



OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

AMG Brasil - Due Diligence Report for Raw Material Procurement in the Year 2025 (“OECD Step 5 Report”)

Period: January 1, 2025 to December 31, 2025

Note: This report is following the “OECD *Due Diligence Guidance Report*” of the Responsible Minerals Initiative - RMI (<http://www.responsiblemineralsinitiative.org/smelter-introduction/>).

Issue Date: April 6, 2026

Revision Date: May 20, 2026

1. Information about the company

AMG Brasil operates in three segments: critical minerals, special materials and energy.

Critical minerals, in other words, minerals available in nature in limited quantities, include spodumene and tantalum concentrates, tin ingots and feldspar. Special materials include high-performance aluminum alloys, deoxidizers and grain refiners, while the chemical plant is dedicated to the production of tantalum and niobium oxides, Altab, cryolite, fluxes and salts.

Brazil Facilities:

AMG Brasil S.A (Special Materials)
Rod. Br 383 km 94, Colônia do Marçal
São João del-Rei-MG, Brasil
CNPJ: 11.224.676/0003-47
RMI CID: 001076

AMG Brasil S.A. (Critical Materials)
Rod. LMG 841 - km 18, Volta Grande
Nazareno-MG, Brasil
CNPJ: 11.224.676/0001-85

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2. RMAP Assessment

AMG Brasil S.A (Special Materials)

Scope of Assessment: Tantalum

RMI Smelter ID: CID001076

Period assessed: April 1, 2024, to March 31, 2025

Date of assessment: May 3, 2025 to May 16, 2025

Assessment Company: Arche Advisors

Compliance status: Compliant

Summary of results:

No non-conformities were identified by the audit. An item Compliant with Continuous Improvement was raised and addressed in 2025.

AMG Brasil S.A. (Critical Minerals) does not purchase tantalum, niobium, tin and lithium ores, since all its production comes from its own mine.

The audit summary can be found at the link:

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/AMG%20Brasil%20Public%20Report.pdf>

3. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human rights abuses in high-risk and conflict-affected regions, AMG Brasil has developed a supply chain policy. This policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA-OECD Guidance).

The policy was assessed in accordance with the RMAP standard and covers all risks identified in Annex II of the OECD Guidance, with a global geographical scope. The company is firmly committed to addressing any Annex II risks, should they be identified. The policy has been reviewed and approved by senior management, which is committed to supporting its implementation. Furthermore, the policy has been widely communicated to customers and suppliers as an integral part of the quality management system.

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This policy is also located on AMG Brazil's website: [https://amg-br.com/pt/wp-content/uploads/sites/2/2024/07/Politica Compra Minerio PT BR-Outubro-2023-Portugues.pdf](https://amg-br.com/pt/wp-content/uploads/sites/2/2024/07/Politica_Compra_Minerio_PT_BR-Outubro-2023-Portugues.pdf)

4. Company Management System

4.1 The company's management system

In addition to the RMAP assessments, the Special Materials unit is audited in accordance with ISO 9001, 14001 and 45001. In the Critical Minerals unit, the ISO certification process is underway. The company follows its commitment to supply chain policy and has established an internal procedure for supply chain management, including the *Due Diligence Guidance* process.

- NQ085 Identification of Conflict-Affected or High-Risk Areas: procedure used to define the KYC processes, risk assessment, red flag review, risk management and risk mitigation.
- PO043 and PO125: procedures to define the processes for Receiving, Unloading, Storing, and Identifying raw materials.
- NQ064 Purchasing Tantalum and Niobium Ores: procedure to provide guidance on the process of qualifying and purchasing minerals.
- Whistleblowing and Reporting Policy: detailed policy on how whistleblowing is handled at AMG. Document available at: https://amg-br.com/pt/wp-content/uploads/sites/2/2024/12/AMG_SPEAK_UP_-_POLITICA_DE_DENUNCIAS_E_RELATORIOS1.pdf

4.2 Management structure

The Procurement Analyst is responsible for executing and updating internal procedures relating to the purchase of tantalum ores and assessing risk areas.

The Procurement Coordinator evaluates and validates the information managed by the Procurement Analyst, and is also responsible for coordinating work with the relevant Procurement, Quality and Production areas to ensure that each area follows its roles and responsibilities to implement due diligence, schedule and report any red flags and potential risks identified.

If any deviations from internal procedures are identified, the Procurement Management will be notified so that risk mitigation measures can be adopted.

4.3 Internal control systems:

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AMG Brasil has established and updated its Due Diligence management system following the guidelines of the OECD and RMAP. These procedures are incorporated into the Integrated Management System (IMS).

i. Following the assessment of the supplier's risk level (high risk or low risk), an evaluation of the OECD red flags is conducted. Based on this assessment, the applicable documentation is requested, AMG Brazil's counterparty due diligence process is carried out, and mine site visits are performed, where applicable. Site visits are conducted every three (3) years for active suppliers. In the case of new suppliers, the visit must be carried out by the fourth purchased lot, within a maximum period of six (6) months.

ii. The company communicates its Ore Purchasing Policy to its suppliers and to those involved in the purchasing process, as well as making it publicly available on its website.

iii. AMG provides an area on its website (<https://amg-br.com/pt/contato/compliance/>) where anyone can make a complaint. All complaints are assessed by the Compliance team who, in accordance with the procedure, will deal with the case in the best possible way.

iv. Throughout 2025, AMG reinforced its commitment to the program and carried out internal and external training with the areas involved in the process.

v. The company used its control procedures to monitor all materials received, which underwent detailed analysis, including transport documentation, invoices, weight verification and chemical analyses. Records of all transactions are filed at the company.

4.4 Documents Maintenance

Once a year, the procedure is reassessed and the employees involved in the purchasing process are individually trained.

In accordance with the quality standard, all documents relating to purchasing are kept on file for 5 (five) years.

5. Risk identification (ALL SOURCES):

AMG Brasil has a robust process for identifying risks in the supply chain.

Before starting new business with a supplier, there is a detailed check by the Procurement team to confirm that the supplier is located and/or the tantalum ore will transit through a CAHRA area. The company uses the following criteria to determine CAHRAs:

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Risk	Resource
Conflict	Ato Dodd-Frank https://www.sec.gov/Archives/edgar/data/1054374/000105437415000089/conflictmineralsreport.htm
	EU Cahra list https://www.cahraslist.net/cahras
	Rule of Law in Armed Conflicts (RULAC - Geneva Academy) https://www.rulac.org/
	Barômetro de Heidelberg https://hiik.de/konfliktbarometer/aktuelle-ausgabe/
Human Rights	United Nations Development Program — International Human Development Indicators — Country Profiles https://hdr.undp.org/data-center/country-insights#/ranks
	Fundamental Rights Index (World Justice Project) https://worldjusticeproject.org/rule-of-law-index/global/2022/Fundamental%20Rights/
Governance	Worldwide Governance Indicators (WGI) https://www.worldbank.org/en/publication/worldwide-governance-indicators/interactive-data-access
	Fragile States Index https://fragilestatesindex.org/indicators/

6. Risk Assessment (HIGH RISK SOURCING ONLY)

6.1 Risk Assessment:

For materials purchased in high-risk areas, AMG Brasil carries out more in-depth assessments, which include:

- Assessment of the CAHRA context;
- Traceability of the origin and transit of materials;
- Assessment of the activities and relationships of *upstream* suppliers;
- Identification of sites and qualitative conditions of extraction, trade and handling;
- Mine visits.

In order to carry out the above assessments, the company has the following procedures in place:

AMG Brasil carries out a *Counter Party Due Diligence* on its suppliers of tantalum and lithium ores, through the *Dow Jones* database, where the following are verified: sanctions, accusations and investigations, negative media and political exposures of the beneficial owners, directors and executives. If any risk alerts are identified in this process, the compliance area responsible for the *Counter Party* will analyze and inform whether or not the purchase can be made.

The company also conducts on-site visits to suppliers located in high-risk areas, based on the methodology suggested by the RMI in the document “*On-the-Ground ASM Mine-Site Assessment Questionnaire*”.

Monthly monitoring of mining news is also carried out in order to identify any potential risk in the origin and transit of materials.

6.2 Results:

The risk identification process resulted in the classification of one (1) country as high risk and two (2) countries as low risk. During the OECD red flag assessment process, three (3) red flags were identified for the country classified as high risk, while no red flags were identified for the remaining countries.

Based on the documents, information provided, and site visits conducted, it was concluded that the suppliers did not present any risks or adverse impacts related to Annex II of the OECD Guidance and were

therefore considered qualified to supply tantalum-containing materials to AMG. Furthermore, the implementation of a Risk Mitigation Plan was not required. In 2025, three (3) site visits were conducted, all of which were properly documented through reports identifying opportunities for improvement.

In the case of AMG Brasil (Critical Minerals), no tantalum, niobium, tin or lithium ores were purchased.

7. Risk Mitigation

7.1 The Ore Purchasing Policy is publicly available on AMG Brazil's website, as well as being disseminated to the company's employees, and its signature by the supplier is a mandatory requirement for the negotiation to take place. Compliance with the policy is monitored on an ongoing basis, and also through visits (when applicable).

7.2 All documentation sent by suppliers is evaluated, analyzed and specific queries made through Counter Party Due Diligence via the Dow Jones database.

7.3 In the event that AMG Brasil identifies any deviation in relation to the mineral procurement policy and/or in relation to the procedures that permeate the Due Diligence process, such deviation will be evaluated and risk mitigation measures will come into effect. Risk mitigation strategies include, but are not limited to:

- Continuous trading throughout measurable risk management efforts;
- Temporarily suspending trade while ongoing mitigation efforts continue;
- Disengaging from a supplier in cases that mitigation appears infeasible or unacceptable.

Risk mitigation strategies also include: alerting government authorities and reporting suspected criminal behavior to local law enforcement agencies.

7.4 AMG works in collaboration with suppliers to encourage improvement in their health, safety and environmental standards.

A handwritten signature in blue ink, appearing to read 'A. Paiva', written over a horizontal line.

Alexander Bruno de Paiva
Procurement Manager