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CONFLICTS OF INTEREST AND RELATED PARTY TRANSACTIONS POLICY

1. OBJECTIVE

This Conflicts of Interest and Related Party Transactions Policy ("Policy") of Samarco Mineração S.A. ("Samarco") establishes the principles, guidelines, and directives for identifying, evaluating, and addressing Related Party Transactions and other situations that may represent potential or actual Conflicts of Interest.

2. SCOPE

This Policy applies to Samarco and its subsidiaries and must be observed by all Employees, Collaborators, and Shareholders of Samarco and its subsidiaries, including (i) directors, interns, trainees, young apprentices, and temporary employees of Samarco ("Employee"); (ii) board members and committee members ("Shareholder"); (iii) Samarco's suppliers, contractors, representatives, and business partners, in Brazil and abroad, including individuals or legal entities that provide inputs, materials, or services to Samarco, with whom Samarco maintains a formal relationship through agreements, partnerships, cooperation agreements, or similar instruments, and who act in the interest or benefit of Samarco before third parties, whether or not they have an employment relationship (collectively referred to as "Collaborator").

Compliance with this Policy will be monitored by Samarco's Compliance and Human Organizational Development departments, with support from the Corporate Governance department, as necessary.

3. ADDITIONAL DOCUMENTS

- Code of Conduct.
- Antitrust Policy.
- Corruption and Fraud Prevention Policy.
- Background Check Operating Procedure.
- Conflict of Interest Mitigation Procedure. [.]

4. 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**: Any person who, even temporarily or without payment: **(i)** is employed or holds a position, job, or role in the public administration or in a service provider contracted or hired to perform an activity subject to a concession by the public administration; **(ii)** holds a deliberative position in a political party, is an employee of a political party, or another person acting for or on behalf of a political party; **(iii)** is a candidate for public office; or **(iv)** represents the interests of a class, sector, or public, such as an employee union, representative institution, or community.
- **Senior Management**: Members of the Board of Directors, members of the Fiscal Council, executives, directors, and members of committees (statutory or otherwise) of Samarco and its subsidiaries.
- **Conflicts of Interest**: Circumstances in which relationships or facts related to personal interests, whether financial or otherwise, may interfere with the objectivity, impartiality, and independence in

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decision-making, judgment, or performance of professional duties of an Employee, Shareholder, or Collaborator.

- **Family Member:** (i) spouse, former spouse, partner in a stable union, or a partner in a similar relationship; (ii) lineal ascendants and descendants of any degree, including natural, civil (adoptive), and testamentary heirs; (iii) relatives up to the third degree of consanguinity. Examples: spouse, partner, siblings, parents, children or stepchildren, grandparents, grandchildren, sons-in-law, daughters-in-law, uncles, aunts, nieces, nephews, cousins, brothers-in-law, and fathers-in-laws.
- **Competitively Sensitive Information:** Specific information that is not in the public domain and/or has not been previously published by Samarco or its subsidiaries, related to strategic matters, including, but not limited to: (i) prices, discounts, commercial policies, and market positioning strategies; (ii) production capacity, production and sales volume, production quality, and expansion and/or restriction plans; (iii) marketing strategies; (iv) profit, profit margin, and costs; (v) information about suppliers and/or customers and the terms of contracts negotiated and executed with them; and (vi) wages and benefits.
 - Information that is in the public domain and/or has been previously published by Samarco or its subsidiaries is not considered Competitively Sensitive Information.
- **Related Party(ies):** Parties are considered related if one of them, whether an individual or legal entity, can control the other or exert any type of influence over its management, assets, or decision-making capacity.
- **Related Party Transaction:** Transfer of resources, assets, services, or obligations, regardless of whether a price is charged in return, including, without limitation: (i) purchase and sale of goods, properties, and other assets; (ii) provision or receipt of services; (iii) leases or lending; (iv) research and development transfers; (v) transfers under licensing agreements; (vi) financial transfers (including loans and capital contributions in cash or cash equivalents); (vii) provision of guarantees, sureties, or bonds; (viii) assumption of commitments to do something, whether a particular event occurs or not in the future, including contracts to be performed (whether recognized or not); (ix) settlement of liabilities on behalf of the entity, or by the entity on behalf of a Related Party.
- **Close Relationships:** persons with whom one maintains ties, affective relationships, or habitual interaction, by bond, whether romantic or friendly, in which there may exist an interest in benefiting the other party.
- **Competition Violations:** Any violations of competition laws applicable to Samarco and its subsidiaries, such as Law No. 12.529/2011, including agreements (explicit or tacit), exchange or sharing of Competitively Sensitive Information, and other concerted conduct between competitors that may have the purpose or effect, even if not achieved: (i) increasing or fixing prices or any other relevant competitive variables; (ii) restricting the quantity of products on the market, limiting their supply; (iii) promoting market and/or customer division; (iv) organizing, promoting, and/or participating in a boycott of suppliers and/or customers; (v) coordinating activities in bidding processes in an attempt to reduce competition and artificially increase prices and profits; (vi) more broadly, artificially distorting competitive conditions in a given market.

5. GUIDELINES

5.1. General Rules

All those covered by this Policy have a duty to act impartially, ethically, and professionally, always in the best interests of Samarco and/or its subsidiaries (as applicable), regardless of any external or personal influence.

In carrying out their professional activities, the relationships of Employees, Shareholders, and Collaborators with any third parties, including customers, intermediaries, service providers,

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subcontractors, and competitors, must be guided by objective criteria and in accordance with Samarco's principles and values, observing all laws applicable to their activities.

5.2. Specific Rules

The guidelines presented below are intended to anticipate situations that should be known to Samarco Employees, Shareholders, and Collaborators and that may represent Conflicts of Interest and, consequently, violations of this Policy. However, situations other than those described below may also constitute Conflicts of Interest, as defined in this Policy. Any situation that may constitute a Conflict of Interest must be immediately reported by the Employee or Collaborator to the Compliance department or, if the situation involves Shareholders, to the Corporate Governance department, even if it does not specifically fit into the scenarios described below.

5.2.1 Relationship or influence in a company that has any type of business with Samarco

In the execution of Samarco's or its subsidiaries' business, especially in locations whose main economic activity is related to the mining sector, it is possible for Employees, Collaborators, and Shareholders and their respective Family Members to hold a stake (direct or indirect), exert influence, or act as service providers in companies or entities that have business or other types of partnerships or commercial relationships with Samarco and its subsidiaries.

In these cases, especially due to the potential risk that the business, partnership, or commercial relationship may not be conducted impartially and objectively, the Employee, Collaborator, and/or Shareholder must immediately inform the Compliance department or, if the situation involves a shareholder representative, the Corporate Governance department for assessment and possible adoption of measures to mitigate the risks of Conflicts of Interest.

The aforementioned reporting requirement also applies to relationships with entities, governance bodies, or individuals with whom Samarco or its subsidiaries have partnerships, agreements, or socio-institutional investments, as well as with companies that may be considered competitors, even if there is no financial compensation.

5.2.2 Working Relationships between Family Members or Individuals with Close Relationships

Samarco and its subsidiaries have thousands of Employees and Collaborators, as well as several Shareholders. It is possible that some individuals are Family Members or have some type of close relationship. In these cases, the decisions or activities of a given Employee, Collaborator, or Shareholder may be affected by their relationship with a Family Member or close associate, especially if there is direct reporting between those involved.

Therefore, if a given Employee, Collaborator, or Shareholder has a Family Member who is also an Employee, Collaborator, or Shareholder of Samarco or its subsidiaries, the person in question must inform the Compliance department or, if the situation involves a Shareholder representative, the Corporate Governance department for assessment and possible adoption of measures to mitigate the risks of Conflicts of Interest.

In any case, Employees, Collaborators, or Shareholders must not participate in any decisions related to another Employee, Collaborator, or Shareholder who is a Family Member or close associate, such as hiring, evaluation, or termination.

5.2.3 Public Officials:

It is possible that certain Employees, Collaborators, Shareholders, or their respective Family Members are or have been Public Officials. While this does not necessarily constitute an irregularity, an individual who is or has been a Public Official may expose Samarco and its subsidiaries to greater reputational and integrity risks, especially if the Employee, Collaborator, Shareholder, or Family Member in question has the ability or can exert influence to benefit Samarco or its subsidiaries in any way. Samarco and its subsidiaries do not authorize the individuals covered by this Policy as per item 2 above, Family

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Members, or any third party to engage in any action or omission that unduly benefits or provides any type of undue advantage to Samarco or its subsidiaries.

Therefore, if an Employee, Collaborator, or Shareholder is or has been a Public Official, or has a Family Member who is or has been a Public Official, regardless of their position, role, or public entity, they must inform the Compliance department or, if the situation involves a Shareholder representative, the Corporate Governance department for evaluation and appropriate action.

5.2.4 External Jobs, Positions, or Roles

As a general rule, Employees, Collaborators, or Shareholders of Samarco and its subsidiaries are not authorized to hold any position or function in companies that carry out activities similar to and/or competing with Samarco, even through a legal entity and/or free of charge.

The above restriction does not apply to members of Senior Management appointed by or linked to Samarco's controlling Shareholders, subject to the rules set forth in items 5.3.5 and 5.3.6 below.

Under any circumstances, Employees, Collaborators, and Shareholders must declare any conflicts of interest in situations that may compromise the impartiality of decisions in the best interests of Samarco. This includes, but is not limited to, situations such as: (i) approval of business plans; (ii) authorization of new investments; (iii) approval of agreements with affiliated, subsidiary, or controlled entities of the Shareholders; (iv) approval of budgets and fundraising plans; (v) decision-making related to Samarco's judicial recovery plan; (vi) analysis of the company's performance indicators; (vii) analysis of financial results.

5.2.5 Related Party Transactions

Related Party Transactions are not necessarily prohibited by this Policy, but there is a greater risk that they will not be conducted with the necessary objectivity, impartiality, and independence. Therefore, Samarco expects all Employees, Collaborators, and Shareholders involved in a Related Party Transaction to act objectively, impartially, and independently, preserving the best interests of Samarco and its subsidiaries.

Furthermore, in a Related Party Transaction, the Employees, Collaborators, and Shareholders involved must follow all applicable internal procedures for a regular transaction and fully comply with applicable laws.

If an Employee, Collaborator, or Shareholder becomes aware of an irregularity and/or potential or actual Conflict of Interest involving a Related Party Transaction, this person must immediately inform the Compliance department or, if the situation involves a Shareholder representative, the Corporate Governance department.

5.2.5.1 Formalization, Evaluation, and Treatment of Related Party Transactions

5.2.5.2 Formal Aspects of Related Party Transactions

Regardless of value or nature, Related Party Transactions must be formalized through a formal written instrument and always recorded separately in the accounting records, as well as disclosed in the financial statements, in accordance with Samarco's Bylaws, current legislation, and other current guidelines. Without prejudice to other specific elements, the instrument must state whether or not a competitive bidding process was conducted for the Related Party Transaction and its outcome. If not, it must include justification and documents supporting the understanding that the Related Party Transaction in question will be conducted in Samarco's best interests.

5.2.5.3 Criteria for Evaluating Related Party Transactions

Regardless of value or nature, Related Party Transactions must be communicated in advance to the Corporate Governance department and evaluated by Samarco's Legal, Risk and Compliance Department and Finance and Procurement Department to ensure compliance with the Bylaws,

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applicable legislation, and other policies and procedures, as well as to verify the necessary approval process. Corporate Governance, after the appropriate internal process, will submit the transaction to the General Shareholders' Meeting for deliberation, approval, or request for other appropriate measures and due diligence.

To evaluate Related Party Transactions, the review process will verify, at a minimum, the following criteria:

- Whether there are demonstrable reasons, from Samarco's business perspective, for the Transaction to be conducted with the Related Party rather than with third parties;
- Whether the compensation is adequate;
- Whether the Transaction will be carried out on terms at least equally favorable to Samarco compared to those generally available in the market or those offered to or by a third party unrelated to Samarco, under equivalent circumstances, attested, if necessary, by assessments performed or opinions issued by a specialized and independent firm;
- Whether the Related Party Transaction involves any reputational risk for Samarco;
- Whether the Related Party Transaction will not violate restrictions contained in current legislation, contracts, and Samarco's Judicial Reorganization Plan; and
- If a competitive process has not been conducted for the subject matter eligible for a Related Party Transaction, Samarco must consider the following factors in its evaluation of the Transaction: (a) the justification; (b) the adequacy of the pricing methodology used, considering other possible alternative pricing methods for the Related Party Transaction; and (c) comparison of prices, terms, and conditions available in the market and/or similar transactions already carried out by Samarco.

5.2.5.4 Handling Conflicts of Interest in Related Party Transactions

When a Conflict of Interest is identified in Related Party Transactions, Corporate Governance and the Compliance area must prepare a report with a detailed summary, considering the recommendations of the Legal, Risk and Compliance Departments and the Finance and Procurement Departments, for review, oversight, and deliberation by (i) the Executive Board, in cases involving Samarco Employees; (ii) the Board of Directors, in cases involving committee members; and (iii) in cases involving board members, the Board of Directors shall convene a General Meeting, in accordance with Article 14, (iv) of the Company's Bylaws, to deliberate on the matter.

5.2.6 Senior Management

In performing their duties, members of Senior Management are expected to have access to a greater volume of confidential information (including Competitively Sensitive Information) and strategic information of Samarco and its subsidiaries, to make relevant decisions, and to be aware of and identify new business opportunities.

To maintain integrity, honesty, and transparency in their operations, and to mitigate the risks of legal violations and internal policies at Samarco, including antitrust violations, it is essential that senior management members always base their decisions and conduct on the best interests of Samarco and its subsidiaries, even if the senior management member in question holds a position or performs external roles, such as those of Samarco's controlling shareholders.

Under no circumstances should a senior management member prioritize external interests, including those of Samarco's controlling shareholders, when performing their duties related to Samarco and its subsidiaries.

If a potential or actual conflict of interest is identified, the senior management member must immediately report it to the body or individual to whom they are directly linked, in addition to informing the Governance department. Whenever a potential conflict of interest is identified by Corporate Governance,

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it is imperative that the member involved and their respective body be formally notified to comment on the matter, in compliance with item 5.2.5.4 above.

All members of Senior Management (including board members, directors, executives, members of the Board of Directors, Committees, and Samarco's controlling shareholders) must sign the "Commitment to Act with Integrity and Absence of Conflicts of Interest," available in **Annex I**.

6. MONITORING

The Corporate Governance department will periodically issue notices to Shareholders, Directors, members of the Board of Directors, committees, and others, requesting that they submit an updated list of Related Parties for Samarco's information and monitoring. However, whenever any change occurs in the information presented, these parties must immediately notify Corporate Governance. Furthermore, the Compliance department will also issue a notice to Employees, Collaborators, and Shareholders requesting that they complete forms to collect information on potential or material Conflicts of Interest, or confirm previously completed data. The same forms must be completed when hiring new Employees and Collaborators. The declaration of employment relationships is mandatory for all Employees and Collaborators who have access to @samprojetos and the Samarco intranet and Shareholders described in item 2 above. The Compliance team will evaluate these declarations, with support from Corporate Governance.

The purpose of processing personal data in this procedure is to prevent Conflicts of Interest and, consequently, the risks of fraud and corruption, potential favoritism, and the risk of Antitrust Violations, among other cases of conduct contrary to the premises of Samarco's Code of Conduct and Compliance Policies.

In cases that present a potential risk to Samarco, even if the person being evaluated is not included in the group of contractors required to submit the declaration of ties, the Compliance department may request completion of the declaration, using any necessary and appropriate means (Conflict of Interest application in Power Apps, manual form, Microsoft Forms, or alternatives).

The evaluation of the declarations should be based on the following instructions:

- Check whether the declarations of all Employees and Collaborators notified by the Organizational Human Development department with access to @samprojetos and notified by the Information Technology department have been submitted.
- Check whether the declarations of the Shareholders listed in item 2 above and notified by the Corporate Governance department have been submitted.
- Check the latest declaration.
- If a close relationship is declared with another Samarco employee, collaborator, or shareholder, directly or indirectly reporting to them, the report should be forwarded to the Organizational Human Development department for assessment as to whether the personal interests of the reporting person conflict or may conflict with the impartial performance of their duties in the best interests of Samarco.
- If a close relationship is declared with an employee of a collaborator, and one of the parties (declarant or declared) holds a position that could interfere with the contract of the collaborator to whom the declared person is employed, the circumstances surrounding the potential conflict of interest must be clarified with the reporting person's immediate manager. It is necessary to ensure that the Samarco employee or collaborator does not participate in the hiring, assessment, oversight, or management of the contract in which their family member works.
- If the reporting person also reports being a public official, for assessment purposes, it should also be verified that there are no inconsistencies in their work schedules.
- When a close relationship with a public official is declared, this must be confirmed with the declarant's immediate manager whenever one of the parties (declarant or declared) holds a leadership or management position.

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- All declarations must be classified as one of the following:
 - **RED**: actual conflict situations that violate the Code of Conduct and the Compliance Policy.
 - **YELLOW**: even if not a violation, it may represent a conflict.
 - **GREEN**: no conflicts of interest were identified.

In addition to the Declaration of Relationships addressed to Employees and Collaborators with access to @samprojetos, and the documents required to be completed for the information of other Employees (such as the DDQ – Due Diligence Questionnaire), a new Declaration will be created to collect information related to Shareholders.

7. REPORTS

Any violation or suspected violation of this Policy must be immediately reported. Reports should be made to the Samarco Ethics Line using the following contact details:

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

Cases reported through the Ethics Channel will be duly recorded and analyzed.

Samarco expressly prohibits retaliation against any individual who reports potential violations of laws or Samarco policies.

8. NON-COMPLIANCE

Employees, Collaborators, and Shareholders who violate the provisions of this Policy will be subject to disciplinary sanctions, including warnings, dismissal, and termination of employment with Samarco and/or its subsidiaries, as applicable, without prejudice to applicable legal or administrative measures.

9. REVISION CONTROL TABLE

Revision	Page	Date	Reason for Revision	Is Training Required?
00	All	XX/XX/2024	Creation of Procedure	Yes

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ANNEX I

AGREEMENT OF COMMITMENT TO INTEGRITY AND ABSENCE OF CONFLICTS OF INTEREST

This Agreement of Commitment to Integrity and Absence of Conflicts of Interest ("Agreement") is signed by [Full Name], registered with the Individual Taxpayer Registry (CPF) under No. [●], [position] of Samarco Mineração S.A., registered with the National Registry of Legal Entities under No. [●] ("Samarco"), hereinafter referred to as "Signatory".

WHEREAS, Samarco is committed to conducting its business in accordance with the highest standards of honesty, integrity, and respect for people;

WHEREAS, Samarco does not tolerate violations of the legislation applicable to its activities or its internal policies, including situations that may constitute acts of corruption, fraud, antitrust violations, or conflicts of interest in its institutional relationships;

The Signatory declares that:

- They are committed to carrying out its activities in the best interests of Samarco and in accordance with applicable laws and the highest standards of honesty, integrity, and respect for people, preventing acts of corruption, fraud, antitrust violations, conflicts of interest, among others;
- They have received copies of Samarco's Code of Conduct, Antitrust Policy, Corruption and Fraud Prevention Policy, Conflicts of Interest and Related Party Transactions Policy, and Conflict of Interest Procedure ("Internal Policies"), they are aware of their contents, and will always act in accordance with all their guidelines;
- If any situation arises that may constitute a violation of this Agreement or Samarco's Internal Policies, the Signatory will immediately notify Samarco's Compliance department in writing;
- They will inform Samarco of their relationship with Related Parties, as defined in applicable law and in the Policy on Conflicts of Interest and Transactions with Related Parties, annually or whenever your relationship changes;
- If they are involved in any activity, transaction, or decision that may represent a conflict between your personal or external interests and Samarco's interests: **(i)** they will immediately report this to the body or individual to which they are directly linked and inform Samarco's Compliance department; **(ii)** they will provide Samarco with information on the nature and extent of the conflict; and **(iii)** they will formalize your exclusion from Samarco in writing, which will be recorded in internal minutes, as applicable; and
- They are aware that violations of this Agreement or Samarco's Internal Policies will subject you to disciplinary sanctions, including the possible termination of your relationship with Samarco, in addition to the applicable legal consequences.

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This Agreement will be in effect for the entire period during which they have a contractual relationship with Samarco.

Date: [XX/XX/XXXX]

[Name]
CPF: [XXX.XXX.XXX-XX]