

**POLICY OF THE CIRCUTOR GROUP MULTI-SITE ORGANIZATION
ABOUT CONFLICT MINERALS
CIRCUTOR, INTERCAP, SM DEZAC y ZURC**

1. DECLARATION

Our commitment is to avoid buying any "conflict minerals" from the DRC region that may fund or benefit armed groups in the Democratic Republic of Congo or neighbouring countries, establishing the reference framework that is necessary for compliance with section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, passed by the US in 2010, in relation to the trade of "conflict minerals" and the commitment to comply with Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

2. POLICY

1. 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.
2. Circutor Group believes in providing information on its suppliers, with a view to increasing supply chain transparency in the Democratic Republic of Congo, the surrounding region and around the world.
3. 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.
4. 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, 3 May 2018



Fernando Gil
General Manager