

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Positivo Tecnologia has a large scale in the acquisition of technology components both locally in Brazil and abroad. The proportion of purchases is today mainly out of Brazil and is about 10% locally and 90% international, with a good part of the manufacturers of inputs located in Asia. At the same time, Positivo has a Procurement team based in Asia, with offices in Taipei and Shenzhen with the goal to strengthen the relationship with our suppliers, in order to interact directly with the headquarters of technology developers and manufacturers and their plants.

Positivo Tecnologia extends its values and policies to its supplier network with very defined requirements. The supplier approval process includes the analysis of the company's profile, using a questionnaire to assess financial, legal, quality and regularity aspects and social and environmental standards.

All strategic suppliers for the company must have ISO 14001 certifications, for environmental management, and ISO 9001, for quality management.

Also considered in the evaluation of the Occupational Health and Safety Management System, and the European directive ROHS , focusing on the environment and health, in addition to the alignment with standards determined by the standard international AS 8000 and the Brazilian standard NBR 16001, related to social responsibility.

Since September 2019, Positivo Tecnologia has incorporated the principles of responsible procurement of Conflict Minerals and we have made our Policy and posture regarding Conflict Minerals available, so we expect suppliers that manufacture components, products or parts to obtain these materials from free conflict sources.

Professionals within Positivo's supply chain are diligently conducting audits and analyzing documentation. We expect suppliers to maintain accurate and up-to-date data, which should be promptly provided to Positivo upon request. Additionally, Positivo encourages suppliers to adopt comparable practices or policies within their own supply chains.

Positivo Tecnologia started the process of collecting data on conflict minerals using the Conflict Minerals Template (CRMT) model. We're increasing the approach year by year of suppliers with the complete reports from 20% in 2022.

We are able to map the minerals and the list of smelters as follow:

Gold	China Henan Zhongyuan Gold Smelter
Gold	Dowa
Gold	Mitsui Kinzoku Co., Ltd.
Gold	Pan Pacific Copper Co Ltd.
Gold	Matsuda Sangyo Co., Ltd.
Gold	Shonan Plant Tanaka Kikinzoku

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Gold	Mitsubishi Materials Corporation
Gold	Niihama Toyo Smelter & Refinery
Gold	Heraeus Precious Metals GmbH & Co. KG
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.
Gold	Heraeus Ltd. Hong Kong
Gold	Royal Canadian Mint
Gold	Metalor USA Refining Corporation
Gold	United Precious Metal Refining, Inc.
Gold	Williams Advanced Materials
Gold	Solar Applied Materials Technology Corp.
Gold	Sumitomo Metal Mining Co., Ltd.
Gold	Tanaka Kikinzoku Kogyo K.K.
Gold	Metalor Technologies (Hong Kong) Ltd.
Gold	Argor-Heraeus S.A.
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)
Gold	Heraeus Metals Hong Kong Ltd.
Gold	Asahi Refining USA Inc.
Gold	Asahi Refining Canada Ltd.
Gold	Metalor Technologies S.A.
Gold	Rand Refinery (Pty) Ltd.
Gold	Valcambi S.A.
Gold	Metalor Technologies (Suzhou) Ltd.
Gold	LAIZHOU SHANDONG
Gold	Tongling Nonferrous Metals Group Co., Ltd.
Gold	JX Nippon Mining & Metals Co., Ltd.
Gold	Metalor Technologies (Singapore) Pte., Ltd.
Gold	Western Australian Mint (T/a The Perth Mint)
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.
Gold	8853 S.p.A.
Gold	Aida Chemical Industries Co., Ltd.
Gold	Almalyk Mining and Metallurgical Complex (AMMC)
Gold	AngloGold Ashanti Corrego do Sitio Mineracao
Gold	Asahi Pretec Corp.
Gold	Aurubis AG
Gold	CCR Refinery - Glencore Canada Corporation
Gold	Cendres + Metaux S.A.
Gold	Daejin Indus Co., Ltd.
Gold	DS PRETECH Co., Ltd.
Gold	Emirates Gold DMCC
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.
Gold	Ishifuku Metal Industry Co., Ltd.
Gold	Istanbul Gold Refinery
Gold	LS-NIKKO Copper Inc.
Gold	MMTC-PAMP India Pvt., Ltd.

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Gold	Moscow Special Alloys Processing Plant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.
Gold	Ohura Precious Metal Industry Co., Ltd.
Gold	PAMP S.A.
Gold	Planta Recuperadora de Metales SpA
Gold	REMONDIS PMR B.V.
Gold	Singway Technology Co., Ltd.
Gold	SOE Shyolkovsky Factory of Secondary Precious Metals
Gold	T.C.A S.p.A
Gold	The Refinery of Shandong Gold Mining Co., Ltd.
Gold	Tokuriki Honten Co., Ltd.
Gold	Umicore Brasil Ltda.
Gold	Umicore S.A. Business Unit Precious Metals Refining
Gold	WIELAND Edelmetalle GmbH
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.
Gold	Advanced Chemical Company
Gold	DODUCO Contacts and Refining GmbH
Gold	Eco-System Recycling Co., Ltd.
Gold	Kazzinc
Gold	Marsam Metals
Gold	Nihon Material Co., Ltd.
Gold	PX Precinox S.A.
Gold	Sichuan Tianze Precious Metals Co., Ltd.
Gold	SungEel HiMetal Co., Ltd.
Gold	Yokohama Metal Co., Ltd.
Gold	Asaka Riken Co., Ltd.
Gold	Bangalore Refinery
Gold	C. Hafner GmbH + Co. KG
Gold	DSC (Do Sung Corporation)
Gold	Italpreziosi
Gold	Japan Mint
Gold	Jiangxi Copper Co., Ltd.
Gold	Kennecott Utah Copper LLC
Gold	KGHM Polska Miedz Spolka Akcyjna
Gold	Kojima Chemicals Co., Ltd.
Gold	Korea Zinc Co., Ltd.
Gold	Kyrgyzaltyn JSC
Gold	Materion
Gold	Mitsui Mining and Smelting Co., Ltd.
Gold	Ogussa Österreichische Gold- und Silber-Scheideanstalt GmbH
Gold	OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)
Gold	OJSC Novosibirsk Refinery
Gold	Prioksky Plant of Non-Ferrous Metals

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Gold	Safimet S.p.A
Gold	Torecom
Gold	AU Traders and Refiners
Gold	Boliden AB
Gold	Chimet S.p.A.
Gold	Geib Refining Corporation
Gold	HeeSung Metal Ltd.
Gold	Heimerle + Meule GmbH
Gold	JSC Uralelectromed
Gold	L'Orfebre S.A.
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.
Gold	PT Aneka Tambang (Persero) Tbk
Gold	SAAMP
Gold	SAXONIA Edelmetalle GmbH
Gold	SEMPSA Joyeria Plateria S.A.
Gold	Umicore Precious Metals Thailand
Gold	Yamakin Co., Ltd.
Gold	JSC Ekaterinburg Non-Ferrous Metal Processing Plant
Gold	Samduck Precious Metals
Gold	Schone Edelmetaal B.V.
Gold	Republic Metals Corporation
Gold	Shandong Gold Mine (Laizhou) Smelter Co.,Ltd
Gold	Chugai Mining
Gold	Shandong Gold Smelting Co., Ltd.
Gold	Eco-System Recycling Co., Ltd. East Plant
Gold	LT Metal Ltd.
Gold	Heraeus Germany GmbH Co. KG
Gold	Navoi Mining and Metallurgical Combinat
Gold	SAFINA A.S.
Gold	Al Etihad Gold Refinery DMCC
Gold	TOO Tau-Ken-Altyn
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.
Tantalum	Exotech Inc.
Tantalum	H.C. Starck Tantalum and Niobium GmbH
Tantalum	H.C. Starck Smelting GmbH & Co. KG
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.
Tantalum	H.C. Starck Co., Ltd.

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Tantalum	H.C. Starck Inc.
Tantalum	Ulba Metallurgical Plant JSC
Tantalum	Global Advanced Metals Aizu
Tantalum	Global Advanced Metals Boyertown
Tantalum	H.C. Starck Hermsdorf GmbH
Tantalum	H.C. Starck Ltd.
Tantalum	D Block Metals, LLC
Tantalum	F&X Electro-Materials Ltd.
Tantalum	FIR Metals & Resource Ltd.
Tantalum	Guangdong Zhiyuan New Material Co., Ltd.
Tantalum	Jiujiang Tanbre Co., Ltd.
Tantalum	KEMET Blue Metals
Tantalum	Metallurgical Products India Pvt., Ltd.
Tantalum	Mineracao Taboca S.A.
Tantalum	QuantumClean
Tantalum	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.
Tantalum	Telex Metals
Tantalum	Changsha South Tantalum Niobium Co., Ltd.
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.
Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.
Tantalum	LSM Brasil S.A.

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Tantalum	Taki Chemical Co., Ltd.
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.
Tantalum	Jiangxi Tuohong New Raw Material
Tantalum	Jiujiang Janny New Material Co., Ltd.
Tantalum	KEMET Blue Powder
Tantalum	Solikamsk Magnesium Works OAO
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.
Tantalum	Power Resources Ltd.
Tantalum	Resind Industria e Comercio Ltda.
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED
Tantalum	NPM Silmet AS
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.
Tantalum	KEMET de Mexico
Tantalum	TANIOBIS Co., Ltd.
Tantalum	TANIOBIS GmbH
Tantalum	TANIOBIS Japan Co., Ltd.
Tin	Yunnan Tin Company Limited
Tin	Rui Da Hung
Tin	Thaisarco
Tin	CV United Smelting
Tin	Malaysia Smelting Corporation (MSC)
Tin	Minsur
Tin	Operaciones Metalurgicas S.A.
Tin	PT Bukit Timah
Tin	PT DS Jaya Abadi
Tin	PT Refined Bangka Tin
Tin	PT Stanindo Inti Perkasa
Tin	PT Timah Tbk Kundur

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Tin	PT Timah Tbk Mentok
Tin	EM Vinto
Tin	PT Babel Inti Perkasa
Tin	PT Bangka Tin Industry
Tin	O.M. Manufacturing Philippines, Inc.
Tin	PT Tinindo Inter Nusa
Tin	China Tin Group Co., Ltd.
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.
Tin	Jiangxi New Nanshan Technology Ltd.
Tin	PT Prima Timah Utama
Tin	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.
Tin	CV Dua Sekawan
Tin	PT Rajehan Ariq
Tin	CV Venus Inti Perkasa
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.
Tin	China Tin Lai Ben Smelter Co., Ltd.
Tin	Alpha
Tin	CV Ayi Jaya
Tin	Gejiu Kai Meng Industry and Trade LLC
Tin	Magnu's Minerais Metais e Ligas Ltda.
Tin	PT Aries Kencana Sejahtera
Tin	PT ATD Makmur Mandiri Jaya
Tin	PT Bangka Prima Tin
Tin	Smelter not listed
Tin	Soft Metais Ltda.
Tin	PT Premium Tin Indonesia
Tin	Guanyang Guida Nonferrous Metal Smelting Plant
Tin	Metallo Belgium N.V.
Tin	PT Bangka Serumpun
Tin	PT Kijang Jaya Mandiri
Tin	PT Mitra Stania Prima
Tin	PT Panca Mega Persada
Tin	Metallo Spain S.L.U.
Tin	Fenix Metals
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.
Tin	HuiChang Hill Tin Industry Co., Ltd.
Tin	O.M. Manufacturing (Thailand) Co., Ltd.
Tin	PT Belitung Industri Sejahtera
Tin	PT Karimun Mining
Tin	PT Sariwiguna Binasentosa
Tin	PT Sukses Inti Makmur
Tin	PT Sumber Jaya Indah
Tin	PT Tommy Utama

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Tin	Tin Technology & Refining
Tin	White Solder Metalurgia e Mineracao Ltda.
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.
Tin	CV Gita Pesona
Tin	Gejiu Fengming Metallurgy Chemical Plant
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.
Tin	Huichang Jinshunda Tin Co., Ltd.
Tin	Melt Metais e Ligas S.A.
Tin	Metallic Resources, Inc.
Tin	PT Artha Cipta Langgeng
Tin	PT Inti Stania Prima
Tin	PT Menara Cipta Mulia
Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.
Tin	PT Timah (Persero) Tbk Mentok
Tin	Jiangxi Ketai Advanced Material Co., Ltd.
Tin	CV Tiga Sekawan
Tin	Gejiu Jinye Mineral Company
Tin	PT Lautan Harmonis Sejahtera
Tin	CV Serumpun Sebalai
Tin	Operaciones Metalurgical S.A.
Tin	PT Eunindo Usaha Mandiri
Tin	PT Timah (Persero) Tbk Kundur
Tin	Yunnan Tin Company, Ltd.
Tin	PT Babel Surya Alam Lestari
Tungsten	China National Non Ferrous
Tungsten	Xiamen Tungsten Co., Ltd.
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.
Tungsten	Global Tungsten & Powders Corp.
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.
Tungsten	Japan New Metals Co., Ltd.
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.
Tungsten	H.C. Starck Tungsten GmbH
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.
Tungsten	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji
Tungsten	Hydrometallurg, JSC
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.
Tungsten	Malipo Haiyu Tungsten Co., Ltd.
Tungsten	Unecha Refractory metals plant
Tungsten	Wolfram Bergbau und Hutten AG
Tungsten	Woltech Korea Co., Ltd.
Tungsten	A.L.M.T. Corp.

POSITIVO

4.10.2.1 Public Disclosure Regarding Conflict Minerals in Products

2022 Year Review

Tungsten	Kennametal Huntsville
Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.
Tungsten	Chenzhou Diamond Tungsten Products Co., Ltd.
Tungsten	Fujian Jinxin Tungsten Co., Ltd.
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.
Tungsten	Hunan Chenzhou Mining Co., Ltd.
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.
Tungsten	Kennametal Fallon
Tungsten	KGETS Co., Ltd.
Tungsten	Moliren Ltd.
Tungsten	Niagara Refining LLC
Tungsten	Masan Tungsten Chemical LLC (MTC)
Tungsten	Philippine Chuangxin Industrial Co., Inc.
Tungsten	ACL Metais Eireli
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.
Tungsten	Tejing (Vietnam) Tungsten Co., Ltd.
Tungsten	Xinhai Rendan Shaoguan Tungsten Co., Ltd.
Tungsten	A.L.M.T. TUNGSTEN Corp.
Tungsten	Asia Tungsten Products Vietnam Ltd.
Tungsten	TANIOBIS Smelting GmbH & Co. KG
Tungsten	Masan High-Tech Materials
Tungsten	China Molybdenum Tungsten Co., Ltd.
Tungsten	Fujian Ganmin RareMetal Co., Ltd.
Tungsten	Lianyou Metals Co., Ltd.