

SAMARCO STANDARDIZATION SYSTEM

ANTITRUST POLICY

CODE: SMIN-POL-CORP-007



SMIN-POL-CORP-007 - ANTITRUST POLICY**ANTITRUST POLICY****1. Objective**

The purpose of Samarco's Antitrust Policy ("Policy") is to define guidelines and rules that must be followed indiscriminately by all Employees, Collaborators, Representatives (including Board Members and members of the Governance Forums) and Business Partners of Samarco in the exercise of their activities, in order to prevent the occurrence of practices that may give rise to violations of the Competition Law and applicable regulations, and to allow the early identification of potential risks and violations of such rules, guiding the target audience on Samarco's (or "Company") expectations regarding the integrity and correct conduct of business.

The Policy is not intended to constitute a definitive or exhaustive position on all aspects or interpretations of current legislation. It is encouraged that any doubts about the interpretation and application of this Policy, as well as any situations not provided for herein, be discussed with the Corporate Governance area, which will have the support of the Legal and Compliance departments, whenever necessary.

2. Definitions:

For the purposes of this Policy, the following shall be considered:

Shareholders: Any person who holds an interest in the capital stock, voting or not, of Samarco (each, "Shareholder").

Antitrust authorities - The authorities responsible for preventing and repressing violations of antitrust laws in the countries in which Samarco operates directly or indirectly. In Brazil, the Administrative Council for Economic Defense ("CADE") is the main authority responsible for the defense of competition. In other countries, for example, the authorities are: in the USA, the Department of Justice – Antitrust Division (DoJ) and the Federal Trade Commission (FTC); in the European Union, the Directorate-General for Competition (DG IV), among others.

Business Partners - Third parties that interact with public or private agents, in the interest or benefit of Samarco or its subsidiaries or affiliates, including suppliers.

Council. Samarco's Board of Directors.

Governance Forums. Samarco's internal governance committees.

Employees - Suppliers, contractors, Samarco representatives and business partners, in Brazil and abroad.

Employee(s): - Employees (including directors), interns, trainees, minor apprentices, temporary employees.

Competitively Sensitive Information - Specific information that is not in the public domain and/or has not been previously published by Samarco related to the Company's strategic issues, including, but not limited to:

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- prices, discounts, commercial policies and market positioning strategies;
- production capacity, production and sales volume, production quality and expansion and/or restriction plans;
- marketing strategies;
- profit, profit margin and costs;
- information about suppliers and/or customers and terms of contracts negotiated and entered into with them;
- salaries and benefits;
- information on trademarks and patents and Research and Development (R&D);
- future procurement plans.

Competitively sensitive information is not considered to be in the public domain and/or that has been previously published by Samarco, as well as information that does not present competitive sensitivity or that cannot be used to restrict competition.

Counsellors. Members formally elected to join Samarco's Board of Directors.

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

Authorized Shareholders: Representatives who have been formally and previously appointed by the Shareholders for contacts with Samarco. The Authorized Shareholders must be formally appointed by e-mail and the list will be under the care of Samarco's Corporate Governance area.

Samarco Authorized Officers: Samarco employees who have been formally authorized to communicate with the Shareholders' Authorized Officers, as appointed by the Directors. The Corporate Governance area will maintain, under its care, a specific list with the names indicated, according to the model available in **Annex II**.

Competition Law: Law No. 12,529, of November 30, 2011, as amended from time to time.

3. Target audience

This Policy applies to all Employees, Collaborators, Representatives (including Samarco's Business Partners), Board Members, as well as representatives of the Company's shareholders who participate in Samarco's Governance forums, in addition to those who, from time to time, have access to Samarco's Competitively Sensitive Information, and who have signed a Secrecy and Confidentiality Agreement.

In particular, this Policy must be known and applied by all Board Members, members of the Governance Forums, Officers, General Managers, Managers and, in addition, by the areas of Governance, External Relations, Marketing, Commercial, Supplies, Legal, Compliance and Samarco Employees and Collaborators who represent the Company in associations, forums, committees or social meetings in which competitors are present, customers, suppliers and/or other industry participants.

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The Policy is in accordance with the Brazilian Competition Law, Law No. 8,137, of December 27, 1990, and the regulations issued by CADE, and contains provisions on:

- (i) relationship with competitors, shareholders, suppliers and customers;
- (ii) participation in associations, forums, committees and social events;
- (iii) document processing;
- (iv) cooperation with antitrust authorities and the Judiciary;
- (v) publication or dissemination of strategic business information;
- (vi) legal and disciplinary sanctions, as well as communication and investigation channels; and
- (vii) Competitive Notification of Acts of Economic Concentration.

Samarco complies with the legislation and regulations in force in the countries where it operates, directly or indirectly, and advises all its Employees and Collaborators to know and comply with them. Ignorance of the legislation does not serve as a defense if an infraction is committed. No addressee of this Policy is authorized to practice, directly or through third parties, any conduct inconsistent with applicable antitrust legislation, nor even to consent, directly or indirectly, or condone such conduct and/or behavior or practice contrary to the guidelines of this Policy.

The awareness and commitment to this Policy will be proven, for example, by the certificate of completion of training, e-learning or face-to-face.

Samarco conducts its business in the light of ethics, in line with values and the Code of Conduct, respecting the principles of free competition and free enterprise. In addition, Samarco believes that strict compliance with the procedures described in this Policy is the best way to ensure that the Company and its Employees develop their activities with excellence and safety, favoring the best business practices in the market.

5. Relationship with competitors

Contacts and negotiations between competitors are not prohibited by competition legislation, as long as they are guided by legitimate justifications, observing a legal-economic rationale, and carried out in accordance with applicable legislation. However, given the sensitivity, from an antitrust perspective, involving any contact between competitors, it is of paramount importance that all Samarco Employees and Collaborators previously assess the real need and relevance of any interaction with a company that is an actual or potential competitor of the Company, and keep in mind the rules described in this Policy when conducting any contact and/or negotiation.

The Competition Law establishes that agreements (explicit or tacit), exchange or sharing of Competitively Sensitive Information, and other concerted conducts between competitors that may have as their object or effect, even if they are not achieved, the following constitute a competitive violation: (i) increase or fix prices or any other relevant competitive variables; (ii) restrict the quantity of products on the market, limiting their supply; (iii) promote market division; (iv) organize, promote and/or participate in boycotts of suppliers and/or customers; (v) coordinate the performance in bidding processes, in an attempt to reduce competition and artificially increase prices and profits; as well as (vi) more broadly, artificially distorting the conditions of competition in a given market.

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To prevent the occurrence of anticompetitive practices, all Samarco Employees and Collaborators are prohibited from engaging in the following acts in situations of interaction with employees or representatives of Samarco's competing companies:

- (a) Communicate or share Competitively Sensitive Information, unless in the context of a corporate transaction. In this case, the communication or sharing is subject to verification by Samarco's Legal Department and, when deemed appropriate, the adoption of measures such as the creation of a *clean team* and aggregation/anonymization of data, according to items (i) and (iii) below.
- (b) Discuss and/or agree with competitors on prices, discounts, pricing methods, costs, payment terms, contractual clauses, production volume, territorial market division, division of customers and services, and/or participation in bids.
- (c) Agree and/or discuss with a competitor the refusal to negotiate or contract with another company (supplier or customer), or adopt practices with the objective of excluding a competitor or preventing the entry or expansion of other companies (competitor, distributor, representative, supplier or customer) in their markets.
- (d) Discuss and/or agree with competitors practices that limit development and innovation.
- (e) Discuss and/or agree with competitors not to hire competitors' employees or salary and/or benefit amounts.

Although there is no exhaustive list of behaviors among competitors that should be avoided, the practices listed above are examples of cartels, and are always considered illegal, even if they are not implemented or do not produce concrete effects. Therefore, defense arguments based on alleged good faith or ignorance of an employee would not rule out the possibility of sanctions in such cases.

If an Employee or representative of Samarco's competitors attempts to address any of the issues listed above, it shall be the duty of the Samarco Employee/Collaborator to immediately advise him/her that he/she is not authorized to discuss any of these topics. In case of insistence, the Samarco Employee/Collaborator must:

- leave the place where the competitor's employee or representative is located (announcing, in the case of meetings, including in virtual mode, their withdrawal and the reason for doing so, making express reference to this Policy and ensuring that such action is witnessed and recorded in the minutes);
- turn off the phone - in the case of calls - after registering your disagreement with this type of discussion;
- respond to any electronic message or other type of communication received immediately to all recipients, stating that the e-mail/communication is inappropriate and requesting that such e-mail/communication not be forwarded to you again, and advising that the communication must be terminated and that all copies of any Competitively Sensitive Information have been deleted and will not be used; and
- immediately report to Corporate Governance any improper conversation initiated by a competitor or the disclosure by it, by any means, of Competitive Information.

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Samarco sensitives.

Any form of interaction with competitors and public disclosure of information on the topics listed above (e.g., in conferences or seminars, including in virtual modalities, newspapers or magazines, television) must be previously submitted to evaluation and prior authorization by the Corporate Governance area. The transmission of information about Samarco to a competitor may have legitimate reasons, such as the negotiation of a corporate transaction. However, without proper context, communications between competitors (directly or through a third party) may be improperly interpreted as cartel practice or as the autonomous conduct of exchanges of Competitively Sensitive Information.

In general, specific care must be adopted whenever contacts and negotiations require the use, even internally, of Competitively Sensitive Information, such as:

- (i) simplify, aggregate, anonymize and delay commercial information and data before its disclosure or use in interactions with third parties (lag of historical information and data by at least 6 months);
- (ii) avoid the disclosure of current data or detailed projections about prospective/future situations or plans;
- (iii) not to coerce third parties to share Competitively Sensitive Information;
- (iv) ensure that communication with competitors is properly contextualized and contains the clarification that Competitively Sensitive Information cannot be disclosed or transmitted without proper authorization; and
- (v) analyze the convenience of creating a *clean team* with the aim of reducing and limiting access to Competitively Sensitive Information that may be shared.

6. Samarco's Relationship with Shareholders

The relationship between Samarco's Employees and Shareholders (including Shareholder Representatives) may, under certain circumstances, expose the Company to the same risks involved in situations of interaction with competitors.

Only Samarco Employees formally authorized to communicate with employees and/or representatives of any shareholder of the Company ("Authorized Shareholders") may interact on behalf of the Company. For the purposes of this Section 6, all Samarco Employees and Collaborators who have been previously appointed by the Executive Officers to the Corporate Governance area shall be considered formally authorized representatives ("Samarco Authorized Representatives"), which shall maintain, under its care, a specific list with the names indicated, according to the model available in **Annex II**, and Samarco shall only respond to contacts made by the Authorized Shareholders. The Authorized Shareholders must also be formally appointed by e-mail, which will also be under the care of Samarco's Governance area.

Authorized Shareholders may, from time to time, request financial and operational information from Samarco from the Company in order to monitor the Company's activities and performance, in order to fully exercise their rights and duties as shareholders and protect their investments in the Company, always acting in Samarco's best interest. In view of these hypotheses, Samarco's Authorized Shareholders must observe the following rules in interactions with the Shareholders' Authorized Representatives:

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respecting the limits established in this Policy and in the legislation in force:

- (a) Understand, in detail, the context, the need and the purpose of the shareholder requests, in order to evaluate the sharing and, in this case, ensure that the requested information is properly handled.
- (b) Limit the disclosure and sharing of Samarco's Competitively Sensitive Information with Authorized Shareholders to what is strictly necessary to meet and fully comply with the obligations set forth in the Shareholders' Agreement and other applicable governance instruments and rules, and must be presented in the most simplified and, when possible, aggregated and outdated manner (and even, when applicable, anonymized).
- (c) Maintain communication on Competitively Sensitive Information only with the Authorized Shareholders who have been formally and previously indicated by them. In the event of communication with employees and/or representatives of the Shareholders who have not been previously indicated/authorized, they must be informed of this Policy and, if applicable, obtain formal and prior approval of their appointment as Authorized Shareholders. Samarco's Governance area can support this dialogue with shareholders, ensuring the best communication and debate on the subject.
- (d) Respect the appropriate channels pre-established by Samarco for the relationship with Authorized Shareholders, which are the Governance Portal, the e-mail governanca@samarco.com and the Governance forums
- (e) Ensure that the Authorized Shareholders undertake to maintain strict confidentiality of all Competitively Sensitive Information shared, as well as to (i) use it only for the specific purposes for which it had access to it, always acting in the best interest of Samarco; (ii) never use them to the detriment of Samarco or the Shareholders; (iii) not to distribute, copy, reveal, reproduce, adapt, provide, commercialize or in any other way, disclose or exploit this information outside the scope of its action; and (iv) never use them in violation of the rules of this Policy.
- (f) Not to solicit or receive Competitively Sensitive Information related to the business of Shareholders or companies related to them.

Even if it does not involve the exchange or sharing, written or oral, of Competitively Sensitive Information, the interaction with employees and/or representatives of the Shareholders must be made by those formally authorized and appointed for this purpose. Other interactions of a more punctual nature – such as, for example, visits to companies and benchmarking for knowledge of best practices – must also comply with the terms of this Policy.

Specific situations that may generate doubts in the form of interaction with Shareholders must be subject to prior consultation with the Corporate Governance area.

7. Relationship with suppliers and customers

Samarco's business practices directed at its customers and/or suppliers may also raise antitrust concerns and, therefore, require caution.

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Contractual restrictions on the supplier's performance (e.g., contracting quantities higher than those actually used/acquired) or on the contracting of other companies by the customer (e.g., supply contracts with exclusivity and/or preference clauses, as well as discounts or loyalty programs that, in practice, result in a de facto exclusivity relationship or market closure for Samarco's competitors) may, may be considered anticompetitive, depending on their net effects on the market.

In view of the complexity of the different forms of business and relationship between Samarco and its suppliers and customers, the negotiation of commercial conditions and the execution of contracts involving sensitive competition issues, which may violate the principles of this Policy, are subject to prior evaluation by the Corporate Governance and Legal areas.

To avoid competitive risks, all Samarco Employees and Collaborators must refrain from:

- (a) To practice prices below the average cost of production of any of Samarco's products (e.g., predatory prices), unless there are solid economic justifications and/or it is a temporary measure (e.g., stock burning, introduction of a new product in the market, etc.);
- (b) Discriminate against customers, including in relation to prices, services and/or discounts, unless there is a solid economic justification and legal basis for doing so, such as:
 - relevant market differences between these customers (e.g., differences in scale, credit, volume, payment term, and relationship history);
 - different conditions of competition in the markets in which each customer is inserted;
 - circumstances associated with the moment in which the negotiation with each of them takes place (e.g., changes in import or export conditions).
- (c) Condition the offer of Samarco's products and/or the granting of discounts to atypical requirements or requirements outside the standards usually adopted by the Company and/or the market;
- (d) Prevent the resale of any of Samarco's products, or control the price (e.g., fixing the price) at which a distributor may resell any Samarco products to third parties;
- (e) Condition or link the sale of Samarco products to the acquisition/contracting of another product/service offered by the Company (e.g., tie-in sale) without there being a solid economic justification and legal basis for doing so;
- (f) Terminate contracts or refuse to negotiate with a third party interested in contracting a product/service offered by Samarco under normal market conditions without reasonable economic justification (e.g., default, breach of contract, regulatory requirements) and legal basis for doing so.
- (g) Condition negotiation with third parties (customer, supplier, partner, etc.) to the requirement that it does not have a commercial relationship with Samarco's competitor;
- (h) Prevent customers from acquiring products or services from Samarco's competitors through contractual restrictions (e.g., exclusivity and preference clauses, discounts or loyalty programs that, in practice, result in an exclusive relationship and market closure for Samarco's competitors) without prior evaluation by the Corporate Governance and Legal areas.

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- (i) Prevent suppliers of relevant inputs/services from serving (or hinder the service of) Samarco's competitors through contractual restrictions (e.g., contracting quantities higher than those actually used/acquired and exclusivity clauses).

Although unilateral conducts are not, in principle, considered illegal from a competitive perspective, and may generate benefits to consumers and the market itself, depending on the situation, such practices may result in the closure of the market to competitors and, eventually, be considered anticompetitive. From a competition perspective, the legality of unilateral conducts is evaluated considering their net effects on the market (i.e., whether the eventual damage to competition outweighs the benefits).

Specific situations that may generate doubts in the form of interaction with suppliers and/or customers must be subject to prior consultation with the Corporate Governance and Legal areas. To avoid competitive risks, Samarco's Employees and Collaborators should not assume that a conduct is correct "because the entire market does" or "because it has always been done that way".

8. Negotiation of mergers, acquisitions, share acquisitions, creation of joint ventures or associative contracts

The Employee and/or Representative of Samarco (including Directors and members of the Governance Forums) who is involved in the negotiation of corporate transactions, mergers and acquisitions or strategic partnerships related to Samarco or its subsidiaries, as well as in any other acts, businesses or contracts that may fall within the hypotheses of mandatory competitive notification, under the terms of the Competition Law, it must comply with the provisions of Annex I regarding mandatory notification operations to CADE.

9. Participation in associations, forums, committees or social events

Despite the positive effects derived from the collective discussion of topics related to the sector's agenda through associations, forums, committees or social events (whether in person or virtually) in which competitors and/or other industry participants are present, it is also certain that such meetings bring with them risks of facilitating the practice of anticompetitive conduct among market participants.

In order to prevent the risk of antitrust violations, Samarco Employees who participate in such events must be previously informed about the limits applicable to interactions with competitors and about the risks that this type of interaction may generate for themselves and for Samarco, from the point of view of competition law. as well as follow the following recommendations:

- Always request that the agenda of the subjects proposed for a given meeting be circulated in writing and in advance to the participants, making sure that the agenda is clear and has legitimate objectives and that potentially sensitive topics will not be discussed from a competition perspective. If competitively sensitive issues are discussed, refuse to participate in said meeting, with express indication to that effect;
- include a reminder about the need to comply with competition law at the beginning of meetings;
- limit itself to participating in discussions on the issues included in the agenda, closing any possible discussions on competitively sensitive topics, with express indication therein

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sense. If the discussions continue, withdraw from the meeting, making sure that the departure is recorded in the minutes;

- keep a written record of the topics discussed in the meetings, making sure that the document addresses all the discussions held. In the event that competitionally sensitive issues are identified, quickly forward the topics addressed to the Legal and *Compliance* departments; and,
- if you become aware of any activities that are contrary to this Policy and the above recommendations, immediately contact the Ethics Channel (regarding communication and investigation channels, see **Section 13** of this Policy).

The rules set forth in **item 5** above on interactions with competitors and the recommendations for the event that any employee or representative of a Samarco competitor attempts to address any competitively sensitive issues within the scope of associations, forums, committees or social events shall apply in full. Where relevant and appropriate, Samarco shall use its membership in the associations to encourage the relevant unions and associations to develop and implement appropriate compliance policies.

Specific situations that may generate doubts in the form of interaction with competitors in associations, forums, committees or in social meetings must be the subject of prior consultation with the Corporate Governance area.

10. Caution with language

To avoid the risk of misinterpretation, when writing letters, memoranda, electronic messages, meeting minutes, institutional materials or any other document, including e-mails and messages, Samarco Employees should seek to:

- write in a direct and clear way, in a professional tone, avoiding metaphors, sports analogies, sayings, codes, nicknames, catchphrases and ambiguous expressions;
- avoid incorporating messages from other people, as the ideas contained therein can be interpreted as being the employee's own;
- send the documents only to the people who actually need to receive them;
- clearly identify, in the title of the message and/or document, whether the content is of a confidential nature;
- indicate the source of the information used;
- not use terms that may suggest any kind of coordination, alignment or coordinated strategy with competitors; and
- Do not use inappropriate language.

As already mentioned, the Corporate Governance area must be consulted about any situations that may raise doubts regarding compliance or not with the rules set forth in this Policy.

11. Request for information by antitrust authorities and the Judiciary

Samarco's premise is to collaborate with investigations of any nature (External and Internal Audits), with the Judiciary and with the antitrust authorities, Brazilian and/or foreign, in the provision of information upon previously justified requests.

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Upon receipt of any request for information by any of the aforementioned authorities, related to competition issues, Samarco's Employees or Collaborators must immediately contact and forward such request to the company's Compliance and Legal areas, in order to determine the best way to present the appropriate response. Responses to competition authorities, whether national or foreign, as well as to the Judiciary, must undergo a prior analysis of the areas mentioned above.

If the Employee is summoned to appear in person before the Brazilian or foreign competition authorities, or before the Judiciary and in cases of judicial warrants, such as search and seizure warrants for Samarco documents and equipment, he/she must also immediately contact the *Compliance and Legal* areas, for guidance and verification of the need for legal assistance and the appropriate measures.

12. Publication or dissemination of strategic information

The publication or disclosure of any strategic information related to Samarco must be previously submitted to the review of the company's Corporate Governance area. To this end, Samarco's strategic information, for example, is all that (a) is not in the public domain and (b) is related to the following matters or others of a similar nature:

- i) investment plans, commercial policies, relationship with suppliers and/or customers, market positioning strategies, including product pricing;
- ii) data on technology, research and development, business plans, promotional or marketing activities, know-how, source code, graphic designs, photographs, drawings, specifications and technical literature; and
- iii) contracts, texts, forms, materials and graphic designs of any factory, equipment, methods and techniques of operation and the various applications of such operations, processes, formulas, plans, strategies, products, intellectual property rights or involving commercial, industrial or any other secrets.

The relationship with the media must be made only by authorized persons, in light of the provisions of the Code of Conduct.

Specific situations that may raise doubts about the publication or disclosure of strategic information must be subject to prior consultation with the Corporate Governance area.

13. Legal and disciplinary sanctions

In addition to reputational damage and losses related to the interruption of the company's normal activities, both the company and the individuals involved in a violation of the applicable antitrust laws in Brazil and around the world are subject to internal disciplinary measures, without prejudice to the applicable legal penalties.

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All Employees have the duty to report, even anonymously, any suspected violation or attempted violation of this Policy and/or the Company's Code of Conduct to their immediate manager and/or Samarco's Ethics Channel, whether by other Employees, Collaborators, Representatives or Business Partners of Samarco. as well as by competitors, suppliers, distributors or customers. Communication must be made through the available channels:

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

Samarco ensures the anonymity of the whistleblower, the confidentiality of the information provided and the non-retaliation of the Employee who reports, in good faith, a violation or attempted violation of this Policy and the Company's Code of Conduct, even if the complaint proves to be mistaken. Acts of retaliation must be immediately reported to the Company's Ethics Channel and will be subject to the application of disciplinary measures by Samarco.

All cases reported to the Ethics Channel will be duly recorded and investigated by Samarco's Compliance team, and will be regularly reported by the Compliance Manager to the Conduct Committee (internal) and, in a timely manner, to the Board Members and members of the Governance Forums (Risk, Audit and Compliance Committee and Board of Directors). During the investigations, Samarco representatives are invited to voluntarily collaborate with the investigation and provide information when requested in the fact-finding process.

15. Attachments**15.1. Annex I – Merger Notification to CADE**

All Samarco Employees are required to comply with the following rules, in the event of negotiation of acts, businesses or contracts that may fall within the hypotheses of mandatory competitive notification, under the terms of the Competition Law:

- (a) Involve Samarco's Legal and Corporate Governance from the initial stage of negotiations.
- (b) During negotiations, do not share information that may affect the competitiveness of companies if the operation does not materialize.
- (c) Provide Competitively Sensitive Information that is strictly necessary for negotiations in an aggregated and anonymized manner (for example: aggregated and historical information on prices, volumes and commercial conditions), unless through a *clean team* to be duly constituted in a timely manner and in a specific manner for the operation in question. In addition, they must take care to, whenever possible, simplify, aggregate and/or delay by at least 6 months competitively sensitive data that need to be shared during negotiations.
- (d) Entering into a Secrecy and Confidentiality Agreement, prepared/reviewed by the Legal Department, before exchanging confidential information and using it only for the purpose of evaluating the transaction. No data or

- (e) Not to perform any act that may characterize the premature implementation of the transaction, partially or entirely, such as altering the normal course of Samarco's business, prior interference by one party over the other, and/or unifying the structures of the companies, before the final approval of the transaction by CADE, especially in relation to the following areas: commercial, research & development, marketing and investments;
- (f) If the negotiation ends without completion of the merger, return or destroy all information sent and/or processed, under the terms of the Secrecy and Confidentiality Agreement entered into, so that no data remains archived or can be reused in the future.

For the purposes of **item 6** of this Policy, the following are the employees and/or representatives of Samarco designated to interact with employees and/or representatives of shareholders, who have been formally authorized by these companies:

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16. Revision Control Table

Lists the versions of the document and the need for training of the new version.

Revision	Page	Date	Reason for Review	Need for Training?
06	All	23/01/23	Policy Review	Yes
07	All	05/06/25	Policy Review	Yes