

PRECIOUS METALS ORIGIN VERIFICATION POLICY – VIA BRASIL

Summary

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1- INTRODUCTION

1.1. VIA BRASIL's Precious Metals Origin Verification Policy seeks to use the best market practices regarding the Chain of Custody and Traceability, in order to ensure the ethical and lawful origin of the metals. The objective is to mitigate risks of gold "heating", money laundering (AML) and terrorist financing, ensuring that the ore does not come from embargoed areas, Indigenous Lands (TIs) or Conservation Units (UCs) where mining is prohibited.

1.2. VIA BRASIL is committed to combating violations of environmental and labor legislation, requiring its suppliers to present valid Environmental Licenses, proof of payment of CFEM (Financial Compensation for the Exploration of Mineral Resources) and compliance with international sanctions.

1.3. The Policy is based on the following principles:

- I. Do not tolerate human rights abuses, war crimes, or slave/child labor.
- II. Monitoring the use of Mercury: Require that extraction follow technical standards that minimize environmental impact, rejecting suppliers with illegal deforestation practices or severe water contamination.
- III. Geographic Rigor: Do not tolerate ore extracted from conflict areas, illegal routes or areas under embargo by IBAMA/ICMBio/State Environmental Agencies.
- IV. Transparency in Security: Ensure that security forces at extraction sites act in accordance with human rights principles.

2- DUE DILIGENCE PROCEDURES AND DECLARATION OF ORIGIN

2.1. When purchasing metals, suppliers (mining companies, cooperatives and miners) must present the Declaration of Origin and the Know Your Partner (KYP) Form, containing:

- I. No child labor or labor analogous to slavery.
- II. Non-financing of militias or armed groups.
- III. Productive Capacity: Declaration of the estimated productive capacity of the area (geology/grade), to ensure that the volume sold is compatible with the licensed mineral reserve.
- IV. Origin of Recycled Metals: In the case of scrap or recycled gold, the supplier must prove the legitimacy of the possession and the financial backing of the acquisition.

2.2. For gold of mining origin, it is mandatory to verify Law 12,844/13 and the new traceability framework, including the identification of the geographical origin (mining coordinates).

2.3. The Risk and Compliance Area will analyze the documents, observing:

- I. Signatures by legal representatives with powers of attorney in force.
- II. Mining Documentation: Validity and validity of the Mining Permit (PLG), Use Guide (GU) or Mining Concession.
- III. Volume Compatibility: Periodic audit aimed at identifying signs of third-party ore laundering.
- IV. Location Analysis: Cross-checking of data to confirm that the declared origin does not overlap Indigenous Lands, Full Protection Areas or areas with recent deforestation.
- V. Background Check: Sanctions Check (OFAC, UN, EU), Negative Media and criminal proceedings (environmental crimes, tax crimes, corruption and money laundering).

3- OPERATIONS AND TRANSPORTATION

3.1. Weighing and Content: Every batch received will undergo weight checking and content testing (purity) in certified laboratories. Significant divergences between what is declared on the Invoice and what is measured at reception will generate the immediate blocking of payment and the opening of an investigation.

3.2. Chain of Custody: The transport must be accompanied by Invoices and Transport Guides that unequivocally identify the lot from the mouth of the mine to the final destination at the exporter.

4- PENALTIES AND REPORTING

4.1. Attempts to deceive, provide false information or evidence of "heating" gold will result in the immediate deregistration of the supplier and the blocking of assets.

4.2. VIA BRASIL will report suspicious transactions to COAF, ANM and the Federal Police, as required by the Anti-Money Laundering (AML) regulations.

4.3. Employees who omit irregularities or facilitate the entry of metal of dubious origin will be subject to dismissal for cause and civil/criminal liability.

Approved:

Signature: