



FUNDAÇÃO  
**renova**

## **RENOVA FOUNDATION CODE OF CONDUCT**

## **Message from the CEO**

Integrity, respect and diversity, collective construction and commitment to delivery are values that guide our repair work. Being honest and respectful in all actions is the role that each one of us must adopt daily, to achieve our purpose in a correct and transparent manner. It is not just about following the rules. It means always having an ethical and respectful posture.

To foster a culture of integrity and respect in all Renova Foundation's activities, including the relationship with all the people with whom Renova Foundation relates, we have an Integrity Program, which is under the responsibility of the Compliance Management. The program details, for example, how we hire people, how we relate to public entities and how we deal with conflicts of interest.

This Code of Conduct is one of the main documents of Renova Foundation. Here you will find the attitudes expected from employees at all hierarchical levels at Renova Foundation and those that will not be accepted in our work routine and in the relationships we build.

Read this content carefully and, whenever necessary, come back to it to clarify doubts and ensure that your activities are in line with the integrity and legal standards expected by Renova Foundation. It is also our role to convey the messages in this document to the public with which we relate, highlighting the importance of acting with integrity.

And remember: the Compliance team is available to answer questions.

The way we act in our daily lives tells us who we are. I am the Compliance. You are the Compliance.

Let's move forward, always improving!

**André Giacini de Freitas**

**Renova Foundation CEO**

# RENOVA FOUNDATION CODE OF CONDUCT

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## Introduction

### 1.1. Institutional Values

**COMMITMENT TO DELIVERY:** Be responsible for the commitments assumed, meeting the conditions of predictability, quality, cost, and deadline, with the aim of delivering the repair efficiently and definitively.

**COLLECTIVE CONSTRUCTION:** Seek synergy and build integrated solutions, to bring technical consistency and legitimacy to deliveries.

**DIVERSITY AND RESPECT:** Respect and value people, human rights, health, well-being, and diversity, making them an integral part of our actions and adopting attitudes and behaviors that favor space for individuality.

**INTEGRITY:** Act ethically, transparently and in compliance, knowing and complying with established rules, processes, procedures, and laws, and adopting respectful conduct with all interlocutors.

### 1.2. Scope

The Foundation's objective, established in the Statute of Renova Foundation, is to manage and implement measures provided for in the socioeconomic and socioenvironmental programs, including the promotion of social assistance to those impacted, because of the event in Mariana, in accordance with the Term of Transaction and Adjustment of Conduct of May 2, 2016.

All employees (including advisers, directors, employees, and interns) of Foundation must adhere to this Code of Conduct and formally accept it. The signatory who works for the Foundation, and for at least five years after the end of the relationship between the signatory and the Foundation, will be subject to the appropriate measures in case of non-compliance with the provisions of this Code of Conduct.

The Foundation will include in contracts with suppliers and third parties a commitment clause with the Code of Conduct, Human Rights Policy of Renova Foundation, and other applicable compliance policies.

The actions of our suppliers and third parties can have a direct impact on our reputation and potentially expose the Foundation to legal liability.

For this reason, the Foundation is committed to working only with third parties who share our commitment to our values, including safety, respect for the

environment, human rights and diversity, integrity, and compliance. We expect and encourage all third parties we work with to act in a manner consistent with our Code of Conduct. We will take appropriate action when we believe they have not met our expectations or their contractual obligations.

### **1.3. Use of the Code of Conduct**

Each section of the Code of Conduct explains why a certain subject is important to Renova Foundation and what our expectations are in relation to the institution's employees.

Regardless of your role, workplace, or the level of decisions you make daily, you will find clear instructions on expected behavior in this Code of Conduct. We all have a responsibility to work within the law and with integrity, respect, and common sense.

#### **Our expectations in relation to employees and suppliers**

When working for or with the Foundation, you agree to abide by our values contained in the Code of Conduct and all relevant policies, standards, and procedures applicable to your work. If you ever have questions, please ask. It is essential that you understand the Code of Conduct and how it applies to you.

#### **All employees must:**

- Read and familiarize yourself with the information contained in the Code of Conduct.
- Act in a manner that is safe, ethical, respectful, and consistent with the requirements of our policies, standards, and procedures applicable to your work.
- Take reasonable action to ensure that those who conduct supplier relationships on the Foundation's behalf, including contractors, agents, consultants and partners, act in a manner consistent with the Code of Conduct.
- Raise all questions and concerns immediately after becoming aware of possible violations of laws, regulations, or the Code of Conduct.
- Never encourage, permit, or personally demonstrate retaliation against anyone who identifies a concern.
- Never ignore an actual or potential violation of the Code of Conduct.

## **Additional expectations regarding leadership**

If you are part of the Foundation's leadership, you have an additional responsibility to understand your responsibilities in dealing with Code of Conduct concerns. Professionals who supervise others should also:

- Consistently demonstrate exemplary behavior.
- Respect the rights of all people with whom we deal, such as our employees, contractors, suppliers, partner organizations, communities and beneficiaries, representatives of civil society and public authorities.
- Ensure that employees feel comfortable raising concerns without fear of retaliation.
- Encourage and reward employees for demonstrating our values.
- Ensure that policies, standards, and procedures are accessible and understood.
- Incorporate the Code of Conduct into processes such as those applicable to politically exposed persons, employment and supply contracts, adaptation, and industrial agreements.
- Help people understand the practical applications of the Code of Conduct.
- Carry out or recommend actions to address business conduct issues.
- Never ignore or dismiss a raised concern.
- Reject any form of moral, psychological or sexual harassment and physical and verbal aggression, as well as any type of inhuman and degrading treatment.
- Promote hiring with a view to increase gender, race, sexual orientation, age, and disability diversity.

## **What happens if a concern about certain conduct is identified?**

All questions about interpretations and applications of the Code of Conduct must be treated with seriousness and respect and evaluated within appropriate timeframes. Actions to be taken will depend on the nature and severity of the issue.

If you are an employee and you are concerned about the involvement of your area, you can direct your concern directly to the Compliance area or make a communication through the Confidential Channel, where your anonymity will be respected.



In many cases, advice, support, and guidance will enable you to resolve the issue yourself. If this is not possible, or if a referral, mediation, or investigation is required, you will be instructed on the next steps, expected timeframes, and the process for receiving a response.

## **Reports of Concerns**

We encourage you to be as open and honest as possible, as this will help in a full and effective response. You may prefer to remain anonymous when raising a concern through the Confidential Channel, or you may contact Compliance directly. If you provide your name and contact details, we may contact you if we need more details.

## **Obligations of those responding to concerns**

Employees who respond to a concern are required to:

- Treat all concerns seriously and, where possible, privately.
- Respond to issues raised quickly and professionally.
- Providing accurate information and guidance consistent with the Code of Conduct and our policies, standards, and procedures, or seeking the advice of experts with appropriate knowledge and impartiality.
- Know where to go for additional support or guidance.
- Register all cases in the Compliance area or in the Confidential Channel.

## **Violations of the Code of Conduct**

Non-compliance with the provisions of the Code of Conduct, other policies, or any applicable laws is a serious matter that will be managed in accordance with the Integrity Program policies, Human Rights Policy and consequence management standards and may lead to actions corrective measures, including layoffs and/or legal action. Violations include:

- Knowingly or intentionally violating laws or policies.
- Instructing others to violate laws or policies.
- Not cooperating with investigations into violations by third parties.
- Retaliate suppliers or employees for reporting concerns or violations in good faith.
- Failure to effectively monitor the actions of subordinates.
- Making investigations more difficult through simulations.

Corrective actions depend on the seriousness of the breach and other relevant circumstances. Examples of these actions include:

- Discussions with leadership about desired behaviors.
- Verbal or written warning.
- Suspension or
- Dismissal.

## **1.4 Notifications and Guidance**

Although this Code of Conduct is intended to provide practical guidance, it does not cover every situation that may arise. The Foundation therefore expects you to use common sense and speak up when you have questions or concerns. Identifying concerns protects the Foundation, our partners, and our community.

### **Our expectations of employees and suppliers**

If you believe that a decision or action is not in line with the rules and values described in this Code of Conduct, if you are not sure how to interpret it, are concerned about how it is being applied by others, or would like to report a potential, suspected or actual violation of the Code of Conduct, you have a responsibility to raise this concern. You do not have to be directly affected by an issue to raise it. You may raise these concerns in person, in writing or over the telephone, anonymously and at any time.

### **Personally**

Talk to your leadership, Human Resources representative, Human Rights or, if for any reason you feel uncomfortable raising concerns with your direct leadership, you can also contact your Compliance manager or any member of the team.

### **Renova Foundation Confidential Channel**

Foundation provides an exclusive channel for safe and, if desired, anonymous communication of conduct that violates the Code of Conduct and good practices of the institution or current legislation. If you wish, your communication may be anonymous, and Foundation will guarantee your anonymity.

Check out how you can contact Confidential Channel:

**Telephone: 0800 721 0717**

**Website:** <https://www.canalconfidencial.com.br/fundacaorenova/>

**E-mail:** [canalconfidencial@fundacaorenova.org](mailto:canalconfidencial@fundacaorenova.org)

Foundation is committed to protecting people who are concerned about retaliation. If you believe you have been retaliated against for raising a concern, you must report it immediately. All allegations of retaliation will be fully investigated. Retaliation is grounds for taking disciplinary action, up to and including termination.

### **1.5. Integrity Program**

Renova Foundation Integrity Program is a decentralized system, with the objective of promoting legal and ethical conduct throughout the institution. The Compliance area has a centralized team of subject matter experts who administer and maintain the Integrity Program but are also available to offer guidance and advice on Compliance related matters. The final responsibility for complying with Foundation policy and the law rests with each individual director, officer and employee, and their lack of knowledge cannot be used as an excuse.

The Compliance manager is responsible for monitoring the performance of the Integrity Program through metrics and substantive milestones, coordinating their activities with other areas to ensure adherence and proper implementation of the Program's principles, and for reporting sensitive matters related to Compliance to the Board of Trustees.

Foundation utilizes a tiered Internal Compliance committee structure to make consensual decisions on sensitive Compliance matters. We believe this structure promotes decentralized oversight, multidisciplinary leadership, and complements compliance functions integrated into business units and divisions. Additional Compliance support is provided by groups or individuals in areas such as Legal, Human Resources, Finance and Procurement.

The Compliance area has sole responsibility for investigating potential, suspected or actual violations of laws or policies. In addition, the area determines the scope of investigations, and may request support from other people or groups to investigate actual or potential violations.

## **Transversal Themes**

### **2.1. Health and Safety**

Renova Foundation considers health and safety to be of the utmost importance and is committed to creating a safe and healthy work environment. In this

sense, we continually seek to promote practices that make the work environment increasingly safe for employees through compliance with applicable requirements. Compliance with all workplace health and safety laws and regulations is required.

All employees must be aware of the health and safety risks related to their activities, they have the right and the obligation to refuse to perform tasks that could endanger their health and safety. Renova Foundation, in addition to promoting awareness actions among its employees, also requires that all suppliers and business partners follow the applicable health and safety regulations, including the mandatory individual and collective use and protective equipment (Personal Protective Equipment and Collective Protection Equipment) and equipment licensing requirements.

In addition, we recognize that our decisions can affect the lives of others, whether they are Foundation employees or not. Therefore, we adopt standards that allow us to have operational discipline, in addition to planning and carrying out our activities in an ethical, responsible, and safe manner.

| <b>ALWAYS</b>   | <b>NEVER</b>   |
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| Seek information in the procedures and with the Health and Safety team to carry out your activities safely and practice active care, taking care of yourself and your colleagues. | Carry out an activity for which you have not been trained, authorized, and evaluated.  |
| Prioritize the risk identification and assessment of your activity. In addition, take steps to mitigate and control the health and safety risks associated with your work.        | Carry out activities under the influence of alcohol or drugs (whether illegal or legal) and, even with medical supervision, when under the influence of psychotropic medications, psychopharmaceuticals that alter perception, emotions, and behavior at such a level that they may pose a risk to your life, as well as that of other people. |
| Stop activities in unsafe conditions immediately.   | Make or tolerate threats, intimidation, harassment, coercion, or violence at work.   |
| Use the mandatory personal protective equipment (PPE) to perform the activity and encourage others to do the same.  | Improvising PPE to carry out any type of activity, no matter how simple.   |

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| <p>Always check your PPE and keep it in good condition and replace it whenever necessary.</p>   | <p>Bring or use weapons on the Foundation's premises, whether firearms or cold weapons, (such as knives, machetes, axes, clubs, among others), unless it is an essential tool for carrying out the work and its use is known your immediate manager and that you are legally authorized to do so.</p> |
| <p>Comply with requirements for use, storage, and disposal of materials.</p>  | <p>Wait for the other to report any risk situation.</p>   |
| <p>Know the necessary actions for emergency situations, remembering your responsibility regarding the presence of visitors.</p>   |   |
| <p>Report any accident, incident, injury, illness, unsafe or unhealthy condition to your leadership so that appropriate action can be taken.</p> <p>Report environmental occurrences to the responsible area.</p> |   |
| <p>Take any complaints or notices into account.</p>   |   |

## 2.2. Human Rights

Our commitment to Human Rights is consolidated in Renova Foundation's Respect for Human Rights Program, which aims to present a set of guidelines, internal regulations and action pillars adopted by Renova Foundation with the aim of promoting respect for human rights throughout the repair process.

Based on international and national legislation on the matter and, in line with the TTAC, the Human Rights Policy, as well as the Statute (2016) and this Renova Foundation Code of Conduct, the PRDH aims to prevent, mitigate, and remedy any disrespect to these rights within the scope of their areas and programs.

PRDH also incorporates the UN Guiding Principles on Business and Human Rights and the principles of the Global Compact on Human Rights, Work, the

Environment and Combating Corruption, consisting of a guidance guide for the areas and programs of Renova Foundation.

These commitments and guidelines must guide and integrate management decisions and organizational behavior, explained through its own employees and third parties, inside and outside its facilities regarding respect for human rights. We respect the rights of all people with whom we interact, including employees, in addition to contractors, suppliers, partner organizations, communities, affected people, governments and civil society, as provided for in our Human Rights Policy.

In any situation where suspicion arises or disrespect and real or potential impacts of violation of human rights in our activities are identified, employees and third parties, business partners and people affected must remain alert and directly and immediately activate the Confidential Channel or Renova Foundation Ombudsman, which are mechanisms for complaints, handling, and remediation of complaints. The Committee to Combat Harassment, Discrimination and Other Forms of Disrespectful Treatment, coordinated by the Human Rights Management, can also be activated internally to act in these situations.

| <b>ALWAYS</b>   | <b>NEVER</b>  |
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| Respect the rights of all people with whom we interact, including employees and affected communities, partner organizations, government, and civil society. | Treat people with whom we interact disrespectfully.                             |
| Consider the human rights implications in all our activities and act in accordance with social responsibility and respect for human dignity.                | Fail to act ethically, with integrity and in an interculturally adapted manner. |

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| <p>Report evidence of any violation of human rights to your leadership and Compliance Management.</p> <p>Provide access to complaint and denunciation mechanisms, such as the Ombudsman and the Confidential Channel for handling and remediating manifestations.</p> <p>Report complaints and denouncements regarding possible disrespect for human rights in an ethical, agile, and transparent manner, so that they can be accessed through the institution's channels.</p> | <p>Fail to report any violation of human rights to your leadership, Compliance Management, or the Ombudsman.</p> <p>Prevent access to complaint and denunciation mechanisms.</p>  |
| <p>Encourage cultural sensitivity, recognize, and respect places, locations, structures, and objects that have traditional or cultural value.</p>  | <p>Offer, promise, or participate in a community development or donation project for improperly influencing anyone.</p>   |
| <p>Request due diligence, where necessary, to identify, prevent and remedy the adverse human rights impact of our activities, projects, and programs.</p>  | <p>Fail to create management plans to mitigate risks and implement remedial actions when necessary.</p>   |
| <p>Recognize the rights of traditional communities (quilombolas and others) and indigenous peoples and respect their right to maintain their culture, identity, traditions, and customs. Respect the different cultures and customs of the communities in which we operate, if they do not conflict with the Code of Conduct or current national legislation.</p>  | <p>Contribute to any religious organization with religious purposes on behalf of Renova Foundation.</p> <p>Intentionally favor people from a political, religious, or ethnic group based on their affiliation with the respective group. The only exception would be when this action supports a legally required positive affirmation program or approved by Renova Foundation (for example, to assist historically vulnerable groups in the community).</p> <p>Implement a community development project that has the potential to adversely affect the well-being of indigenous peoples.</p> |
| <p>Seek to identify and consider the concerns and expectations of all stakeholders, especially those most affected by our operations, and take their point of view into account when making decisions.</p>   |   |

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| <p>Participate in dialogues and other public policy development initiatives within the affected area and in Brazil, whenever they are related to Foundation Programs.</p>  |  |
| <p>Train employees in the Voluntary Principles on Safety and Human Rights and work with partner organizations to ensure that our activities are carried out in accordance with these principles.</p>   | <p>Employ public or private bodies to provide security services to Renova Foundation site without confirming their compliance with the requirements and purposes of the Voluntary Principles on Security and Human Rights.</p> |
| <p>Incorporate zero tolerance policies for violations of human rights in relation to suppliers of goods and services, including child labor, forced or slave labor, submission to degrading working conditions or harassing, disrespectful or inhumane treatment of employees.</p> | <p>Hire or accept a supplier or business partner who uses child labor or forced or compulsory labor, or treats employees in a harassing, disrespectful or inhumane manner.</p>   |

## 2.3 Environment

Renova Foundation is committed to working to recover the environment and support the impacted community through innovative and environmentally sustainable solutions. We demonstrate responsibility by minimizing environmental impacts and contributing to biodiversity, ecosystems, and other environmental resources.

Our goal is to avoid or minimize and rehabilitate environmental impacts, becoming a reference in environmental recovery. When impacts remain, compensatory actions will be implemented to address biodiversity and ecosystems. In addition to our direct management actions, we look for opportunities in conservation to offer environmental benefits.

We accept the conclusions of the Intergovernmental Panel on Climate Change that global warming is unequivocal, human influence is clear and physical impacts are now inevitable. Limiting climate change will require substantial and sustainable reductions in greenhouse gas (GHG) emissions. We recognize our responsibility to act with a focus on reducing our emissions, build resilience to physical climate impacts, invest in low-emission technologies and work with others to improve the global response to climate change.

Employees must understand the possible environmental impacts of the tasks they perform and look for ways to avoid and minimize these impacts. If you



have a suggestion on how Renova can contribute to promoting environmental sustainability, talk to your leadership.

| <b>ALWAYS</b>   | <b>NEVER</b>   |
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| Identify, assess, and take action to minimize the environmental impacts associated with your work. Share lessons learned from good practices, developing procedures, and seeking training for those involved in the activities.   | Ignore a potential or actual environmental incident or assume someone will report it.  |
| Identify and report opportunities to reduce environmental impacts, including increasing energy efficiency, water use, raw materials, minimizing waste generation and pollution.   | Take on work that has the potential to affect the environment unless you are trained and competent to do so and controls are in place to minimize environmental impacts. |
| Immediately stop any work that could contribute to a significant incident in the community or the environment. Report any actual or potential impacts to the environment or communities to your leadership so that appropriate action can be taken to prevent, correct and/or control these conditions. |  |
| Define and document tasks, responsibilities, authorities, and procedures.   | Hire suppliers or business partners that have a history of significant environmental violations, without considering adequate prevention and control measures.           |
| Encourage our suppliers, associated partners, customers and other third parties to engage in responsible practices to minimize their environmental impacts.   |  |
| Identify, monitor, and comply with legal requirements.  |  |

### 3. Relations with employees

#### 3.1. Use of alcohol and other drugs, licit and illicit, including "recreational smoking"

Alcoholic beverages and other legal drugs are not compatible with a safe and healthy work environment. Therefore, no task can be carried out for Renova Foundation while you are under the influence of alcoholic beverages and other drugs, the consumption of which is prohibited during working hours.

| ALWAYS  | NEVER  |
|---|--|
| Report to work able and ready to perform the assigned tasks that are part of the duties of your position  | Possess, use, or pass on drugs or illegal substances on Foundation’s premises.   |
| Recognize and act on early symptoms of an addictive condition in yourself or someone you supervise.   | Consume or offer alcohol to others on Foundation’s premises.   |
| Treat addiction issues with respect and privacy. Take concerns to your leadership or your People Management, Human Rights or Occupational Health and Safety representative. | Perform errands (including driving to and from work and attending work-related functions) if you are under the influence of alcohol or drugs (whether illegal, legal, or prescribed by a physician). |
| Let your leadership know if you have any questions or concerns about your suitability for the job.  | Smoke on Foundation’s premises, except in designated smoking areas.  |
|   | Ignore drug abuse.   |

#### 3.2. Harassment, Discrimination and Other Forms of Disrespectful Treatment

Renova Foundation does not tolerate any form of harassment, discrimination, or other form of disrespectful treatment in any of its relationships, whether between employees or in interactions with any third-party. Our values

encourage a culture where people are treated with equality, respect, and dignity.

Harassment is an action, conduct or behavior that is humiliating, intimidating or offensive to the person receiving it. Discrimination is the adoption of an adverse attitude due to a specific and different characteristic of the other. Discrimination is synonymous with distinguishing or differentiating. Forms of disrespectful treatment are preconceived judgments, which manifest themselves in a discriminatory attitude towards people, beliefs, feelings, and behavioral tendencies. Bullying is repeated verbal, physical or psychological abuse by a person or group of people in the workplace. Harassment, discrimination, prejudice, and intimidation are prohibited by Renova Foundation and may lead to disciplinary actions up to and including termination.

The practices listed above are not tolerated in the work environment of Renova Foundation and should not be confused with constructive evaluation or guidance on work performance, on behaviors related to the work of a person or group with the aim of advancement and improvement.

Renova Foundation has a Plan and Committee to Combat Harassment, Discrimination and Disrespectful Treatment in the Workplace (CEAD), coordinated by the Human Rights Management (GDH) and integrated by the People Management and Administrative Services Management (GPSA), Compliance Management; General Ombudsman; Health and Safety Management.

CEAD is responsible for carrying out actions aimed at the promotion and education of human rights, emphasizing the importance of respect for human dignity, diversity, and the promotion of inclusion.

| <b>ALWAYS</b>   | <b>NEVER</b>  |
|---|---|
| Treat everyone with respect and dignity, in line with our values.                 | Behave in an offensive, insulting, intimidating, malicious, threatening, or humiliating manner.                                       |
| Report it if you are uncomfortable or bothered by someone's comments or behavior. | Make jokes or comments about anyone's race, gender, ethnicity, religion, sexual orientation, age, physical appearance, or disability. |

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| <p>Be prepared to adapt your own behavior in response to assessments, or when considering cultural specificities of other operations or countries. Be open to knowing and having respect and empathy in the interaction with the different publics of society.</p> | <p>Assume that acceptable behaviors are the same across cultures.</p>  |
| <p>Feel free to report it, even if the behavior is not directed at you.</p>  | <p>Engage in harassment or sexual and/or bullying.<br/>Commit bullying, discrimination, or other forms of disrespectful treatment.</p>   |
| <p>Encourage and insist on working relationships and interactions with society's diverse audiences free from harassment, discrimination, and other forms of disrespectful treatment.</p>   | <p>Display or use Foundation's resources (including email, telephone, computers, and laptop) to distribute offensive materials, including inappropriate images and drawings.</p> |

### 3.3. Equal Opportunities

Renova Foundation is committed to developing and maintaining a diverse and inclusive work environment, in which all employees are treated with equality and respect. Employment, development opportunities and promotions at Renova Foundation are offered and awarded based on merit. All employees and job applicants will be treated and evaluated according to their work-related technical skills, qualifications, and potential.

We do not promote or tolerate any form of discrimination, such as those based on gender, race, color, sexual orientation, gender identity or expression, religion, national origin, marital status, pregnancy, age, disability, health problems. Decisions based on attributes unrelated to job performance constitute unlawful discrimination and are prohibited. Any evidence of these and other human conditions only occurs in the sense of including and creating equality in opportunities (affirmative actions).

| <p><b>ALWAYS</b></p>                                   | <p><b>NEVER</b></p>  |
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| <p>Show fairness and respect in all your dealings.</p> | <p>Admit or tolerate harassment, discrimination, or disrespectful treatment.</p> |

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| <p>Ensure that employment-related decisions, including recruitment, promotions, training and development, compensation and termination be based solely on merit and business considerations.</p> | <p>Make decisions based on attributes unrelated to ability or job performance.</p> |
| <p>Respect the dignity and human rights of all employees, suppliers, and business partners.</p>  |  |
| <p>Report occurrences that violate the provisions of this Code of Conduct to the areas of People Management, Human Rights, Legal, Compliance or Ombudsman.</p>                                   |  |
| <p>Report any occurrence of harassment, discrimination, or disrespectful treatment to the areas of People Management, Human Rights, Legal, Compliance or Ombudsman.</p>                          |  |

### **3.4. Protection of Personal Data and Privacy**

Renova Foundation adopts technical and organizational measures aimed at protecting the personal data of holders against accidental or unlawful destruction, loss, alteration, communication or dissemination or unauthorized access, in addition to ensuring that the environment (whether physical or logical) used by Renova Foundation for the processing of personal data is structured in order to meet the security requirements, the standards of good practices and governance and the general principles set forth in the General Law for the Protection of Personal Data (LGPD) – Law 13,709 /2018 and other applicable regulatory standards.

We respect the personal information and privacy of our employees, and we expect that you will also respect the personal information and privacy of others. Thus, if you participate in any project or activity that handles the processing of personal data that are under our responsibility, whether as an employee, partner, or supplier, you have a strong commitment to applying and monitoring the defined security controls.

Renova Foundation will only collect, use, disclose and retain personal data necessary to meet the needs of the institution, as authorized by law. Personal data is information that can identify a person, either based on the information itself or in combination with other information that has a reasonable probability of being obtained by Renova Foundation.

Personal data will be collected in a legal and fair manner, and in a way that preserves the privacy of employees. We will not use or disclose this information in a manner inconsistent with the purpose for which it was collected, unless required by law. For Renova Foundation, employees are responsible for protecting personal information and for processing it only within the limits of the organization's policies and the law.

To the extent permitted by law, Renova Foundation reserves the right to monitor or investigate the use of its information systems by employees and to access electronic communications or information stored in systems, devices or equipment for maintenance, institution needs, or to meet to a legal or policy requirement. If you do not want others to read an email, consider not sending it.

With these measures, Renova Foundation reaffirms its commitment to comply with the General Personal Data Protection Law, contributing to strengthening the protection of the right to privacy of the holder of personal data; freedom of expression, information, opinion, and communication; the inviolability of privacy, honor and image and economic and technological development.

| <b>ALWAYS</b>  | <b>NEVER</b>   |
|--|--|
| Collect personal information directly from the person involved, to the extent that is reasonable and practical, respecting the privacy of individuals. | Access personal information unless you have appropriate authorization and a clear business need.               |
| Comply with legal requirements that apply to the collection, use, disclosure, and retention of personal information.                                   | Provide personal employee information to anyone inside or outside the Foundation without proper authorization. |
| Only collect, use, disclose and retain personal information that is necessary for legitimate activities and functions.                                 | Conduct reference or security checks without proper clearance or permission from the person.                   |

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| Use personal information consistently and compatible with the purposes for which it was collected, unless approved by the person involved.               | Transfer personal information between the Foundation's various legal entities or outside the country of origin without verifying the correct procedure. Talk to the Legal or Compliance areas if you have any questions. |
| Use security measures to help protect personal information from the risk of loss, destruction, unauthorized access, modification, or disclosure.         |  |
| Ensure that personal information is not retained longer than is legally required or necessary to meet the reasons the institution had for collecting it. |  |
| Keep personal information accurate.  |  |
| Be proactive rather than reactive; act preventively, not correctively.   |  |
| Privacy must be always observed when carrying out activities or creating a new product or service.   |  |
| Respect the Policies, Rules and Procedures related to the Protection of Personal Data  |  |

### 3.5 Information Security

Our information or those in our custody are considered confidential and must be protected in accordance with your need for secrecy and criticality. We consider confidential personal and sensitive data of our employees and suppliers, as well as other critical and strategic information of Renova Foundation.

Access to this information is authorized only for those who need to know it due to their professional activities at the Foundation.

Our employees have a duty to protect and maintain the secrecy of the information they have access to due to their professional activities at the

Foundation, and must not misuse or disclose it, even after the end of the contractual relationship maintained with us.

Any information made available to partners is confidential and cannot be used for their own benefit or that of third parties, except with our express authorization.

Our employees must also ensure the protection of intellectual property rights owned by Renova Foundation and third parties, including brands and other distinctive signs, such as the corporate name, domain name and other elements of visual identity, patents, industrial and business secrets, know-how and industrial designs.

Renova Foundation is the owner of all information or results arising from the professional activities of our employees, which have been developed using our resources, which have been the object of a contract authorizing their transfer to the ownership of Renova Foundation or whatever the law determines.

| <b>ALWAYS</b>  | <b>NEVER</b>  |
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| Protect and maintain confidentiality of the information you have access to due to professional activity. | Access information that is not authorized due to professional activity.     |
| Ensure the protection of intellectual property rights owned by Renova Foundation.                        | Using information from Renova Foundation for your own benefit.              |
| Know the guidelines established in Renova Foundation's Information Security Policy.                      | Disclose information without the proper authorization of Renova Foundation. |

### **3.6. Travels**

Renova Foundation will reimburse the employee for all reasonable expenses related to travel and evidenced by valid invoices or other legitimate records. However, we do not pay business travel per diems for our employees.



For more information on how to obtain approval or reimbursement for travel and other expenses, you should read the Travel Policy and comply with the Anti-Corruption Policy.

| <b>ALWAYS</b>  | <b>NEVER</b>  |
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| Make sure your trip has been approved by the appropriate person before starting.   | Accept offers of sponsored travel or accommodation without first obtaining formal approval from the Foundation. If there is a valid business purpose for the trip, obtain approval from Renova to pay for any travel and/or accommodation expenses. |
| Please ensure that all items submitted for reimbursement are legitimate business expenses and that they relate to approved business travel and are supported by original documents (e.g., receipts, taxi bills or other tax evidence). | Exchange a ticket from a contributor to a lower class to purchase a ticket for someone who is not a contributor (for example, a family member) at Foundation expense.   |
| Comply with global immigration rules when traveling internationally, and make sure employees under your supervision do the same.   | Authorize your own expenses or the expenses of a contributor more senior than you unless you have received specific delegation or authorization.  |
|  | Allow multiple employees with core roles at a single location, workgroup, or project team to travel together across the same company.   |

### **3.7. Acceptable use of resources and technology**

All Renova Foundation employees have an obligation to protect the Foundation's resources, whether tangible or not, and to use them for their intended purposes, keeping all appropriate and accurate records.

Employees must use technological resources and information provided by the Foundation in an ethical, professional, safe, and legal manner. Even if the Foundation provides communication resources (telephone, software, e-mail, and internet) for work, it allows moderate and responsible use of these for personal purposes, provided that such use does not infringe any internal rules

or guidelines or disrupt performance at work. In any case, the user must consider that the use of these resources can be monitored by the Foundation.

| <b>ALWAYS</b>  | <b>NEVER</b>  |
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| Protect your computer equipment, programs/software, data, and information stored on Foundation systems from damage, loss, duplication, alteration, or unauthorized access. | Use Foundation technology resources to transmit, display, or perform content or materials that violate the law or Foundation policy or that would cause the Foundation to be ashamed if published. This includes using Foundation systems or devices to communicate, store, create, access, or print materials that are intimidating, harassing, threatening, abusive, sexually explicit, or otherwise inappropriate, violating applicable harassment and discrimination by the Foundation. |
| Use Foundation resources only for its intended purpose.  | Share passwords or individual logins with third parties, including other Foundation contributors.   |
| Please report any waste, damage, misuse, loss, fraud, or potential theft of our resources.   | Provide unauthorized access to Renova premises.   |
| Ensure that all third parties, such as vendors, follow necessary standards and procedures when using Foundation resources.   | Participate in any illegal or fraudulent transaction involving our resources or use Foundation resources for personal gain.   |
| Use only authorized software, devices, and procedures when performing company work. Foundation, as well as to share data and information with third parties.               | Ignore complaints of security or inadequate security procedures that could pose threats to Foundation personnel or resources.   |
| Report any concerns immediately to your leadership.  | Use Foundation systems or devices in conjunction with programs or devices   |

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|  | that record communication without first obtaining authorization. |
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### 3.8. Accuracy of Data and Information

We must always demonstrate the accuracy of Renova Foundation's data and information related to it or its activities, transparently and in accessible language. This may include financial, operational, project, health, safety, environmental, resource, time stamp or other information in all formats.

Employees who perform work for the Foundation must comply with all applicable regulatory requirements, as well as laws and regulations and the Foundation's own requirements regarding the provision of data and information. All data created and maintained by employees must accurately reflect the underlying transactions and events.

If you are responsible for reporting information, whether financial or otherwise, you are responsible for ensuring that your reports are true, accurate, complete, consistent, timely and understandable. Renova does not tolerate falsification, concealment, alteration, destruction, leakage, or any other type of manipulation of information, nor the creation of information that leads to mistakes.

All financial transactions must be supported by documents from adequate sources, verified for their validity and accuracy, properly authorized, and accurately and completely recorded in the appropriate accounts and records, as required by law and Renova's own requirements. This applies to all financial information, including purchase orders, receipt documents, invoices, travel and expense records, journal entries, and tax returns. Once created, data must be retained, protected, and disposed of appropriately in accordance with Renova's archiving and document management requirements, as well as applicable laws and regulations.

| <b>ALWAYS</b>  | <b>NEVER</b>   |
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| Cooperate with internal and external auditors and disclose all pertinent information that could reasonably affect the results of an audit, favorably or unfavorably. | Falsify any record or make a false or misleading entry (financial or otherwise), including the omission of information that makes the entry false or misleading in a report, record, system, or expense claim. |

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| Report to your leadership and internal reporting channels any identified irregularities, real or suspected, in relation to internal control, accounting or reporting issues (whether financial or otherwise). | Hide information that could affect the outcome of audits from internal and external auditors.  |
| Immediately report any actual or suspected instances of fraud or misconduct.  | Forget review and approval processes.  |
| Maintain accurate, complete, and truthful accounting, records, documentation, and reporting in accordance with applicable laws, regulations, and Foundation standards.  | Influence or allow others to do anything that would compromise the integrity of Foundation records and reports.                              |
| Protect Renova records from unauthorized access, alteration, disclosure, or destruction.  | Conceal or manipulate Foundation records or documents.   |
| Record Renova-related work time accurately, as well as all leave granted.   | Disclose or otherwise disseminate confidential or commercially sensitive information, internally or externally, without prior authorization. |
| Ensure that no undisclosed or unrecorded account, fund or asset is established or maintained.   | Dispose of documents and records without knowing what is being discarded or whether they need to be kept for business reasons.               |
| Submit and approve only legitimate and reasonable expenses that are supported by valid receipts and bills.  |  |
| Retain documents and records in accordance with applicable laws and our applicable information management procedures.   |  |
| Return or transfer custody of all relevant business records if you change roles within the Foundation   |  |

or if you leave the Foundation. Do not have personal copies.

### 3.9. External Communications and Social Media

Our communication with the media is based on mutual trust and respect. Renova Foundation has a Communication Management duly authorized to maintain a relationship with the media, and public disclosures can only be made by these authorized spokespersons. No one else is permitted to contact any media representative or respond to any requests for comment on behalf of Renova. If you are approached by any media or journalist, ask that the request be forwarded to the email [press@fundacaorenova.org](mailto:press@fundacaorenova.org). If you have any questions, please contact us at [comunicacao@fundacaorenova.org](mailto:comunicacao@fundacaorenova.org)

When using social media, employees must speak on their own behalf and never on behalf of Renova. Even when acting on their own behalf, employees should be aware that their references to Renova, in their private social media, could potentially be interpreted as a reflection of the institution's opinions or could affect its reputation. For this reason, people should always be judicious and ethical when using social media, acting in a legal, prudent, and careful manner and, when in doubt, consult the Communication Management through official channels.

| <b>ALWAYS</b>   | <b>NEVER</b>  |
|---|---|
| Be truthful, accurate and respectful.   | Make unauthorized disclosures to the public.  |
| Refer media questions to the Communications team.   | Disclose, internally or externally, proprietary information of Foundation, internal procedures and rules, knowledge, technology, which may be confidential. |
| Feel free to "like" or "share" stories published by the Foundation itself on social media, if you like. | Post comments about the Foundation mentioning/looking at photographs of workplaces and processes/activities on social media.                                |
|   | Interact with the media and press if you are not an authorized spokesperson on the issue.   |

## **4. Relations with third parties**

### **4.1. Interest Conflicts**

Employees of Renova Foundation must always consider any relationship or association that may be or appear to be a conflict of interest with Renova.

Renova respects the privacy and choices of its employees. At work or in your personal life, nothing you do should conflict or appear to conflict with your responsibilities to the institution, or compromise the quality or performance of your work, your commitment to your work, or your ability to make unbiased business decisions.

Employee interactions with public entities and agents must always be professional, legal, and ethical. Any participation in festivities and events must always take place in the company of more than one Foundation employee.

A conflict of interest arises when an employee's position within Renova or his financial or personal considerations or interests may affect, or have the potential to affect, or appear to affect his judgment, objectivity, or independence. Common examples of potential or apparent conflicts of interest include:

- To seek, offer or pursue Renova business opportunities for personal gain or to benefit close family members or friends.
- To hold direct or indirect investments in companies or assets that have been contracted to do business by Renova or on its behalf.
- To receive money, goods or services or other forms of personal advantage, directly or indirectly, from suppliers or other third parties involved or with proposals to engage in business with Renova.
- To endanger or influence the results of proposals or quotations.
- To maintain outside jobs or affiliations that affect or interfere with Renova's work.
- To offer jobs or affiliations to close family members.
- To offer or accept gifts, hospitality, and entertainment.

In this context, a relative is understood to be the spouse, partner or direct or collateral relative, by consanguinity or affinity, up to the third degree of the employee.

Renova Foundation prohibits the involvement of employees with the institution's negotiations and with decisions related to business in which the

employee may have a personal interest. You must avoid dealing with personal relationships that cause or could cause conflicts of interest or create the appearance of an actual or potential conflict with your relationship with Renova. Always refuse to participate in any decision-making process where you may have interests that influence or could be seen to influence your ability to make an objective decision and fulfill your responsibilities to Renova.

All members of Renova's Board of Directors, directors and employees must annually complete the Declaration of Relationships, as established in the Conflict of Interests Procedure.

Inform your management, in writing, of any outside activities, financial interests or relationships that could involve you directly or indirectly in an actual conflict of interest or the appearance of a conflict, using the Renova Foundation conflict of interest registration form. Any conflict of interest will be properly analyzed. This includes considering whether it is appropriate for you to resume any discussions or activities involving the conflict.

| <b>ALWAYS</b>   | <b>NEVER</b>   |
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| Conduct all business relationships in a professional, impartial, and competitive manner.  | Hold positions or investments (directly) in organizations that do business with the Foundation (business partners and suppliers, or your own or your family's business) if you can influence transactions or if the relationship itself creates a conflict of interest real, potential, or apparent. |
| Avoid business transactions and personal relationships that cause or may cause a conflict of interest (actual or potential) or that create the appearance of a conflict.              | Hire, promote, or directly supervise a family member unless specifically authorized to do so.  |
| Inform your leadership, in writing, of any outside activities, financial interests or relationships that could involve you in a conflict of interest or the appearance of a conflict. | Offer gifts, items of hospitality or entertainment, or those accepted by an organization or person involved in a proposal or quotation with the Foundation.  |

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| <p>Obtain appropriate approval before accepting an officer or director position with another company or institution.</p>   | <p>Request personal gifts, hospitality items or anything else of value from a business partner or supplier. This includes direct requests and giving the impression that offering a gift, hospitality item or item of value would be appropriate or desirable.</p> |
| <p>Use good judgment when deciding to offer or accept gifts or hospitality items and obtain approval, if necessary, in accordance with the Gift and Hospitality Policy.</p>  | <p>Use Renova resources or your position inappropriately to influence Renova to promote or assist an outside activity or party.</p>  |
| <p>Refuse to participate in any decision-making process where you may have interests that influence or could be seen to influence your ability to make an objective decision and fulfill your responsibilities to Renova.</p>  | <p>Interferes with the fair and transparent operation of a proposal and quotation process in a way that could inappropriately influence decision-making or give the impression that decision-making processes are being inappropriately influenced.</p>            |
| <p>Reflect before investing in a business partner or supplier of Renova. While such activity does not automatically create a conflict of interest, a conflict could arise if an employee has a financial interest in a Renova supplier, as well as the authority to influence Renova's contracts with that supplier.</p> | <p>Personally pursue or chase any opportunities that Renova might have an interest in that are identified using Renova information, assets, or resources.</p>  |
|  | <p>Accept discounts or other personal benefits from suppliers, service providers, customers or other third parties due to your association with Renova that are not extended to the public or your colleagues, unless this has been previously approved.</p>       |



## **4.2. Anti-bribery and Anti-corruption**

Compliance with anti-bribery and anti-corruption laws is vital for Renova Foundation. Bribery and corruption divert resources, undermine the integrity of government and community decisions, and reinforce cycles of distrust. Both are offenses, under the terms of the laws, which apply to Renova. We must all be sensitive to bribery and corruption issues, as we have worked closely with public officials, public prosecutors, and regulatory authorities during Renova's existence, and our goals and objectives will be defined, in part, by public officials and prosecutors.

No director, officer, employee, or anyone acting in any way on behalf of Renova may ever offer, authorize, or make a payment or grant an advantage with the aim of improperly influencing – or appearing to improperly influence – a public agent or obtain any advantage unfair, either for Renova or for the sponsoring entities. Committing such an act would be contrary to the law, against this Code of Conduct and would constitute grounds for dismissal, in addition to possible legal action.

Likewise, facilitation payments are also strictly prohibited. Facilitation payments are payments of small value to low-level public officials to ensure or expedite the proper performance of a public employee's routine, duties, or related acts, such as:

- Customs clearance.
- Processing of public documents such as visas, permits or licenses.
- Provision of police protection.
- Provision of mail, telephone, or utility services.

However, the health and safety of Renova's employees and its contractors are a priority. If a payment must be made because of a direct or associated imminent threat to the health or safety of any employee, contractor or director, or any accompanying person, it must be reported to your leadership and the Compliance Manager immediately.

Bribery involving commercial (non-governmental) parties is also prohibited. Renova employees and agents will not offer, promise, authorize payment, or pay or provide anything of value to any employee, agent or representative of another company or institution to induce or improperly repay any business-related function or activity. Renova's employees and their agents will also not solicit, agree to receive, or accept anything of value from any employee, agent or representative of another company or entity as an inducement or consideration for any business-related role or activity.

Anti-corruption laws also require that all transactions be accurately recorded in reasonable detail in Renova's books and records. Transactions recorded inaccurately or in a way that omits their true nature cannot be monitored and may raise suspicions that the transaction is improper. Any attempts to

obfuscate or conceal the true nature of any expense are expressly prohibited and may lead to dismissal and, eventually, give rise to other legal actions. Samples of all accounting entries and supporting documentation will be periodically reviewed to identify and correct discrepancies, errors, and omissions.

These same standards apply to third parties working on behalf of Renova.

Make sure you read and understand our Anti-Corruption Policy and its importance. Key points of the Anti-Corruption Policy include:

- Do not offer or pay a bribe to anyone.
- Transactions must be transparent.
- Gifts and hospitality must be reasonable and infrequent.
- Decisions on hiring cannot benefit public agents, directly or indirectly.
- Facilitation payments are prohibited.
- Keep books and records accurately.
- Report actual or suspected violations and seek advice.
- Retaliation for reporting concerns is not tolerated.

| <b>ALWAYS</b>  | <b>NEVER</b>   |
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| Follow applicable procedures before engaging third parties.  | Authorize, initiate, or participate in schemes that give an undue advantage, kickback or secret kickback to anyone.  |
| Ensure that all expenses are recorded accurately and in reasonable detail in Renova's books and records.                             | Offer, promise or make payment for a daily allowance, in cash or cash equivalent, of any kind to a public official, unless all of the following conditions are met: (i) when such offer, promise or payment is provided for in the terms of Renova's Programs and Projects; (ii) when a written agreement is in place providing for the performance of such offer, promise or payment; and (iii) such promise, offer or payment is not made directly to such public official, but in a formal and official manner. |
| Report any requests for bribes or facilitation payments or other suspected corruption to your leadership and Compliance immediately. | Establish a hidden or wrongly record fund for prohibited payments.   |

### 4.3. Gifts and Hospitality

Giving or receiving anything of value to individuals must always occur in accordance with the law and the Anti-Corruption Policy. The Anti-Corruption Policy requires the use of common sense, discretion and moderation when giving or accepting anything of value in the professional environment.

In line with our commitment to conduct ourselves with the highest ethical standards, we do not solicit donations, hospitality items or favors of any value from individuals or companies. Nor do we act in a way that places any third party in a position where they feel obligated to donate, provide hospitality, or perform personal favors in exchange for doing business with Renova. All employees, officers and directors must use extreme care when accepting gifts, hospitality, or entertainment. If you are in doubt, consult Compliance or reject the offer. Ignorance of the law or policy does not justify possible violations.

In certain specific circumstances, Renova will provide government officials or third parties with reasonable and modest accommodations and hospitality items. These expenses will only be approved if they are directly related to a duly authorized Renova Foundation project and will be subject to frequent audits.

To reinforce the promotion of these values, our Anti-Corruption Policy provides for the need for prior approval before providing or accepting anything of value to public officials, regardless of value.

On the other hand, in the case of private agents, it is necessary to obtain prior approval before providing or receiving gifts, gifts and hospitality when the amount involved exceeds R\$ 200.00.

Offers or receipts of "other things of value", regardless of the counterparty and the amount involved, require prior approval. These cases include unusual requests such as providing fuel or hiring a relative.

Gifts, items of hospitality or entertainment should only be given or accepted if they are occasional or of modest value. Determining what is occasional and modicum is a matter of common sense, and specific limits for approval are established in the Anti-Corruption Policy where the main points are defined in the table below.

| <b>ALWAYS</b> | <b>NEVER</b> |
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| Ensure that gifts, hospitality items, and anything of value given or received are reasonable and related to a legitimate purpose associated with Renova.   | Pay bribes, kickbacks, provide any undue advantage or anything with intent to corrupt.   |
| Obtain prior approval, as needed, before offering, promising, or giving anything of value, including sponsorships and community development projects.      | Pay in person for a gift, hospitality item, or anything of value to avoid complying with the Anti-Corruption Policy.                             |
| Ensure that gifts, hospitality items, and anything of value given and received comply with applicable laws and regulations and the Anti-Corruption Policy. | Give or receive gifts or hospitality items or anything of value that may interfere with the exercise of impartial judgment in Renova's interest. |

#### **4.4. Competition and Antitrust**

Renova Foundation is committed to full compliance with competition laws and the application of competition laws against those who act in an anti-competitive manner. Competition laws protect free enterprise and prohibit practices and agreements that reduce competition.

Representatives of sponsoring entities, such as members of the Governance Board or any other Renova body, will not use their positions to evade the responsibility of the companies.

Failure to comply with competition laws can result in serious consequences for Renova and its employees, including fines and imprisonment. Renova considers any violation of competition laws to be a serious irregularity, which may lead to disciplinary action and, ultimately, termination of employment.

Likewise, any work performed for Renova, discussions and decisions related to the core businesses of Samarco, BHP and Vale are not permitted. You must take great care not to discuss or reveal any confidential business information, including:

- Prices, fees, amounts, rebates, and discounts.
- Commercial conditions or other contractual clauses.
- Data or information related to production capacity, sales, offers or costs.
- Data or information related to markets, customers, or suppliers.

- Do not use Renova Foundation environment to share any other sensitive information related to the business of Samarco, BHP and Vale.

As provided for in its statute, Renova Foundation is endowed with administrative, patrimonial, financial, and operational autonomy.

#### **4.5 Combating Money Laundering**

Renova Foundation is committed to fully complying with the laws on money laundering and combating the financing of terrorism. “Money laundering” is any procedure whereby criminals transfer the proceeds of their criminal activity to legitimate organizations to give the appearance of being “clean” or unrelated to a crime. “Terrorist financing” is any procedure by which criminals obtain or collect funds that will be used to carry out a terrorist activity. Renova is committed to preventing your participation in any of these activities.

#### **4.6. Suppliers and Business Partners**

Renova Foundation strives to have effective and simplified procedures with suppliers and encourages them to adopt similar standards. We believe that our goods and services partners can significantly contribute to the success of our mission.

Our relationship must be based on mutual respect, honesty, good faith, and transparency.

We are very careful to carry out fair and equitable procurement processes, and any situations related to potential conflicts of interest or favoritism are prohibited. Thus, all suppliers must receive impartial and equal treatment in competitive processes.

Our selection process seeks to clearly inform potential suppliers of our expectations, standards, and requirements.

Renova is always looking for suppliers who share our commitment to:

- Lawful business practices conducted in accordance with a high ethical standard.
- Management practices that respect people's rights.
- Employees and the local Community.
- Minimize the impact on the environment.
- Provide a healthy and safe work environment.

We value the initiative of suppliers and partners in building integrity programs that aim to promote this value in their organizations.

“Business partner” means any third-party who, in the context of their activities for the Foundation, has the authority, power or ability to make decisions,

negotiate or assume commitments with public agents on behalf of or for the benefit of Renova. Any undue conduct by business partners may cause damage to the reputation of Renova and its employees, criminal, civil and administrative liability, and other sanctions.

Business partners must be subject to due diligence procedures to assess risks of corruption, human rights violations, and reputational damage prior to engagement. You must certify that the business partner has the reputation, competence, and qualifications to perform the service for which it was contracted and that the requested remuneration is reasonable. When hiring a business partner, you must take steps to ensure that their performance is monitored and evaluated, in addition to requesting the necessary training. This will, at a minimum, require checking invoices thoroughly and raising concerns with the business partner about any unreliable or excessive costs. See Renova's Compliance policies for further guidance on hiring business partners.

The Due Diligence Procedure sets out in detail the due diligence required by the Foundation for different types of suppliers and third parties (including Business partners). Employees responsible for conducting due diligence processes regarding third parties, including those in the Compliance area, must read and familiarize themselves with this document.

If there are any questions or concerns regarding the supplier, business partner or prospective supplier or business partner about your integrity or ability to perform the contract, you must ensure that these issues are addressed immediately by raising the matter with Compliance or Legal.

| <b>ALWAYS</b>  | <b>NEVER</b>  |
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| Seek to obtain a competitive offer under suitable circumstances.   | Avoid or try to avoid the formal procurement procedure.   |
| Use the formal audit procedure or due diligence in procurement processes to hire suppliers and respect the assessment of the Compliance area.  | Hire a supplier contrary to the determination that it presents significant risks to Renova without the adoption of control measures that can mitigate such risks.   |
| Base procurement decisions on the best technical and commercial terms received, considering the merits of price, quality, performance, track record and sustainability to meet Renova's standards. | Delete supplier contract terms and concessions without proper internal approval. Contracts must reflect the entirety of the agreement and include all conditions and concessions agreed by Renova and the supplier. |

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| <p>Immediately report any deviation to the supplier and/or partner manager</p>   | <p>Offer or receive undue advantages.</p>   |
| <p>Give feedback on the positive and negative aspects, seeking continuous improvement.</p>   | <p>Allow differentiated treatment for suppliers and partners.</p>   |
| <p>Inform suppliers of the Foundation's values and standards, including Renova Code of Conduct.</p>  | <p>Ignore warning signs that a vendor may be engaging in prohibited conduct. Red flags include unusual demands for reimbursement, disproportionate compensation, or efforts by the vendor to withhold its identity or receipt of payment.</p> |
| <p>Help our suppliers understand Renova's conduct and compliance requirements.</p>   | <p>Use business partners as intermediaries to offer, give or receive gifts or hospitality items or anything of value that is prohibited under the Anti-Corruption Policy.</p>   |
| <p>Ensure that contracts clearly state the services or products to be provided, the basis for receiving payment, and the applicable amount and compensation.</p> | <p>Use non-standard contracts instead of standard Renova supply contracts.</p>  |



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| <p>Ensure that before entering a contract or commitment with a supplier, the following has been obtained:</p> <ul style="list-style-type: none"> <li>• an adequate risk assessment and commercial review, including an assessment of the health, safety, reputational due diligence, conduct, integrity, qualifications and experience, credibility, and suitability of the potential supplier to meet Renova's standards.</li> <li>• all appropriate internal approvals, including legal review.</li> </ul> | <p>Use suppliers that provide environmentally irresponsible or unsafe products or services, violate laws and regulations, use forced or child labor, or use physical punishment to discipline cooperating people, even if permitted by local law.</p> |
| <p>Conduct regular reviews of supplier relationships and performance.</p>  | <p>Ignore warning signs that a vendor may be engaging in prohibited conduct. Red flags include unusual demands for reimbursement, disproportionate compensation, or efforts by the vendor to withhold its identity or receipt of payment.</p>         |
| <p>Check that the invoices clearly and fairly represent the goods and services provided, as well as that the entire process of inspection and mediation of services was consistent with what was delivered to Renova.</p>  | <p>Change billing terms so that they are inconsistent with contracts.</p>   |
| <p>Monitor the conduct of business partners, including checking invoices and questioning any suspicious or unclear amounts.</p>  | <p>Use or continue to use a vendor if you are aware of or suspect misbehavior. Any issues must be fully investigated and resolved to your satisfaction, and the decision must be properly documented if the business contract continues.</p>          |



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| <p>Make payments only to the person or organization that provided the goods and services. Payment must be made in the supplier's home country, place of business or where the goods were sold or services provided, unless approval to do otherwise has been obtained from the Compliance Officer.</p>  | <p>Change billing terms so that they are inconsistent with contracts.</p>  |
| <p>Please be alert to report to your leadership any activity by a supplier that is inconsistent with our business conduct requirements.</p>   | <p>Structure or manipulate transactions or contracts for personal advantage or improper advantage of a third-party. The manipulation of recipes, quotas or the budget is prohibited.</p>       |
| <p>Hire suppliers that respect freedom of association and collective bargaining; that guarantee a living wage (including the payment of social contributions); that respect non-excessive working hours; that prevent and reject child labor, forced labor, and work analogous to slavery, exposure to degrading working conditions, harassment, discrimination, and other forms of disrespectful treatment and that also reject sexual exploitation of children and adolescents.</p> | <p>Provide confidential information about a supplier's business (e.g., proposed values, winning bid information and other similar information) directly or indirectly to another supplier.</p> |

## **5. RELATIONS WITH THE COMMUNITY**

### **5.1. Political Activity**

Renova Foundation does not contribute funds to any political party, elected official or candidate for public office in any country. It is acceptable for Renova to express our views to governments on matters that affect Renova's interests and operations. This must be done in a manner that demonstrates high ethical standards and meets the requirements of the law.

Although Renova encourages employees, directors, and advisers to exercise their right to participate in political activities, such activity must strictly take place in a private and individual capacity, and not on behalf of Renova. Personal political activity may not be conducted during working hours at Renova, and no one may use Renova property or equipment for political purposes.

Any employee, officer or director wishing to run for political office must apply for leave if they are running for office or performing public office duties during normal working hours. Such participation, including contributions of time and money, must be conducted entirely at your own expense, and your political views must not be portrayed as those of Renova. Any such applicant may not solicit donations from Renova co-workers or Renova locations.

| <b>ALWAYS</b>  | <b>NEVER</b>  |
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| Conduct business relationships on behalf of Renova with any political party, politician, elected official or candidate for public office in any country in accordance with the Code of Conduct and all applicable laws and regulations related to anti-corruption and corporate participation in public affairs. | Make cash or in-kind contributions or incur expenses using your Renova account to any political campaign, political party, political candidate, elected official or any of its affiliated organizations.  |
| Be aware of Renova's reputation and how the public would view your actions when engaging with government officials.  | Use or allow others to use any Renova assets or resources for any political campaign, political party, political candidate, elected official or any of its affiliated organizations.  |
| Make it clear that you are speaking on your own behalf and not on behalf of Renova.  | Use charitable donations as a substitute for a political payment.   |
| Discuss with your leadership in advance if planning to run for office or performing public office duties   | Use your position at Renova to try to influence another person to give or accept a position or role, make political contributions, or provide public support. If this could create a conflict of interest for any politician or political party, you must document the case in writing. |

## **5.2 Government Relations**

Renova Foundation representatives must act honestly, transparently, and truthfully in their discussions with representatives of public bodies and agents and will maintain cooperative relationships with governments and their agents, in accordance with the Policy for Interaction with Public Agents. The Legal Department must be notified of any inquiries, investigations or requests for information received from public officials or public bodies and must approve the corresponding response. If you provide information to governments on Renova's behalf, you must ensure that all information is accurate and suitable for the purpose at hand. Errors or omissions can damage Renova's reputation and be illegal. Records of meetings with public officials must be kept.