

Albasteel Indústria e Comércio de Ligas Para Fundição is committed to ensuring that our raw materials are purchased responsibly in all locations of our company.

Our Supplier Policy and Code of Conduct establish our corporate commitments to ethical business practices and legal compliance and we only do business with suppliers who comply with these commitments. With a single plant with tungsten smelting / refining capacity located in São Paulo-Brazil, it has implemented processes and procedures to ensure that our supply does not support or benefit groups in armed conflict or involve serious human rights abuses. We are included in the Responsible Minerals Guarantee Process (RMAP) tungsten casting list (<http://www.responsiblemineralsinitiative.org/active-tungsten-smelters/>).

Albasteel complies with United Nations sanctions resolutions and, where applicable, national laws (for example, Section 1502 of the Dodd Frank Act) implementing such resolutions, and we endorse the activities of the Organization for Economic Cooperation and Development (OECD) and use the recommendations of the OECD Due Diligence Guide for Responsible Mineral Supply Chains from conflict-affected and high-risk areas (OECD Guidance) as a model for our own due diligence.

According to Annex II of the OECD Guidance (<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-GuidanceMinerals-Edition3.pdf>), Albasteel strongly condemns all activities and will refuse any material that we believe to have benefited or supported armed rebels / terrorist groups through illegal financing or other activities or involved serious human rights violations associated with the extraction, handling, transport or trade of minerals, including:

- Serious abuse (ie torture, cruel, inhuman and degrading treatment; forced labor for compulsory labor; worst forms of child labor; human rights violations and abuses, such as widespread sexual violence; war crimes or other serious violations of international law humanitarian, crimes against humanity or genocide).
- Direct or indirect support for non-state armed groups.
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of the minerals.
- Money laundry.
- Failure to pay taxes, fees and royalties to governments.

Albasteel must, through our continuous due diligence, market intelligence and publicly available reporting system, discover that our suppliers are involved in practices that do not meet our responsible purchasing requirements, we must immediately inform the supplier that we are suspending the supply to that supplier and develop a plan to mitigate the identified risks. If mitigation does not address the risks identified to our satisfaction, or we must find more activities that indicate extreme abuse, dishonesty or situations where a supplier is not willing to help with our due diligence. Albasteel will immediately stop any activity with that supplier. We have implemented a management system in accordance with the OECD Due Diligence Guide for Responsible Supply Chain for Minerals Affected by Conflicts and High-Risk Areas (CAHRA) to ensure that all raw materials containing tungsten and other relevant raw materials they come in a way that does not support or benefit from illegal armed conflicts or contributes to serious human rights abuses or violations of international humanitarian law.

In line with the OECD Guidance, Albasteel is committed to being audited by an independent third party company to ensure transparency and assurance to our customers that Albasteel's supply chain due diligence policy is verifiable and effective.


Albasteel was initially determined with the Responsible Business Alliance RMI - RMAP Assessment Standard (<http://www.responsiblemineralsinitiative.org/active-tungsten-smelters/>) and continues to engage in this independent assessment annually. Albasteel communicates the included supply policy to our suppliers and customers and makes it publicly available for Review. In addition, Albasteel requires our suppliers to contractually recognize our policy and commit to providing information, documentation and accommodation for site visits, as necessary to conduct our own due diligence.

In line with the OECD Guidance, Albasteel makes annual Due Diligence reports available for mineral supplies in areas affected by conflict and high risk [www.Albasteel.com.br](http://www.Albasteel.com.br)

Our purchasing manager for strategic raw materials, Eduardo Wetter ([Eduardo.wetter@albasteel.com.br](mailto:Eduardo.wetter@albasteel.com.br)), was appointed with the responsibility of ensuring that all tungsten is obtained in a legitimate and ethical manner and in accordance with our policies and procedures.

In case of problems or anonymously report your concerns related to:

<https://www.albasteel.com.br>



Eduardo Wetter  
CEO