

Soft Metais Ltda. was founded in 1986 by engineers who were always dedicated to the melting of tin minerals and refining of tin metal, and today is a leading manufacturer of tin-based alloys in the Brazilian market. Installed in its own facilities in the city of Bebedouro, in the northern state of São Paulo, occupies a land area of 20,000 m<sup>2</sup> with 3,500 m<sup>2</sup> of built-in area, and uses only tin in the form of ingots and other non-ferrous metals to manufacture about 600 different items in various fields of use of tin alloys.

Soft Metais Ltda. is aware and supports the initiative of the **RMI - Responsible Minerals Initiative** in order to track and ensure that all sources of minerals and metals used in their production line come from reliable sources and are situated out of the conflict and risk zones, besides of supporting and following all the Legislation concerned to the safety and protection of labor, human rights and environment. We are aware and we also support **OECD - Organization for Economic Cooperation and Development** guidelines.

Recognizing the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas and recognizing that we have a responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and / or agreements with suppliers. We publicly express the decision to conduct DUE DILIGENCE, performing operational activities within the following commitments:

- Manage mitigation measures of aspects and impacts generated by our activity within the influence sphere to minimize the social and environmental damage risk.
- Establish the necessary measures that allow personnel to comply with labor and social rights, duty and obligation to stop and report any act and/or sub-standard condition that may cause loss or damage to people, property and/or the environment.
- Suspend or immediately interrupt the commitment with actors in the supply chain management that commit crimes against humanity, genocide and/or direct and indirect support to armed groups, public or private security forces.
- Reject any activity within the EMV supply chain management regarding the human rights violation in terms of forced labor, all child labor forms, torture, cruel, inhuman, degrading treatment, sexual abuse and/or violence.
- Refrain from carrying out any action that directly or indirectly finances or benefits non state armed groups
- Contribute to the effective elimination of money laundering if we identify a reasonable risk, as well as bribes to governments, for mineral extraction, trade, handling, and transport/export purposes.
- Not offer, promise, give or demand bribes and resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transportation and export;
- Ensure that all taxes, fees and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth the Extractive Industry Transparency Initiative (EITI).
- Promote the human resources development part of our company, through continuous training to ensure the necessary competence in meeting our stakeholder's needs.
- Perform an annual verification of all procedures established in our management systems;

November 1st, 2019.

A handwritten signature in blue ink, appearing to read "Paulo Toledo de Abreu Jr.", written over a light blue circular stamp or watermark.

Paulo Toledo de Abreu Jr.  
Diretor Técnico Comercial