# **BOCAR GROUP**



## **CONFLICT MINERALS**

## **GENERAL MANAGEMENT**

# **PURPOSE:**

Establish the position of Bocar according the prohibition of the use of minerals from the Republic of the Congo or adjacent conflict zones.

## SCOPE:

From the policy definition of conflict minerals until their diffusion and application

#### VALIDITY:

As general application in all the manufacturing Bocar units

## **DEFINITIONS:**

Minerals in Conflict: Gold, columbita - tantalita (coltán), casiterita, volframita or its derivatives, (tántalo, estaño y tungsteno), coming from the Democratic Republic of Congo, or in any of the neighboring countries (Angola, Burundi, Republic of Central Africa, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia).

**Securities and Exchange Commission:** The mission of the U.S. Securities and Exchange Commission is to protect investors, maintain fair, orderly, and efficient markets in the United States. Is the authority responsible for receiving the minerals in conflict use report according to the "Dodd Frank Rule" (Dodd – Frank Wall Street Reform and Consumer Protection Act.)

# **RESPONSIBILITY:**

Direct Material Purchasing Manager, Projects Manager, Logistic and Materials Manager, Quality Manager of the Plant, and the Plant Manager: To ensure that the materials from unauthorized sources or that violate the present policy will not been used.

Corporate Communications Department: Disseminate this policy on Bocar's website to publicly publicize the organization's position on the issue of conflict minerals.

# **REALIZATION:**

"Conflict minerals" refer to minerals mined in areas where mining and trade finance violence, exploitation, and human rights violations. This term is mainly used in relation to minerals such as tin, tungsten, tantalum, and gold, which are crucial for the production of various electronics.

Bocar adheres to the industry's efforts to move towards a supply chain free of conflict minerals. Our principal business is the fabrication of injection parts, aluminum die casting and gravity casting for which we don't obtain minerals from the Democratic Republic of Congo or adjacent conflict zones.

When our clients require that our pieces of casting be surface coated or that includes additional components, some of these processes may contain minerals that are subject to the regulation of Minerals in Conflict. In such circumstances, we are working tightly with our suppliers to examine the supply chain of this products and identify processes and components, if there are, that may contain Minerals in Conflict. Our goal is guaranty and make sure that these components didn't come from zones of Conflict Minerals.

Bocar acts in accordance to the "Dodd Frank Rule", which dictates that the companies inform to the "Securities and Exchange Commission (SEC)", if they obtain Conflict Minerals. This law was established due to the concern that the minerals of the conflict zone finance armed groups in the region.

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Bocar comply this law in an effort to reduce the violations with the human rights that are caused in the region due to the armed conflicts.

We know that we are part of a sustainable supply chain and likewise we transmit this policy to our customers and suppliers to make an effort to have an industry more fair and sustainable.

# **AUTHORIZATIONS:**

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RELATED DOCUMENTS	S:
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N/A

ANNEXES:

N/A

# **APPROVALS:**

Document approval		
Sender	Reviewed Department / Site owner	Authorized Process owner
Roberto Abad  Quality System Regional  Coordinator	Thelma Dominguez  Quality System Regional  Coordinator	Rafael Quiroz <b>Quality Director</b>