

## Conflict Minerals Policy

### Objective

VILLARES METALS S.A. supports the principles of the Responsible Minerals Initiative (RMI), the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, and the EU Conflict Minerals Regulation (2017/821) regarding the prevention of the use of conflict minerals and the need for due diligence to trace the origin of minerals in our supply chain. The term “conflict minerals” originally referred to minerals or other derivatives, including tin, tantalum, tungsten, and gold (3TG), which, when mined in the Democratic Republic of the Congo (DRC) and neighboring countries, are known to directly or indirectly finance armed groups involved in civil wars.

In accordance with the scopes defined in the EU Conflict Minerals Regulation, VILLARES METALS S.A.’s requirements regarding the responsible sourcing of minerals now include all Conflict-Affected and High-Risk Areas (CAHRAs). CAHRAs are determined by the Organization for Economic Cooperation and Development (OECD). In addition to the 3TG, VILLARES METALS S.A. has expanded this policy to reflect a broader scope of “responsible minerals” sourcing, focusing on the sourcing of tin, tantalum, tungsten, and gold (collectively known as 3TG), as well as aluminum, cobalt, copper, chromium, and manganese. The due diligence activities are necessary to ensure ongoing compliance with regulations, alignment with key standards as they evolve, and support for the requirements and expectations of key stakeholders.

The obligation to disclose the origin of conflict minerals applies to the entire supply chain of VILLARES METALS S.A. and to all companies directly involved in its manufacturing process. VILLARES METALS S.A. categorically rejects the use of conflict materials originating from any of these conflict regions and sources such materials exclusively from responsible sources. VILLARES METALS S.A. may request that these disclosures be provided using industry-standard reporting tools offered by the Responsible Minerals Initiative (RMI), such as the Conflict Minerals Reporting Template (CMRT), the Extended Minerals Reporting Template (EMRT), or the Additional Minerals Reporting Template (AMRT).

As a member of the global business community in compliance with the Dodd-Frank Act and Regulation (EU) No. 2017/821, VILLARES METALS S.A. is committed to addressing risks related to human rights and the environment in its extended supply chain while complying with legal requirements regarding the disclosure of information on conflict minerals. The risk of human rights violations is a specific cause for concern in the context of certain high-risk minerals and requires compliance with all obligations and an adequate level of transparency throughout the supply chain.

### Scope

This policy covers all operations of VILLARES METALS S.A., its business units, and its employees, as well as supply chain stakeholders who are suppliers of materials containing conflict minerals.

### Requirements for Suppliers

Transparency is important throughout the entire supply chain. In accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, at a minimum, all suppliers are required to:

- Supply VILLARES METALS S.A. only with materials that are “conflict-free”;
- Inform VILLARES METALS S.A. of the presence of 3TG in the materials;
- Ensure transparency in supply chains containing conflict minerals (suppliers must provide the most recent version

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of the Conflict Minerals Reporting Template (RMI) that supports due diligence efforts), in addition to the Extended Minerals Reporting Template (EMRT) or the Additional Minerals Reporting Template (AMRT);

- Adopt policies consistent with the OECD Due Diligence Guidance on Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas.

Sumaré/SP, 28 de abril de 2026.

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