## **DUE DILIGENCE**



### **1. - COMPANY INFORMATION**

**CRM SYNERGIES MEXICO S.A. de C.V.** is located at Blvd. Benito Juárez 39, San Mateo Cuautepec, 54948 Tultitlán de Mariano Escobedo, Méx. CRM SYNERGIES MEXICO is a Wholesale trade of metallic materials.

Company Name: CRM Synergies México S.A de C.V CID: 4683 3TG: Tin Time period covered: 09/01/2022 to 11/30/2023

### 2. - DOWNSTREAM ASSESSMENT PROGRAM (DAP)

- a. Date of last DAP Assestment: First Assestment
- b. Assessment period: 09/01/2022 11/30/2023
- c. Assesment firm: ARCHE ADVISORS
- d. URL to most recent assessment summary report: N/A

### 3. - SUPPLY CHAIN POLICY.

CRM SYNERGIES MEXICO S.A. de C.V. has developed a Supply Chain Policy to avoid the use of minerals coming from conflict zones. This policy is fully aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas This policy is publicly available on the website <u>www.crmsynergies.com</u> and it has been communicated to our suppliers and stakeholders.

#### 4. COMPANY STRUCTURE.

CRM SYNERGIES MEXICO S.A. de C.V. has developed an internal due diligence management system with the following points:

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CRM's CEO is responsible for the tin supply channel for the due diligence program and the design and implementation of risk management.

The Company has assigned the Compliance Manager, Mr. Joel Jacobo, as the program manager in order to coordinate the work of all the relevant departments (including the Purchasing Department, Quality Department, Production Department, Logistics...) involved to respond to any identified red flags and potential risks.

CRM SYNERGIES has provided training to the relevant staff and workers in the due diligence management system. If there is any program update, the Company will provide additional training.

#### Internal control systems

**CRM SINERGIES MEXICO S.A. de C.V.** has established, and will update, a due diligence management system, to be aligned with the OECD Due Diligence Guidance for Responsible Minerals Supply Chains in Conflict-Affected or High-Risk Areas. The Company will communicate the Supply Chain Policy to its suppliers, included in the list of approved suppliers updated in December 2023. In addition, duediligence requirements have been incorporated by contracts and agreements with direct suppliers.

The Company has established a system to gather any RMI complaints through the email address:

consultasrmimexico@crmsynergies.com

### **Record-keeping system**

**CRM SYNERGIES MEXICO S.A. de C.V.** requires that all records related to the due diligence program are maintained for at least five years, used correctly and stored securely in the Company's database.

### 5. RISKS IDENTIFICATION (ALL SOURCES).

The company has an internal process to identify supply chain risks.

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First, referring to the risks in the company's Supply Chain Policy, the company established a procedure for identifying conflict-affected and high-risk areas.

The procedure includes the resources used, the criteria for defining a "conflict-affected and high-risk" area, as well as the frequency with which our determination is reviewed. The company uses the following criteria and resources to determine these.

Criteria	Information Resources
Financial and humanitarian risks	World Risk Map – KnowYourCountry
Human rights risks	riskmap-2024-map-regions-americas-eng-a3.pdf (controlrisks.com)
Potential risks in the future	Human Freedom Index: 2023   Cato Institute
Risk of conflict	www.rulac.org/browse/map

Second, the Company reviews at least once annually the level of risk of tin-related suppliers. If red flags were identified, the Company would engage further with its suppliers to clarify and improve the information if it is needed. During this time, any red flags related to the information collected by suppliers has been identified.

Third, the company collects information about the origin of each material and assures that it is able to understand the origin of the transaction, the transport route, as well as the names and locations of their direct suppliers.

Fourth, all information collected was reviewed by the company against sanctions lists, local laws, and domestic sourcing requirements.

### Risk Assessment (HIGH RISK SOURCING ONLY)

In the case of material and supply chains, identified as "high risk", the company will collect the information to establish whether the criteria established in the second edition of the OECD Due Diligence Guide for the Responsible Management of Mineral

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Supply Chains from Conflict zones and High Risk Zones are met". This includes, if appropriate, the following points:

- - Assess the risk context;
- - Clarify chain of custody;
- - Assess initial supplier activities and relationships;
- - Identify locations and qualitative mineral sourcing conditions;
- - Conduct field assessments.

### 6. - RISK MITIGATION (FOR HIGH RISK SUPPLIES ONLY).

If a supply does not comply with the OECD Due Diligence Guidance for the Responsible Management of Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, a risk mitigation plan shall be established using the following strategy:

(a) The supplier shall be informed of the action plan and given six months to implement it. During this period, the Compliance Department will monitor the progress of this plan, keeping the Head of the Compliance Department informed at all times. During this period the supplier will have the support of the Company for the implementation of the Plan.

b) If after this period the Action Plan has not been implemented, the supplier will be notified of the suspension of relations.

During the period covered by this report, no Action Plan has been necessary to mitigate the risk.