

MINERAIS US LLC

BILL S-211 REPORT

An Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act and to amend the Customs Tariff

For the fiscal year ended June 30, 2023



May 17, 2024

Minerais US LLC: Bill S-211 Report

Minerais US is a sales / marketing office supplying ferroalloys to the North American steel market. Minerais employs 12 people and had revenues of over \$100 million in its 2023 fiscal year.

Minerais is committed to conducting business in adherence with the highest standards of integrity, responsibility and ethical behavior. The Company's commitment to protecting human rights and responsible labor practices is founded on its strong belief in doing the right thing. The manner in which its operations and global supply chain partners uphold these commitments to human rights, including preventing forced labor and child labor, is critical to the Company's long term business success.

Minerais sources a variety of raw materials for the production of steel, most of which are global commodities that are produced and available from a variety of suppliers. The Company's most sourced raw materials include manganese, chrome and silicon products. For further information on Minerais' corporate structure and a description of business, please visit our website www.mineraisus.com.

Addressing Child Labor and Forced Labor

Minerais is committed to engaging in employment practices that meet all ethical and legal standards, including laws and regulations related to forced and child labor, in the markets in which it operates. Similar to its internal commitment to preventing child labor and forced labor, Minerais expects its suppliers to share and uphold these same commitments across their business operations as well. Further, Minerais expects its raw material suppliers to have these expectations through their supply chains.

Forced Labor

All workers across Minerais' operations and its supplier's operations must work under voluntary conditions. Minerais and its suppliers will not use any form of forced or involuntary labor, including prison labor, indentured labor, bonded labor, military labor, slave labor or any form of human trafficking.

Child Labor

The use of child labor that contravenes local labor laws within the Minerais organization or by the company's suppliers is strictly prohibited. Management is responsible for ensuring that child labor does not occur and manages the risk of child labor in the company's supply chain relationships.

Accountability / Governance

Minerais has internal policies that further reinforce and clarify its commitment to responsible labor practices, including preventing the use of forced labor and child labor.

Accountability

In April 2018 Minerais instituted and formalized a Foreign Labor Enforcement Policy in response to new and updated US Custom laws to increase its enforcement to prevent goods manufactured by prohibited forms of labor being imported into the United States.

US Customs visited our offices in 2018 to review and survey Minerais' supply chain and compliance. It was determined in June 2018 that based on our internal procedures Minerais was not subject to any official audit.

Governance

The Labor Enforcement Policy is signed by each employee who is negotiating or planning to purchase goods from a foreign producer and that they must obtain verifications from that producer to insure they are not using prohibited forms of labor in the mining, production, manufacture or transport of goods.

Minerais obtains and holds copies of detailed information regarding supplier employment policies along with any signed statements from suppliers indicating full compliance with foreign government rules and regulations regarding forced and child labor laws.

Minerais employees make regular yearly visits to each foreign supplier's operations whereby they visually see the operations along with reviewing policies of using prohibited forms of labor.

Summary

Minerais remains committed to preventing child labor and forced labor within the Company's operations and by its suppliers. Minerais is committed to engaging with its employee's and suppliers on these concerns while ensuring compliance with applicable labor laws.

Reporting entity's legal Name: Minerais US LLC

Financial reporting year: Fiscal year ended June 30, 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labor and Child Labor in Supply Chains Act. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Minerais US LLC.

Date: May 17, 2024

J. G. Cooke

Joseph G Cooke
CFO