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SurTel electrónica, s.L.

CONFLICT MINERALS POLICY STATEMENT OF SURTEL

Background

The Securities and Exchange Commission (SEC) requires disclosing requirements relating to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Dodd-Frank Act and SEC require to companies to disclose which the products manufacture or contract to manufacture contain, or are necessary to produce them, conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries. The term conflict minerals refers to tin, tantalum, tungsten and gold (3TG) and cobalt. Minerals usually present in electronic components and devices.

Purpose

The conflict minerals or their derivatives from conflict-affected and high-risk areas may lead to human rights or related abuses, because they could be used directly or indirectly to finance or benefit armed conflicts and armed groups in the region, quoted previously.

SurTel is a socially responsible company; one of the SurTel responsibilities is respect human rights and not contribute to these types of conflicts and/or armed groups.

SurTel is committed to working with its customers to supply products that meet the Dodd-Frank Act where the supply chain has been verified to be compliant with the CFSI CFSP Supply Chain Partners. SurTel will not purchase products that SurTel knows that contain conflict minerals. SurTel ask its supplier chain to supply material only get minerals from responsible sources.

SurTel Actions:

- Create and communicate our policy about conflict minerals to SurTel suppliers.
- Include clauses about conflict mineral and human rights in quality agreements.
- Determine which products or materials do not comply with this requirement.
- Do not purchase products which contain conflict minerals.
- Inform customers of products that do not comply with this requirement.
- Make efforts toward a conflict-free and to acquire from Conflict Free Smelter.

SurTel Requirements to Supply Chain:

- Create conflict minerals policy.
- Identify all smelters/refiners in its supply chain.
- Determine if the products supplied to SurTel contain conflict materials.
- Notify SurTel of non-compliance this requirement.
- Make efforts toward a conflict-free and to acquire from Conflict Free Smelter.

In La Carolina 26th September 2022

Martín Rey Rodríguez (Quality Manager)