

Due Diligence Pilot Process Summary and Results

April 2026





Scope of Due Diligence

- Pinto Valley Mining Corp. (the “Company”) is currently piloting a harmonized global Responsible Sourcing Due Diligence process (“Process”) that will be applied to suppliers and service providers (together, the “Suppliers”) of the Company.
- This Process is intended to replace the Company’s existing diligence process, align with industry practices, and meet the best practices of Capstone Copper Corp.
- The priority is expanding the Process to apply to new Suppliers. Existing Suppliers are undergoing the same Process, with high-spend or critical suppliers being prioritized.



Summary of Due Diligence Process

The Process currently being piloted for conducting Supplier due diligence consists of 5 key stages:

- 1) Initial Review:** The Supplier is provided with a Prequalification Questionnaire requesting Supplier details, is entered into the Company's compliance software, and public searches are done on the Supplier.
- 2) Analysis:** Based on the results of the Initial Review a risk level is assigned to the Supplier.
- 3) Follow Up:** Depending on the Supplier's risk profile additional questions may be provided to the Supplier.
- 4) Mitigation:** Based on the Supplier's risk profile and follow up responses, the Company's compliance team may approve the Supplier, approve the Supplier with certain risk mitigation actions applied, or reject the Supplier.
- 5) Documentation:** Appropriate records detailing Supplier risk, communications, and mitigation are prepared and stored.



Process Risk Assessment

- The Process includes reviewing Suppliers' key shareholders and management personnel, global and local databases containing information on anti-money laundering checks, sanctioned individuals and entities, legal actions, investigations, convictions, connections to Politically Exposed Persons, financial behavior, labor fines and violations, and any adverse media.
- This involves compiling and holistically considering information from the Company's questionnaire and any follow ups, results from compliance software, and reviews of other publicly available databases.



Due Diligence Figures for 2025

- While the Company continues to pilot its enhanced Process in 2026, during the 2025 seventy-one new suppliers were reviewed under its prior diligence process.
- The due diligence process at that time resulted in the following recommendations:
 - Reject: 0 Suppliers
 - Abstain: 0 Supplier
 - Approve: 71 Suppliers
- The Company intends to collect statistics during the pilot period and review its enhanced Process at the conclusion of the Pilot.



Conclusion

- The Company continues to Pilot the current Process and is working to ensure that it is appropriately applied to future and existing Suppliers.
- The Company continues to collect feedback from its internal and external stakeholders on this Process and takes a continuous improvement approach to develop best practices in the diligence it undertakes on Suppliers.