

Sasil SA

SASIL S.A. Conflict Minerals Policy

Introduction

At SASIL S.A., we are dedicated to upholding the highest standards of ethical conduct and social responsibility in every facet of our business operations. This commitment extends to our supply chain, where we recognize the critical importance of responsible sourcing and the potential risks associated with conflict minerals.

Policy Scope

This policy specifically addresses the sourcing, handling, and trade of minerals originating from conflict-affected and high-risk areas. While SASIL S.A. is not directly subject to the reporting requirements of the Dodd-Frank Act, we uphold the principles outlined in Section 1502 and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Our Commitments

- 1. Respect for Human Rights:** We are resolute in our commitment to respect and uphold human rights. We neither tolerate nor engage in any activity that contributes to human rights abuses, including forced labor, child labor, torture, and other violations.
- 2. Responsible Sourcing:** We actively work to ensure that our supply chain is free from conflict minerals that finance or benefit armed groups in conflict-affected and high-risk areas. This includes conducting thorough due diligence and risk assessments of our suppliers and their sources.
- 3. Suspension or Disengagement:** In cases where we identify a reasonable risk that a supplier is sourcing from or linked to any party that supports armed groups, we will promptly suspend or discontinue our engagement with that supplier.
- 4. Zero Tolerance for Bribery and Corruption:** We maintain a strict zero-tolerance policy against all forms of bribery and corruption. We will not engage in any activity that conceals or misrepresents the origin of minerals or involves illegal taxation or extortion.
- 5. Collaboration and Transparency:** We believe in the power of collaboration and transparency to promote responsible sourcing practices. We actively engage with our suppliers, governments, international organizations, and civil society to improve and monitor our performance in preventing and mitigating risks related to conflict minerals.

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6. **Suspension of Dubious Supply:** If we have reasonable grounds to believe that a supplier is not complying with this policy, we will suspend or discontinue the supply from that source.

Supplier Responsibility

We expect our suppliers to fully comply with this policy and to implement their own due diligence measures to ensure that the minerals they supply to SASIL S.A. are not contributing to conflict or human rights abuses.

Continuous Improvement

We are dedicated to continuously improving our conflict minerals policy and due diligence practices to align with evolving international standards and best practices.

References

- Dodd-Frank Act, Section 1502
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas