

## Resind Indústria e Comércio Ltda Supply Chain Policy

Resind Indústria e Comércio Ltda is a Brazilian company focused on the recovery of elements from low grade materials through novel and innovative processes. We have worked with a several materials, including Aluminum, Zinc, Manganese, Tin, Tantalum and Niobium. Over the years, the last three elements became the focus of our company, which required special efforts in terms of research and development. We understand that we have a very high social responsibility, both with our stakeholders and the society.

In this context, we are aware that extraction, production, and trade of minerals from High-Risk Areas can contribute to adverse impacts related to human rights. Therefore, our supply chain policy explicitly forbids purchase of any material from countries such as in the Democratic Republic of Congo, adjoining countries or any other Conflict Affected and High-Risk Areas (CAHRAs), including those countries considered CAHRAs by relevant conflict minerals regulations.

This supply chain policy is specially related to the procurement of tin and tantalum containing materials, which are known to be explored in those regions (conflict minerals). This policy also follows the Annex II within the “OECD Due Diligence Guidance for Supply Chains of Minerals from Conflicted-Affected and High-Risk Areas” and from the “Responsible Minerals Assurance Process Tin and Tantalum Standard” from RMI. Therefore, we are aware of material and supply chain risks and in line with our ethical standards we do not tolerate any form of human right abuse (torture, degrading treatment, forced or compulsory labor, child labour, among others), bribery, misrepresentation of origin of minerals, money laundering, tax evasion or financing of non-state armed groups. Also, we recognize the importance of public or private security forces at mine sites and/or surrounding areas and/or along transportation routes when these are solely related to the maintenance of the rule of law, safeguarding human rights or other aspects described in Annex II from the OECD Guidance.

If our company identifies a risk or receives proof that a supplier is infringing our Supply Chain Policy or any legislation, our business relation will immediately be suspended or discontinued. We will cooperate with authorities in any instance. Our communication channels are opened for complaints in our website.

Our company does not have a mine or industrial facility in any High-Risk Area nor CAHRA's and we work solely with by-products from Brazilian tin smelters. However, this fact does not hold us from taking serious measures to protect our supply chain from such abuses. We only buy from companies that take into consideration responsible practices for sourcing tin, tantalum and other elements. Also, we do not buy any material from CAHRAs and we comply with sanctions such as from the United Nations.

Considering the mentioned OECD Guidance and the Standard from RMI, our company has established a management process for risk management. This process includes, among other

aspects, 5 steps: a strong company management system, identification and assessment of risks in the supply chain, design and implementation of a strategy to respond to identified risks, independent third-party audit of smelt/refiners due diligence, annual report on supply chain Due Diligence. All these steps are documented through internal procedures at our company. Therefore, we conduct Due Diligence steps and recommendations according to the Tin and Tantalum Supplement of the OECD Guidance.

We not only encourage our suppliers to adopt this policy on their own supply chain but we also cooperate with them so that they can better comply with legislation requirements. One of our practices is to promote risk awareness, both with our employees and our suppliers. This is performed regularly through internal trainings and communications to our suppliers. We also inform them about our supply chain policy. In this way, our suppliers and Stakeholders are explicit informed about our policy regarding the supply chain.

Our company complies with national and international regulations regarding all aspects of production and transport of materials. If any tantalum and/or tin containing material is eventually classified as class 7, such material will be subjected to appropriate safety, transport, and environmental legislation.

We are engaged with our supply chain actors, society and organizations such as the RMI, in order to continuously improve its supply chain policy management, to prevent or mitigate risks and to promote risk awareness.

Implemented on 01 April 2015

Last revised on 10 Dec 2020



---

Almir Clemente  
Production Director of Resind Indústria e Comércio Ltda