



ANNUAL COMPLIANCE

Program Report 2025



MESSAGE FROM THE CEO



In 2025 we lived an intense and transformative year, with significant deliverables to the company's strategy and to build a more sustainable future. We doubled our production capacity, strengthening our presence in the transoceanic iron ore pellet market, and obtained the environmental license for the Full Capacity Resumption project – which represents the largest investment in Samarco's history, amounting to BRL 13.8 billion.

We also completed the Judicial Reorganization ahead of schedule and made consistent progress on the decommissioning of the Germano dam. We have fully

assumed responsibility for leading the reparation process in New Rio Doce Agreement, making progress in areas such as indemnity, new districts and environmental recovery.

In this context of growth, investments and expanded responsibilities, we strengthened our governance and integrity mechanisms. The creation of the Governance and Compliance Officer, reporting directly to the Board of Directors, marked a new chapter in our journey of evolution, expanding our ability to anticipate risks, ensure regulatory compliance and support decisions consistent with our values.

We continued to nurture the fundamentals of our way of operating: a culture that values integrity, safety, diversity, respect for people and human rights and that rigorously combats all forms of discrimination, harassment and violations of our Code of Conduct.

Therefore, I am pleased to present the Annual Compliance Program Report, which consolidates the main advances and lessons learned in 2025 and reinforces our commitment to transparency and good governance.

Rodrigo Vilela
CEO

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1. THE COMPLIANCE *program*

Our evolution over the years:

2023

Diagnosis of the Compliance Program conducted by KPMG:

We have reached level 4 of maturity in each element of the methodology, on a scale of 1 to 5, aligned with best market practices. This means that our compliance function is based on risks, regulatory affairs and other groups that support training, investigations and the development of a compliance culture.

2024

Launch of the Ethics Channel Page and Accountability Report for the Channel:

We implemented several actions and improvements to the channel's structure and created the report to provide transparency to the data, materializing our progress in implementing best compliance practices.

2025

Creation of the Governance and Compliance Officer:

A completely new structure, reporting directly to the Board of Directors, ensuring the necessary autonomy to promote strategic alignment with the company's senior management, as well as securing greater transparency and security in the conduct of processes, including Internal Controls and Auditing.

2. Governance

Responsible for the Compliance Program, the Compliance Management reports to the Governance and Compliance Officer, which in turn reports directly to the Board of Directors. Samarco has a Finance, Risk, Audit and Compliance Committee, with the purpose of advising and enhancing the strategic discussions of the Board of Directors.

This structure ensures independence and autonomy for the management of the Compliance, Internal Controls and Risk areas.

Existing committees and frequency of meetings:

Third-Party Due Diligence Working Group (WG) – on demand

Finance, Risk, Audit, and Compliance Committee - bimonthly

Conduct Committee – bimonthly and on demand

Consequence Management Committee – on demand



3. Guidelines

The guidelines of the Compliance Program are established based on our Code of Conduct, which defines the company's values and establishes the ethical principles guiding our actions.

The Compliance Program also includes other important documents for its implementation, among them:

- Code of Conduct for Suppliers;
- Corruption and Fraud Prevention Policy;
- Offering and Receipt of Promotional Gifts and Hospitality Policy;
- Conflict of Interest and Related Party Transactions Policy;
- General Privacy and Personal Data Protection Policy

The other documents listed below also support the Compliance Program and their creation, review, and respective training are under the responsibility of the specific areas:

- Antitrust Policy (area in charge: Legal);
- Corporate Approval Level Manual (area in charge: Internal Controls);
- Risk Management Manual (area in charge: Business Risks);
- Institutional and Social Investment Policy (area in charge: Institutional Relations);
- Domestic and International Travel Procedure (area in charge: Controller);
- Consequence Management Policy (area in charge: Labor Relations);
- Information Security Policy (area in charge: Information Security);
- Human Rights Policy (area in charge: People and Culture).

4. COMMUNICATION *and Training*

Code of Conduct and Compliance Policies Training:

100% participation rate among direct employees, which means **2.751** people trained.

The engagement of all our employees and contractors is fundamental to the promotion of our values. Our compliance communications and training sessions are an excellent opportunity to promote our slogan: “A conduct with integrity starts with me.” Learn about the main actions:

- **In-person training – Onboarding for all new employees.**
- **Code of Conduct for Suppliers and training for our contractors.**
For contractors, the communication and training reach extended to 7,786 of the 9,377 suppliers, representing 83.03% of the total.
- **Training of Ethics Channel Focal Points**
33 employees received training, preparing them to act as role models for ethics and integrity in their respective areas, supporting specific actions aimed at investigating reports.

- **Conducting DDSSs**

Addressing the Ethics Channel, harassment, conduct, and other issues with the relevant departments in industrial units.

- **Integra Compliance: Workshop with representatives from the suppliers Compliance areas.**

A moment to expand knowledge and exchange ideas with the compliance areas of our contracted companies regarding the Ethics Channel.

The teams were trained to conduct investigations into issues involving employees of contractors working at Samarco's offices.



DISCLOSURES

11 publications in newsletters on the following topics:

- Code of Conduct for Suppliers Training for Contracted Employees
- Disclosure of the 2024 Compliance Program Report
- Combating workplace harassment
- Compliance topics and performance goals for leadership; Integrity in relations with public authorities
- Launch of the Code of Conduct and Compliance Policy Training
- Creation of the Governance and Compliance Officer
- Combating Corruption
- Integrity
- Conflict of Interests and Related Party Transactions
- Offering and Receipt of Promotional Gifts and Hospitality Policies
- Workplace Harassment and Sexual Harassment or Molestation

5. MONITORING *and control*



Compliance assessment in legal documents and instruments

Issuance of 135 opinions via a control system called Escalation Protocol.



Compliance Request Portal

Analysis of 710 queries on the portal, involving topics such as giveaways, gifts, subcontracting, conflicts of interest and others from a compliance perspective



Third-party Analysis

3,137 suppliers measured: 825 presented some kind of risk to Samarco, with 77 at high risk, 72 at medium risk, and 676 at low risk.

Furthermore, out of these analyses that generated risk, 612 pertained to service acquisition, 200 to material acquisition and 13 to material recovery.

- 118 analyses of socio-institutional demands.
- 113 contracts with Business Partners (third parties interacting with the Government).
- 46 cases brought to the Third-Party Due Diligence Work Group (WG).



Giveaways, Gifts and Hospitality

There was also a record of the distribution/receipt of more than 115 giveaways, gifts and/or hospitality items from/to employees and the external public. All cases were measured by the Compliance team and responded to those responsible for the registration.



Compliance Program Effectiveness Index

The continuous monitoring of the Compliance Program is a task that involves evaluating various requirements indicated from the diagnoses presented in the work delivered by KPMG in 2023. Together, Compliance and Internal Controls areas defined the program activities and separated them into nine themes: Governance and Compliance Culture; Compliance Risk Assessment; People, Skills and Due Diligence; Policies and Procedures; Communication and Training; Technology and Data Analysis; Monitoring and Testing; Point Management and Investigation and Reporting.

In this year an evolution was observed in the Maturity Diagnosis of the Compliance Program, reinforcing the actions implemented based on changes proposed by audits and continuous improvements in our processes.

6. ETHICS

channel



One of the main instruments for strengthening a culture of integrity is the Ethics Channel.



Samarco has had such a channel since 2013.

Formerly known as the Ombudsman's Office, and known as of 2024 as the Ethics Channel, it exists so that employees, contractors, and the several publics who interact with the company feel comfortable reporting suspected misconduct within the organization that violates the Code of Conduct.



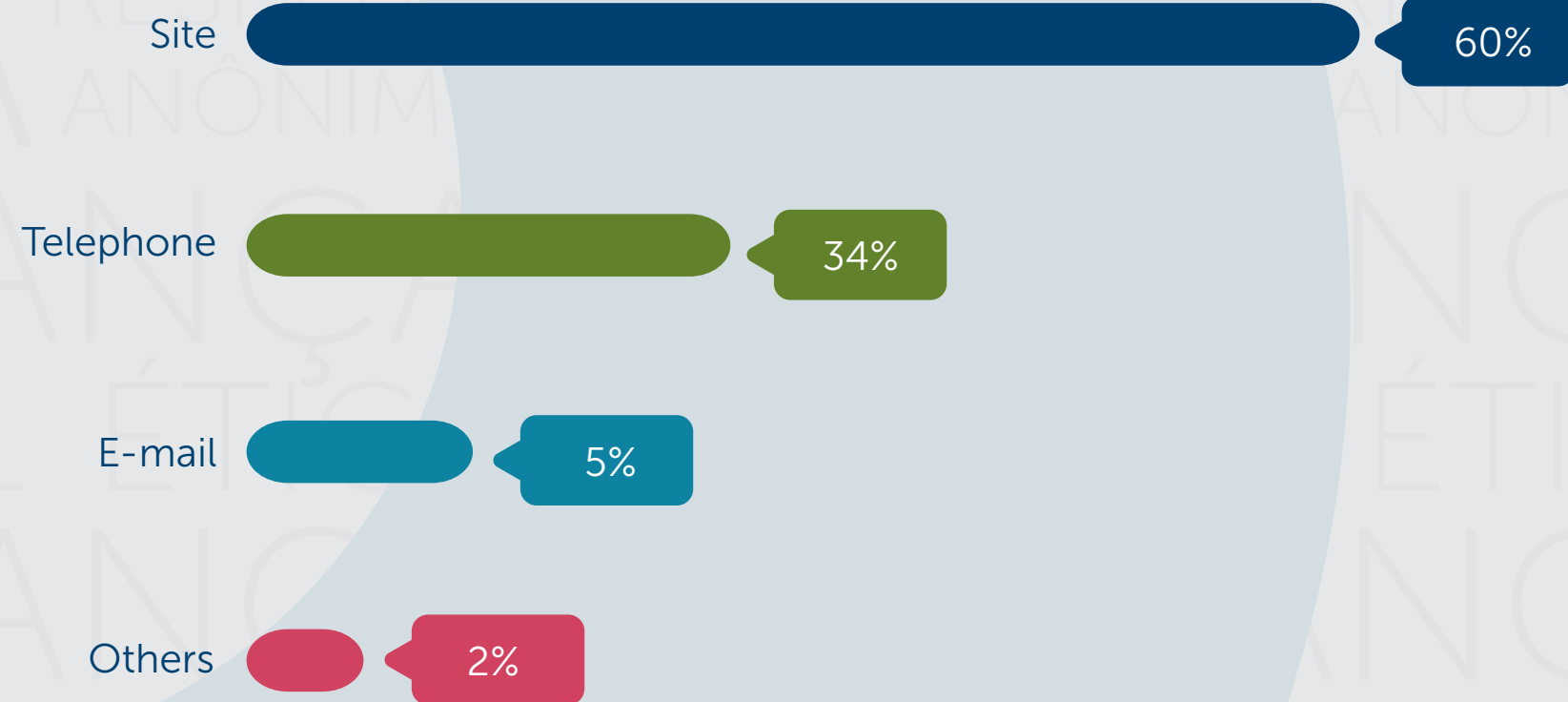
Samarco protects whistleblowers acting in good faith from retaliation, offers the possibility of anonymous reporting and guarantees the confidentiality of the source of the reports. This protection also extends to any employee or contractor who cooperates with the investigation of the alleged violation.

The Ethics Channel, in addition to investigating and addressing the cases received, contributes elements for implementing process improvements at Samarco.

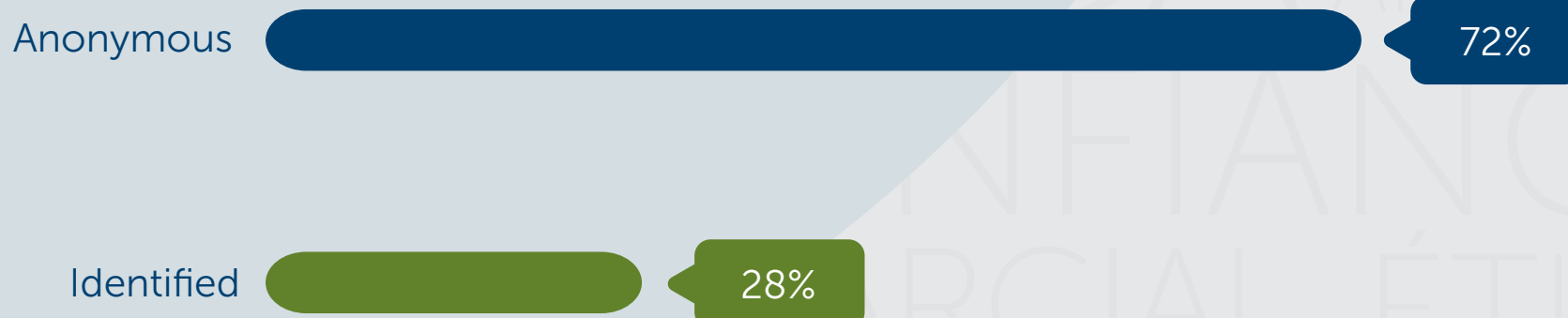
The handling of reports originating from the Ethics Channel is established in a specific investigation protocol and is carried out by the Compliance team and if necessary has the support of focal points from various areas, who have a duty of confidentiality. All reports are received, triaged, and if they contain sufficient information, analyzed, classified and verified with or without specialized external support. Subsequently, the reports are closed with the possible execution of an action plan and disciplinary measures, as appropriate.

RELEVANT NUMBERS

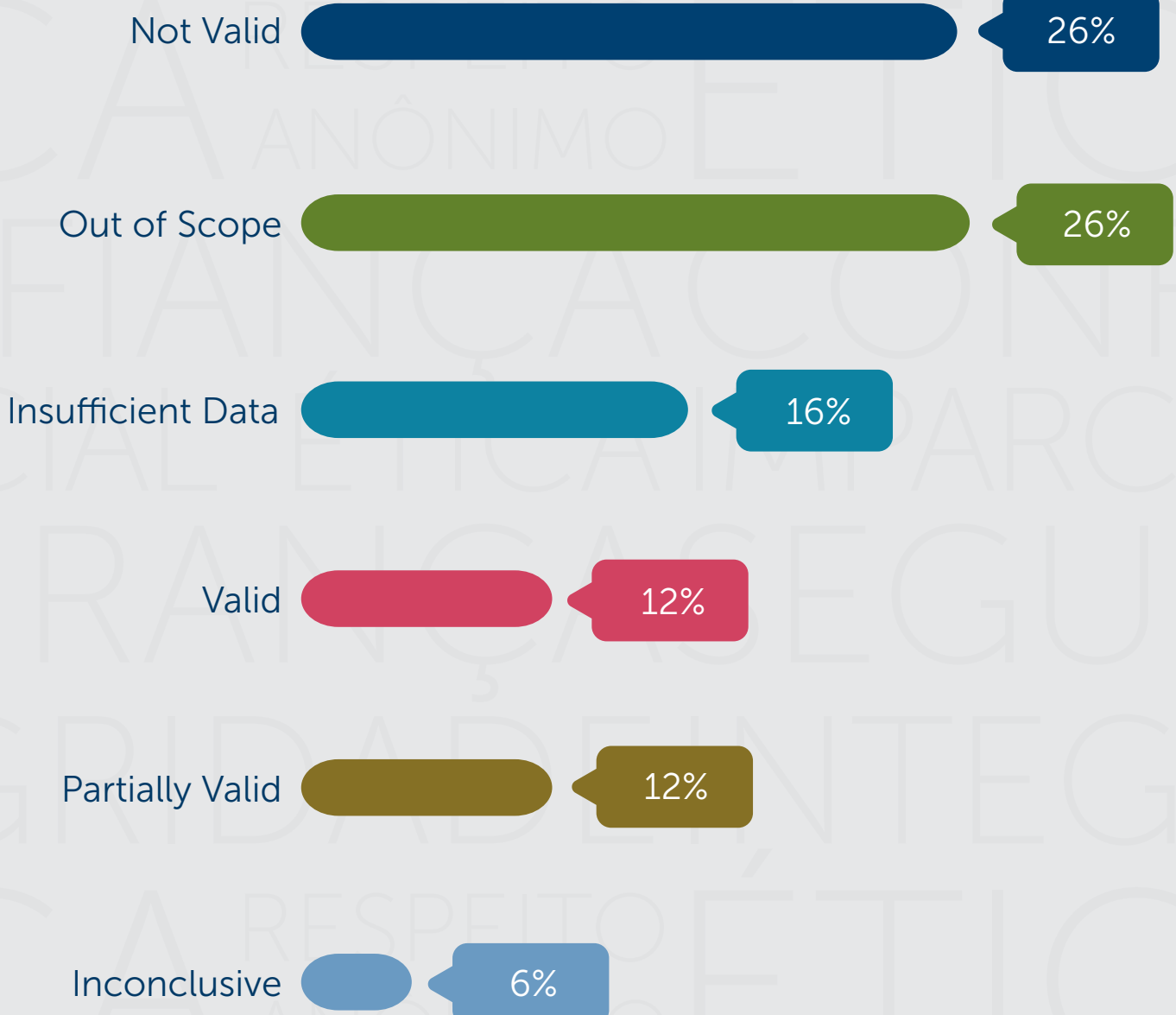
● Sources of Receipt - **1.211 reports**



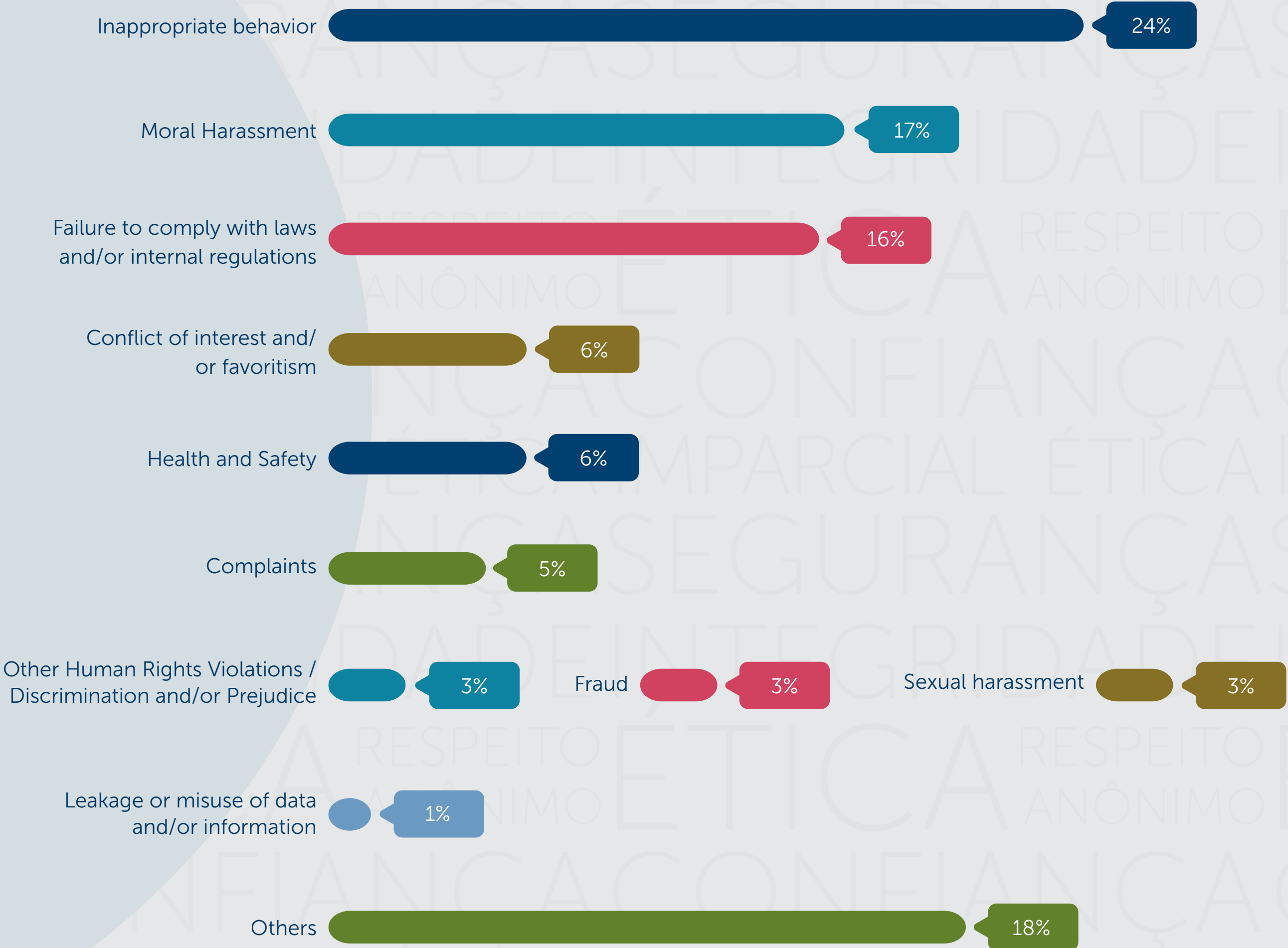
● Ways to Report



● Reports Closed - **1.145**



● **Main Reports Received in 2025 - 1.211**





Alana Goncalves Felisberto
Agatha Ribeiro

1.211 was the total number of reports received by the Ethics Channel in 2025 representing a **63%** ncrease compared to the previous year and an **85%**, increase compared to the average of the last five years.

By 2025, more than a third (**34%**) dos relatos confirmados está ligado a relações interpessoais e tem como pano de fundo o fator comportamental das pessoas.

In 2025, an
average of,
44 days
were used to
complete the
investigation
on the reports.

The effectiveness of the Ethics Channel and trust in the Compliance Program depend on full compliance with preventive actions such as the Code of Conduct, policies, communication and training. In this way will employees and contractors be aware of the rules to which they are subject and know how to act in case non-conformities are identified.

7. ACTION *plans*

Samarco's Compliance Program responds whenever misconduct or internal non-conformities are detected.

In 2025, we had **218 action plans** agreed upon as a result of investigations carried out by the Ethics Channel.

These actions were created to address substantiated or partially substantiated reports, as a way to apply the response pillar of the program.



Olavo Honório, Andrea Soares, Romulo Brazil, Anatelli Heringer, Christiano Gomes, Pedro Henrique Vettoraci, Layda Adriana Garcia, Julia Valente.

8. CONSEQUENCE *management*

Seeking to ensure the ethical standards established in our Code of Conduct, accountability actions were adopted, and the investigations carried out generated institutional learning, resulting in internal advancements, revisions of guidelines and improvements to procedures and policies. Leadership plays a leading role in the process of managing consequences and is responsible for enforcing disciplinary measures. This preventive and corrective approach contributes to the continuous strengthening of Samarco's ethical environment and controls. We work to ensure that all corrective actions are fair, appropriate and aligned with best practices in integrity and governance.



9. Challenges

The main challenges of the program, aimed at reducing the time it takes to investigate reports, include developing improvements in the Ethics Channel's service and in case management. These improvements include, for example, using Artificial Intelligence resources in Compliance processes and ensuring communication on the topic reaches all hierarchical levels.

With the creation of the new Governance and Compliance Officer, considering the context of Reparation, the evolution of the program faces the challenge of integrating controls and developing a culture of integrity. We remain committed to continuously improving governance, transparency, ethics and integrity in all our processes.

Compliance Management



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