

FAGOR ELECTRÓNICA POLICY ON CONFLICT MINERALS

1. Purpose

The purpose of this Policy is to establish a framework for action to prevent, identify and mitigate the risks associated with the acquisition of minerals originating from conflict-affected or high-risk areas, including their extraction, trade, handling and export.

As part of Fagor Electrónica, S. Coop.'s commitment to the highest ethical, labour and environmental standards, and although we do not directly purchase minerals from mines or smelters located in such areas, this Policy constitutes a key reference for ensuring the traceability and responsible management of our supply chain from the origin of the material through to the final product.

Fagor Electrónica supports the global industry approach and follows the guidelines of the Responsible Minerals Initiative (RMI), promoting responsible and sustainable sourcing practices.

2. scope of application

This Policy applies to all activities, business lines and employees of Fagor Electrónica, as well as to its suppliers, contractors, business partners and entities throughout the value chain, both in Spain and abroad.

3. Fagor Electrónica's commitments

Fagor Electrónica undertakes the following commitments in the management of purchasing and responsible sourcing:

- **Contractual relationship**

Integrate this Policy into contracts and agreements with suppliers, establishing mandatory compliance clauses and evaluation criteria associated with its application.

- **No financing of conflicts**

Refrain from any action that could contribute directly or indirectly to the financing of armed conflicts, complying with the relevant United Nations resolutions and requiring our suppliers to make the same commitment.

- **Responsible mining**

Require suppliers to comply with the requirements established in Section 1502 of the Dodd-Frank Act (USA) and Regulation (EU) 2017/821, which regulate the responsible import of tin (Sn), tantalum (Ta), tungsten (W) and gold (Au) —known as 3TG minerals—, as well as

other materials considered critical or high-risk by the European Union (Regulation (EU) 2023/1115).

- **Due diligence and management system**

Apply the guidelines of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals through the implementation of a system based on the following stages:

1. 1. Establish strong management systems.
2. 2. Identify and assess risks in the supply chain.
3. 3. Design and implement strategies to respond to identified risks.
4. 4. Carry out independent third-party audits.
5. 5. Report on due diligence results and progress.

- **Conflict minerals reporting**

Request the Conflict Minerals Reporting Template (CMRT) from suppliers annually, in accordance with the RMI model, in order to identify risks and verify whether the smelters and refiners used are certified under the Responsible Minerals Assurance Process (RMAP).

- **Supplier Code of Conduct**

Require suppliers to adhere to the Fagor Electrónica Supplier Code of Conduct, which includes commitments to transparency, ethics, anti-bribery, cooperation in risk mitigation, and collaboration with authorities, organisations and affected third parties.

- **Management of impacts and opportunities**

Assess, manage and mitigate the risks and impacts arising from our operations and supply chain, taking into account the recommendations of international organisations and the principles of the EU Sustainable Corporate Due Diligence Strategy (2024).

- **Awareness and training**

Promote internal training and awareness of responsible sourcing among our employees and strategic partners, fostering a corporate culture based on ethics and sustainability.

- **Transparency**

Communicate the results achieved transparently and regularly to both our customers and stakeholders through reports or the corporate website.

4. Approval, monitoring and review

This Policy has been approved by the Management Board of Fagor Electrónica, S. Coop., which ensures its integration into the company's overall sustainability strategy. The Sustainability and Compliance Committee oversees its implementation and effectiveness, reporting progress to General Management.

The Policy will be reviewed periodically to reflect changes in legislation or stakeholder expectations and is publicly available through Fagor Electrónica's official channels.



Fagor Electrónica, Koop. E.

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*Legal references: Regulation (EU) 2017/821, Regulation (EU) 2023/1115, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. *

Approved by the Management Board of Fagor Electrónica S.Coop.

In Arrasate-Mondragón, 16 May 2025