



**PUIG**

# Conflict Minerals Policy



Context	3
Purpose	4
Scope	4
Commitments arising from this Policy	4
Our Commitments	4
Commitments to be achieved by suppliers	4
Raising concerns	5
Remediation	6
Compliance	6
Approval, Publication and Revision	6
Appendix	7
Conflict Minerals Regulations	7
OCDE Due Diligence Regulations	7
Reporting template	7



## Context

As reflected in the **Puig** Ethical Code, we are committed to doing business responsibly and growing in a sustainable way, preserving the environment, having ethical working practices and respecting the communities in which we operate.

This commitment is reaffirmed in the Sustainable Sourcing Policy through which **Puig** suppliers are urged to conduct business responsibly and to integrate sustainability criteria into their own supply chains.

Significant adverse impacts, including human rights abuses, corruption and conflict, may be associated with the extraction, trade, handling and export of minerals originating or mined in conflict-affected and high-risk areas<sup>1</sup>.

While we do not directly source any minerals, including conflict minerals from mines, smelters or refiners and we are not subject to the compliance and reporting requirements of the United States Securities and Exchange Commission, we are committed to working with our suppliers to ensure they share our commitment and use only responsibly sourced materials and do not directly or indirectly finance or benefit armed groups in any conflict-affected regions.

For the purposes of this Policy, Conflict Minerals are defined in alignment with the United States of America and European Union legislations as the following:

- Cassiterite (Tin)
- Columbite-tantalite (Coltan) –Tantalum
- Wolframite (Tungsten)
- Gold
- Derivatives of these minerals

and are collectively referred to as “3TG”, wherever extracted.

<sup>1</sup> Such as the Democratic Republic of Congo (“DRC”) or an adjoining country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), which directly or indirectly finance or benefit armed groups in the DRC or in any country whose natural resources include minerals which are in high demand, either locally, regionally, or globally and is suffering from armed conflict, such as civil war.



## Purpose

The purpose of this Policy is to reflect our requirements of all **Puig** suppliers in our supply chain regarding the use of 3TG minerals in their products.

For the purposes of this Policy ‘**Puig** suppliers’ shall mean those who provide **Puig** finished products, product components, raw ingredients, packaging or **Puig** branded merchandise to **Puig**.

## Scope

This Policy reflects the requirements to be met by those companies acting as suppliers when doing business with **Puig**<sup>2</sup>. It is the responsibility of **Puig** suppliers to ensure this Policy is adhered to by their own suppliers including any subcontractors and third-party suppliers.

<sup>2</sup> “Puig” refers to the Puig Brands, S.A. company and its subsidiaries and other entities that may be incorporated in the future in which Puig Brands, S.A. holds or may hold direct or indirect control, according to article 42 of the Spanish Commercial Code.

## Commitments arising from this Policy

### Our Commitments

To ensure that products in our supply chain meet the conflict mineral requirements set forth in this Policy, **Puig** is committed to:

- Identifying if any of our products contain 3TG minerals.
- Engaging with suppliers to gather information on source of origin.
- If we become aware of a supplier whose supply chain includes minerals that are not Conflict Free, taking appropriate steps to remedy the situation in a timely manner.
- Ceasing sourcing from suppliers that have provided product containing 3TG minerals that are not Conflict Free and where the supplier has failed to implement reasonable steps to transition to Conflict Free sources in a timely manner.

### Commitments to be achieved by suppliers

We request that our suppliers comply with the following:

- Support the aims and objectives of EU and US legislation on supply of conflict minerals.



- Establish their own policies, due diligence frameworks, and management systems for the traceability of conflict minerals consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas, and communicate an expectation to their suppliers that they do the same to ensure Conflict Free supply chains.
- Provide **Puig** only with minerals or products that are Conflict Free.
- Inform **Puig** about the presence in products of 3TG minerals sourced from conflict-affected and high-risk areas and share the origin of such minerals without delay.
- Provide a completed Conflict Minerals Reporting Template (CMRT) in a form specified by **Puig** for smelters based in conflict-affected and high-risk areas. The link to the CMRT can be found in the Appendix.
- If any high-risk smelters are reported in the CMRT, suppliers must identify if their vendors, who have listed these smelter sources, contribute to the ingredients or materials supplied for **Puig** products.
- In these instances, the supplier will be expected to work with their suppliers to ensure they use smelters validated via RMAP (the Responsible Minerals Assurance Process) or for gold on London Bullion Market association list and ensure they participate in the RMI (Responsible Mineral Initiative) smelter<sup>3</sup> audit program or equivalent.

### Raising concerns

We encourage both internal and external stakeholders to raise concerns related to conflicts with the law, regulations, and **Puig** policies including this Policy.

As part of our Speak Up culture, **Puig** supports transparency and openness, and there will be no retaliation against those who report actual or suspected breaches of our policies.

In particular, where non-compliance with the requirements of this Policy has been identified, we encourage any third party to report this non-compliance using the **Puig** Reporting Channel. A link to the Reporting Channel can be found on the **Puig** corporate website at [www.puig.com](http://www.puig.com) or it can be accessed using the following link <https://puigreportingchannel.ethicspoint.com/>.

Our suppliers must support investigations of non-compliance, and if required, the implementation of corrective actions or remediation plans.

<sup>3</sup> A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms “smelter” and “refiner” are used interchangeably throughout various publications. The term “slag” means a by-product of smelting ores and recycled metals.



## Remediation

In case of breach of this policy or identification of 3TG minerals that are not Conflict Free, suppliers must work with **Puig** to develop a remediation plan. However, depending on the materiality of the breach, **Puig** reserves the right to adopt other decisions, as detailed below.

Even though **Puig** will support in the implementation of the remediation plan, any cost involved in such remediation will be borne by the supplier.

## Compliance

This Policy shall be mandatorily accepted by **Puig** suppliers – as defined in this Policy – before the commencement of a business relationship with **Puig**.

The requirements set out in this Policy form part of the agreement between **Puig** and the supplier. If a supplier is not in compliance with this Policy, **Puig** will take appropriate action to address such non-compliance, which may include, depending on the materiality of the non-conformity, (i) the implementation of a remediation action plan by the Supplier and timeline to effectively and promptly resolve the breach, (ii) the nonrenewal of the supply contract at its term or (iii) the immediate termination of the business relationship.

The supplier will authorize **Puig** to carry out regular verifications of the application of this Policy.

The requirements reflected in this Policy will be replaced and superseded by any internal or external applicable regulation that sets a higher standard of diligence.

## Approval, Publication and Revision

This Policy has been proposed by the **Puig** Chief Sustainability Officer and approved on the 10<sup>th</sup> of June 2025 by the **Puig** Chief Executive Officer.

This Policy is available on the intranet (Ethics Home), on the **Puig** website and will be communicated to **Puig** employees and other stakeholders where appropriate.

This Policy will be reviewed regularly or as required to reflect changes to legislation, regulatory change, and organizational change.

A review of the effectiveness of this Policy will be completed from time to time, to ensure that the Policy remains fit for purpose for the business.



# Appendix

## Conflict Minerals Regulations

### **European Union**

Conflict Mineral Regulation - [EU Conflict Mineral regulation](#)

### **United States of America**

Dodd-Frank Wall Street Reform and Consumer Protection Act - [USA Conflict Mineral requirements](#)

### **OCDE Due Diligence Regulations**

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

[List of facilities on RMI - Active and Conformant Facilities List](#)

[List of facilities on LBMA - Gold](#)

### **Reporting template**

[CMERT \(Conflict Minerals Reporting Template\)](#)