



<b>CONFLICT MINERALS POLICY</b>	REVISION No. 0
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COMPANY:  GRUPO ANTOLIN	COUNTRY:  ALL
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GRUPO ANTOLIN is committed to respect and comply with the principles of Human Rights outlined by the United Nation Convention on the Rights of the Child (UNCRC) and the International Labour Organization’s (ILO’s) eight core conventions. We strive to ensure that neither the Company nor its Employees abuse any of these aforementioned principles. As part of this commitment, we only source products and services from companies that share our values about working conditions, human rights, business ethics and environmental responsibility.

As a result of our commitment to the responsible sourcing of minerals/materials used in our products and recognizing that we have the responsibility to respect human rights and not to contribute to conflict. This Policy aims to identify and eliminate risks of adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. "Conflict minerals" refers to Gold (Au), Tantalum (Ta), Tin (Sn) and Tungsten (W), the 3TG’s, without regard to the location or origin of the minerals or derivative metals.

We commit to apply this Policy on the responsible sourcing of minerals from conflict-affected and high-risk areas, as representing conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user.

GRUPO ANTOLIN shall be proactively improved this Policy in order to comply with Organization for Economic Cooperation and Development’s Guidance for Responsible Supply Chains of Minerals from Conflict Areas (from now on OECD’s Guidance), Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act as well as upcoming regulation such as European Union Regulation on Conflict Minerals.

Our target is to be “Conflict free” by the year 2020 and to comply with the OECD’s Guidance.

GRUPO ANTOLIN is committed:

- To review, identify, reduce and eliminate the use of conflict minerals in our products from smelters which are not actively complying or following a corrective action plan.
- To engage our Suppliers to develop business practices in accordance to internal procedures that guarantee that any conflict minerals contained in our products are originated from conflict free sources.
- To encourage our Suppliers to commit to using conflict free sources, and to implement the OCDE guidance.
- To fulfill our reporting obligations and respond to customers inquires.
- To comply with any applicable requirements under the conflict minerals laws and implement internal required process to meet obligations under legislation.

APPROVED - MANAGEMENT	
DATE: 11-02-19	 SIGNATURE: J. Kuppens



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GRUPO ANTOLIN Suppliers shall have to complete and provide the Conflict Minerals Reporting Template (CMRT) annually. These report must be filed once per year, before September 1<sup>st</sup>.

Supplier's willingness to comply with this initiative shall be a factor in our sourcing decisions. In the event that GRUPO ANTOLIN determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, GRUPO ANTOLIN reserves the right to take appropriate actions, which may include discontinuing the business relationship with the Supplier.

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