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DESARROLLO

1. Purpose

The purpose of this Policy for Responsible Sourcing of Raw Materials for METAL GROUP is to ensure that all raw materials used are from legal sources and to guarantee that our products do not incorporate minerals from conflict zones.

2. Scope of application

This Policy is mandatory and is applicable globally and directly to all the companies that make up the METAL GROUP - regardless of their geographical location - and is binding on all their personnel, regardless of the position and function they hold.

Compliance with this Policy is also obligatory for individuals and/or legal entities related to the METAL GROUP, insofar as applicable, who, where applicable, must undertake in writing to comply with it.

In accordance with the Policy, the METAL GROUP may develop procedures and instructions to implement and comply with the obligations assumed, as well as to adapt it to the various local legislations applicable to the Group.

3. Content of the Policy

3.1. General principles

The responsible sourcing of raw materials is one of METAL GROUP's commitments, which is why through this policy we are committed to continuously improving the level of sustainable sourcing, complying with credible requirements and avoiding sourcing from unknown or unsustainable sources.

Furthermore, the METAL GROUP is committed to sourcing in a socially responsible manner and avoids the deliberate use of goods, services or raw materials such as tin, tungsten, tantalum or gold ("3TG" or "conflict minerals") that support or finance inhumane treatment, including human trafficking, slavery, forced labor, child labor, torture and war crimes.

3.2. Concept of Responsible Sourcing of Raw Materials

For the purposes of this policy, responsible sourcing of raw materials means ensuring that the supply of all raw materials used comes from legal sources, which is part of the METAL GROUP's commitment to sustainable development.

3.3. Basic principles of action

This METAL GROUP policy is based on the following principles for relations with/with both indirect and direct suppliers:

- ✓ Our partners and employees must respect human rights without diminishing the state's obligation to protect them. These rights include the protection of child and youth labor, as well as non-discrimination based on gender, ethnicity, race, age, etc. And to establish a specific policy for cases of harassment.
- ✓ No one should be forced to work against their will and workers should be paid a fair wage according to the laws in force at any given time.
- ✓ All persons should be free to associate freely; to belong to trade unions and to participate in negotiations with the company.
- ✓ Working hours should be regulated in accordance with the law so that workers can reconcile work and private life.
- ✓ Integrity is METAL GROUP's identity and reputation, so our supplier must act with integrity in everything they do to avoid corruption, extortion and bribery.
- ✓ All suppliers must avoid engaging in activities that conflict or may conflict with the best interests of METAL GROUP.
- ✓ Suppliers shall apply the utmost caution when safeguarding information and personal data with the aim of guaranteeing its confidentiality and integrity, implementing the necessary technical and organizational measures with regard to the custody, storage and conservation of data and with the aim of preventing its alteration, loss, unauthorized processing or access, all in accordance with current legislation on intellectual property, trade secrets and the protection of personal information.
- ✓ All suppliers must at all times comply with applicable international, national or local regulations regarding financial controls, export controls, fair competition and anti-trust and counterfeit parts.
- ✓ Develop Quality in all activities and make it a key factor in the organization.
- ✓ To consider the Health and Safety of the worker as a priority condition in the company's activity.
- ✓ All suppliers should use energy efficiently and from renewable sources as far as possible.
- ✓ All suppliers must implement a programme to reduce and control water consumption and water quality.
- ✓ All suppliers must quantify and reduce air and greenhouse gas emissions.
- ✓ All our partners must implement a waste management programme to encourage reuse, composting and recycling.
- ✓ No supplier shall use chemicals or pesticides that have been banned or raw materials of dubious or restricted origin.
- ✓ Establish a system of internal and external communication and reporting that allows for the incorporation of suggestions and best practices through consultation processes.
- ✓ **No supplier shall use or supply minerals from conflict zones.**
- ✓ **METAL GROUP suppliers are expected to adopt a position statement or policy regarding responsible sourcing that is consistent with this policy statement, implement management systems to support compliance with their position statement or policy, educate their supply base regarding conflict minerals and require their suppliers to adopt the same measures.**

By applying these principles to all our suppliers and subcontractors we hope to support the creation of environments where all people are treated with fairness, dignity and respect, where the natural environment is protected and restored through business operations and where everyone complies with all applicable legal and moral laws and regulations.

4. Communication of the Policy

This Policy will be available on the Web and App to all employees and will be made available to all stakeholders of the Company. The Policy shall also be the subject of appropriate communication, training and awareness-raising activities to ensure that it is properly understood and put into practice.

5. Implementation of the Policy

METAL GROUP undertakes to allocate specific resources to ensure the effective implementation of the Policy.

6. Updating and reviewing the Policy

The Policy will be reviewed and updated when appropriate, in order to adapt it to changes that may arise in the business model or in the context in which the Group operates, guaranteeing at all times its effective implementation.



Antonio Román Molina

In Abadiano, 30th of March 2022

CUADRO DE REVISIONES

DETALLE DE REVISION	REVISION	FECHA	REVISADO	APROBADO
Edición inicial	00		SISTEMAS	C.E.O.