

## 1.- COMPANY INFORMATION

CRM SYNERGIES, S.L. is located at Calle José Antonio s/n 45183 Las Ventas de Retamosa -Toledo- (CID ESB81400368). CRM SYNERGIES is a manufacturer of soldering products producing tin and tin alloys through the refining and recycling of tin materials.

The Company is certified according to UNE EN ISO 9001 and UNE EN ISO 14001 since 1995. These certifications assure the application of high-quality standards and the respect of the environmental requirements for protection of the environment.

## 2.- SUMMARY OF THE RMAP EVALUATION.

The last third-party audit of the Responsible Minerals Assessment Process, Tin and Tantalum Standard (the "RMAP Standard") was assessed in August 11-12, 2020 by U.L. company. The final report is dated on 20.10.2020.

Audit results can be found in the following LINK.

- [RMI - Tin Conformant Smelters.](#)

## 3.- SUPPLY CHAIN POLICY.

CRM SYNERGIES, S.L. has developed a Supply Chain Policy to avoid the use of minerals coming from conflict zones. This policy is fully aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the supplements for each Conflict Mineral (the "CAHRA-OECD Guidance"). This policy is publicly available on the website [www.crmsynergies.com](http://www.crmsynergies.com) and it has been communicated to our suppliers and stakeholders.

## 4. COMPANY STRUCTURE.

CRM SYNERGIES, S.L. has developed an internal due diligence management system with the following points:

CRM's CEO is responsible for the tin supply channel for the due diligence program and the design and implementation of risk management.

The Company has assigned the Quality Manager, Mrs Esther Cañete, as the program manager in order to coordinate the work of all the relevant departments (including the Purchasing Department, Quality Department, Production Department, Logistics...)involved to respond to any identified red flags and potential risks.

CRM SYNERGIES has provided training to the relevant staff and workers in the due diligence management system. If there is any program update, the Company will provide additional training.

### **Internal control systems**

**CRM SINERGIES, S.L.** has established, and will update, a due diligence management system, to be aligned with the OECD Guidance and RMAP published in 12.01.2017. The Company will communicate the Supply Chain Policy to its suppliers, included in the list of approved suppliers updated in December 2020. In addition, due diligence requirements have been incorporated by contracts and agreements with direct suppliers.

The Company has established a system to gather any RMI complaints through the email address: [reclamaciones@crmsynergies.com](mailto:reclamaciones@crmsynergies.com)

### **Record-keeping system**

**CRM SYNERGIES, S.L.** requires that all records related to the due diligence program are maintained for at least five years, used correctly and stored securely in the Company's database.

## **5. RISKS IDENTIFICATION (ALL SOURCES).**

The company has an internal process to identify supply chain risks.

First, referring to the risks in the company's Supply Chain Policy, the company established a procedure to identify CAHRAs.

The procedure includes the resources used, the criteria for defining a "conflict-affected and high-risk" area, as well as how often our determination is reviewed. The company uses the following criteria and resources to determine CAHRAs.

| Criteria                         | Information Resources  |
|----------------------------------|--|
| Financial and humanitarian risks | <a href="http://www.knowyourcountry.com">www.knowyourcountry.com</a>                                 |
| Human rights risks               | <a href="http://www.controlrisks.com/riskmap2020/maps">www.controlrisks.com/riskmap2020/maps</a> , w |
| Potential risks in the future    | <a href="http://www.cato.org/humanfreedom-index">www.cato.org/humanfreedom-index</a>                 |
| Risk of conflict                 | <a href="http://www.rulac.org/browse/map">www.rulac.org/browse/map</a>                               |

Second, the Company reviews at least once annually the level of risk of tin-related suppliers. If red flags were identified, the Company would engage further with its suppliers to clarify and improve the information if it is needed. During this time, any red flags related to the information collected by suppliers has been identified.

Third, the company collects information about the origin of each material and assures that it is able to understand the origin of the transaction, the transport route, as well as the names and locations of their direct suppliers.

Fourth, all information collected was reviewed by the company against CAHRAs sanctions lists, local laws, and domestic sourcing requirements.

**Risk Assessment (HIGH RISK SOURCING ONLY)**

In the case of material and supply chains, identified as "high risk", the company will collect the information to establish whether the criteria established in the second edition of the OECD Due Diligence Guide for the Responsible Management of Mineral

Supply Chains from Conflict zones and High Risk Zones are met". This includes, if appropriate, the following points:

- Evaluate the context of CAHRAs;
- Clarify the chain of custody;
- Evaluate the activities and relationships of initial suppliers;
- Identify the places and qualitative conditions of sourcing, trade, handling and export of minerals; And
- Realization of field assessments.

#### **6.- RISK MITIGATION (FOR HIGH RISK SUPPLIES ONLY).**

If a supply does not meet the established OECD Due Diligence Guide (2<sup>nd</sup> edition) for responsible management of mineral supply chains from conflict zones and high risk zones, a risk mitigation plan shall be established following the following strategy:

a) The supplier will be informed of the action plan and given a period of six months for its implementation. During this period, the Quality Department will monitor the progress of this plan by keeping the Head of that department informed at all times. During this period the supplier will have the support of the Company for the Implementation of the Plan.

b) If the Action Plan has not been implemented after this period, the supplier shall be notified of the suspension of relationships.

During the period covered by this report, any Action Plan has been necessary for risk mitigation.