENT

We are committed to taking necessary steps to comply with the rule and have implemented a global process to meet our obligations and customer expectations. We commit to apply this policy for the responsible sourcing of minerals from CAHRAs, from the point of extraction until end user, by means of conflict-sensitive sourcing practices and by raising supplier risk awareness.

To consolidate its Conflict free System, Grupo Antolin implemented a due diligence process for conflict minerals in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs. Additionally, we encourage suppliers to switch to smelters certified by the Responsible Minerals Initiative (RMI) as conformant and require uncertified smelters in our supply chain to undergo Responsible Minerals Assurance Process (RMAP) and become compliant with RMI.

This Policy shows Grupo Antolin’s commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals. Grupo Antolin will proactively improve this policy in order to comply with the Organization for Economic Cooperation and Development’s Guidance for Responsible Supply Chains of Minerals from Conflict Areas (from now on OECD Guidance), Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act as well as European Union Regulation on Conflict Minerals.

APPROVED – CORPORATE PURCHASING DIRECTOR	
DATE : 06-05-2022	 SIGN : Jos Kuppens



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Grupo Antolin is committed:

- To review, identify, reduce, and eliminate the use of conflict minerals in our products from smelters that are not actively complying or following a corrective action plan.
- To engage our suppliers to develop business practices in accordance to internal procedures that guarantee that any conflict minerals contained in our products originate from conflict free sources.
- To encourage our suppliers to commit to using conflict free sources and to implement the OCDE guidance.
- To fulfill our reporting obligations and respond to customer inquiries.
- To comply with any applicable requirements under the conflict minerals laws and implement internal required process to meet obligations under legislation.

EXPECTATIONS

Grupo Antolin suppliers will have to complete and provide the Conflict Minerals Reporting Template (CMRT) for 3TGs and Extended Minerals Reporting Template (EMRT) for Cobalt and Mica annually. These reports must be filed once per year, before September 1st. Suppliers are also encouraged to support industry efforts to enhance traceability and responsible practices in supply chains. In the event that Grupo Antolin determines a supplier has failed to develop and implement reasonable steps to comply with this policy, Grupo Antolin reserves the right to take appropriate action, which may include discontinuing the business relationship with the supplier.

IMPROVEMENT

Grupo Antolin's vision is to ensure that only conflict-free materials and components are used in its product portfolio and fully understands the importance of this issue to its customers and is committed to supply chain initiatives, overall corporate social responsibility, and sustainability efforts that work towards a Conflict Free supply chain. We encourage all our suppliers to likewise support these efforts. For this, we constantly track our supply chain to ensure transparency, which enables us and our stakeholders to carry out further action and improvement.

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