

1. About the company

Mineração Taboca S.A. is a traditional mining company in the field in which it operates, with mining, concentration and smelting facilities for tin and tantalum ores. All concentrates and metals produced by Mineração Taboca S.A. are generated in its own mine located in the state of Amazonas, Brazil, and processed at its units located in Pitinga-AM and Pirapora do Bom Jesus-SP. The company IDs for the RMAP program are CID001173 (tin) and CID001175 (tantalum).

More information about the company's operations can be accessed at the following link: <https://www.mtaboca.com.br/paginas/sobre-nos.aspx>

2. RMAP assessment summary

Mineração Taboca's smelters underwent an RMAP assessment on June 29, 2021 (Tin) and from June 30 to July 2, 2021 (Tantalum), with the aim of renewing RMI certification. The evaluation period considered was between 03/01/2018 and 02/28/2021. The audit is valid for three years and was conducted by lead auditor Sara Lomeli of UL Responsible Sourcing according to the RMI-RMAP protocols.

The summary report with the most recent assessment is public and can be found on RMI's website:

[Tin 2021](#)

[Tantalum 2021](#)

the next RMAP assessment is scheduled for August 19 to 20 at the Pirapora do Bom Jesus unit – SP and from August 21 to 23 at the Pitinga unit – AM for the year 2024. To be conducted by lead auditor Alejandro Lopez of Arche Advisors.

3. Raw Material Sourcing Policy Containing Tin and Tantalum

In support of international efforts to investigate, monitor and mitigate activities that contribute to illegal armed groups, human rights violations or financial irregularities in supply chains, Mineração Taboca implemented the "[POLICY FOR THE SUPPLY OF RAW MATERIALS CONTAINING TIN AND TANTALUM](#)" in its first version on October 19, 2012, and has been undergoing revisions to adjust its content over the years. having its revision on 18 April 2024.

This policy is in line with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all risks identified in Annex II of the OECD Guidance and its geographical scope is global. The company is committed to addressing any Annex II risks if identified, and to the RMI's "Responsible Minerals Assurance Process Tin And Tantalum Standard" (RMAP guide). Our policy has been reviewed and approved by senior management, who have committed to supporting its implementation.

Mineração Taboca's policy has been widely communicated and disseminated in order to promote awareness of the risks and prevent our supply chain from such abuses. This policy is available on the <https://www.mtaboca.com.br/Paginas/minerais-resposaveis.aspx> website for access by suppliers, customers, employees and other stakeholders. Going further, Mineração Taboca S.A., with its commitment to prevent human rights abuses, money laundering and other suspicious activities that may compromise ethics, respect for individuals and the fight against corruption, has an extensive and detailed Code of Conduct and Statement of Ethics. For more details, see: <https://www.mtaboca.com.br/paginas/codigo-conduta-declaracao-etica.aspx>

4. Company Management System

4.1 Introduction

In addition to the RMAP assessments, Mineração Taboca S.A. is audited according to the protocols of ISO 9001 (tin and tantalum), ISO 14001 (tin), ISO 45001 (tin) certifications. The internal audit of the supply chain due diligence system is carried out in conjunction with the internal audits of the ISO 9001:2015 quality management system, and are evaluated according to the same schedule.

4.2 Structure

Mineração Taboca has established internal procedures for the management of the structure and responsibility. In particular, our procedure for "[Purchasing Concentrate containing Tin and Tantalum](#)" accurately describes the flow of information and the responsibility of each step in relation to the acquisition of materials containing Ta and Sn. It includes the collection of information, Due Diligence Processes, among others.

Our Procurement department is responsible for evaluating and validating the initial information of potential suppliers, collecting available documents, such as Declaration of Conformity, among others. It is also responsible for reviewing whether the supplier agrees to comply with our Tin and Tantalum-Containing Raw Materials Supply Policy.

Mineração Taboca's Foundry Director is responsible for the company's due diligence management system, through his subordinate team, overseeing the operation and supporting the procurement and compliance department by applying the conflict minerals policy. Its assigned team is also responsible for expanding the information provided by the Procurement department using other sources such as UN sanctions lists, the "Identification of Conflict-Affected and High-Risk Areas - CAHRA's" Procedure, and for requiring an on-the-ground assessment. The company's senior management evaluates and validates the initial information and monitors the purchasing and due diligence processes.

The team responsible for the due diligence system can be described by the organizational chart below



Each action of the due diligence system can be proven through the records retained by the sectors involved, from the beginning of the negotiation with data collection and verification of the legality of their representatives, through documentation of the supplier's suitability and records of the origin of the material to the verification of lots, weights and analyses with tax documentation of the physical receipt, use and transformation of this raw material and in the results of the final product, closing the cycle of the raw material (containing tin and tantalum) until the sale of the final product.

The procedures related to Due Diligence are updated annually, when international standards are modified, when an error is eventually found in the procedure or when there is continuous improvement of the Due Diligence processes that suggest an update in the procedure. They are then reviewed and approved by our Directors. This update also aims to ensure that Due Diligence processes are in compliance with international standards. All relevant and involved employees of Mineração Taboca are trained regularly or when changes to the policy or procedures relating to them are changed.

5. System of internal controls

As Mineração Taboca has its own mine and produces all the raw material used in the foundries, the monitoring and control of the batches are via the ERP system (SAP), in this way, we guarantee the continuous traceability of materials containing tin and tantalum from the extraction of the raw material, samples, analyses, identification, weighing, issuance of invoices, loading and transportation to the foundries in Pitinga-AM and Pirapora-SP. In the due diligence system, a complaint and complaint mechanism is maintained on the www.mtaboca.com.br/paginas/canal-integridade.aspx website to collect information from any interested parties. All generated records are stored for at least 5 years as described in the DOCUMENT AND RECORD CONTROL procedure ([CRP-SGE-SGI-PSG-008](#)).

5.1. (Supplier) Own Mine

As Mineração Taboca has its own mine, vertically integrated with the smelter operations, we have full control over the cassiterite and columbite produced, from extraction, analysis, transportation and tracking of lots and weights, where the controllership of Mineração Taboca has its own procedures for verification and monitoring of the entire process, including for the transport from the Pitinga-AM mine to the Sn foundry located in Pirapora do Bom Jesus-SP is done by a specialized company hired by Mineração Taboca, which has a risk management system and comprehensive monitoring of transport. In addition to all legal and statutory requirements, Mineração Taboca complies with internal standards, such as the Code of Conduct and the Declaration of Ethics and Compliance.

5.2. (Supplier) Third Parties

Before starting new business with a supplier, there is a detailed check by the Procurement department according to the procedure PURCHASE OF CONCENTRATE CONTAINING TIN AND TANTALUM ([CRP-SCM-SUP-PSG-023](#)) to confirm that this potential supplier meets all the legal requirements and the internal requirements regarding conflict-free areas, this check is defined by the KYC (Know Your Counter Party) procedure - [CRP-SCM-SUP-PSG-026](#), Mineração Taboca, ensures that in addition to the identity of the supplier, the beneficiaries of each company evaluated are also verified.

It is worth mentioning that the company's senior management evaluates and validates the initial information and monitors the purchase and due diligence processes.

6. Identification and Mitigation of Risks

Mineração Taboca is committed to preventing or mitigating all risks identified in Annex II of the OECD Guidance, referring to the Supply Chain Policy

- Serious human rights abuses associated with the extraction, transport or trade of minerals;
- Direct or indirect support to non-state armed groups;
- Direct or indirect support to public or private security forces that control mines, transport routes, and upstream actors;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Money laundering;
- Payments of taxes, fees, and royalties to governments.

Some steps have been implemented to identify these risks in the supply chain

In a first step, Mineração Taboca has implemented a due diligence procedure called Know Your Counterparty (KYC) ([CRP-SCM-SUP-PSG-026](#)) to include information on the legal status and identity of the supplier and the potential existence of any risks identified in Annex II of the OECD Guidance.

All vendors have completed or will have to complete and return a KYC form before any transaction is possible.

Incomplete information or inconsistencies in the KYC form will lead to a request to update the form before a transaction takes place.

This information is registered on the G-CERTIFICA platform so that it can be automatically checked in several different public databases, generating in the end, a report on the reputation of the potential partner company and its respective partners.

In a second step, Mineração Taboca implemented a procedure to identify "[Conflict-Affected and High-Risk Areas](#)" (CAHRA's) and [identify red flags in the supply chain](#). The procedure will apply to all suppliers of raw material containing tin and tantalum. The procedure includes the resources used, the criteria for defining a CAHRA, and the periodicity of the procedure review. The following resources are used to determine CAHRA's:

- The Heidelberg Conflict Barometer: this indicator allows companies to detect the presence of armed conflict and violence through a periodically updated global list of countries. The country or area that has a rating of 4 or higher in the region of origin or transit routes will be identified as CAHRA's and the transaction will be considered a red flag.
- The EU CAHRA list: this is an indicative list of CAHRA's, assessed at a sub-national level, provided by the European Commission in light of the Conflict Minerals Regulation (EU) 2017/821. This resource considers the following countries as CAHRA: Afghanistan, Burkina Faso, Burundi, Cameroon, Central African Republic, Colombia, Democratic Republic of Congo, Eritrea, Ethiopia, India, Libya, Mali, Mozambique, Myanmar, Niger, Nigeria, Pakistan, Philippines, Somalia, South Sudan, Sudan, Turkey, Ukraine, Venezuela, Yemen, Zimbabwe.
- The Fragile States Index: global governance indicators that assess the human rights indicator, rule of law, and security apparatus.
- Human Freedom Index - The Human Freedom Index presents the state of human freedom in the world based on a broad measure that covers personal, civil, and economic freedom. The report is published jointly by the Cato Institute and the Fraser Institute.
- Dodd Frank Law: The following countries are classified as CAHRA: the Democratic Republic of the Congo and its nine adjacent countries (The Democratic Republic of the Congo, Angola, Zambia, Tanzania, Uganda, Rwanda, Burundi, the Central African Republic, and the Congo) as described in Section 1502 of the Dodd Frank Act

All high-risk countries are recorded in an overview "List of CAHRA's". This list will apply to the country of origin and transit routes. CAHRA's list for Mineração Taboca was revised in March 2024.

The governance structure for risk management defined by Mineração Taboca and its relationship with the other areas of the organization based on the 3 lines of defense model, a model that aims to establish risk management Roles and Responsibilities for the various areas of the Company:



a. 1st Line of Defense: Operational and/or business managers are responsible for the knowledge and management of their own risks and must implement and execute mitigating actions (action plans) ensuring the compliance of operations and strategies for their adequate process management. It is also the responsibility of the 1st line to proactively report changes in processes and internal controls to the identified risks, in order to ensure the constant updating of the identification of risks to the 2nd line

b. 2nd Line of Defense: They assist the 1st line in a consultative manner in identifying the causes and consequences associated with the risks. Internal Controls, Risks and Compliance are components of the Corporate Governance Management that are part of this line.

c. 3rd Line of Defense: The area of c. Internal Audit, which has the independence to evaluate and certify the controls implemented by the 1st line.

To identify the threats posed by Mineração Taboca, an exhaustive analysis will be carried out related to internal and external risk factors.

- External factors: Economic; Environmental; Political; Legal; Social; and technological technologies.
- Internal factors, related to operational aspects and the company's own decisions, which may give rise to risks include, among others: Infrastructure; People; Processes; and Technology.

To identify Mineração Taboca's threats and opportunities, the following tools or a combination of them can be used, depending on their scope, access to communication with those responsible, among other aspects: General Risk Analysis (AGR); Risk identification workshops; Cause-effect analysis; Analysis of the 5 Whys; Event indicators; and identify threats to strategic risks

The identified risks are classified based on the impact and probability ruler established by Taboca and their results are validated with all those responsible (risk owners) to define a risk treatment strategy and prepare any action plans for their mitigation.

Taboca's updated risk matrix is presented and validated quarterly by the Risk Management Committee with Taboca's Board of Directors.

In addition, there is a quarterly risk management committee also with Minsur's Board of Directors in order to present the risk matrix already validated by Taboca's Board of Directors.

6.1 Identified risks

The conclusion of CAHRA's report is available at: [CRP-SCM-SUP-PSG-024 – ANNEX I – CAHRA's Verification](#) and follows

Below is the opinion of Taboca mining on its risk situation according to the area:

ANNUAL DUE DILIGENCE REPORT - 2024

CRITERION	RESOURCE	RESULT April / 2024	CAHRA's
Dodd-Frank	Lei Dodd-Frank	Not on the list of the Lav	NO
List of European Union CAHRAs	List of EU CAHRAs	Brazil is not on the list of countries identified by the EU	NO
Heidelberg Conflict Barometer	Heidelberg Conflict Barometer	Brazil (page 99) has an overall score of less than 4. (Score 3)	NO
Fragile State Index: Human Rights and Rule of Law indicator	Fragile State Index	Brazil scores less than 8 (7.9)	NO
World Governance Indicators, Corruption Control Indicator	World Bank Report	Brazil has a score higher than 20% (Score 32.8%)	NO
Fragile State Index: Security Appliances Index	Fragile State Index	Brazil scores less than 8 (6.2)	NO

Considering that the supply of taboca mining occurs 100% within the national territory, and Brazil is not considered a risk area, taboca operates in a **Low Risk area**.

During the period evaluated, there were no red flags raised, the supply process of Mineração Taboca has been taking place for more than 30 years, and therefore risk mitigation has taken place over this time. We currently have two mapped risks related to the supply of minerals, they are:

ANNUAL DUE DILIGENCE REPORT - 2024

RISCO	Contratação de fornecedor ou prestador de serviço que não satisfaçam necessidades técnicas, econômicas e/ou legais			
CAUSAS		CONSEQUÊNCIAS		
Contratação por sole source ou emergência de fornecedores não aprovados e/ou aprovados com restrição Alto volume de compras emergenciais para operação e projetos Análises técnicas necessitam de maior aprofundamento para conclusão correta de escopo de contratação Falta de acompanhamento na gestão do contrato com rrelação as restrições indetificadas na contratação Ausência de notificação a fornecedores que não cumprem o contrato total ou em parte na prestação de serviço		Exposição da empresa a riscos diversos (trabalhista, ambiental, segurança, abandono do contrato, etc) A emergência/sole source não tem concorrência no mercado Pleitos adicionais aos contratos Multas não aplicadas		
Dono do Risco			Probabilidade	
Marcia Kono		Insignificante (1)	RARO (1)	
Planos de Ação	1- Acompanhamento do report de KPIs de emergência e regularizações - Resp. Dagoberto - Concluído 2- Divulgação para diretoria das plantas. Resp. Dagoberto. Prazo: 15/02/2020 - Concluído 3- Avaliar compra de Sistema de gestão de compras. Resp. Dagoberto. Prazo: 30/11/2019 - Análise concluída com recomendação da solução Ariba que foi compartilhada com a diretoria de suprimentos e TI da Minsur, e está aguardando a decisão para uma implementação corporativa. Previsão DEZ/2020. Estamos em fase de atualização dos valores para o Brasil para comparação com os preços de Lima para tomada de decisão de implementação. Previsão para tomada de decisio: 31/03/2021. Tomada de decisão favorável para aquisição do Ariba a partir de Julho 2021. Ariba contratado em 09.04.2021 para início de vigência do contrato a partir de julho 2021. O Ariba está em fase de implementação com go live previsto para janeiro 2022. 4- Mapeamento das oportunidades para desenvolvimento de contrato sob demanda. Resp: Bruno (serviços de apoio); Paulo (serviços operacionais). Prazo: 30/11/2019 - Concluído no workshop em 21.11 em Pitinga 5- Criação do KPI de controle de vigencia de contrato. Resp. Bruno Frare e Paulo. Prazo: 31/10/2019 - Concluído (Periodicidade Mensal, Responsável Suprimentos) 6 - Em desenvolvimento o formato de acompanhamento quinzenal do KPI - Dagoberto - 28/02/2020 - concluído com o powerBI 7 - Implementação do sitema de gestão Ariba: e o cronograma será informado com a contratação da empresa de implementação no mes de junho.Resp.: Dagoberto // Em negociação com a empresa de implementação: Resp. Bruno - prazo: 16/07/21. Status em 17.08: Está em fase de contrato com a empresa que irá implementar para fecharmos o cronograma. Status 15.09: Falta ajuste de uma cláusula para fechamento do contrato para termos a reunião com o fornecedor e definir o cronograma. A implementação foi iniciada com o go live do módulo sourcing, previsto para janeiro de 2022. Status em 10.01.22: Devido a problemas técnicos o go live está previsto para fevereiro. Go live para Concluído 8- Definir e divulgar procedimento formal para cadastro de fornecedores que contemple as especificidades do módulo Ariba do SAP. - Já tem procedimento para o cadastro no SAP - Sergio - Concluído 9- Estabelecer compras emergenciais única e exclusivamente para os casos que apresentem comprovadamente risco de saúde e segurança, meio ambiente e/ou parada de produção. - Responsável Evandro - Concluído			
	RISCO RESIDUAL		Impacto	Probabilidade
			Insignificante (1)	RARO (1)

2022/07-1039	Roubo de estoque de estanho em Pirapora				
CAUSAS		CONSEQUÊNCIAS			
Cercamento deficiente em alguns pontos da planta; Falta de câmeras de vigilância em pontos mais internos da planta; Sistema desatualizado de CFTV;		Perda financeira em decorrência do roubo de produto acabado no estoque			
Dono do Risco		Impacto	Probabilidade		
Alexandre Moscone		3	1		
	Ação	Responsável	Prazo		Status
Plano de Ação	1-Reforço temporário da equipe operacional de vigilância. Não é mais apenas um reforço temporário. A Equipe foi efetivamente aumentada em 01 Supervisor de Segurança + 03 Postos de Vigilância	Fábio Merli	08/09/2020		Concluído com evidência
	2- Reestabelecimento de iluminação fixa na área do antigo grêmio, acesso e lagoas	Fábio Merli	20/03/2021		Concluído com evidência
	3 - Desenvolvimento de maturidade do projeto de novo cercamento perimetral da unidade de PBJ	Robson Mota	PPTO25		Não iniciado
	4 - Aprovação do Projeto de novo cercamento perimetral da unidade de PBJ	Robson Mota	PPTO25		Não iniciado
	5 - Elaborar estudos ambientais e de proteção radiológica para sequenciamento do projeto	Robson Mota	PPTO25	Não iniciado	
	6 - Aprovação do Projeto de Reestruturação predial da portaria	Robson Mota	PPTO25	Não iniciado	
	7 - Troca dos rádios HT analógicos para Digital	Moscone	15/12/2022	Concluído com evidência	
	8 - Procedimento de Segurança e Controle de Acesso	Moscone	22/07/2022	Concluído com evidência	
	9 - Elaboração e aprovação do Projeto de Readequação completa do sistema de monitoramento via câmera	Alexandre Costa	22/07/2022	Concluído com evidência	
	10 - Elaboração e aprovação do Projeto de Readequação completa do sistema de iluminação da planta	Rafael Leite	30/03/2023	Concluído com evidência	
RISCO RESIDUAL		Impacto	Probabilidade		
		3	1		

These risks are addressed and mitigated according to our risk management with the internal teams of Mineração Taboca and with the material carriers.

6.2 Risk Assessment (high-risk sourcing only)

Annually, Mineração Taboca SA undertakes to carry out internal audits of the supply chain due diligence system in order to improve its system and find possible risks associated with the supply of responsible minerals, since its mine operates in a CAHRA's region.

The 2024 management system internal audit reports can be consulted at the following links:

[Internal Audit Report 2024 - PBJ](#)

[Internal Audit Report 2024 - PTG](#)

That said, in March 2023, Mineração Taboca engaged Liz Muller & Partners to conduct an independent assessment of our Mine and supply chain. The summary report with the evaluation can be found at the links below:

Mina: [CRP-DIR-SUP-POL-002 - ANEXO I - Mine Assessment Summary Report - Taboca - Liz Muller & Partners](#)

Estanho: [CRP-DIR-SUP-POL-002 - ANEXO II - Supply Chain Assessment Summary Report - Taboca Tin - Liz Muller & Partners](#)

Tântalo: [CRP-DIR-SUP-POL-002 - ANEXO III - Supply Chain Assessment Summary Report - Taboca Tantalum - Liz Muller & Partners](#)

In 2024, as a way to prepare for RMAP recertification, Mineração Taboca again engaged the consulting services of Liz Muller & Partners, resulting in a new assessment report that confirms the low risk of Mineração Taboca's supply.

[Mock Assessment Report Memo April 24](#)

7. Conclusions

According to the reports of the internal audits and the audit of Liz Muller & Partners, Mineração Taboca concludes that it operates a closed supply chain and supplies, processes and transports only tantalum and tin from its own mine and the mine does **not** present potential damages related to OECD Annex II risks.

Taboca's mining operations, policies and practices pose a **low risk** of harm under Annex II of the OECD Guidance.

Mineração Taboca's processing facilities have implemented sufficient and effective due diligence and materials management systems against enhanced due diligence of the high-risk supply chain principles and criteria set out in the RMAP Standard.

In accordance with the RMAP standard, the transport company (Cesari | Ceslog) sufficiently:

- Protects shipments from tampering and maintains a complete chain of custody along the entire transport route;
- It has policies in place to prevent and respond to risks associated with security forces or bribery along the transportation routes of Taboca's shipments;
- It conducts due diligence on its drivers and subcontractors.

These conclusions are reinforced by recognizing that there is no commercial benefit for Taboca to introduce any external minerals into its supply chain, given:

- 1) the isolated and closed conditions of Taboca's Pitinga facility,

- 2) the abundance of tin and tantalum in the Pitinga mine
- 3) the absence of artisanal mines or other nearby mines.

8. Termination

Mineração Taboca's ongoing commitment S.A. com compliance and transparency is demonstrated by the rigorous implementation of international standards and the maintenance of a robust due diligence system. Through internal audits and independent assessments, the company ensures that its tin and tantalum supply, processing and transportation operations are aligned with industry best practices and OECD requirements.

Compliance with the Responsible Minerals Assurance Process (RMAP) and strict internal controls ensure that Mineração Taboca continues to operate with integrity, minimizing risk and promoting an ethical and responsible supply chain. With the next RMAP assessment scheduled for August 2024, Mineração Taboca is poised to reaffirm its commitment to operational excellence and social responsibility.

We thank our stakeholders for their trust and reiterate our commitment to transparency, accountability, and continuous improvement. For more information or clarification, we are available through our communication channels.

Mineração Taboca S.A.

Eduardo Orban
Chief Executive Officer