



CONFLICT MINERALS POLICY

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1. GLOSSARY

For the purposes of this conflict minerals policy (hereinafter, the “**Policy**”):

- (i) “**Board of Directors**” means the Board of Directors of Grupo Gransolar, S.L.;
- (ii) “**Bylaws**” means the bylaws (*estatutos sociales*) of Grupo Gransolar, S.L.;
- (iii) “**Commercial Code**” means the Royal Decree of August 22, 1885, publishing the Commercial Code;
- (iv) “**Conflict Minerals**” means tin, tantalum, tungsten, and gold (3TG), as well as any other mineral that, in accordance with applicable regulations or international standards, is identified as susceptible to financing armed conflicts or human rights abuses;
- (v) “**Corporate Macro Policy**” means the supply chain corporate macro policy of Gransolar Group;
- (vi) “**Due Diligence**” means the ongoing process through which risks associated with the Supply Chain are identified, assessed, prevented, mitigated, and communicated;
- (vii) “**ESG Committee**” means the advisory body of the Board of Directors responsible for managing and overseeing environmental, social and governance (ESG) matters of Gransolar Group, prior to their final approval by or submission to the Board of Directors;
- (viii) “**Governance Department**” means the governance department of Gransolar Group;
- (ix) “**Governance Director Plan**” means the governance director plan of Grupo Gransolar, S.L.;
- (x) “**Gransolar Group**” means the Group whose parent company is Grupo Gransolar, S.L.;
- (xi) “**Group**” means a group of companies within the meaning of Article 42 of the Spanish Commercial Code, i.e., a group of companies which, in accordance with such article, is under the direct or indirect control of a parent company;
- (xii) “**GRS Purchasing Department**” means the purchasing department of the services and solutions area of Gransolar Group;
- (xiii) “**PVH Purchasing Department**” means the purchasing department of the product area of Gransolar Group;
- (xiv) “**SDGs**” means the Sustainable Development Goals established under the 2030 Agenda for Sustainable Development; and
- (xv) “**Supply Chain**” means the set of activities, entities, and processes involved in the extraction, transformation, transport, commercialization, and supply of goods or services to Gransolar Group.

2. INTRODUCTION

Gransolar Group bases its management model on operational excellence, responding to the needs and expectations of its stakeholders, creating value for society and promoting sustainable development in its social, economic and environmental dimensions.

In this context, the corporate governance system of Gransolar Group is structured through a set of internal rules (hereinafter, the **"Internal Regulatory System"**), including corporate policies, which constitute an essential element to (i) ensure compliance with applicable regulations, (ii) establish clear guidelines for the development of activities, and (iii) promote the standardization and efficiency of internal processes.

The Internal Regulatory System is inspired by the highest international standards in the fields of sustainability, business ethics and corporate governance. In particular (and by way of example only), as a participating member of the United Nations Global Compact, Gransolar Group promotes the SDGs and actively assumes its responsibility as an agent of change in matters of sustainability.

Likewise, Gransolar Group maintains a firm commitment to:

- (i) the respect for and protection of Human Rights, adopting a preventive and Due Diligence approach in relation to potential violations in the territories in which it operates (this commitment extends to all stakeholders of Gransolar Group, who are provided with access to a whistleblowing channel); and
- (ii) the promotion of the highest standards of transparency, business ethics and accountability, applying a zero-tolerance policy towards any conduct contrary to the provisions of the Internal Regulatory System and extending these principles throughout its entire value chain.

In line with the above, Gransolar Group promotes an organizational culture based on regulatory anticipation, encouraging the early adoption of new regulations, as well as the incorporation of guidelines, standards and recommendations issued by leading international organizations.

3. PURPOSE AND OBJECTIVE

The purpose of this Policy is to establish the principles, criteria and guidelines governing the actions of Gransolar Group with regard to the use and procurement of Conflict Minerals, with the objective of:

- (i) avoiding direct or indirect contribution to armed conflicts, Human Rights abuses, or practices contrary to international standards;
- (ii) guaranteeing a responsible, ethical, and transparent Supply Chain; and
- (iii) complying with applicable regulations and international standards regarding Due Diligence.

4. SCOPE OF APPLICATION

4.1. OBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to:

- (i) the acquisition of goods, equipment, materials, or components that may contain Conflict Minerals;
- (ii) the selection, qualification, and contracting processes of suppliers; and
- (iii) any activity of Gransolar Group linked directly or indirectly to the Conflict Minerals Supply Chain.

4.2. SUBJECTIVE SCOPE OF APPLICATION

This Policy shall apply to (and, therefore, shall be binding upon):

- (i) all companies forming part of Gransolar Group, regardless of the jurisdiction in which they are incorporated;
- (ii) the management bodies of the companies forming part of Gransolar Group;
- (iii) the senior executives of the companies forming part of Gransolar Group;
- (iv) the employees of the companies forming part of Gransolar Group, understood as any persons linked to such companies through an employment, commercial, training or any other similar legal relationship; and
- (v) in general, any person acting on behalf of or representing any of the companies forming part of Gransolar Group.

4.3. GEOGRAPHICAL SCOPE OF APPLICATION

This Policy shall apply in all countries in which Gransolar Group carries out its activities, without prejudice to any adaptations that may be required in order to comply with the applicable local regulations in each jurisdiction.

5. GENERAL PRINCIPLES

In the course of its activities, Gransolar Group shall act in accordance with the following general principles:

- (i) Regulatory compliance: Gransolar Group shall carry out its activities in accordance with (a) the regulations applicable in each jurisdiction in which it operates and (b) the provisions set out in the Internal Regulatory System, promoting a culture of compliance and zero tolerance for conduct contrary to the law or to its internal rules.
- (ii) Integration into strategy and decision-making: Gransolar Group shall integrate the principles set out in its Internal Regulatory System into its corporate strategy, its decision-making processes and the management of its activities and operations.
- (iii) Risk-based management: Gransolar Group shall apply a preventive and risk-based approach, promoting the identification, assessment, mitigation and monitoring of the risks associated with the scope of application of each of the documents forming part of its Internal Regulatory System.

- (iv) Responsibility and accountability: Gransolar Group shall promote responsible, transparent and traceable conduct, establishing appropriate supervision, control and monitoring mechanisms to ensure the proper implementation of each of the documents forming part of its Internal Regulatory System.
- (v) Continuous improvement: Gransolar Group shall promote the review and continuous improvement of its processes, tools and management systems, adapting to regulatory, technological and business environment developments.
- (vi) Training and awareness: Gransolar Group shall promote the training, communication and awareness of all documents forming part of its Internal Regulatory System, in order to ensure their proper understanding and compliance by their corresponding subjective scope of application.
- (vii) Extension to the value chain: Gransolar Group shall promote the application of the principles set out in its Internal Regulatory System in its relationships with business partners, suppliers, contractors and other third parties, where appropriate depending on the nature of the relationship.
- (viii) Respect for international standards: Gransolar Group shall guide its actions in accordance with internationally recognized standards, guidelines and best practices in the fields of sustainability, business ethics and corporate governance.

6. CONFLICT MINERALS PRINCIPLES

In addition to the general principles set out in Section 5 above (which shall govern all activities of Gransolar Group in general), in the performance of its activities in relation to Conflict Minerals, Gransolar Group shall act in accordance with the following principles:

- (i) Zero tolerance: Gransolar Group will not tolerate the direct or indirect financing of armed conflicts, nor participation in activities that involve human rights violations in its Supply Chain.
- (ii) Due Diligence in the Supply Chain: Gransolar Group will implement Due Diligence processes aligned with international standards (such as the OECD guidelines), with the objective of:
 - identifying risks associated with Conflict Minerals;
 - assessing the origin of the minerals used;
 - mitigating detected risks; and
 - performing continuous monitoring.
- (iii) Supplier evaluation and selection: Gransolar Group will promote that its suppliers:
 - adopt policies and practices aligned with this Policy;
 - provide information on the origin of the minerals used;
 - collaborate in Due Diligence processes; and

- comply with applicable regulations and standards.

Likewise, Gransolar Group may require declarations, certifications, or audits in relation to Conflict Minerals.

- (iv) Risk-based approach: Gransolar Group will apply a risk-based approach in relation to Conflict Minerals, prioritizing:
 - critical suppliers;
 - high-risk geographical areas; and
 - materials with a higher probability of containing Conflict Minerals.
- (v) Traceability and transparency: Gransolar Group will promote traceability in its Supply Chain, fostering:
 - the identification of the origin of minerals;
 - transparency in the information provided by suppliers; and
 - the adequate documentation of control processes.
- (vi) Corrective measures: in the event that non-compliance or significant risks are detected, Gransolar Group may:
 - require the implementation of corrective action plans;
 - suspend or review the commercial relationship; or
 - terminate the relationship with the supplier.
- (vii) Training and awareness: Gransolar Group will promote the training and awareness of its employees and, when appropriate, of its suppliers, in relation to the risks associated with Conflict Minerals.

7. REFERENCE REGULATIONS AND STANDARDS

Gransolar Group shall orient its actions in accordance with, among others:

- (i) the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals;
- (ii) Regulation (EU) 2017/821 on conflict minerals;
- (iii) the Principles of the United Nations Global Compact; and
- (iv) the local regulations applicable in each jurisdiction.

8. RELATED INTERNAL REGULATIONS

8.1. ASCENDING HIERARCHY

This Policy forms part of the Internal Regulatory System of Gransolar Group and is hierarchically positioned below the following corporate rules, upon which it depends and in furtherance of which it is issued:

- (i) the Bylaws;
- (ii) the Governance Director Plan; and
- (iii) the Corporate Macro Policy.

8.2. DESCENDING HIERARCHY

This Policy may be implemented through procedures, protocols or other internal rules specifying its practical application.

In the event of any contradiction between this Policy and internal rules of a lower hierarchical rank, the provisions of this Policy shall prevail, without prejudice to the provisions set forth in applicable legal regulations or in internal rules of a higher hierarchical rank.

8.3. SAME HIERARCHICAL LEVEL

In the event that Gransolar Group has specific corporate policies which, depending on the same Corporate Macro Policy, regulate matters related to the subject matter of this Policy (including those whose adoption is mandatory under the applicable regulations in a specific jurisdiction), such policies shall:

- (i) comply with the general principles and guidelines established in the relevant Corporate Macro Policy; and
- (ii) be applied in coordination with this Policy.

9. RESPONSIBLE DEPARTMENT

The department responsible for this Policy are the GRS Purchasing Department and the PVH Purchasing Department.

10. COMMUNICATION

10.1. INTERNAL COMMUNICATION

This Policy shall be published on the corporate intranet of Gransolar Group, so that it is (i) disseminated among and (ii) accessible to all its employees.

10.2. EXTERNAL COMMUNICATION

This Policy shall be published on the websites of Gransolar Group, so that its stakeholders may access it.

11. REVIEW AND UPDATE

This Policy shall be reviewed and – where appropriate – updated every three (3) years by the GRS Purchasing Department and the PVH Purchasing Department, in coordination with the Governance Department.

Without prejudice to the foregoing, this Policy may be reviewed and, where appropriate, updated in advance when (i) regulatory or organizational changes occur, or when there are changes in the risk profile associated with its scope of application, or (ii) the GRS Purchasing Department, the PVH Purchasing Department and/or the Governance Department deem it appropriate due to any other circumstance.

In any case, any proposal for amendment shall be reported to the ESG Committee, which shall be responsible for submitting such proposal to the Board of Directors for approval.

12. APPROVAL

This Policy has been approved by the Board of Directors, as part of its general and non-delegable authority to approve the general policies and strategies of Grupo Gransolar.

13. ADDITIONAL PROVISIONS

This Policy shall be interpreted in accordance with the applicable regulations and the Internal Regulatory System.



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