

POLICY OF THE CIRCUTOR GROUP MULTI-SITE ORGANIZATION ABOUT CONFLICT MINERALS

1. PURPOSE

Establish the necessary framework through which comply section 1502 of the Dodd Frank Wall Street reform and Consumer Protection Act pertaining to "Conflict Minerals". (Tin, tantalum, tungsten, and gold)

"Conflict Minerals" are mined in the eastern province of the Democratic Republic of the Congo and in the adjoining countries (DRC Region), where revenues generated by their sale may be directly or indirectly financing armed groups.

2. CULTURE AND VALUES OF THE ORGANIZATION

- Proximity to the customers and complicity with provider
- Persons as value
- Work in team
- Audacity with integrity and transparency
- Internationalization
- Austerity
- Reinvestment of profits in innovation and technology
- Create future

3. SCOPE

This policy applies to the enterprises of the CIRCUTOR Group Multi-site organization, affiliates and units worldwide.

4. DECLARATION

It is our commitment, in accordance with our culture and values, to avoid "Conflict minerals" purchase of the DRC Region that could finance or benefit armed groups in the Democratic Republic of the Congo or any neighboring country.

- CIRCUTOR Group operates in socially responsible way, striving to have a supply chain, free of 'Minerals in conflict'; sourcing of products and materials, from non-conflicting sources.
- CIRCUTOR Group promotes the benefits of section 1502 and its intended purpose; working and guiding to providers in the provision of information, to increase the transparency of the supply chain through the world, the Democratic Republic of the Congo and the surrounding region.
- CIRCUTOR Group supports its suppliers in the establishment of necessary actions to identify the source of the "minerals in conflict" contained in their products; and that those sources do not support conflict or violations of human rights.

To date, the SEC (Securities and Exchange Commission) has not published any positive guidance that gold salts are exempt, and as such, it is expected that suppliers establish the origin of gold salts used in galvanic baths applied to our products.

- CIRCUTOR Group implements procedures to ensure that the "conflict minerals" are only obtained from mines and foundries outside the Region of DRC or mines and smelters that have been certified by an independent third party as "conflict-free".

Viladecavalls, february 01, 2016

Ferran Gil
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