

## SUPPLY CHAIN POLICY

COLORES CERÁMICOS DE TORTOSA, S.A. is a company dedicated to the design, manufacture and marketing of dyes, decorative colours and glazes for the ceramic and glass industry. It is part of the Torrecid Group, a globalised multinational business group dedicated to supplying products, services, solutions and future trends to the ceramics and glass sectors.

Various raw materials are used in the manufacture of our products, which may include certain metals and/or minerals whose supply chain is subject to due diligence obligations under the Responsible Minerals Regulation (EU) 2017/821<sup>1</sup>.

We recognise the risks that may be associated with the extraction, trade, handling and export of minerals from conflict and high-risk areas and our responsibility to respect human rights and not contribute to conflict.

We are committed to refraining from any action that contributes to the financing of conflict and are committed to complying with relevant UN sanctioning resolutions or, failing that, with national legislation implementing such resolutions.

For this reason, we are committed to adopting, disseminating and incorporating into contracts and/or agreements with suppliers the following policy on the responsible sourcing of minerals from conflict-affected and high-risk areas. To ensure compliance with this policy, the following principles apply to all purchases of raw materials that may be sourced from conflict-affected and high-risk areas:

### **1. With regard to serious abuses related to the extraction, transport or trade of minerals:**

During the course of our sourcing activities from, or operating in, conflict and high-risk areas, we will not tolerate or benefit from, contribute to, assist or facilitate in any way the commission by third parties of the following acts:

- i. Any form of torture or cruel, inhuman or degrading treatment
- ii. Any form of forced or compulsory labor, this means, any work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily;

---

<sup>1</sup> 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 in conflict-affected and high-risk areas.

- iii. The worst forms of child labour;
- iv. Other gross humans rights abuses and violations, such as widespread sexual violence;
- v. War crimes or other serious violations of International humanitarian law, crimes against humanity or genocide.

**2. With regard to the management of the risks of serious abuses:**

Any interaction with suppliers shall be immediately suspended and/or stopped where a reasonable risk has been identified that they are sourcing from, or are linked to, any actor committing the serious abuses defined in paragraph 1.

**3. Regarding support, direct or indirect, to non-state armed groups:**

No support, direct or indirect, to non-state armed groups through the extraction, transport, trade, handling or export of minerals will be tolerated.

“Direct or indirect support” to non-state armed groups includes, but is not limited to, obtaining minerals or providing any other kind of logistical assistance/equipment to non-state armed groups or their affiliates which:

- i. Illegally control mines, transport routes, mineral/metal trading points and upstream actors in the supply chain.
- ii. Illegally obtain taxes, extort money or minerals at mine entrances, transport routes or at points where minerals and metals are traded.
- iii. Illegally collecting taxes, extorting or bribing intermediaries, exporting companies or International traders.

**4. With regard to risk management of direct or indirect support to non-state armed groups:**

We will immediately suspend or discontinue our engagements with suppliers where we identify a reasonable risk that they are sourcing from, or are linked to, any third party that is committing serious abuses, or is directly or indirectly supporting non-state armed groups.

## 5. With regard to public or private security forces:

We agree to eliminate direct or indirect support to public or private security forces that illegally control mines, transport routes and upstream actors, illegally tax or extort for money or minerals at the point of access to mines, along transport routes or where minerals/metals are traded, or illegally tax or extort middlemen, export companies or International traders.

We recognize that the role of security forces, whether public or private, in mining areas and on transport routes should focus solely on preserving the rule of law. This implies safeguarding human rights, ensuring the safety of miners, their equipment and structures, as well as protecting mining sites or transport routes.

When we or any other company in our supply chain engages the services of public or private security forces, we commit to, or will require, interacting with such security forces in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps to adopt screening policies to ensure that individuals or units of security forces known to have been responsible for serious human rights violations are not engaged.

When appropriate, we will support efforts and take the following actions:

- Inspection policies to ensure that individuals or units of the security forces that have manifestly committed gross human rights violations are not recruited.
- Collaborate with public entities (state and local authorities), International organisations or civil society (i) contribute to find viable solutions on how to improve the transparency, proportionality of payments made to public security forces and, (ii) reduce the exposure of vulnerable groups (in particular artisanal and small-scale miners) to the negative effects of security forces, public or private, in those mining areas.

## 6. With regard to risk management of public or private security forces:

We will promptly design, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or reduce the risk of direct or indirect support to public or private security forces, where we identify a reasonable risk. In such cases, we will suspend or discontinue our

engagements with suppliers after several unsuccessful risk reduction attempts within six months of adopting the risk management plan.

**7. With regard to corruption, bribery and misrepresentation in the declaration of the origin of minerals:**

We will not offer, promise, give or solicit bribes of any kind, and we will reject any offer of bribes made to us to conceal or disguise the origin of mineral sor to misrepresent the taxes, duties and fees paid to governments for the extraction, trade, handling, transport and export of minerals.

**8. With regard to money laundering:**

We will take action or support efforts to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising from or related to the extraction, trade, handling, transport or export of minerals, as a result of ilegal taxation or extortion at mine access points, along transport routes or where minerals are traded by upstream suppliers.

**9. With regards to the payment of taxes, fees and charges to governments:**

We will ensure that all taxes, fees and charges relating to the extraction, trade and export of minerals from conflict and high-risk areas are paid to governments.

**10. With regard to risk management of bribes, fraudulent declaration of the origin of minerals, money laundering, payment of taxes, fees and royalties to governments:**

Given the company's specific position in the supply chain, we are committed to engage with suppliers, public entities (state and local authorities), International organisations, civil society and affected thir parties, as appropriate, to improve and follow up on measures taken to prevent or mitigate the risks of adverse impacts. We will suspend or terminate our interactions with upstream suppliers after unsuccessful mitigation attempts.



COLORES CERAMICOS DE TORTOSA, S.A. is stongly committed to developing its business in compliance with all aplicable laws and regulations and in accordance with the highest ethical principles. We will continue to work with our suppliers to ensure the observance of due diligence in the supply chain in a manner consistent with the standards set out in the OECD Due Diligence Guidance.

We have established a communication channel that allows any stakeholder to safely, responsibly and anonymously report and complain, without risk of any form of retaliation, about discrepancias relating to the responsible sourcing of minerals in our supply chain.

These are the communication channels we offer to our stakeholders:

- E-mail: [minerales.responsables@cctgroup.es](mailto:minerales.responsables@cctgroup.es)
- Telephone number: 977 45 40 15



**Rubén Alarcón**  
**Manager**  
**COLORES CERÁMICOS DE TORTOSA, SA**