



## DUE DILIGENCE AND RESPONSIBLE SOURCING POLICY IN THE SUPPLY CHAIN

### 1. GENERAL COMMITMENT

ATC COLORES CERÁMICOS is firmly committed to due diligence in the supply chain of minerals originating from conflict-affected and high-risk areas, in line with:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Annex II).
- Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold.

Our objective is to ensure that our sourcing activities do not directly or indirectly contribute to human rights violations, armed conflicts, corruption, or illicit financial practices.

### 2. SPECIFIC COMMITMENTS

In accordance with the OECD Guidance (Annex II), ATC COLORES CERÁMICOS commits to:

#### 1. Human Rights

Not tolerating human rights violations during our activities.

Suspending relationships with any supplier where there is a reasonable risk of involvement in serious human rights abuses.

#### 2. Armed Conflicts

Not tolerating the provision of support to non-state armed groups.

Suspending business relationships if a reasonable risk of support to non-state armed groups is identified.

#### 3. Security Forces

Implementing risk management plans together with upstream suppliers and other stakeholders to prevent or mitigate risks of undue support to public or private security forces that illegally control mining sites, transport routes, or supply chains.

#### 4. Integrity and Financial Legality

Adopting measures against bribery, corruption, and money laundering.

Ensuring that all taxes, fees, and royalties related to minerals from conflict-affected and high-risk areas are legitimately paid to the relevant governments.



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### **3. MANAGEMENT SYSTEM (ARTICLE 4 OF REGULATION (EU) 2017/821)**

ATC COLORES CERÁMICOS has established a management system that includes:

- A responsible sourcing policy published and communicated to suppliers and the public.
- An internal management structure to oversee the implementation of due diligence.
- Documentation control and supply chain traceability, including contracts and purchase records.
- A grievance and communication mechanism accessible to stakeholders.

### **4. RISK MANAGEMENT (ARTICLE 5 OF REGULATION (EU) 2017/821)**

The company will apply a risk management process that includes:

- Identification and assessment of risks in the supply chain.
- Development and implementation of corrective or mitigation action plans together with suppliers.
- Temporary or definitive suspension of business relationships in case of severe, unmitigable risks.
- Periodic review of risks and mitigation measures.
- Continuous improvement of action plans.

### **5. TRANSPARENCY AND COMMUNICATION**

- We will publish an annual report on our responsible sourcing practices and the results of our risk management.
- We will maintain active communication with stakeholders, fostering continuous improvement and responsible collaboration throughout the supply chain.

### **6. APPROVAL AND COMMITMENT OF THE MANAGEMENT**

This policy has been approved by the Management of ATC COLORES CERÁMICOS, which is committed to its compliance, dissemination, and implementation throughout the organization.

Onda, January 13, 2026

Director of ATC COLORES CERÁMICOS