

INDEPENDENT LIMITED ASSURANCE REPORT

Date of report	24th November 2023
Addressee Company name and registered address	White Solder Metalurgia e Mineracao LTDA CNPJ 04.107.120/0001-43 ROD BR-421 1211 APOIO BR-421 Ariquemes -RO 76877-03 Brasil
Level of assurance engagement	The level of assurance for this audit was 'limited'. The Standard applied to this Engagement will be the <i>International Standard on Assurance ISEA3000 (revised) – Assurance Engagements other than Audits & Reviews of Historical Financial Information</i> issued by the International Auditing and Assurance Standards Board (IAASB).
Period covered by assessment	The assurance considered the period Aug 9 th 2022 to Sept 9 th 2023

Author of the Assurance Report

Name and address of auditor and assurance firm authoring this report	David Shirley, Director Corporate Integrity Ltd Cockshott Farm House, Highgate Hill, Hawkhurst, United Kingdom, TN18 4LS
Qualifications, experience and independence of assurance firm	<p>Corporate Integrity Ltd has extensive experience in responsible sourcing assurance in the mining and metals sector and in audits of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.</p> <p>We are accredited by ITA to conduct audits against the requirements of the International Tin Association (ITA) – Responsible Minerals Initiative (RMI) Assessment Criteria for Tin Smelting Companies. These assessment criteria reflect the requirements of the OECD Due Diligence Guidance. We are also accredited by Copper Mark to conduct audits to the OECD Due Diligence Guidelines.</p> <p>Corporate Integrity Ltd undertakes its assurance according to ISEA 3000 (revised). Our policies and procedures align with high standards of ethical and quality control including IESBA Code of Ethics and ISQC1.</p> <p>The independence of the company has been reviewed through our internal control processes and does not present a conflict of interest to the integrity of the assurance process and findings.</p>
Qualifications, experience and independence of auditors	<p>David Shirley, and Raj Aseervatham both Directors of Corporate Integrity Ltd both have extensive experience of risk management and assurance in the mining and metals sectors and have carried out numerous responsible sourcing assurance assignments. Both are approved ITA and Copper Mark assessors.</p> <p>The independence of our team has been reviewed through our internal control process and none of the Corporate Integrity Ltd. assessors involved in this project presents a conflict of interest to the integrity of the assurance process and findings.</p>

Assurance Firm Responsibilities

Corporate Integrity Ltd confirms that its responsibilities for this assignment include:

- Providing suitably experienced and capable personnel of conducting the assurance engagement to the ISAE 3000 Standard.
- Applying testing methodologies and processes to data and information used by the company in compiling the company report to validate its accuracy.
- Providing an explanation to the company of audit findings including misstatements identified or absence of information that hinders the formation of a definitive conclusion.
- The provision of clear evidence and information on which, in the opinion of the auditor, the assertions made in the company report are not accurate and cannot be substantiated
- Verifying corrections to misstatements with the company report where there is insufficient information to enable verification.
- Applying the audit principles of traceability, completeness, consistency and accuracy to the verification of information and data.
- Preparation of the report in accordance with ISAE 3000 including International Standard on Quality Control (ISQC1).

Company Responsibilities

Corporate Integrity Ltd confirms that White Solder Ltd.:

- Prepared data and information appropriate for auditing and verification
- Disclosed data and information to the audit firm on request
- Provided further information to the audit firm on request to enable a conclusion to be reached by the audit firm to a limited assurance engagement level as to whether the assertions of senior management and the directors contained within the company report of complying with a section 7.3 of the Tin Code standard were appropriate and accurate.
- Disclosed any changes in the data and information, or misstatements identified internally by the company that could affect the conclusion of the audit firm.

The Subject Matter

The topic and subject of the assurance engagement is section 7.3 of the Tin Code - *Responsible sourcing* 'Companies will evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement.'

The Assessment Criteria

International Tin Association (ITA) – Responsible Minerals Initiative (RMI) Assessment Criteria for Tin Smelting Companies (Version 2) Publication Date: 23 March 2021 Effective Date: 25 March 2021, and

Summary of Work Performed

The assurance was conducted in three steps:

1. Document review and preparation for site visit
2. Site visit
3. Assurance statement and management report

Step 1 – Document Review and preparation for corporate review and site visits

1. White Solder provided relevant information which included:
 - a. Site plan, simple process diagram and aerial maps of local area
 - b. Ownership, Governance and Management structure of White Solder
 - c. Documented evidence of policies and procedures designed to implement International Tin Association– Responsible Minerals Initiative- Assessment Criteria
 - d. Information on suppliers and supplier due diligence undertaken

2. Corporate Integrity reviewed uploaded information and identified expected focus areas for the assessment based on the scope and risk profile. At this stage we conducted a risk and materiality assessment to inform our audit agenda and sampling approach.
3. Clarification discussions were conducted with White Solder and International Tin Association regarding scope and agenda for site visit.
4. Corporate Integrity prepared for the site visit and agreed a visit agenda.

Step 2 – Site Visit

1. Kick off meeting with management team
 - a. Overview of operations and management structure
 - b. Overview of material risks and risk management processes
2. The scope of the audit covered all 5 Steps of the OECD Due Diligence Guidelines and the International Tin Association (ITA) – Responsible Minerals Initiative (RMI) Assessment Criteria for Tin Smelting Companies. The 5 Steps in scope were:
 - Step 1 – Establish Strong Company Management Systems
 - Step 2 – Identify and Assess Risks in The Supply Chain
 - Step 3 – Design and Implement a Strategy to Respond to Identified Risks
 - Step 4 - Carry Out Independent Third-Party Audit of Smelter’s Due Diligence Practices
 - Step 5 – Report Annually on Supply Chain Due Diligence

During the audit we determined that Steps relevant to CAHRA were not applicable based on the company determination of CAHRA and red flag review. We confirmed that the company did not source from locations it determined to be CAHRA. The audit therefore considered Steps 1 (excluding 1C1 to 4), 2A, 4 and 5.

3. The audit included interviews with the COO and the Site Manager. Sampling of data and information was done on the company online SAP system and by viewing documents at site. This included going through mass balance calculations for the reporting period.
4. Site walkabout and visits to all key elements of the operation – interviews with relevant managers.
5. Close out meeting

Documents and information reviewed are listed in the management report and included:

- Policies and procedures
- Supplier information and due diligence evidence
- Supplier contracts and communications
- Transaction and mass balance information (documentation and on-line systems)
- Other third-party audit reports.


Company Report

The Company Report is – White Solder Due Diligence Report for Responsible Minerals – signed by CEO and COO on 27th November 2023. The report is provided in Annex 1 of this report.

Assurance Conclusion

Based on the work in this assurance report and in the opinion of the auditors, nothing has come to our attention that the assertions made in the company report are not accurate and this conclusion is without qualification.

This work has been carried out by checking samples of information and documents that have been made available during the period of assurance activity by White Solder. Our procedures have been designed to obtain a limited level of assurance upon which to base our conclusions. Corporate Integrity does not accept any liability for any loss, including indirect or consequential damages arising from or in relation to the use of the information contained in this report. Notwithstanding this, there are no restrictions to the use of this report.

Signature	
Position and Location	Director Corporate Integrity Ltd., United Kingdom

ANNEX 1

DUE DILIGENCE REPORT FOR RESPONSIBLE MINERAL SOURCING

The period covered by this report is from the of August 9th 2022 to September 9th 2023 and has been reviewed and approved by the COO and CEO:

PAULO AUGUSTO
MENDES AMPARO

Assinado de forma digital
por PAULO AUGUSTO
MENDES AMPARO
Dados: 2023.11.27
09:55:36 -03'00'

COO

Paulo Augusto Mendes Amparo

ALESSANDRO
SACCOMAN
TORRENTE:1636890
0830

Assinado de forma digital por
ALESSANDRO SACCOMAN
TORRENTE:16368900830
Dados: 2023.11.27 09:34:27
-03'00'

CEO

Alessandro Saccoman Torrente



Company Presentation

WHITE SOLDER METALURGIA E MINERAÇÃO LTDA is registered, with national registration of the legal entity in Brazil 04.107.120/0001-43 and identification code with the RMI CDI 002636. The company is established on Highway BR-421, No. 1211 in the city of Ariquemes, State of Rondônia and currently has 91 employees and website available according to the electronic address <https://whitesolder.com.br/>.

All production in our smelter is made from primary materials (cassiterite ore). We do not use any secondary material that does not come from our own smelting process, and we also do not dispose of any secondary material that cannot be reused in our process, so this material is sold to other companies that can use them or are only kept in stock for future use.

100% of the cassiterite acquired over the period analyzed originates in Brazil, being supplied by cooperatives that we maintain long-term agreements with and also by our own group mining company NBF Mineração S/A. Therefore, we did not have any ore inputs from areas identified as conflict-affected high-risk areas (CAHRA's).

In the period evaluated we had a total of 1268 ore inputs with a total weight of 9,256 tons (already discounted the humidity) and an average tin content in this ore of 62.69%. Of the total weight, we had 6.82% coming from NBF Mineração S/A and the remainder (93.18%) from cooperatives.

The tin ingots of White Solder Metalurgia e Mineração LTDA are registered at the London Metal Exchange (LME brand) under the name WHITE SOLDER BR. These ingots supply the three solder plants that the group has (two in Brazil and one in Portugal) and is commercialized in several countries, especially in America's and Europe.

The strong commitment to achieve the highest world standards in tin production and business management is a regular practice in our company and,



over the years, large investments have been made in international certifications and to be associate with important entities in the national and international markets, aiming to raise the standards of corporate governance to the levels practiced by large global corporations.

White Solder Metalurgia e Mineração LTDA already had ISO 9001:2015 and ISO 37001:2017 certifications, being a pioneer in the world tin market to obtain such certification, and in September 2023 it was certified ISO 14001:2015 and ISO 45001:2018.

In addition to being a pioneer in the tin market by obtaining the anti-bribery certification ISO37001:2017, the White Solder Group has its entire corporate structure determined according to the best compliance practices in the market and with its financial statements always audited by the largest auditing companies in the world (currently by PWC).

We were one of the first companies in South America to be certified by the Responsible Minerals Initiative (RMI) as Conflict Free Tin Smelter and we are members of the International Tin Association (ITA).

We have channels for communicating general matters to stakeholders through our website <https://whitesolder.com.br/contato/> and we have specific whistleblowing channels described below:

- E-mail – grupotor@legaletica.com.br (24 hours and 7 days a week);
- Phone 0800 400 3333 (business hours – 8 am to 6 pm – 7 days a week), applicable only to Brazil;
- Company Website <https://whitesolder.com.br/canal-de-denuncia/>

RMAP Assessment Summary

The last evaluation that White Solder Metalurgia e Mineração LTDA went through was in the period from March 09th to 11th, 2021, referring to the operations of the period from 01/01/2020 to 12/31/2020. This process has not yet been finalized and the company has been framed in the extended correction action



plan of the RMI (ECAP) and continues with the necessary adjustments for the conclusion of this process.

In parallel to ECAP, a new audit process is scheduled to run in week 43, between October 23th and 26th, 2023. RMI has determined that this process will cover the period from 08/31/2021 to 09/09/2023.

Our standard of execution of the due diligence report is to use the closed year, that is, from January 1st to December 31th, however, due to the total reformulation of our responsible sourcing procedures that we made as an action to complete the ECAP, it was also necessary to update the due diligence report. If we maintained the standard of starting on January 1 and then ending on September 9th, 2023 to coincide with the final audit period, we would have an evaluation period of less than one year so we decided to make this report using the new versions of our procedures from August 9th, 2022 to September 9th, 2023, thus having a full year being contemplated in the report.

Company Management System

With the intention of making our management system for the mineral responsibility program stronger, a total review of the procedures was made, and a separate structure was created from the other documentation that the company has on behalf of ISO's 9001, 14001, 45001 and 37001 so all the topics related to mineral responsible sourcing can be easily identified and handled in the day-to-day operations of the company. Documents that are fully related to mineral responsible sourcing will have the SGRM code which stands in Portuguese for "Mineral Responsibility Management System" and following this report we will present detailed information about these documents and their correlations.

Supply Chain Policy

We adopt and commit to the supply chain policy that is formalized through the document SGRM.004 – Supply Chain Policy, available in our quality management system (Qualis System), on the bulletin boards in the company and also on our website <https://whitesolder.com.br/sistema-de-gestao-antissuborno/>. Annually a critical analysis of the policy is carried out for the purpose of revalidating all specified items and, if relevant, revising them.

We communicate to suppliers through e-mail to follow the defined policy, all the e-mail signatures of the company's employees also have the link to the mineral conflict policy, thus making a reinforcement to each communication about our policy, as well as we make available on the company's website for communication to the public.

Management Structure

Assigned authority and responsibility to the "COO – CHIEF OPERATING OFFICER and Operational Manager – TOR" with the necessary skills, knowledge and experience to oversee the supply chain due diligence process and cross-functional team for operational implementation of the conflict minerals compliance program.

The responsibility and authority of the persons who administer, perform and verify the activities related to mineral liability are defined in the documents relating to the management system and in the job descriptions of the organization, ensuring internal responsibility with respect to the implementation of the process of *Due Diligence* of the supply chain and other related activities.

Team Supervision of the process of *Due Diligence*:

- COO – *Chief Operating Officer* – Job Description: DES.015 – WSG;
- Operational Manager – Job Description: DES.066 – TOR.

Cross-functional Team and Job Description:

- In charge of Management System – Job Description: DES.021 – TOR;
- SGAS Assistant – Job Description: DES.016 - WSG;
- Administrative Manager – Job Description DES.065 – WSRO;
- Receiving Assistant – DES.069;
- Receiving Assistant (ADM) – DES.076;
- Integrated Management System Assistant – DES.86 – WSRO.

Mineral Responsibility Committee:

- COO – *Chief Operating Officer* – Job Description: DES.015 – WSG;
- Operational Manager – Job Description: DES.066 - TOR;
- In charge of Management System – Job Description: DES.021 – TOR.

All of the positions described above are trained in all procedures related to mineral responsibility and we annually review such procedures. If a procedure is changed, the training is also redone.

In this way we work with a small structure, but with total autonomy for decision making. For this reason we will always be responsible for the management process of the mineral responsibility system the highest operational hierarchical degrees of the company.

Material Control Systems

We have implemented sufficient measures regarding internal material control systems ensuring that:

- Each individual transaction of material received is identified and documented. The process records the date the material was physically received.

- Inventory, including work-in-process, metal inventories and other types of materials are calculated. The process ensures that weight fluctuations due to processing are monitored for losses. Unjustified changes in inventory (losses or gains) are investigated and conclusions established in writing.

- Receipts, inventories, losses, and sales quantities are reconciled in a mass balance.

- Discrepancies observed during material control processes and/or a mass calculation of the balance are investigated according to the details of the systematics specified in the procedure SGRM.003 – Material Control Systems.

Even though Brazil is classified as low risk according to our CAHRA criteria, some important actions that precede the receipt and application of these aforementioned material controls are also performed in order to offer greater control of all the previous steps thus reducing the risks in the supply chain.

1. Electronic invoice: As we do not negotiate directly with artisanal miners and cooperatives have legal treatment similar to a private company, all purchase transactions we carry out go through the stage of issuing the electronic invoice (NFe). In the issuance of an NFe, data such as weight, number of items, who is responsible for transport, truck data, data of the mining process of this cooperative with the national mining agency, transaction value, among others, are mandatory. At the time of issuance, government entities receive the data online and can do all pertinent checks, such as determining the amount of the federal contribution on mineral exploration (CFEM) that is due for that transaction.

2. Regarding the disclosure of information on payments made to governments in accordance with the requirements established under the Initiative for the Transparency of the Extractive Industry (EITI), Brazil is not listed as a member country of the EITI, but we reinforce our commitment according to the statement of support for the implementation of the twelve principles listed, the statement "EITI – Transparency", published on the company's website <https://whitesolder.com.br/>. This report covers not only the CFEM, previously mentioned and which is

directly related to mineral exploration, but also various other taxes and fees that the company pays.

3. Routes: We only acquired material from two states of Brazil, Rondônia and Pará. Our company is located in Rondônia so the routes from the mining areas in Rondônia to our foundry are extremely short (often with displacements of less than 100 km) and often the route made by our own group carrier (BI Transportes e Logística) or even by the truck of White Solder Metalurgia e Mineração LTDA. In the acquisitions of Pará, where the distances are much greater, we try to use only the trucks of our carrier of the group to have full control during the route.

Recordkeeping systems

The documents and records (documented and retained information) pertaining to the mineral liability management system are prepared and controlled in accordance with the PG.002 procedure that aim to define the activity, responsibility and authority of the areas in the preparation, approval, issuance, distribution, and review of documents as well as dealings with records (retained information) where the form to identify, collect, index, access, archive, store, maintain and dispose of is established.

The documents prepared are available in our quality management system (Qualis system) as well as registration control.

Critical analysis is carried out annually of the documents prepared for the mineral liability management system for the purpose of revalidating the documents, that is, critically analyzing the documents and, if relevant, revising them.

All Records pertaining to mineral liability are stored for a minimum period of 5 years. Documents scanned and saved in the Qualis system, in SAP or even in specific folders within the company's server are saved on servers in the cloud managed by a specialized company and with backups in different locations to avoid any type of data loss incident.

Records of each operation are stored and also the documents of each supplier to demonstrate its legality before the governmental institutions and also before the requirements that our company determines that each supplier has.

Risk Assessment

We have established the following steps for the identification and assessment of risks in our supply chain, below a brief comment of the systematics:

Step 1: Analysis for CAHRA identification: This step aims to identify conflict-affected and high-risk areas that may exist in our supply chain. The resources and criteria used to identify a CAHRA include countries or areas identified as high risk by the relevant regulations:

- The Democratic Republic of the Congo (DRC) and its nine neighboring countries as described in Section 1502 of the Dodd Frank Act (DFA 1502), namely: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (OECD Portal for Supply Chain Risk Information);
- The indicative and non-exhaustive list of *CAHRAs* provided by the European Commission pursuant to Article 14.2 of European Union Regulation 2017/821 <https://www.cahraslist.net/cahras>;
- Other areas that the company determines as high risk based on the implementation of its *CAHRAs* procedure and *Red Flag review*;
- If the EU lists an area as *CAHRA* and DFA 1502 does not do so, the area will be considered a *CAHRA* and vice versa.
- If the EU lists a subnational area as a *CAHRA* and DFA 1502 considers the entire country as one *CAHRA*, we consider it is a *CAHRA* national.
- If the company determines that an area is *CAHRA*, even if it is not listed in DFA 1502 or the EU list, the area is *CAHRA*.

We also use open-source information and are grouped according to the criteria established in the definition of conflict-affected and high-risk areas:

CONFLICT— making it possible to assess whether an area is in a "state of armed conflict" or whether it is a "fragile post-conflict" area;

GOVERNMENT – allowing to assess the extent to which areas have weak or non-existent governance and security;

HUMAN RIGHTS – allowing to assess whether an area is affected by widespread and systematic violations of international law, including human rights abuses.

The analysis flow is followed by the following steps:

1. Based on the supply chain information we must first identify the geographical areas of supply, trade, handling and transportation of minerals, with a view to understanding the context in which mining and trade activities occur and identifying the related risks;

2. Consult the open sources (analytical sources, maps/tables and news) contained in Annex A – Open Information Sources of the SGRM.005 procedure, covering the three criteria of the definition of conflict-affected and high-risk areas by selecting at least one relevant resource for each criterion category;

3. Understand the political and security context and identify and assess the potential risks of adverse impacts from your supply chain.

4. If the sources listed in Appendix A of SGRM.005 provide contradictory or inconclusive information, we should exercise caution before dispensing with an area of enhanced *due diligence procedures*.

5. The sources listed in Annex A of the SGRM.005 procedure is updated at varying intervals and, although relevant, may not always be fully accurate, so we should use them in combination and with the addition of complementary sources as appropriate.

Based on these criteria we determine that the other research sources to be used will be:

- Conflict Barometer
- Rule of Law of the Geneva Academy in Armed Conflict



- Corruption Perception Index
- Sanctions (Know Your Country website)
- Fragile State index – FSI

So if a country is classified as high risk in the mandatory resources (Dodd Frank list and EU CAHRA), it will be considered a CAHRA regardless of the assessment of complementary resources.

As described in one of the examples in the document “Example of procedures for identifying conflict-affected and high-risk areas” (version 1.2, revised on April 2, 2021), we will use the criterion that if a country is not classified as high-risk, risk in mandatory resources, may be elevated to a high-risk country if two of the three criteria (Conflict, Governance and Human Rights) are assessed through the complementary resources that White Solder Metalurgia e Mineração LTDA with a high-risk classification.

The CAHRA procedure is reviewed at least every 12 months but may be reviewed earlier if there is any material change in some of the criteria listed above. Based on our CAHRA procedure none of our raw materials originates or is transported through a CAHRA and thus we are a low-risk facility

Step 2: Analysis for identification of Red Flags:

After the identification of CAHRAS and, to determine the scope of the risk assessment, White Solder Metalurgia e Mineração Ltda begins the analysis of its supply chain and transportation through the process of collecting information about the business partners supplying ore and carriers in high-risk chain, a process that we call "Know Your Counterparty (KYC)". The basic principle of KYC is to determine the identity, type of business relationship, and legality of business operations for each ore supplier. We have developed a specific form for ore suppliers that combines the basic principles of the KYC method with the OECD (Conflict, Governance and Human Rights) evaluation criteria to bring impartiality and transparency in the evaluation to identify possible Red *Flags* in the supply chain: SGRM.009 – *Red Flag Analysis*.

No material originates from or transited through a CAHRA and Brazil is a plausible country of origin. We only had one red flag identified related to the fact

that a cooperative was unable to prove payment of the CFEM tax and our action was to suspend the purchase from this supplier until this situation is resolved.

Step 3: Advanced Due Diligence;

After the analysis for identification of CAHRA's and Red Flag specified above, White Solder Metalurgia e Mineração Ltda continues with the performance of advanced due diligence performing evaluation and raising information related to the supply chain of cassiterite ore under the following aspects:

1. Knowledge of the context of the area of origin, transit and/or export of minerals affected by conflicts and high risk;
2. Knowledge of its suppliers and business partners;
3. Knowledge of mineral extraction conditions in areas affected by conflict and high risk;
4. Knowledge of the conditions of transport, handling and trade of ores in conflict-affected and high-risk areas; and
5. Knowledge of export conditions from conflict-affected and high-risk areas.

Advanced *due diligence* of operations with business partners identified as CAHRA's or Red Flag to evaluate aspects 1 to 5 listed above, is obtained by applying the necessary questions to the prior knowledge of the business partner's supply chain regarding tin. Better details are specified according to procedure SGRM.010 – Advanced Diligence.

As none of the raw materials originate or transit through a CAHRA, Advanced Due Diligence is only necessary for the red flag was identified in the cooperative that was unable to prove payment of the CFEM tax. As of the date of preparation of this document, the Due Diligence advanced in this cooperative had not been carried out yet, so negotiations with this supplier will remain suspended until the Due Diligence is carried out and the problem is resolved as established in the risk mitigation plan prepared for this supplier.

Step 4: SCA - Upstream Mechanism Data Analysis

In the event that it acquires materials from a CAHRA, White Solder has rule to use a *100% RMI-recognized Upstream Assurance mechanisms to support part of its on-site due diligence activities and reinforces that:*

- Will carry out field diligence (In loco), if the documentation provided by the mechanism of *Upstream* presents some kind of inconsistency or discrepancy;
- Field diligence (In loco) if we do high-risk operation without using a mechanism of *Upstream*.

We also reinforce that we will use the *upstream* mechanism for the supply chain and transport chain for high-risk cases.

When making a transaction in area CAHRA's using the upstream mechanism as part of the due diligence data and information will be analyzed, the objective of the SCA is to consolidate and analyze in a single report all the documentation provided by the upstream mechanism, before approving the operations as a due diligence factor; Because it is a living organism, the SCA will be updated with each operation and will include all other documentation and information that will be generated after the shipment of the material to its final destination.

None upstream mechanism was used during the period analyzed once 100% of the raw material that entered our smelter its originated in Brazil, which is a low-risk country according to our CAHRA procedure.

Risk Management

Our SGRM.007 - Scope, Identification, Assessment and Risk Management REV.000 procedure determines all the criteria we use for risk management. Below we will present a summary of the main points that are determined in this procedure.

Assessment and identification

White Solder Metalurgia e Mineração Ltda, through its advanced diligence applied on high-risk actors, identifies and assesses the presence and severity of risks in the supply chain, comparing the facts and circumstances against the risks included in Annex II OECD, specifically:

- Serious human rights violations:
- Support for armed groups :
- Security contracting:
- Bribery and fraud
- Money laundering
- Non-payment of debts

Risk classification and management

As specified in OECD Annex II and detailed in its SGRM.004 – Supply Chain Policy, White Solder Metalurgia e Mineração Ltda classifies the possible risks identified in Severity 3 and Severity 2 and the actions that mitigate them as described below:

- We consider serious human rights violations associated with the extraction, transportation or trade of minerals to be Severity 3 and will take the following measures when identified:
 - We will immediately suspend or discontinue engagement with suppliers when we identify a reasonable risk that they are acquiring or linking to any party committing serious human rights abuses.
- When risks linked to direct or indirect support to non-state armed groups are identified, they will be considered as Severity 3 and will receive the following treatments:
 - We will immediately suspend or discontinue engagement with upstream suppliers when we identify a reasonable risk that they are acquiring or linked to any party providing direct or indirect support to non-state armed organizations.

- In relation to public or private security forces and the exposure of artisanal miners to this risk, White Solder considers as a Severity 2 and will adopt the following measures:

- When we identify that there is reasonable risk, we will suspend or discontinue the contract with suppliers following failed mitigation attempts within 6 months of the adoption of the risk management plan.

- In relation to the management of risks of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties to governments, the risk identified will be considered Severity 2 and we will adopt the following stance:

- If within 6 months of the adoption of the risk management plan, there are no measurable and significant improvements to prevent or mitigate the risks of bribery and fraudulent misrepresentation of the origin of the minerals, money laundering and payment of taxes, fees and royalties to governments, we will suspend the contract with the supplier for a minimum period of 3 months. If the company has an interest in continuing operations after the minimum period established, the suspension must be accompanied by a revised risk management plan, indicating the performance objectives for the progressive improvement that must be met before the resumption of the business relationship.

When identifying a risk, in addition to elaborating, implementing and monitoring the risk management and mitigation plan, White Solder Metalurgia e Mineração Ltda:

- Report through reports the conclusions to the Senior Management describing the information collected and the potential risks;
- Seeks to build and/or exert influence on the actors in the chain that can most mitigate risks effectively;

- Consults with other affected stakeholders to align on the risk management strategy;
- Implements and monitors the risk management plan and reports to senior management to consider suspending or discontinuing the business relationship after failed mitigation attempts;
- Supports network-based communities to monitor risk mitigation;
- Maintains continuous monitoring of risks:
 - Measurable evidence for elimination of the risk should be referred in maximum 6 months from the adoption, if it does not happen, White Solder Metalurgia e Mineração Ltda will suspend or discontinue the operation/involvement for a minimum of 3 months.

Mitigation and Indicators

White Solder Metalurgia e Mineração Ltda could adopt measures to reduce and mitigate risks that may be identified, whether individually or through associations, joint assessment teams or other appropriate means to carry out such activities, following the guidelines presented in Annex III of the OECD “Suggested Measures for Risk Mitigation and Indicators for Measuring Improvements”:

Conclusion

Our standard of execution of the due diligence report is to use the closed year, that is, from January 1st to December 31th, however, due to the total reformulation of our responsible sourcing procedures that we made as an action to complete the ECAP, it was also necessary to update the due diligence report. If we maintained the pattern of starting on January 1st and then ending on September 9th 2023 to coincide with the final audit period, we would have an evaluation period of less than one year and then we decided to make this report using the new versions of our procedures from August 9th 2022 to September 9th, 2023, thus having a full year being contemplated in the report.



Our production continues to use only primary materials as raw material and 100% of the cassiterite acquired over the period analyzed originates in Brazil, being supplied by cooperatives that we maintain long-term agreements with and also by our own group mining company NBF Mineração S/A. Therefore, we did not have any ore inputs from areas identified as conflict-affected high-risk areas (CAHRA's) and one of the suppliers, whose volume supplied throughout the entire period is less than 1.3% of the total ore used by the company, had a red flag identified in relation to failure to prove payment of the CFEM tax and whose action was the suspension of commercial relationship with this supplier until advanced due diligence is performed and the issue is resolved.

We also didn't have any entries in our grievance mechanism.

In the period evaluated we had a total of 1268 ore inflows with a total weight of 9,256 tons (already discounted the humidity) and an average tin contained in this ore of 62.69%. Of the total weight, we had 6.82% from NBF Mineração S/A and the remainder (93.18%) from cooperatives.

Based on this information, we consider our Mineral Responsibility Management System effective and now we have to apply the new procedures for a longer time in order to be able to identify possible improvements that make our system even more complete.