

Sumcab Specialcable Group, S.L. (hereinafter, SUMCAB) management defines its Integrated Management System (IMS - SIG for its acronym in Spanish) policy as an integral part of its General Policy and is committed to complying with it, disseminating it and ensuring compliance by all staff.

To demonstrate its commitment to Quality Management and Environmental Management, the SUMCAB management system is based on the UNE-EN-ISO 9001:2015 standards "*Quality Management Systems Requirements*" and UNE-EN-ISO 14001:2015 "*Environmental Management Systems guidance for their use*". To confirm that the requirements of these standards are met, the IMS is reviewed and certified by an external certification body on a regular basis.

SUMCAB's Integrated System Policy includes all the actions that are integrated in its IMS, defined as follows:

**In terms of Quality Management**

- SUMCAB believes in the need to improve its Integrated Management System in a continuous and systematic manner and to comply with the applicable legal and regulatory requirements.
- Personnel in the organisation are motivated and integrated so that they are clearly aware of the objectives established by management and share and assume the values established to achieve them.
- Possible expansion of the workforce, according to the needs of the company, hiring people with relevant skills and/or with professional experience in the business.
- Constant review and update of infrastructure, machinery and commercial vehicles.

**In terms of Environmental Management**

- Maintain a **proactive attitude and continuous progress on environmental issues**.
- Comply with all environmental regulatory requirements applicable to the company's activity and other environmental regulatory requirements to which the company subscribes.
- Commit to protecting the environment, including preventing pollution and other specific commitments relevant to the context of the organisation.
- Foster attitudes of collaboration and participation on environmental matters throughout all levels of the organisation, for which information, communication and training are essential. Information will be smoothly and reliably transmitted to effectively achieve the implementation of the system.
- Establish annual objectives to improve environmental performance.
- Inform manufacturers and suppliers of the Integrated Quality, Environmental, and Occupational Risk Prevention Management Policy and invite them to commit to SUMCAB's instructions on good practices.

**In terms of Occupational Risk Prevention Management**

- The safety of employees must always prevail. All accidents must be avoided, and the necessary resources must be allocated for such purpose.
- Proper identification, assessment, and effective control of work-related risks.
- Adjustment of employees to their jobs through health monitoring and training of employees.
- Promote a culture of prevention through continuous employee training and qualification in order to involve each worker and ensure they are aware of the impact of their work on the safety of people, processes and facilities.

Manuel Romero Rincón

General Manager of SUMCAB Specialcable Group, S.L.



**SUBJECT: IMPLICA helps us all to comply with the law**

Dear **customer**,

As you know, we have a **new legal framework in Spain for Packaging**, Law 7/2022 on Waste and Spanish Royal Decree 1055/2022 on Packaging, both published in the Spanish Official State Gazette BOE in 2022 and whose entry into force, for most aspects, took place in 2023. Some other aspects will have to be fulfilled by 2024.

The new legal framework establishes a series of **new obligations and responsibilities for companies** that are considered "**Product producers**", as is the case of **Sumcab Specialcable Group, S.L.**, and which could be summarised as follows:

- The obligation to assume **EPR (Extended Producer Responsibility)**, which means assuming the organisation and cost of the complete management of the packaging in which we supply you with our products, once they have reached the end of their useful life.
- The obligation to **inform Public Administrations** through the MITECO Register about the types, materials and formats of the packaging we use.
- The obligation to **inform you, our customers**, along the value chain, about the operating-technical model to be applied in such management.

These new obligations do not exempt our **customers** as final users from their obligation to properly manage their packaging waste.

We would like to inform you about **the collective solution system that Sumcab Specialcable Group, S.L. has joined and is collaborating with. It is called IMPLICA ([www.somosimplica.com](http://www.somosimplica.com))** and it has requested the corresponding authorisation from the relevant Public Administration to operate as a Collective System of Extended Producer Responsibility (SCRAP in Spanish) for commercial and industrial packaging, which it expects to obtain this year (2024).

IMPLICA enables us to **offer you the best technical and organisational solution for the management of the packaging** of the products we supply. Its main feature is that it will observe the management you already operate with for the packaging of the products we supply.

For this reason, we consider that IMPLICA is the EPR collective system which is best placed to help both **Sumcab Specialcable Group, S.L.** and our **customers**.

You, as our customers, could be affected by this Law in two respects:

- a) If you are a PRODUCER OF A PACKAGED PRODUCT, whose EPR obligation can be fulfilled by joining a Collective System of Extended Producer Responsibility. We recommend you join IMPLICA.
- b) As the HOLDER of our company's PACKAGING WASTE, we are obliged to manage it properly and since we are members of IMPLICA, the operating model we have chosen to use is that which we adhere to by the signing of an IMPLICA HOLDER Agreement. This is the only way to guarantee the organisation and financing of such management, as required by the Law.

This year, 2024, IMPLICA is organising informative webinars for companies, for both cases a) and b).

- a) These informative webinars are aimed at those companies that have not yet decided on an EPR Collective System to which the management of the packaging they use can be delegated.
  
- b) But such informative webinars are also aimed at those companies which are customers of IMPLICA member companies, as is your case. The webinars will explain how you can maintain the operational management you already have by signing a specific agreement for this purpose.

We suggest you write to [info@somosimplica.com](mailto:info@somosimplica.com) asking to be included in their database and that you specify the type of webinars you would like to be invited to. It would be enough to provide them with your email address.

Yours sincerely

Signed by Sumcab Specialcable Group, S.L.