

SAMARCO STANDARDIZATION SYSTEM

SAMARCO HUMAN RIGHTS POLICY

CODE: SMIN-POL-CORP-011



SMIN-POL-CORP-011 - SAMARCO HUMAN RIGHTS POLICY**SAMARCO HUMAN RIGHTS POLICY****1. Purpose**

This policy aims to reaffirm Samarco's commitment to respecting human rights and to establish principles and operating guidelines to ensure this commitment is effective, in line with the provisions of our Code of Conduct and related policies.

2. Scope

It applies to all Samarco operations, including its industrial, logistics, and administrative units, covering employees, contractors, suppliers, and other business partners. The company encourages its suppliers and partners to adopt practices that respect human rights, promoting a value chain aligned with Samarco's principles.

3. Related documents

[Samarco Code of Conduct](#)

[Samarco Supplier Code of Conduct](#)

[Sustainability Commitment Statement](#)

[Annual Sustainability Report](#)

[Reparation at Samarco](#)

[D&EI Program: People with Disabilities, Gender, LGBTQI+ and Race](#)

SMIN-POL-004 - Risk Management Policy

SMIN-POL-001 - Occupational Health, Workplace Safety, and Environment Policy – SSMA

SMIN-POL-003 - People Management Policy

SMIN-MA-005 - Corporate Risk Management Manual

SMIN-POL-009 - Dam Safety and Geotechnical Structures Policy

4. Commitment

We strive to continuously identify and assess risks and adverse human rights impacts arising from our activities and across our value chain. Based on guidelines and good practices, we adopt measures to prevent, mitigate, and, when applicable, remedy impacts we may have caused or contributed to. In addition to risk management, we seek to strengthen the promotion of human rights by fostering social development and expanding positive impacts in the territories where we operate.

5. Human Rights Due Diligence

As part of our commitment, we seek to systematically and progressively improve our due diligence processes to identify, prevent, mitigate, and remedy adverse impacts, as well as to report on the measures adopted. Accordingly, we work to:

- Incorporate human rights standards into our processes and practices, promoting regular training for employees and contractors on the guidelines of our Code of Conduct.
- Strengthen the management of human rights risks by integrating the assessment of these risks into our corporate risk management portfolio.
- Periodically monitor and review our policies and practices to ensure that identified impacts are mitigated and that corrective measures are continuously improved.
- Increase transparency about challenges and progress in managing human rights impacts, promoting an open channel of communication with communities and reporting our actions through our institutional platforms.

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- Establish internal governance dedicated to the human rights agenda, ensuring the active participation of senior leadership and seeking support from internal and external experts to continuously improve our strategies and practices.

We pay special attention to human rights topics relevant to the mining sector and to the territories where we operate, focusing on the following principles:

- Safe and inclusive work environments: We seek to prevent risks to the health (physical and mental) of employees and contracted workers, and to promote diversity and inclusion in our workplaces.
- Eradication of child labor and labor in conditions analogous to slavery: We do not tolerate forced labor practices, human trafficking, or undue restrictions on freedom of movement.
- Freedom of expression, association, and social dialogue: We respect and encourage collective bargaining and establish active listening mechanisms to engage with human rights and environmental defenders.
- Ongoing training: We seek to continuously improve the competencies of our employees, suppliers, and partners to ensure their activities are aligned with Samarco's policies.
- Respect for communities and Indigenous peoples: We work to mitigate and prevent negative impacts on communities located within the area of influence of our operations. We respect and recognize the right to ethnic self-identification of Indigenous peoples, Quilombola communities, and traditional peoples and communities, as established in Article 1 of International Labour Organization Convention 169.
- Avoid involuntary displacement: If expanding our operations becomes necessary, we seek to prioritize alternatives that avoid involuntary displacement. If unavoidable, we follow current human rights standards to ensure appropriate compensation and resettlement of affected populations.
- Protection of the environment and access to water: We implement environmental and water-resources management processes to prevent and mitigate environmental impacts.
- Ensuring effective reporting channels: We maintain and regularly monitor grievance mechanisms, such as the Ethics Channel and the Relationship Center, ensuring they are accessible, effective, and aligned with international best practices.

If it is identified that Samarco caused or contributed to adverse human rights impacts, we will seek to implement mitigation, reparation, and remediation measures directly or in partnership with specialized entities, ensuring the active participation of affected rights-holders. In addition, we reinforce our commitment to the principle of non-repetition, working in collaboration with relevant authorities to prevent new human rights violations in our operations and value chain.

6. Stakeholder engagement

We recognize that a structured and transparent relationship with our stakeholders is fundamental to improving the management of impacts from our operations and strengthening respect for human rights. To that end, we seek to establish ongoing and participatory engagement with those who may be potentially or effectively affected by our activities, including communities, workers, suppliers, civil society organizations, and government representatives.

Our commitment includes:

- Where appropriate, conduct meaningful and participatory consultations to understand stakeholders' concerns and expectations, so that their voices are considered in our decision-making processes.
- Ongoing monitoring and improvement of our engagement initiatives, ensuring that communication channels are accessible, effective, and aligned with international best practices.
- Structured use of the feedback received to inform our human rights strategy, strengthen due diligence, and improve impact mitigation and remediation measures.

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We complement this approach with our established communication channels, such as the Relationship Center and the Ethics Channel, ensuring a safe space for comments and concerns related to human rights.

7. Value Chain

Samarco seeks to integrate principles of respect for human rights across its value chain, encouraging suppliers and business partners to adopt responsible practices in conducting their business. In addition to the commitment formalized in this policy, our Supplier Code of Conduct sets clear human rights standards, covering aspects such as working conditions, non-discrimination, freedom of association, occupational health and safety, and socio-environmental impacts.

Samarco recognizes that managing human rights risks requires an ongoing and collaborative approach. Therefore, we encourage suppliers and partners to strengthen their own due diligence processes, promoting transparency, meaningful stakeholder engagement, and proactive measures to avoid negative impacts throughout the value chain.

8. Proportional use of force

We recognize that protecting life, physical integrity, and human dignity is a non-negotiable value. Therefore, we reaffirm our commitment to responsible and ethical conduct in situations that may require the use of force, especially by security professionals.

Any and all actions involving the use of force must be strictly aligned with the principles of proportionality, reasonableness, and prudence, non-discrimination, and the use of lethal force as a last resort to protect lives. These principles guide institutional conduct and ensure that the use of force is always an exceptional measure, adopted only when indispensable to protect lives and preserve safety.

Samarco is committed to ongoing training for professionals involved in any eventual use of force. We also commit to systematically assessing risk situations and establishing specific operating protocols to ensure the safe, proportional, and legitimate use of force.

9. Listening and reporting mechanisms

With the commitment to ensuring transparency, active listening, and effective reparation of adverse impacts, Samarco provides different engagement and reporting channels, each with a specific purpose to meet the needs of its internal and external stakeholders.

9.1 Ethics Channel

The Ethics Channel is an independent and confidential mechanism intended to receive reports of violations of Samarco's Code of Conduct, applicable law, and human rights principles. This channel is accessible to employees, contractors, and other stakeholders who wish to report inappropriate conduct, including, but not limited to:

- Workplace and sexual harassment;
- Discrimination and human rights violations;
- Fraud, corruption, and ethical misconduct;
- Noncompliance with occupational health and safety standards that may compromise the life and integrity of workers and communities.

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The Ethics Channel guarantees anonymity and confidentiality to reporting parties and can be accessed through the following channels:

- **Toll-free:** 0800 377 8002
- **Email:** canaldeetica@samarco.com
- **Website:** www.canaldeetica.com.br/samarco/

9.2 Relationship Center

The Relationship Center aims to establish an accessible and direct channel for communication with communities located within the area of influence of Samarco's operations.

Unlike the Ethics Channel, the Relationship Center is not a formal reporting channel, but rather a space for dialogue and active listening with communities, allowing their perceptions to be properly recorded and addressed. The Relationship Center can be accessed through the following channels:

- **Toll-free:** 0800 033 8485
- **Email:** relacionamento@samarco.com

The submissions recorded are reviewed and forwarded internally to the responsible areas, ensuring that issues raised by communities are addressed appropriately.

9.3 Ensuring Dialogue and Reparation

Any violation or suspected violation of this Policy must be reported immediately to the Ethics Channel. Submissions that require clarification and dialogue should be directed to the Relationship Center. In doing so, Samarco reinforces its commitment to transparency and the effective reparation of impacts, ensuring that listening and reporting channels are widely publicized and accessible.

10. Approval and review of the Human Rights Policy

Approval and review of this policy are the responsibility of Samarco's Board of Directors. The General Management of People and Culture is responsible for monitoring the need to revise its terms, establishing dissemination and communication procedures for all stakeholders.

11. Revision Control Table

Revision	Page	Date	Reason for the review	Training needed?
01	All	05/29/2025	Internal standard establishes a 2-year deadline for updating Policies	Yes