

CONFLICT MINERALS POLICY

In 2010, the United States Congress passed the Dodd-Frank Act. Section 1502 of this Act requires certain companies to report whether their products contain one or more of the four minerals known as “conflict minerals” (tin, tantalum, tungsten/wolfram and gold, hereinafter 3TG) that are sourced from the Democratic Republic of the Congo (DRC) or any of its neighbouring countries.

This provision responds to concerns that the exploitation and trade of these minerals by armed groups may be helping to finance conflicts in the DRC region and contributing to a severe humanitarian crisis.

Furthermore, Cables de Comunicaciones Zaragoza, S.L. takes into account Regulation (EU) 2017/821 and is guided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, applying it in a manner proportionate to its size and context.

Cables de Comunicaciones Zaragoza, S.L. fully supports these principles and rejects the use of 3TG minerals that directly or indirectly finance or benefit armed groups or are linked to serious human rights abuses, whether they originate in the DRC and neighbouring countries or in any other conflict-affected or high-risk area.

To support this commitment, Cables de Comunicaciones Zaragoza, S.L. has implemented the following due diligence actions in its supply chain:

- Identify and assess the various sources of supply of materials containing tin, tantalum, tungsten and gold (3TG) that may directly or indirectly finance or benefit armed groups or be linked to serious human rights abuses in the DRC, neighbouring countries or any other conflict-affected or high-risk area.
- Ensure transparency of the products we work with by using the Conflict Minerals Reporting Template (CMRT), where required, to collect and provide information on the entire supply chain, including the country of origin of the mineral and the smelters and refiners used. Cables de Comunicaciones Zaragoza, S.L. has set the objective of requesting completion of the CMRT from 100% of suppliers to whom it applies **(Cablescom’s target: 100% of suppliers affected by 3TG minerals submit the required documentation within the established deadlines and, based on the information available, their supplies are not linked to conflict-affected countries or the financing of armed groups).**
- If a supplier fails to provide the required information, is unable to adequately trace the origin of 3TG minerals, or if a risk is identified of financing armed groups or serious human rights violations, Cables de Comunicaciones Zaragoza, S.L. will unilaterally cease to do business with the supplier in question.
- Request our suppliers’ commitment to comply with this Policy by accepting it as part of our General Terms and Conditions of Purchase.

Cables de Comunicaciones Zaragoza, S.L. undertakes to review this Policy periodically, adapting it to any new requirements that may arise, and to communicate it, ensure it is understood and enforce it among all members of the organisation and its suppliers.



Qiang Wang
Chairman of BoD
September 2025
