

Albasteel Indústria e Comércio de Ligas Para Fundição founded in 1982 located in Guarulhos, São Paulo, Brazil, producing and reprocessing ferroalloys for foundries is committed to ensuring that our raw materials are sourced responsibly from all locations in our company.

Our Supplier Policy and Code of Conduct set out our corporate commitments to ethical business practices and legal compliance, and we only do business with suppliers who meet these commitments to ensure our sourcing and recommendations in the OECD Due Diligence Guide for Responsible Supply Chains.

In accordance with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas, Albasteel strongly condemns all activities and will refuse any material that has violations associated with extraction, handling, transport or trade of minerals, including:

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

Our strategic raw materials purchasing manager, Eduardo Wetter (Eduardowetter@albasteel.com.br), has been designated with the responsibility to ensure that all tungsten is obtained in a legitimate and ethical manner and in accordance with our policies and procedures.

We aim to establish relationships with our immediate suppliers. We are committed to transparency in the implementation of this policy, providing reports on our evolution to our customers, relevant stakeholders and the public (as needed).

We support the implementation of the Extractive Industry Transparency Initiative (EITI) principles and criteria.

In case of anomalies, communicate the interested parties according to communication mechanisms/channels in: <https://www.albasteel.com.br>



Eduardo Wetter
CEO