

SAMARCO STANDARDIZATION SYSTEM

POLICY FOR OFFERING AND RECEIVING GIVEAWAYS, GIFTS, AND HOSPITALITY

CODE: SMIN-POL-CORP-006



POLICY FOR OFFERING AND RECEIVING GIVEAWAYS, GIFTS, HOSPITALITY, AND OTHER THINGS OF VALUE

1. Purpose

In addition to the Code of Conduct and the Corruption and Fraud Prevention Policy, the Policy for Offering and Receiving Giveaways, Gifts, and Hospitality ("Policy") aims to define the guidelines and rules to be followed when offering and receiving Gifts, Giveaways, Meals, Entertainment, Hospitality, and Other Things of Value (as defined below) between Samarco Employees and Collaborators and Public Officials and employees or representatives of private entities, in order to prevent corruption and fraud within the company.

2. Definitions

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

Benefits: any giveaways, gifts, meals, entertainment, hospitality, or other things of value, which may be referred to collectively and/or separately. Recurring Benefits are those that occur repeatedly, that is, two or more times, in more than one installment/occasion, over a short period of time.

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.

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.

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 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.

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.

Public Administration: any government body, entity, or company, whether national or foreign, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by any government body, entity, or company, whether national 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.

Collaborator(s): Suppliers, Contractors, Subcontractors, Partners, Representatives, and Business Partners of Samarco, in Brazil and abroad.

Employee(s): Employees (including managers and directors), interns, trainees, young apprentices, temporary employees.

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.

3. Target Audience and Scope

This Policy applies to all Samarco Employees. It also applies to its Collaborators, the latter while acting on behalf of or for the benefit of Samarco, or when providing services to Samarco.

This Policy applies to any Benefit granted, offered, promised, or received by an Employee or Collaborator while acting on behalf of or for Samarco.

4. Mandatory Principles

Samarco is committed to maintaining the highest ethical standards. For this reason, this Policy was created to promote compliance with all laws applicable to Samarco and its shareholders, including the U.S. Foreign Corrupt Practices Act ("FCPA"), as well as applicable Brazilian legislation, such as Law No. 12.846 of August 1, 2013 ("Clean Company Law" - Brazil).

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Employees and Collaborators, personally or through third parties, are not permitted to promise, offer, grant, or even receive or accept any Undue Advantage to Public Officials or employees and representatives of private entities.

All Benefits offered, provided, or received by Employees and Collaborators, when on behalf of Samarco, must be:

- Not exorbitant or extravagant;
- Given or received openly and transparently;
- Given or received for legitimate commercial and institutional purposes; and
- Must never involve the offering of money to third parties.

Furthermore, when granting or receiving benefits, Employees and Collaborators acting on behalf of or in favor of Samarco must ensure that:

- The circumstances and the amount do not create the appearance of bad faith or lack of probity, and do not constitute corruption or fraud.
- The circumstances and amount would not cause embarrassment to Samarco or an Employee or Collaborator if they were made public, nor would they negatively impact Samarco's or the Employee's or Business Partners's reputation;
- The frequency of benefits granted to or received from the same recipient does not create the appearance of improper conduct.

Any benefits involving spouses or guests not involved in the interactions should generally not be offered, as they pose a high risk to Samarco. Exceptional cases with robust and plausible justifications may be evaluated and, therefore, should be subject to consultation with the Compliance team through the Compliance Request Portal.

If you have any questions regarding this Policy, please consult the Compliance team. 5.

5. Rules and Limits

Any Benefits to be offered, acquired, granted, accepted, or received, including Other Things of Value, require the Employee or Collaborator to obtain prior approval and register, according to the rules set out in the table below.

Electronically register any giveaway, gift, or hospitality offered to or received from Public Officials or the private sector through the Compliance Request Portal. When registering through the system, approval from the requester's area manager will automatically be requested. The Compliance team will receive the form and will perform the necessary control and review actions to ensure compliance with this Policy. Below is a table describing the rules:

Counterparty Classification	Benefit to be offered, granted, accepted, or received	Requires registration with the Compliance team (1)	Requires approval from an area manager and the Compliance team ^{(1) (2) (3)}
Private	Gifts, Giveaways, Meals, Hospitality, Entertainment;	If the value exceeds R\$ 200.00 in Brazil or USD100.00 abroad;	If the value exceeds R\$ 200.00 in Brazil or USD100.00 abroad
Public	Gifts, Giveaways, Meals, Hospitality, Entertainment;	Always	Always

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Private or Public	Other Things of Value;	Always	Always
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¹ The above limits must be considered cumulatively per Event.

² Recurring benefits must be pre-approved by the area manager, general manager, or director and by the Compliance Committee under the terms of item 6 below.

³ The rule is to obtain approval from the area manager, if applicable. In the case of areas where there is no Manager, approval must be obtained from the General Manager. When the person responsible for granting/receiving benefits is the General Manager, approval must be obtained from the Director. The same applies to other professionals reporting to the director. The director must approve the granting/receipt of Giveaways, Gifts, and Hospitality to those employees directly reporting to them. If the person responsible for granting/receiving benefits is the director, approval must be obtained from the CEO.

It is not necessary to complete the form when: a) employees and collaborators participate in corporate events or internal training sessions under "working conditions", with the provision or receipt of giveaways or hospitality (e.g., internal training sessions or events with coffee breaks or snacks, or the provision of giveaways to third parties at these events). b) when Samarco departments wish to provide benefits to Samarco employees, such as internal recognition initiatives, goal achievement, among others. This rule does not apply when third-party employees are involved. c) institutional giveaways (items with a typically low or insignificant nominal value or no commercial value, but which somehow bear the institutional brand of a company or institution. Examples: personalized pens, mechanical pencils, folders, wallets, keychains, diaries, notebooks, picture frames, calendars, flash drives, card holders, notepads, mugs, recyclable bags, office accessories, among others.)

Meals and any expenses incurred with Public Officials, as provided for in this Policy (including meals offered at Samarco units), must be allocated to a specific Politically Exposed Person (PEP) for Routine Expenses: PEP OD-DV-001-0002 (Brazil), duly registered and approved.

5.1. Deadlines

After approval by the requesting area manager, the Compliance team will have 7 business days to evaluate the registration to be offered, acquired, granted, accepted, or received.

Exceptionally, certain hospitality arrangements may be granted or accepted, such as hospitality for participation in public hearings, meals during demonstrations, lunch or dinner, as a courtesy and provided they involve amounts specified in SMIN-POP-GCT-007 – National and International Travel Procedure, without prior approval from the responsible manager and the Compliance department. These situations must arise from events or meetings where there was no prior invitation to the meal and/or adequate time to plan the concessions. They must be subsequently registered with the Compliance department within 7 business days, counting from the first business day of the event date.

6. Approval for Recurring Benefits

If Samarco wishes to offer a specific benefit on a recurring basis, the Employee or Collaborator responsible for offering the benefit must obtain the appropriate approval from a Director or General Manager of the area. To do so, the Employee or Collaborator must complete the Form for Offering and Receiving Giveaways, Gifts, and Hospitality, describing in detail the benefit, its estimated value, recurrence, and period, and indicating that it is an Approval for Recurring Benefits. Along with the Form, the Employee or Collaborator must submit a justification supporting the request and presenting an assessment of the economic value of the benefit, considering the entire recurrence period and its intended purpose.

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The form must then be submitted to Compliance Management, who will present it to the Internal Compliance Committee for decision-making. The approval of a recurring benefit will be valid for a maximum of 6 months. Recurring benefits offered to public officials are not exempt from proof of accounting in a specific PEP element: PEP OD-DV-001-0002 by the responsible employee.

7. Violations

Any violation or non-compliance with the provisions of this Policy, the Corruption and Fraud Prevention Policy, the Code of Conduct, or other Samarco standards and policies will subject those responsible to disciplinary measures from Consequence Management, as defined by the company, and may result in termination of employment with Samarco, as well as applicable penalties under applicable law.

8. Reports

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

- Free call: 0800 377 8002;
- E-mail: canaldeetica@samarco.com / compliance@samarco.com
- Website, at the following electronic address: [https:// www.canaldeetica.com.br/samarco/](https://www.canaldeetica.com.br/samarco/)

Revision Control Table

Revision	Page	Date	Reason for Revision	Is Training Required?
00	All	03/30/2020	Policy Creation	Yes
01	All	06/30/2021	Policy content review and adaptation	Yes
02	All	08/31/2023	Inclusion of the App as a way to register giveaways; change of the Ombudsman's Office to the Ethics Channel, with the inclusion of new contact information	Yes
03	All		Policy content review and adaptation, with a change in the concept of Public Agent, adaptation to Reparation, change in the amount, and mention of the Compliance Portal	Yes