

SAMARCO STANDARDIZATION SYSTEM

CORRUPTION AND FRAUD PREVENTION POLICY

CODE: SMIN-POL-CORP-005



CORRUPTION AND FRAUD PREVENTION POLICY

1. Purpose

The purpose of this Corruption and Fraud Prevention Policy (the "Policy") is to define guidelines and rules that must be followed in compliance with anti-corruption legislation, including Law No. 12.846/2013 ("Clean Companies Act" - Brazil) and the Foreign Corrupt Practices Act of 1977 ("FCPA" - USA), in order to prevent acts of corruption and fraud directly or indirectly involving Samarco and its operations. This policy describes Samarco's expectations regarding how business should be conducted.

Even if the country where an individual operates or resides has more lenient rules that permit conduct contrary to this Policy, they should not be followed. On the other hand, if local legislation is stricter, that legislation must be respected, always taking into account the adoption of the highest and most restrictive standard.

2. Definitions:

For the purposes of this Policy, the following terms should be interpreted as indicated:

Public administration: Any governmental body, entity or company, domestic or foreign, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by any governmental body, entity or company, domestic or foreign.

Public Official: "Public official" means (i) all public entities, direct public administration bodies, indirect public administration entities, as well as any other public institution, including, but not limited to, autonomous agencies, public foundations, state-owned companies, mixed-capital companies, and international organizations; (ii) any person who, even temporarily or without pay, (ii.1) holds a position, job, or role in the Public Administration or in a service provider contracted or agreed to perform an activity subject to a concession by the Public Administration; (ii.2) holds a deliberative position in a political party, is an employee of a political party, or otherwise acts for or on behalf of a political party; (ii.3) any candidate or pre-candidate for political or elective office; or (ii.4) represents the interests of a class, sector, or public, such as an employee union, association, representative institution, or community. Mere membership in a political party does not, in itself, constitute classification as a public official.

* For the purposes of referral for compliance analysis, and considering the controls adopted in the respective processes to ensure the correct application of eligibility criteria, in the transactions related to the Doce River Basin Reparation, in compliance with the Renegotiation Agreement, which involve the payment of indemnity and/or the resettlement of Bento Rodrigues and Paracatu (including the respective municipal schools and the Sewage Treatment Plant), the concept of public official will be limited to public officials with decision-making power and Politically Exposed Persons, as per COAF Resolution No. 40/2021. Likewise, former public officials, even if classified as Politically Exposed Persons, are not considered a red flag for referral for

compliance analysis. Any other red flag, including those from the aforementioned processes, must be appropriately referred for compliance analysis.

Giveaways: items of typically low or insignificant nominal value, or with no commercial value, that in some way bear the institutional brand of a company or institution. Examples: pens, watches, mechanical pencils, folders, wallets, keychains, diaries, picture frames, calendars, flash drives, card holders, notepads, mugs, office accessories, among others, distributed for strictly institutional purposes.

“Business Partners” or “Intermediaries” are any third parties, Samarco service providers, who, in the context of their activities for Samarco, have the authority, power, or capacity to make decisions, negotiate, represent, or assume commitments with Public Officials on behalf of or for the benefit of Samarco, its controlled companies, and affiliates, including arbitration claims involving public or private agents.

Third Party(ies): Suppliers, Contractors, Subcontractors, Partners, Representatives, and Business Partners of Samarco, in Brazil and abroad.

Employee: Employees: including directors, interns, trainees, young apprentices, and temporary employees.

Corruption: The act of promising, offering, or giving, directly or through third parties, an Undue Advantage to a Public Official, a third party or a representative appointed by them, or an employee, representative, or agent of any private company, with the intent to influence the recipient of the Undue Advantage to grant Samarco any benefit or advantage, to obtain or retain business, and/or to direct business to any other person. Corruption can occur even if the Undue Advantage is merely offered or promised, and has not actually been realized or transferred to the recipient.

Due Diligence: Verification of information about any Suppliers, Partners, including Customers, or other third parties who receive any funds from Samarco.

Private Entity: Any national or foreign company that is not a member of the Public Administration, with which Samarco has a relationship or may have a relationship in the future.

Entertainment: Sporting, cultural, or social events, such as various competitions (e.g., soccer, volleyball, motorsports, golf, etc.), concerts, plays, technical and business conferences as part of a current or future business relationship.

Event: Meeting or gathering (lecture, seminar, conference, supplier event) to discuss matters or topics of interest to Samarco, with the participation of other companies.

Family members: spouse, partner, siblings, parents, children or stepchildren, grandparents, grandchildren, sons-in-law, daughters-in-law, uncles, nieces, nephews, cousins, brothers and sisters-in-law, and fathers and mothers-in-law.

Suppliers: any individual or legal entity that provides inputs, materials, or services to Samarco, including financial institutions. Included in this definition are contractors whose employees provide services within Samarco's facilities.

Fraud: An unlawful or bad-faith act aimed at obtaining an undue advantage for Samarco, any employee, or collaborator. Fraud includes acts such as document forgery, theft, embezzlement, fraud, offering, promising, or offering an undue advantage, receiving or attempting to receive discounts outside of regular market practice, or other benefits, in the acquisition of goods or services for personal use or consumption, due to their position at Samarco, valuable favors, sexual favors, among others.

Interaction with public officials: any form of communication, information exchange, emails, phone calls, messages and WhatsApp messages, requests for support, clarification, any type of dialogue between members of the Board of Directors, employees, and/or collaborators of Samarco and public officials.

Hospitality: Situations in which airfare, ground transportation, meals, lodging, and participation in technical and business events or conferences may be offered as part of a current or future business relationship and which require travel from your work location.

Other things of value: Any benefit, tangible or intangible, that does not qualify as a Giveaway, Gift, Meal, Entertainment, or Hospitality under the terms of this Policy. Examples: job offers, promises of recommendation (e.g., speaking highly of someone to gain their favor or moving someone's resume to the top of a list), offering fuel for commercial or operational purposes, loan discounts, receiving or attempting to receive discounts outside of regular market practice, or other benefits when purchasing goods or services for personal use or consumption, due to their position at Samarco.

Facilitation payments: Nominal payment or offer of a favor or benefit to a Public Official to ensure or expedite routine, non-discretionary acts, including, but not limited to, payments for processing documents or issuing licenses, permits, or visas, customs clearance, obtaining tax benefits, or obtaining police protection.

Partners: Individuals or legal entities with which Samarco maintains a formalized relationship through agreements, covenants, terms of cooperation or similar instruments, including investors.

Gifts: These are tangible items with commercial value that do not necessarily bear the institutional brand of a company or institution. Examples: flowers, fountain pens or other valuable branded items, watches,

backpacks, electronics, leather briefcases, paintings, books, CDs, DVDs, Blu-rays, sculptures and works of art, ornaments, Christmas baskets (or those related to other holidays), and alcoholic beverages.

Meals: Breakfast, snacks, lunch, or dinner during which business discussions can be conducted.

Representatives: Individuals or legal entities, with or without an employment relationship, who act in the interest or benefit of Samarco before third parties.

Meetings with Public Officials: Formal events with public officials where the company's interests are discussed, including, but not limited to, meetings, inspections, etc. These are agendas with a pre-planned agenda and require registration with Compliance.

Bribery: an unlawful act that consists of inducing someone to perform a certain act in exchange for an undue advantage, whether in cash, material goods, or other personal benefits.

Undue Advantage: illicit, illegal or unfair advantage, having no minimum value and may include, without limitation, money or equivalent (such as gift vouchers), gifts, travel, meals, entertainment, use of vehicles, accommodation and any intangible benefit. It may also be in the form of favors, such as: educational and/or employment opportunities for friends or relatives, or any unofficial payment to encourage the recipient or a third party to perform their existing obligations or assignments, or to expedite or refuse to perform a routine task that they would otherwise be required to do. They may also be for the purpose of sexual favors, receiving or attempting to receive discounts other than regular market practice or other benefits, in the acquisition of goods or services for personal use or consumption, due to their position at Samarco.

3. Target Audience

This Policy applies to all employees (including managers and directors), members of the Board of Directors, interns, trainees, young apprentices, temporary employees, suppliers, contractors, subcontractors, Samarco representatives, Business Partners, and individuals or legal entities with whom Samarco maintains a formal relationship through agreements, conventions, cooperation agreements, partnerships, or similar instruments, whether in Brazil or abroad.

4. Supplementary Documents

- Code of Conduct
- Code of Conduct for Third Parties
- Policy for Offering and Receiving Giveaways, Gifts, and Hospitality - SMIN-POL-CORP-06

- Government Interface Matrix - SMIN-POP-GCO-008

5. Corruption and Fraud

Samarco prohibits any and all forms of corruption and fraud.

This Policy focuses on preventing corruption, bribery, and improper payments to public officials, as well as to any other person, regardless of whether the recipient is a government official or an employee/representative of a private institution.

Only persons formally authorized by Samarco may enter into agreements or make promises to third parties on Samarco's behalf.

Employees, Collaborators, Partners, and Members of the Board of Directors of Samarco, including through third parties, are prohibited from promising, offering, or giving any undue advantage to a public official or employee or representative of the private sector.

Likewise, they may not receive any undue advantage or accept any promise of payment or reward, for themselves, for third parties, or for Samarco, from a public official or employee or representative of a private entity, if this could be interpreted as an attempt to unduly influence a decision.

They may also not offer, promise, or authorize payment, pay, or provide, directly or through a third party. This policy also prohibits and considers illegal conduct against the Public Administration, such as fraud in public bidding processes, to be an unlawful act.

Furthermore, the promise, offer, or making of Facilitation Payments, directly or through third parties, to Public Officials or employees and representatives of private institutions is prohibited. See examples below of acts that should not be performed:

- Expediting permits, visas, authorizations, or licenses (with the exception of official rush fees that have their own payment slips);
- Obtaining illegal tax benefits; and
- Obtaining police protection, mail delivery and mailing, water and energy supplies, or any other public services.

Transactions that violate anti-corruption laws or this Policy are prohibited even if they are only offered or promised but not consummated. The following non-exhaustive list of Undue Advantages demonstrates how broad the definition of "anything of value" can be:

- Promotional gifts, travel, meals, or lodging.
- Educational opportunities, job interviews or offers, letters of recommendation, medical services.
- Donations (including to charity) to organizations with some type of direct or indirect relationship with third parties or public officials.
- Allocation of contracts to a specific supplier linked to a third party or public official.
- Permission to use Samarco resources for private purposes (e.g., allowing access to Samarco vehicles for personal use).
- Reimbursement of unjustified expenses to a third party or supplier.
- Contributions to political parties or candidate campaigns (donations, facilities for political events or campaign workspace, event sponsorship, transportation, etc.).

The well-being and safety of Samarco's employees, collaborators, partners, and members of the Board of Directors are paramount. If any of these individuals are in a situation of imminent risk to their integrity and safety due to the provision of services to Samarco, payment to a Public Official, upon request, is exceptionally tolerated solely to preserve their safety and integrity. The incident must be immediately reported and justified to the Compliance department through the Compliance Request Portal using the "Report Non-Compliance in a Meeting with a Public Official" form and to the immediate manager.

Only Samarco employees specifically trained to interact with public authorities may represent Samarco in interactions with public officials. Both Employees and Collaborators must always be accompanied by another company employee. This rule does not apply to court hearings, regular protocols, routine dispatches, and general dispatches.

Formal events with government officials where the company's interests are discussed, including, but not limited to, meetings, inspections, and other events, must be recorded in the Public Officials Meeting Recording tool by the department involved.

The Compliance department must be notified of any non-compliance or suspected non-compliance in formal meetings between employees and public officials to address company interests. In these cases, after the meeting, a "Record of Non-Compliance in a Meeting with a Public Official" must be recorded via the Compliance Request Portal, and meeting minutes, if applicable, must be attached.

Samarco Employees, Collaborators, Partners, and Members of the Board of Directors are prohibited from, personally or through third parties, participating in the conception or execution of conduct considered fraud, such as those described in the following exemplary list:

- Falsification of payment authorizations, invoices, and receipts.
- Requesting reimbursement for false, fictitious, or non-professional expenses incurred at Samarco.
- Appropriation, alteration, diversion, and/or theft of valuables, inventory, supplies, or any other Samarco assets.
- Acceptance of irregular invoices, such as billing for services not rendered, billing for goods and/or services not delivered, or overbilling.
- Inclusion in the Vendor List for the bidding process of companies not technically qualified for participation.
- Supplier discounts not passed on to Samarco.
- Diverting Samarco's customers or business to another entity (own or third parties).
- Omission or falsification in Samarco's accounting records.
- Improper alteration, appropriation, improper destruction, or falsification of electronic information contained in Samarco's systems.
- Improper use of unlicensed or illegal software;
- Promising or granting any undue advantage to favor Samarco in the ore sales process.
- Receipt of any Undue Advantage so that the Supplier is favored in Samarco's bidding process;
- Favoring a supplier and/or customer, in violation of Samarco's qualification and selection procedures.
- Promising or granting an undue advantage to an employee of a Samarco competitor to obtain an advantage for themselves or Samarco.
- Providing confidential Samarco information to third parties in exchange for the promise or payment of an undue advantage.
- Payments made before or during a bidding process to prevent other competitors from participating in the bidding process.
- Receiving or attempting to receive discounts outside of regular market practice or other benefits on the purchase of goods or services for personal use or consumption, due to their position at Samarco.
- Directing Samarco's business to a Supplier owned or managed by, or employing, a Family Member who poses a risk of conflict of interest, as per the Code of Conduct.

6. Payments

No Samarco Employee, Collaborator, Partner, or Board of Directors member may:

- authorize or make cash payments of any kind to third parties on Samarco's behalf.

- make bank payments of any kind to a third party's account without first verifying that the account number is linked to the recipient's tax identification number.
- use personal resources to provide anything of value to third parties in a way that, if such action were carried out directly by Samarco, would be prohibited by this Policy.

7. Partners, Suppliers, Representatives, and Business Partners/Intermediaries

The relationship between Samarco's employees and members of the Board of Directors with its partners, suppliers, representatives, and business partners must be transparent and free from conflicts of interest. Samarco employees, collaborators, partners, and members of the Board of Directors must ensure that their personal interests do not overlap with those of the company.

To minimize the risks of corruption and fraud, the hiring of Partners, Suppliers, Representatives, and Business Partners, including the selection of Clients, must be preceded by a survey that includes the gathering of public information that allows Samarco to understand and assess the risks involved in relationships with these entities ("Due Diligence Process"). The Due Diligence Process is conducted in accordance with the requirements and conditions defined in the Specific Procedure.

The hiring of Partners, Suppliers, Representatives, and Business Partners should be considered red flags for corruption and fraud if they:

- Insist on doing business with a specific Employee or Collaborator;
- Have a reputation for dishonest business practices;
- Insist on anonymity;
- Fail to cooperate in audits;
- Refuse to sign clauses complying with applicable anti-corruption legislation;
- Present inaccurate invoices;
- Request excessive or advance payments;
- Request deposits into accounts outside Brazil whose account holders cannot be identified;
- Act as intermediaries between Samarco and other Suppliers, meaning they do not produce or provide services themselves.

Contracts must also adhere to the following principles:

- The services to be provided must be lawful;
- The prices charged must reasonably reflect the value of the services provided;
- Partners, Suppliers, Employees, Representatives, and Business Partners must have proven experience in the service or product being contracted;

- Legal instruments signed with Partners, Suppliers, Representatives, and Business Partners must contain a clause certifying compliance with applicable anti-corruption legislation.

In situations such as those described above, or others that raise questions about the proper conduct of Partners, Suppliers, Representatives, and Business Partners, the Compliance department should be consulted through the Compliance Request [Portal](#).

8. Offering and receiving giveaways, meals, gifts, and hospitality

The rules regarding any type of benefits offered, granted, accepted, or received are fully described in our Policy for Offering and Receiving Giveaways, Gifts, and Hospitality ("Gifts Policy"), which can be accessed via the Samarco intranet or website.

9. Projects, Sponsorships, Donations, and Contributions

Samarco's provision of resources for Projects, Sponsorships, Donations, and Contributions must be done legally and ethically and in accordance with the provisions of the Code of Conduct and Samarco's Socio-Institutional Investment Policy (PIIS), and in compliance with this policy.

10. Fraud in Accounting Records

Samarco, its Employees, Partners, and members of the Board of Directors are obligated to maintain complete and accurate Accounting Books and Records that accurately and truthfully reflect the purpose and amount of all transactions for which they are responsible. Making or requesting records that conceal or alter the nature and details of transactions and payments made and received by the company is prohibited.

No Samarco employee, collaborator, partner, or member of the Board of Directors may record the amount or description of a transaction inaccurately or in an attempt to conceal the true nature of the transaction. Any attempt to do so will constitute grounds for the application of appropriate disciplinary action.

A sample of all Samarco entries and related internal documentation must be periodically reviewed by Internal Controls to identify discrepancies, errors, and omissions. All Samarco Employees, Collaborators, Partners, and Members of the Board of Directors must cooperate with requests of this nature. Failure to comply with this requirement will constitute grounds for dismissal.

11. Violations

If you are a Samarco Collaborator, Employee, Partner, or Board Member and receive a demand or request for a Facilitation Payment, bribe, kickback, or any other prohibited Undue Advantage, or are offered a bribe or other Undue Advantage in an attempt to influence the performance of your duties at Samarco, you must take the following steps (if possible):

- Ensure you have not misheard or misinterpreted the other party;
- Clearly and deliberately refuse to cooperate;
- End discussions as quickly as possible;
- Promptly report the non-compliant request or request to your supervisor or immediate superior and to the Compliance team immediately after leaving the meeting;
- Document the incident in writing as soon as possible;
- Be prepared to cooperate fully with the Compliance investigation team.

In Brazil, liability for the commission of crimes is personal and will be imposed on the individual directly involved in the unlawful conduct. Therefore, the Employee, Collaborator, Partner, or any other person who has corrupted or attempted to corrupt, or who has committed any fraudulent act, will be held accountable.

The Brazilian Anti-Corruption Law, as well as the Foreign Corrupt Practices Act of 1977 ("FCPA" – USA) may apply in the event of a violation.

Internally, Samarco will apply the criteria defined in its consequence management policy for cases of violation of this policy. Any Employee, Collaborator, Partner, or member of the Board of Directors who violates this policy will be subject to disciplinary action, including dismissal in the case of an employee, or termination of contract in the case of a contracted/partner institution.

In addition to the measures outlined above, violation of this Policy may result in investigations by local and foreign authorities, which, if convicted, may result in Samarco being subject to significant fines and other sanctions. Investigations may also result in parallel proceedings against the individuals involved in the violation, who may face both civil and criminal penalties.

Ignorance of the legislation or of the law is not an excuse and does not exempt from liability. Similarly, failure to act in response to a violation committed by an Employee, Collaborator, Partner, or member of the Board of Directors and witnessed by another Employee, Collaborator, Partner, or member of the Board of Directors may be interpreted as condoning or cooperating with such violations.

12. Reports

Any violation or suspected violation of this Policy by Samarco Employees, Collaborators, Partners, or members of the Board of Directors must be immediately reported. Reports should be made to the Samarco Ethics Line using the following contact details:

- ☐ Toll-free: 0800 377 8002;
- ☐ E-mail: canaldeetica@samarco.com /compliance@samarco.com
- ☐ Website: www.canaldeetica.com.br/samarco.

The Ethics Channel will act with complete independence and authority, free from any external or internal influence, in investigating and monitoring any violations committed by Samarco Employees, Collaborators, Partners, or members of the Board of Directors and applying any applicable sanctions. Samarco will take steps to promptly stop any detected violations and will make every effort to remedy any damages caused.

Samarco expressly prohibits retaliation against any Employee, Collaborator, Partner, or member of the Board of Directors who reports a violation of this Policy, even if the person making the report is mistaken. Acts of retaliation must be immediately reported and will result in the application of disciplinary measures by the company. The prohibition of retaliation also extends to any Employee, Collaborator, Partner, or member of the Board of Directors who cooperates with the investigation of a possible violation.

All Employees, Collaborators, Partners, and members of the Board of Directors must provide accurate information when requested and cooperate with Samarco's misconduct investigations.

Cases reported to the Ethics Channel will be duly recorded and verified by the applicable authorities, including the Conduct Committee, with the participation of members of Samarco's Board of Directors.

13. Revision Control Table

Lists the document versions and the training requirements for the new version.

Revision	Page	Date	Reason for Revision	Is Training Required?
00	All	03/30/2019	Policy Creation	Yes
01	All	06/30/2021	Policy Review	Yes
02	All	08/31/2023	Changes to the name of the Ombudsman Channel and contact information	Yes
03	All	04/30/2025	Change to the concept of Public Agent and Intermediary, with the inclusion of the concept of Gifts, in addition to minor changes to adapt to Reparations	Yes