



# DUE DILIGENCE IN THE 3TG MINERAL SUPPLY CHAIN

## ANNUAL REPORT

2024 Financial Year / Published in 2025

Company: ATC COLORES CERÁMICOS (Tax ID No. A12057832)

Corporate Website: <https://atc-colores.com>



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## **1. STATEMENT OF COMMITMENT**

ATC COLORES CERÁMICOS is committed to carrying out a responsible sourcing of minerals in compliance with Regulation (EU) 2017/821, on due diligence obligations in the supply chain of tin, tantalum, tungsten, their ores and gold (3TG), originating from conflict-affected and high-risk areas.

Our sourcing policy is aligned with the OECD Due Diligence Guidance and aims to prevent our supply chain from directly or indirectly contributing to armed conflict or human rights violations.

## **2. RESPONSIBLE SOURCING POLICY**

- We reject any supply of 3TG minerals that may be linked to human rights violations, armed conflict, or corruption.
- We require our suppliers to comply with international standards for traceability and responsible sourcing.
- We promote transparency in our supply chain by publishing this report annually.

## **3. INTERNAL MANAGEMENT SYSTEM**

- The Purchasing and Compliance Directorate is responsible for the application of due diligence.
- We have integrated specific contractual clauses on responsible sourcing into our agreements with suppliers.
- We have an accessible complaints channel for employees, suppliers, and other interested parties.

## **4. RISK IDENTIFICATION AND ASSESSMENT**

During 2024:

- Statements of conformity were requested from all relevant raw material suppliers that could contain 3TG.
- Certificates and lists of smelters/refiners audited by the Responsible Minerals Initiative (RMI) were reviewed.
- No serious risks of sourcing from conflict-affected or high-risk areas were identified.



## 5. RISK MITIGATION STRATEGY

In the event of detecting a risk, we apply a corrective action plan that may include:

- Requesting additional information from the supplier.
- Requiring improvement plans.
- Suspension or termination of the commercial relationship if the risk persists.

No supplier was terminated in 2024 for non-compliance.

## 6. VERIFICATION AND AUDIT

- Our main 3TG suppliers work with smelters certified under internationally recognized programs (RMAP – Responsible Minerals Assurance Process).
- We request, verify, and file each supplier's CMRT and confirm that the identified smelters/refineries are RMAP, as well as the supplier's Assessment Summary Report, if available.
- COLORES CERÁMICOS S.A. maintains an internal due diligence system, supported by external audits of recognized suppliers and smelters, thereby complying with EU regulations and international standards.

## 7. PUBLIC COMMUNICATION

This report is available on our website at <https://atc-colores.com> and will be updated annually.

We keep copies of previous reports for at least 5 years for public consultation.

## 8. FINAL DECLARATION

ATC COLORES CERÁMICOS declares that it has applied a due diligence system in the supply chain of 3TG minerals in line with Regulation (EU) 2017/821 and the recommendations of the OECD.

Signed in Castellón, September 1, 2025

ATC COLORES CERÁMICOS

General Management



# ATC Colores