

CODE OF CONDUCT

OF RENOVA FOUNDATION

MESSAGE FROM THE PRESIDENT

Integrity, Respect, Diversity, Collective Construction and Commitment to Delivery are values that guide our work in remediation. Being honest and respectful is a duty to be practiced daily by all of us, to achieve our purpose in a correct and transparent manner. It is not just following rules. It means having an ethical and respectful attitude, always.

To foster a culture of integrity and respect in all Renova Foundation activities and relationships, including with external actors, we count on the support of the **Integrity Program**, which is under the responsibility of the Compliance Management. The program details, for example, how we hire, how we relate to public entities and how we deal with conflicts of interest.

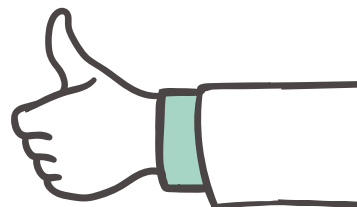
This Code of Conduct is one of the main documents of the Renova Foundation. Here you will find the attitudes expected of employees at all hierarchical levels, as well as those that will not be accepted in our work routine and in the relationships we build.

Read carefully and, whenever necessary, return to clarify doubts and ensure the alignment of your activities with the honest and lawful standards expected by the Renova Foundation.

It is also our role to transmit the messages of this document to the audiences with which we interact, highlighting the importance of morally correct behavior. The way we act in our daily lives tells us who we are.

Compliance is what guides us.

Moving forward, always improving!



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1. INTRODUCTION

1.1 OUR VALUES

COMMITMENT TO DELIVERY

Be accountable for the commitments made, taking into consideration the conditions of predictability, quality, cost and deadline, with the aim of delivering remediation efficiently and definitively.

EXPECTED ATTITUDES AND POSITIONS:

- have an “ownership attitude” and a sense of urgency, working to meet goals and make effective deliveries;
- be proactive in planning and resolutions and make use of good management practices and tools, taking into account the complexity of the processes to be carried out;
- be scrupulous and responsible in the application of resources;
- comply with deadlines and agreements signed with internal and external players;
- take the lead in seeking results, acting to solve problems and make things happen.

COLLECTIVE CONSTRUCTION

Seek synergy and build integrated solutions as a means of bringing technical consistency and legitimacy to deliveries.

EXPECTED ATTITUDES AND POSITIONS:

- inform the people and/or areas involved about the progress of the processes;
- know governance and involve the necessary actors in a timely and strategic manner;
- apply institutional solutions, sharing resources and involving necessary areas;
- build solutions from different perspectives, increasing the possibility of viability in the governance system and successful implementation;
- take a stand and defend, in the governance system, the solutions technically constructed by the Foundation.



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.

EXPECTED ATTITUDES AND POSITIONS:

- respect each person's differences and expression through ideas, beliefs and identity characteristics;
- value diversity, especially in the areas of gender, sexual orientation, race, ethnicity, origin, age and people with disabilities;
- in addition to respect, promote the inclusion of diversity;
- take care of your own physical and emotional health and your safety and quality of life, as well as that of your co-workers;
- show yourself as you truly are, respecting and honoring yourself and others.

INTEGRITY

Act ethically and transparently and in compliance, being cognizant of and complying with established standards, processes, procedures and laws, and adopting respectful conduct with all the persons involved.

EXPECTED ATTITUDES AND POSITIONS:

- “walk the talk”, be consistent, aligning speech and practice;
- guarantee reliability and traceability of your actions;
- be informed and up to date on how to proceed;
- incorporate into your work routine the processes necessary for compliance;
- provide information and notifications whenever you perceive the need to alert co-workers and/or the institution about risk situations.



1.2 SCOPE

Our objective is to manage and execute measures provided for in socioeconomic and socio-environmental programs, including the promotion of social assistance to those impacted as a result of the collapse of the Fundão dam, in Mariana (MG), in accordance with the Transaction and Conduct Adjustment Term - the TTAC.

All collaborators must adhere to this Code of Conduct and formally accept it. All collaborators with contracts in force and for at least five years after the end of the relationship with Renova will be subject to appropriate measures in the event of non-compliance with the provisions of this Code.

The actions of our suppliers and third parties can also 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 and values, including in contracts with third parties a clause adhering to the Code of Conduct, the Human Rights Policy of the Renova Foundation and other applicable compliance policies.

1.3. USE OF THE CODE OF CONDUCT

Regardless of your position, workplace or the level of decisions you make on a daily basis, you will find clear instructions on expected behavior in this Code of Conduct.

When working for or with Renova Foundation, you agree to follow our values contained in the Code of Conduct and all relevant policies, standards and procedures applicable to your work. It is essential that you understand the Code of Conduct and how to apply it in your daily life. Don't hesitate to ask any questions necessary.

ALL COLLABORATORS MUST:

- read and be familiar 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;



- ensure that those who conduct relationships with suppliers on behalf of the Foundation, 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, internal rules or the Code of Conduct;
- never encourage, permit, or demonstrate retaliation against anyone who identifies a concern;
- never ignore an actual or potential violation of the Code of Conduct.

IF YOU ARE PART OF LEADERSHIP, IT IS YOUR DUTY TO:

- consistently demonstrate exemplary behavior;
- respect the rights of all people, whether hired employees, suppliers, partner organizations, communities and affected people, representatives of civil society and public authorities;
- ensure that collaborators feel comfortable raising concerns without fear;
- encourage and reward employees for demonstrating our values;
- ensure that policies, standards and procedures are accessible and understood, helping the team understand the established rules and applications of the Code of Conduct;
- incorporate the Code of Conduct into processes such as those applicable to politically exposed persons, employment and supply contracts, onboarding processes and agreements;
- take or recommend actions to address corporate conduct issues;
- never ignore or dismiss a concern raised;
- 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 increasing diversity of gender, sexual orientation, race, ethnicity, origin, age and people with disabilities.



WHAT HAPPENS IF A CONCERN ABOUT CERTAIN CONDUCT IS IDENTIFIED?

All questions regarding interpretations and applications of the Code of Conduct must be treated seriously and respectfully and evaluated within appropriate time frames. The actions to be taken will depend on the nature and severity of the issue.

In many cases, counseling, support and guidance will empower you to resolve the issue. When this is not possible, you can ask your immediate manager or support areas for support or guidance, such as: People Management, Human Rights and Compliance; or to the members of the Diversity and Respect Committee.

GUIDELINES FOR COLLABORATORS RESPONDING TO A CONCERN:

- be open and honest, this will help to get a complete and effective response;
- treat seriously and, whenever possible, in private;
- respond to questions raised in an agile and professional manner;
- provide accurate information and guidance consistent with the Code of Conduct and our policies, standards and procedures.

VIOLATIONS OF THE CODE OF CONDUCT

Failure to comply with the provisions of the Code of Conduct, other policies or any applicable laws will be dealt with in accordance with the Integrity Program policies, Human Rights Policy and consequence management standards. This may lead to corrective actions, including dismissals and/or legal action.

Violations include:

- violating laws or policies or directing others to do so;
- failure to cooperate with investigations into possible violations by third parties;





- retaliating against suppliers or collaborators for reporting concerns or violations in good faith;
- failing to effectively monitor the actions of subordinates;
- hindering investigations through simulations.

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

- conversations with leadership about desired behaviors;
- verbal or written warning;
- suspension or dismissal.

1.4. NOTIFICATIONS AND GUIDANCE

This Code of Conduct does not cover all possible situations that may occur. Therefore, we hope you will use common sense and speak up when you have questions or concerns.

OUR EXPECTATIONS FOR EMPLOYEES AND SUPPLIERS

If you consider that an action does not comply with the rules described in this Code of Conduct; if you are not sure how to interpret it; if you are worried about how it is being applied or if you would like to report a suspected or actual violation — even if it doesn't directly affect you — you have a responsibility to speak out personally or anonymously. If you feel uncomfortable communicating with your direct leadership, please contact the Compliance team.



CONFIDENTIAL CHANNEL



The Foundation provides an exclusive channel for secure and anonymous communication — if you do not wish to identify yourself — of conduct that violates the institution's good practices, this Code or current legislation.

HOW TO CONTACT THE CONFIDENTIAL CHANNEL

Telephone: 0800 721 0717

Website: www.canalconfidencial.com.br/fundacaorenova

E-mail: canalconfidencial@fundacaorenova.org

We are committed to protecting people who are concerned about retaliation. If you believe you have been the victim of retaliation, report it immediately. Allegations will be fully investigated.

Remembering that retaliation is a reason for taking disciplinary action that may include dismissal.

1.5. INTEGRITY PROGRAM

Our Integrity Program aims to promote legal and ethical conduct throughout the institution. The Compliance area has a centralized team of specialized professionals, who manage and maintain the Program, in addition to being available to offer guidance and advice. The final responsibility for complying with the Renova Foundation's policies and the law lies with each advisor, director and collaborator, individually.

Compliance management is responsible for monitoring the performance of the Integrity Program through metrics, coordinating its activities with other areas to ensure adherence and adequate implementation. Furthermore, it is responsible for reporting sensitive matters relating to Compliance to the Board of Trustees.

The Compliance area is responsible for investigating potential, suspected or actual violations of laws or policies. Furthermore, the area determines the scope of the investigations and may request support from other people or groups.



2. CROSS-CUTTING THEMES

2.1. HEALTH AND SAFETY

We are committed to creating a safe and healthy work environment. In this sense, compliance with all laws and our health and safety regulations is required.

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

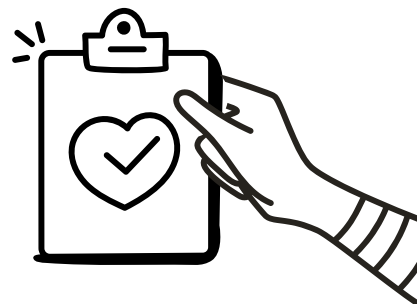
NEVER

- Carry out an activity for which you have not been trained, qualified, authorized and evaluated, or which puts you and other people at risk of accidents.
- Carry out activities under the influence of alcohol or legal or illegal drugs, nor when under the influence of psychotropic medications or drugs that alter perception, emotions and behaviors to such a degree that it could cause risk to your life, as well as that of other people, even with medical supervision.
- Engage in or tolerate threats, intimidation, harassment, coercion or violence at work, as well as regarding others.
- Improvise PPE to carry out any type of activity, no matter how simple it may be.
- Bear or use weapons on the Foundation's premises, whether knives, firearms or other offensive weapons (such as knives, machetes, axes, clubs, pocket knives, among others), unless: it is an essential tool for carrying out assigned work, your immediate manager is aware of it, and you are legally authorized to do so.
- Wait for someone else to report any risk situation.



✓ ALWAYS

- Seek information from the procedures and from the Health and Safety team to carry out your activities safely. Practice active care, protecting yourself and your colleagues.
- Carry out the identification and assessment of risks of your activity in advance. Additionally, take preventive measures to control health and safety risks associated with your work.
- Show up for work physically and emotionally fit to carry out the assigned tasks that are part of the duties of your position.
- Stop activities that expose people to the risk of accidents or that involve unsafe conditions.
- Use mandatory personal protective equipment (PPE) to carry out the activity and encourage others to do the same.
- Check your PPE, keep it in good condition and replace it when necessary.
- Know the necessary actions to take in emergencies, remembering your responsibility to pass on this information to visitors.
- Report any accident, incident, injury, illness and unsafe or unsanitary condition to your leadership so that appropriate measures can be taken. Report environmental occurrences to the responsible area.
- Consider any types of warnings and complaints and take necessary actions to mitigate risks.

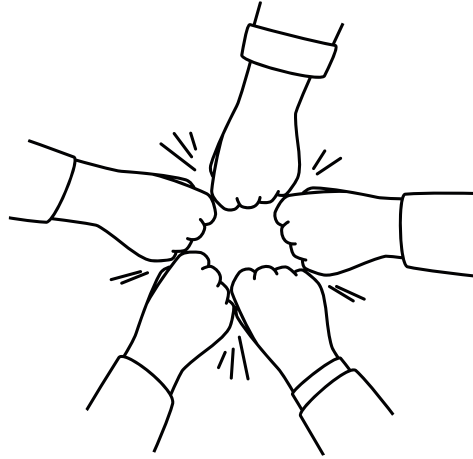




2.2. HUMAN RIGHTS

Our commitment to Human Rights is consolidated in the Renova Foundation's Human Rights Respect Program (PRDH), which presents guidelines, internal regulations and pillars of action with the purpose of promoting respect for Human Rights throughout the remediation process.

These commitments and guidelines must guide and be part of management decision-making and organizational behavior. We respect the rights of all people with whom we interact, as set out in our Human Rights Policy. Furthermore, we value the promotion of diversity and inclusion among all our audiences.



NEVER

- Offer, promise or participate in a community or donation project with the aim of unduly influencing any person.
- Stop creating management plans to prevent, mitigate and remediate risks of human rights violations, nor implement actions when necessary.
- Intentionally favor people from a political, religious or ethnic group based on their affiliation/belonging to the respective group, except for positive affirmation actions and programs legally required or approved by the Renova Foundation.
- Implement a community development project that has the potential to adversely impact the well-being of communities, particularly indigenous peoples and traditional communities.



 ALWAYS

- Respect the rights of all direct and outsourced collaborators, supplier companies, affected communities, partner organizations, government and civil society.
- Avoid conduct that involves disrespectful treatment, harassment and discrimination, especially in the workplace.
- Report signs, complaints and reports regarding possible disrespect for Human Rights to the Diversity and Respect Committee or through the Confidential Channel. Do this in an ethical, agile and transparent way, so that these can be investigated through the institution's channels.
- Enable access to complaints and reporting mechanisms, such as the Ombudsman and the Confidential Channel for handling and resolving complaints.
- Encourage and disseminate the culture of Human Rights, recognize and respect traditions, customs, local structures and objects that have historical, traditional or cultural value.
- Request due diligence, checks or investigations, as appropriate, to identify, prevent and remedy the adverse impact on Human Rights of our activities, projects and programs.
- Respect the rights to culture, identity, traditions and customs of indigenous peoples and traditional communities.
- Identify and consider the concerns and expectations of all interested parties impacted by our activities, and take their demands into account when making decisions.
- Seek information about dialogues and other public policy development initiatives, whenever they are related to the Foundation's Programs.
- Incorporate the Voluntary Principles on Security and Human Rights and work with suppliers to ensure that our activities are carried out in accordance with these principles.
- Incorporate zero tolerance policies for human rights violations in relation to suppliers of goods and services, including child labor, forced or compulsory labor and submission to degrading or inhumane working conditions.



2.3. ENVIRONMENT

We are committed to working to reclaim the environment and supporting impacted communities with innovative and sustainable solutions. We demonstrate responsibility by minimizing environmental impacts and contributing to biodiversity, ecosystems and other ecological resources.

Reparatory and compensatory actions will be implemented to treat biodiversity and ecosystems, in addition to our direct management actions. We look for opportunities in conservation to offer environmental benefits.

Collaborators must understand the possible environmental impacts of the tasks they perform and minimize said impacts. If you have any suggestions on how the Renova Foundation can contribute to promoting environmental sustainability, speak to our leadership.

NEVER

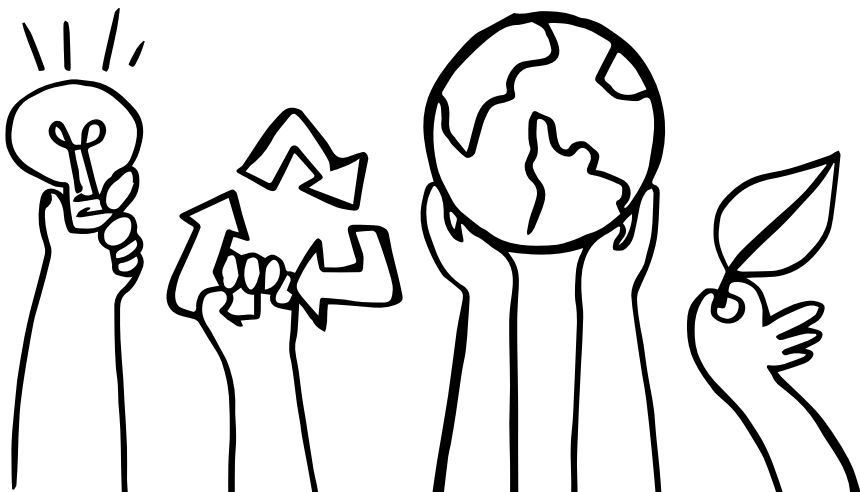
- Ignore a potential or actual environmental incident. Never fail to report any incident to the manager. In all cases, the offender must be notified.
- Take on work that has the potential to affect the environment unless you are trained and competent to do so.
- Hire suppliers or business partners who have a history of significant environmental violations without considering adequate prevention and control measures.





✓ ALWAYS

- Identify, assess and take action to minimize environmental impacts associated with your work. Share lessons learned from good practices, developing procedures and seeking training for those involved in the activities.
- Identify and report opportunities to reduce environmental impacts, including increasing energy efficiency, water use and raw materials, minimizing waste generation and pollution.
- Immediately stop any work that could contribute to a significant community or environmental incident. 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.
- Seek to become familiar with documents, responsibilities, authorities and procedures related to the tasks/activities in which you are involved.
- Inspect and monitor suppliers and other third parties so that they do not engage in practices that could cause environmental impacts.
- Identify, monitor and comply with the legal requirements and internal standards of the Renova Foundation. Violations of legislation may result in civil and criminal liability.





3. RELATIONS WITH COLLABORATORS

3.1 USE OF ALCOHOL AND OTHER DRUGS

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

NEVER

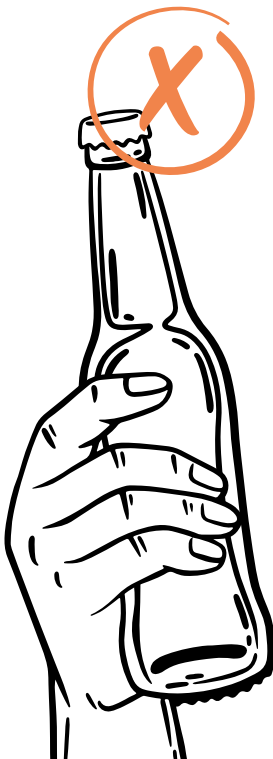
- Possess, use, sell, consume, offer or pass on drugs, alcohol or illegal substances on Foundation premises or while carrying out work.
- Perform tasks (including driving to and from work and participating in work-related functions) if you are under the influence of alcohol or drugs, whether legal or illegal. In case of drugs prescribed by a doctor, discuss with occupational medicine the safety of performing your tasks in this case.
- Smoke on Foundation premises, except in designated smoking areas.
- Allow yourself excessive or ongoing alcohol or drug use.
- Use medications without a prescription.





✓ ALWAYS

- Treat addiction issues with respect and privacy, if you identify your own symptoms or those of a work mate.
- Raise concerns to your leadership or your People Management, Human Rights, Health and Safety or Diversity and Respect Committee representative.
- Talk to your leadership, preferably, if you have any doubts or insecurities about your working condition. If you do not feel comfortable, contact your People Management or Health and Safety representative.
- Report any irregularities related to the use, sale or transfer of drugs during work hours.
- Seek a health service when you identify symptoms of chemical dependency.





3.2

HARASSMENT, DISCRIMINATION AND OTHER FORMS OF DISRESPECTFUL TREATMENT

The Renova Foundation does not tolerate any form of **harassment, discrimination, prejudice or other manifestation of disrespectful treatment** in any of its relationships. Such attitudes can lead to disciplinary actions, including dismissal. Our values encourage a culture where people are treated with equality, respect and dignity.

Harassment is a humiliating, intimidating or offensive action, conduct or behavior that impacts continuously and repeatedly the person who is subject to it.

Discrimination is the adoption of an adverse attitude due to a specific and different characteristic of the other. It is synonymous with distinguishing or differentiating in a negative way.

Disrespectful treatment is behavior, attitude or any other thing or action that denotes a lack of respect for other people, such as preconceived judgments. These 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.

Attention: the practices listed above should not be confused with an assessment or constructive guidance on the work performance and professional behaviors of a person or group.

The Renova Foundation has a Diversity and Respect Committee (CDR), coordinated by the Human Rights Management (GDH) and integrated by the People Management, Compliance Management, Ombudsman, Health and Safety Management.

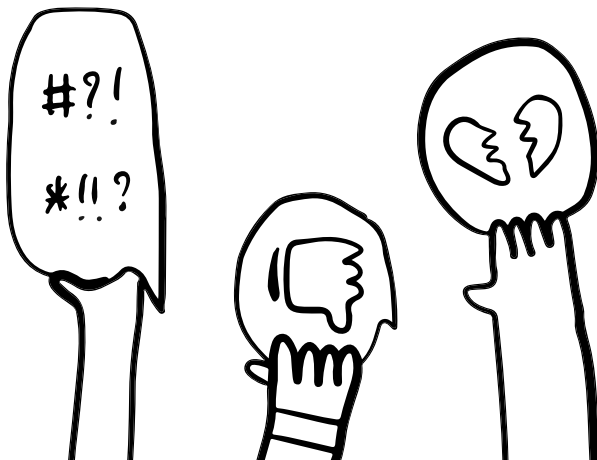


X NEVER

- Behave in an offensive, insulting, intimidating, malicious or threatening manner. Never make jokes or comments about anyone's race, gender, sex, ethnicity, religion, sexual orientation, age, national origin, physical appearance or disability.
- Assume that acceptable behaviors are the same across cultures.
- Engage in harassment or sexual and/or moral harassment.
- Commit bullying, discrimination or other forms of disrespectful treatment.
- Display or use Foundation resources (email, telephone, computers, and laptop) to distribute offensive materials, including inappropriate images and drawings.

✓ ALWAYS

- Practice attitudes and behaviors related to the value of Diversity and Respect.
- Use the channels available to deal with a situation of inappropriate behavior.
- Encourage and insist on working relationships and interactions free from harassment, discrimination or other forms of disrespectful treatment.





3.3 EQUAL OPPORTUNITIES

We are 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 are offered and awarded based on merit. All employees and candidates for vacancies will be treated and evaluated according to their technical skills related to the job.

We do not promote or tolerate any form of discrimination, such as that based on gender, sexual orientation, race, ethnicity, origin, age, religion, disability, pregnancy or health problems. Decisions based on attributes not related to job performance constitute illegal 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).





⊗ NEVER

- Allow or tolerate harassment, discrimination or disrespectful treatment.
- Make decisions based on attributes not related to ability or job performance.

✓ ALWAYS

- Demonstrate fairness and respect in all your relationships.
- ensure that employment-related decisions, including recruitment, promotions, training and development, compensation and termination are based solely on merit and qualifications for the role, observing diversity.
- respect the dignity and Human Rights of all collaborators, suppliers and business partners.
- report any occurrence of harassment, discrimination or disrespectful treatment to the People Management, Human Rights, Legal, Compliance or Ombudsman areas.





3.4 PROTECTION OF PERSONAL DATA AND PRIVACY

The Renova Foundation adopts technical and organizational measures to protect people's personal data against destruction — accidental or illicit — loss, alteration, communication, dissemination or unauthorized access, following standards of good practice and governance and the principles set out in the General Personal Data Protection Law (LGPD) – Law No. 13,709/2018 and other applicable regulatory standards.

The personal data collected by Renova Foundation is obtained in a legal and fair manner, in order to preserve people's privacy. We will not use or disclose this information in a manner incompatible with the purpose for which it was collected, unless required by law. You are responsible for protecting personal information and processing it only within the limits of your organization's policies and the law.

We respect the personal information and privacy of our collaborators, contributing to strengthening the protection of the right to privacy; freedom of expression, information, opinion and communication; to the inviolability of intimacy, honor and image and to economic and technological development.

We expect you to also respect the personal information and privacy of others. Therefore, if you participate in any project or activity that processes personal data that is under our responsibility, you will be highly committed to applying and monitoring the defined security controls.

To the extent permitted by law, Renova Foundation reserves the right to monitor and investigate the use of its information systems and to access electronic communications or information stored on systems, devices or equipment for maintenance, needs of the institution, or to meet a legal or policy requirement.



NEVER

- Access personal information without prior authorization and using tools unknown to the Foundation.
- Provide personal information about collaborators to anyone inside or outside the Foundation without due authorization.
- Conduct reference or security checks without proper authorization.
- Share personal information with external actors without proper authorization. Never forget to contact Legal or Compliance if you have any questions.

ALWAYS

- Collect personal information directly from the person involved, or using resources permitted by Renova Foundation, in accordance with legislation.
- Meet the legal requirements that apply to the collection, use, disclosure and retention of personal information.
- Collect, use, disclose and retain personal information only when necessary for activities that meet the objectives of Renova Foundation.
- Use personal information consistently and in a manner compatible with the purposes for which it was collected.
- Use authorized security measures to protect personal information against the risk of loss, destruction, unauthorized access, modification or disclosure.
- Ensure that personal information is not retained for longer than is necessary or required by law.
- Make sure personal information is true.
- Respect and act in accordance with the policies, standards and procedures related to Personal Data Protection.



3.5 INFORMATION SECURITY

The information in our custody is considered confidential and must be protected in accordance with applicable secrecy and criticality.

We must protect and maintain the confidentiality of the information to which we have access due to our professional activities at the Foundation, and must not use or disclose it inappropriately, even after the end of the contractual relationship. One must remember that any information made available to partners is confidential and cannot be used for your own benefit or that of third parties, except with our express authorization.

All information and results arising from the professional activities of collaborators are the property of Renova — if they were developed using the institution's resources, and are the subject of a contract that authorizes their transfer to the Foundation's ownership or whatever the law determines.

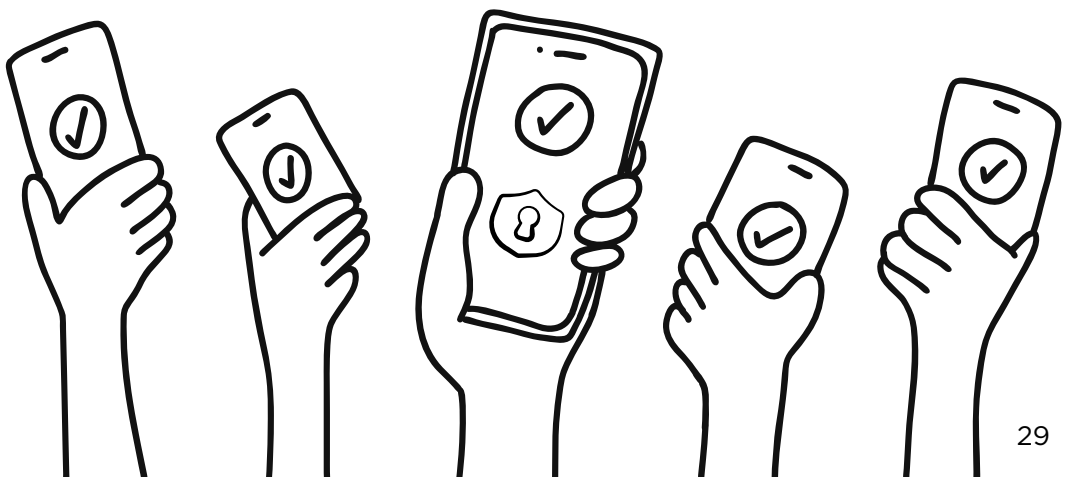
NEVER

- Access information that is not authorized due to professional activity.
- Use information from Renova Foundation for your own benefit or for the benefit of third parties.
- Disclose information classified as confidential, restricted and sensitive without due authorization from Renova Foundation.
- Attend sensitive or confidential meetings in public places.



✓ ALWAYS

- Maintain the confidentiality of information to which you have access, whether of a commercial, strategic, technological, or personal data of direct collaborators or third parties, or of affected people. Preserve them exclusively for those involved in the process and do not use them or disclose them unduly, even after the end of the contractual relationship with us.
- Ensure the protection of intellectual property rights owned by Renova Foundation and third parties, including know-how, patents, industrial and business secrets, brands and other distinctive signs, such as company name, domain name and other visual identity elements.
- Know and comply with the guidelines established in the Renova Foundation's Information Security Policy.
- Participate in confidential meetings in a safe and private location in order to protect information and prevent any sharing or leakage.
- Obtain prior authorization from the manager or director of the area that owns the information and Legal to promote lectures, conferences, presentations, publications, comments and any other form of communication with the external public, through which concepts, plans, results, strategies, name and image of the Renova Foundation are exposed.





3.6 TRAVEL

Renova Foundation will reimburse the collaborator for all reasonable expenses related to travel that are substantiated by valid invoices or other legitimate records.

For more information on how to obtain approval or refund, please read the Travel Policy and comply with the Anti-Corruption Policy.

NEVER

- Accept sponsored travel or accommodation offers without first obtaining formal approval from the Foundation. If there is a valid organizational purpose for the trip, obtain approval to pay for any travel and/or accommodation expenses.
- Exchange a ticket for a contributing person to a lower class to buy a ticket for someone who is not a collaborator, at the Foundation's expense.
- Authorize your own expenses or the expenses of a collaborator senior to you, unless you have received specific delegation or authorization.
- Allow multiple collaborators with essential functions at a single location, work group or project team to travel together on the same airline.

ALWAYS

- Please ensure your trip is approved by the appropriate person before leaving.
- Ensure that all items submitted for reimbursement are legitimate business expenses, that they relate to approved business travel, and that they are supported by original documents (example: receipts, taxi receipts, or other fiscal receipts).
- Comply with global immigration rules during international travel and ensure that co-workers under your supervision do the same.



3.7 ACCEPTABLE USE OF RESOURCES AND TECHNOLOGY

The technological resources made available by the Foundation are **for professional use**. Renova may inspect and monitor any content stored, disclosed, used and transmitted through these resources.

NEVER

- Use the resources to transmit, display or execute content/materials that violate the law and our policies or that impact Renova's reputation. This includes using systems or devices to communicate, store, create, access, or print materials that are intimidating, harassing, threatening, abusive, sexually oriented, or otherwise inappropriate.
- Share individual logins and passwords with third parties or other people who collaborate with the Foundation.
- Provide unauthorized access to Renova Foundation facilities.
- Engage in any illegal or fraudulent transaction involving our resources or use them for personal or third-party gain.
- Ignore complaints about security or security procedures that may pose threats to collaborators or Foundation resources.
- Sell goods or products during working hours and/or using Renova resources, especially if it may interfere with other people's work.



✓ ALWAYS

- Protect your equipment, programs/software, data and information stored on the Foundation's systems against damage, loss, duplication, alteration or unauthorized access.
- Use resources only for their intended purpose.
- Report any incident, waste, damage, misuse, loss, fraud or potential theft of our resources.
- Ensure that all third parties follow necessary procedures when using Foundation resources.
- Only use software and technological devices approved by the Technology and Systems Management when carrying out Foundation work, as well as when sharing data and information with third parties.
- Report any concerns immediately to your leadership.





3.8 ACCURACY OF DATA AND INFORMATION

We must always demonstrate the accuracy of data and information related to the Renova Foundation and its activities with transparency and in accessible language. This may include financial, operational, project, health, safety, environmental, resource, timekeeping, or other information in all formats.

If you are responsible for reporting information, whether financial or otherwise, you must ensure that your reports are accurate, complete, timely and intelligible. 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 deception.

NEVER

- Provide imprecise, inaccurate, unsuitable information or omit information in order to favor internal or external approval.
- Falsify any record or make a false or misleading entry (financial or otherwise), including omitting information that makes the entry false or misleading in a report, record, system, or expense claim.
- Hide or divert information that could affect the results of internal or external audits.
- Ignore review and approval processes.
- Influence or allow others to do anything that would compromise the integrity of Renova's records and reports.
- Hide or manipulate Foundation records or documents.
- Disclose or disseminate confidential information or information sensitive to the Foundation's activities without prior authorization, whether internally or externally.
- Discard documents and records without knowing what is being discarded or whether they need to be kept for security, legal or organizational reasons.



ALWAYS

- Support all financial transactions with documents from appropriate sources, checked for validity and accuracy, appropriately authorized, fully 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.
- Retain, protect and dispose of data appropriately in accordance with Renova's archiving and document management requirements, as well as applicable laws and regulations.
- Cooperate with internal and external auditors, providing all requested information and any other information that you consider relevant to the audited scope.
- Report to your leadership and internal reporting channels any irregularities identified, real or suspected, in relation to current internal procedures.
- Immediately report any actual or suspected instances of fraud, misconduct or non-compliance with the Code of Conduct.
- Maintain accurate, complete and truthful accounting, records, documentation and reports, in accordance with Renova Foundation policies, regulations and procedures and current legislation.
- Protect Renova records against unauthorized access, alteration, disclosure or destruction.
- Ensure that no undisclosed or unrecorded accounts, funds or assets are contracted, acquired, established, deployed, used or maintained.
- Submit and approve only legitimate and reasonable expenses that are supported by valid receipts and invoices.
- Retain documents and records in accordance with Renova Foundation policies, regulations and procedures and current legislation.
- Return or transfer custody of all relevant business records if you change positions or leave Renova (do not keep personal copies, dispose of them appropriately).



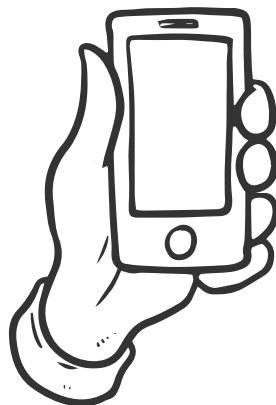
3.9 EXTERNAL COMMUNICATIONS AND SOCIAL NETWORKS

Our communication with the media is based on mutual trust and respect. The Renova Foundation has a Communications Management duly authorized to maintain a relationship with the media, and public disclosures can only be made by authorized spokespersons. No one else is permitted to contact any media representative or respond to any requests for comment on Renova's behalf.

If you are contacted by a media outlet or journalist, ask that the request be forwarded to the email imprensa@fundacaorenova.org. If you have any questions, please contact the area: comunicacao@fundacaorenova.org.

When using social networks, collaborators must speak on their own behalf and never on behalf of Renova. Even when acting on their own behalf, collaborators must be aware that your references to Renova on your private social networks 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 when there is any reference to the Renova Foundation. If in doubt, consult the Communication Management through official channels.





NEVER

- Make unauthorized disclosures to the public.
- Disclose information owned by the Foundation that may be confidential, such as internal procedures and standards, knowledge and technology.
- Post any data about the Foundation on social media, including those containing photographs of workplaces and processes/activities, which are not data already officially posted by the Renova Foundation (posts about social experiences of collaborating people, such as celebrations and meetings, are allowed).
- Interact with the media and press if you are not authorized by Communications as a spokesperson on the matter.

ALWAYS

- Be truthful, accurate and respectful.
- Forward requests and questions from media outlets to the Communications team.
- Feel free to like, comment or share stories published by the official Renova Foundation profiles on social networks.



4. RELATIONS WITH THIRD PARTIES

4.1 CONFLICT OF INTERESTS

People who collaborate with Renova Foundation must always take into account any relationship or association that may or appears to be a conflict of interest with the Institution.

Renova respects the privacy and choices of collaborators, whether at work or in their personal life, but nothing you do should generate conflicts with your responsibilities in relation to the Institution, or compromise the quality, performance and commitment to your work or your ability to make impartial decisions.

A conflict of interest arises when the position of a collaborator within Renova — his/her considerations, financial or personal interests — may affect or have the potential to affect his/her criteria, objectivity or independence.

Common examples of potential or apparent conflicts of interest include:



- seek or offer Renova business opportunities for personal gain or to benefit close family or friends;



- maintain investments, directly or indirectly, in companies or assets that were contracted to do business with Renova or on its behalf;



- receive money, goods, services or other forms of personal advantage, directly or indirectly, from suppliers or other third parties involved or offering to engage in business with Renova;



- put at risk or influence the results of proposals or quotations;



- maintain jobs or external affiliations that affect or interfere with Renova's work;



- offer jobs or affiliations to close family members;

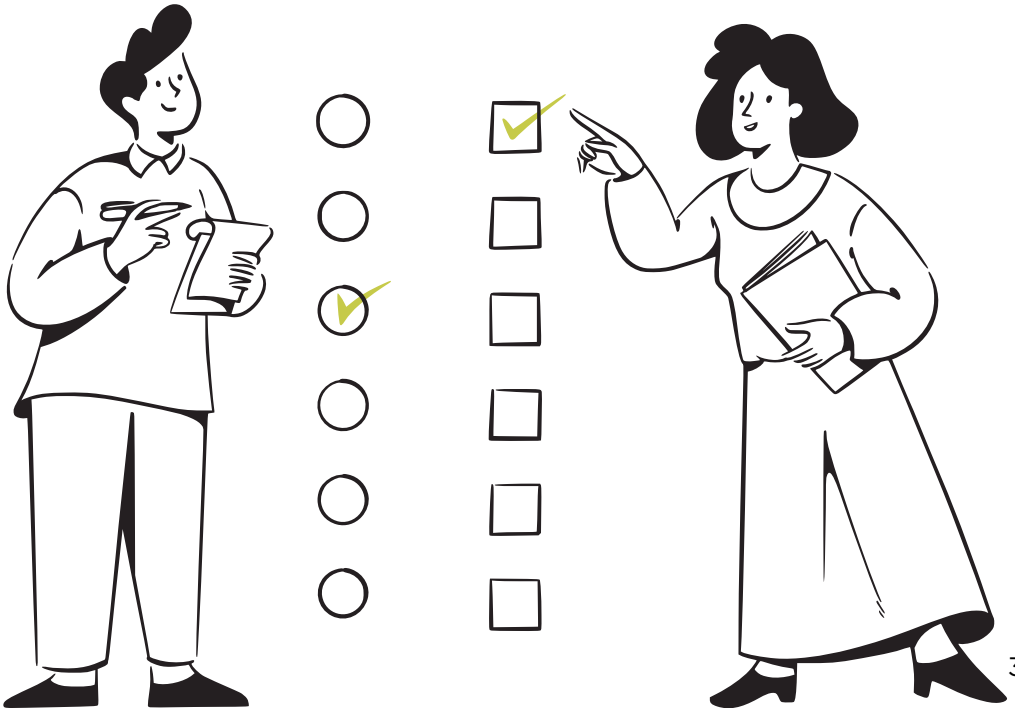


- offer or accept gifts, hospitality and entertainment linked to an action or omission on your part.

In this context, a family member is a spouse, partner or relative in a direct or collateral line, by blood or affinity, up to the third degree.

Members of the Boards and management, in addition to other collaborators, must complete the Declaration of Relationships annually, as established in the Conflict of Interest Procedure.

Inform your leadership, in writing, of any activities, financial interests or external relationships that may directly or indirectly involve you in a real conflict of interest or the appearance of a conflict, using the Renova Foundation's Declaration of Links form. All situations will be appropriately analyzed.





NEVER

- Hold positions or investments (directly or indirectly) in organizations that do business with the Foundation (partners, suppliers, or your own or your family's company) if you are in a position to influence transactions or if the relationship itself creates an actual conflict of interest, potential or apparent.
- Hire, promote, or directly supervise a family member unless specifically authorized.
- Get involved in business-related negotiations and decisions in which you may have a personal interest.
- Participate in any decision-making process in which you may have interests that influence or may be seen as influencing your ability to make an objective decision and fulfill your responsibilities to Renova.
- Offer or accept gifts, hospitality and entertainment from an organization or person involved in a proposal or quote with the Foundation.
- Request personal gifts, hospitality or anything else of value from a business partner or supplier. This includes direct requests and giving the impression that offering a gift, hospitality, or thing of value would be appropriate or desirable.
- Use Renova resources or make inappropriate use of your position to influence, promote or assist an external activity or party.
- Interfere with the fair and transparent operation of a proposal and quotation process of potential suppliers and partners in a way that may inappropriately influence decision-making or give the impression that decision-making processes are being inappropriately influenced.
- Seek or personally pursue any opportunities in which Renova may be interested and which are identified by the use of the institution's information, assets or resources.
- Accept discounts or other personal benefits that are not extended to the general public or your colleagues when these come from suppliers, service providers, customers or other third parties due to your association with Renova, unless this has been previously approved.



ALWAYS

- Conduct all work relationships in a professional and impartial manner.
- 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.
- Be accompanied by another collaborator in interactions, meetings and events with public entities and agents.
- Inform your leadership, in writing, of any activities, financial interests or outside relationships that could involve you in a conflict of interest or the appearance of a conflict.
- Obtain appropriate approval before accepting an administrator or director position with another company or institution.
- Use common sense when deciding to offer or accept gifts or hospitality items and obtain approval, if necessary, in accordance with the Gifts, Hospitality and Other Things of Value guidelines.
- Refuse to participate in any decision-making process in which you may have interests that influence or could be seen to influence your ability to make an objective decision and fulfill their responsibilities towards Renova.
- Think before investing in a Renova business partner or supplier. Although such activity does not automatically create a conflict of interest, a conflict could arise if a contributing person had financial interests in a supplier, as well as having the authority to influence contracts with that supplier.



4.2 ANTI-BRIBERY AND ANTI-CORRUPTION

Compliance with anti-bribery and anti-corruption laws is vital for the Renova Foundation. Bribery and corruption divert resources, undermine the integrity of government and community decisions and reinforce cycles of lack of trust. Both are crimes, under the terms of the laws which may be applicable to Renova.

No advisor, director, collaborator or anyone acting on behalf of the Foundation may offer, authorize, make a payment or grant an advantage with the aim of unduly influencing (or appearing to influence) a public agent or obtain any unfair advantage, whether for Renova or for the supporting entities. Committing such an act would be contrary to the law and this Code of Conduct and would constitute grounds for dismissal, in addition to possible legal action.

Likewise, **facilitation payments** are also totally prohibited.

Payments often made to low-level public agents to guarantee or expedite the adequate performance of a collaborator's routine, duties or related acts, such as:

- customs clearance;
- processing public documents such as visas, authorizations or licenses;
- provision of police protection;
- provision of correspondence, telephone or public utility services.



The health and safety of employees and third parties are a priority. If a payment must be made as a result of a direct or associated imminent threat to health or safety, it must be reported to the Situation Room and Compliance Management immediately. You can also report your concerns to the Confidential Channel. In addition, news of the fact must be registered with the police authority, when it constitutes a crime.

Anti-corruption laws also require that all transactions be recorded accurately and in reasonable detail in our 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 hide the true nature of any expense are expressly prohibited and may lead to dismissal, in addition to possibly giving 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.

Read and understand our Anti-Corruption Policy and its importance. Main points:

- do not offer or pay bribes to anyone;
- transactions must be transparent;
- gifts, giveaways, hospitality and other items of value must be reasonable and infrequent;
- decisions about hiring cannot benefit public agents, directly or indirectly;
- facilitation payments are prohibited;
- maintain books and records accurately;
- report actual or suspected violations and seek advice;
- Retaliation against good faith protesters will not be tolerated.



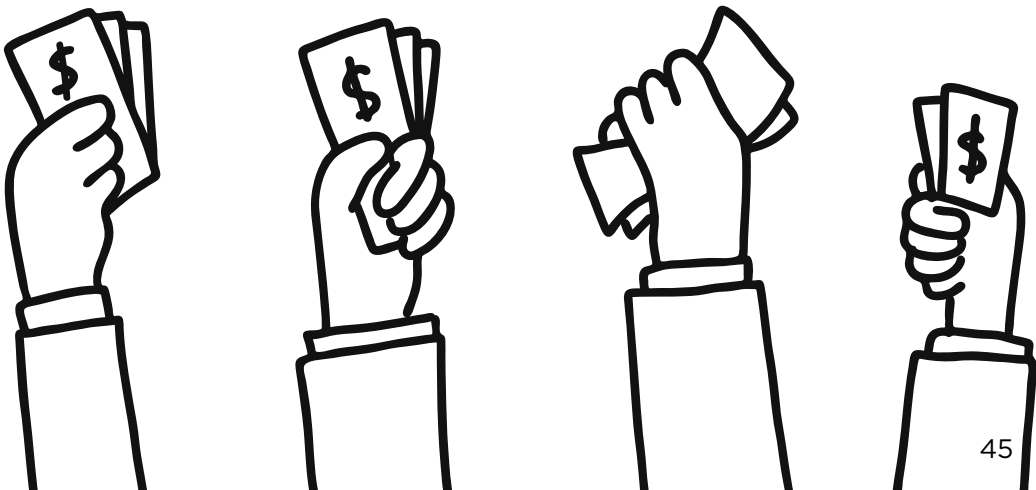
NEVER

- Authorize, initiate or participate in schemes that give undue advantage, bribes or secret commissions to any person.
- Offer, promise or make payment relating to subsistence assistance, in cash or equivalent, of any kind, to a public official, unless all of the following conditions are met:
 - when such offer, promise or payment is provided for in the terms of Renova's programs and projects;
 - when a written agreement is in force providing for the making of such offer, promise or payment;
 - when such promise, offer or payment is not made directly to such public agent, but in a formal and official capacity.
- Establish a hidden or incorrectly recorded fund for prohibited payments.
- Offer, promise, authorize payment or pay/provide anything of value to any employee, agent or representative of another company or institution to improperly induce or repay any business-related function or activity.
- Request, agree to receive, or accept anything of value from any collaborator, agent, or representative of another company or entity as an incentive or retribution for any business-related function and activity. Bribery involving commercial (non-governmental) parties is prohibited.



✓ ALWAYS

- Follow applicable procedures before hiring third parties.
- Ensure that all expenses are recorded accurately and in reasonable detail in Renova's books and records.
- Report any requests for bribes, facilitation payments or other suspected corruption to your leadership and Compliance immediately.





4.3 GIFTS, HOSPITALITIES AND OTHER ITEMS OF VALUE

Giving or receiving anything of value from individuals must involve common sense, discretion and moderation, always in accordance with the law and the Anti-Corruption Policy.

Our commitment is to maintain an attitude in accordance with the highest ethical standards. We do not solicit donations, items of hospitality or favors of any value from people or companies, nor do we act in a way that puts any third party in a position in which they feel obliged to make a donation, provide hospitality or provide personal favors in exchange for business with Renova.

Collaborators, directors and advisors must be careful when accepting gifts, hospitality or entertainment items. If you are in doubt, consult the Compliance or reject the offer. Ignorance of the law or policy does not justify possible violations.

In certain specific circumstances, Renova will provide public officials or third parties with reasonable, non-luxurious accommodations and hospitality items. These expenses will only be approved if they are directly related to a duly authorized Foundation project and comply with the applicable policies. Furthermore, they will be subject to frequent audits.

To reinforce the promotion of these values, our Anti-Corruption Policy establishes the need for prior approval for the provision or acceptance of any gift and/or hospitality to public officials, regardless of the value.

On the other hand, when dealing with private agents, it is necessary to obtain prior approval before providing or receiving gifts, presents and hospitality when the value involved is greater than R\$200.00.

Offers or receipts of “other things of value”, regardless of the consideration and the amount involved, require prior approval. These cases include unusual requests, such as providing fuel or hiring relatives.

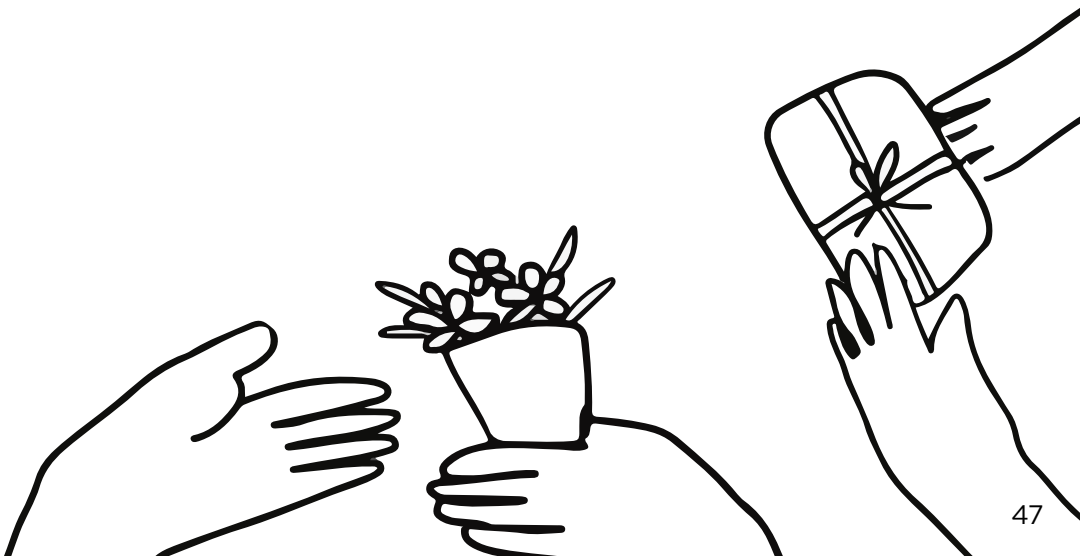


NEVER

- Pay bribes, kickbacks, provide any undue advantage or anything with the intention of corrupting.
- Pay in person for a gift, hospitality item or anything of value to avoid complying with the Anti-Corruption Policy.
- Give or receive gifts, giveaways, hospitality or any items of value that may interfere with the exercise of impartial judgment in the interests of Renova.

ALWAYS

- Ensure that gifts, presents, hospitality and any items of value given or received are reasonable and are related to a legitimate purpose linked to Renova.
- Obtain prior approval, as necessary, before offering, promising or giving anything of value, including sponsorships and community development projects.
- Ensure that gifts, presents, hospitality and any items of value given and received comply with applicable laws and regulations and the Anti-Corruption Policy.





4.4 COMPETITION AND ANTITRUST

We are committed to competition laws and their enforcement against those who act in an anti-competitive manner. Competition laws protect free enterprise and prohibit practices and agreements that reduce competition.

Failure to comply with competition laws may result in serious consequences for Renova and collaborators, 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 the employment contract.

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

- prices, fees, values, 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;
- use the Renova Foundation environment to share any other sensitive information related to the businesses of Samarco, BHP and Vale.

As provided for in our statutes, the Renova Foundation has administrative, patrimonial, financial and operational autonomy.

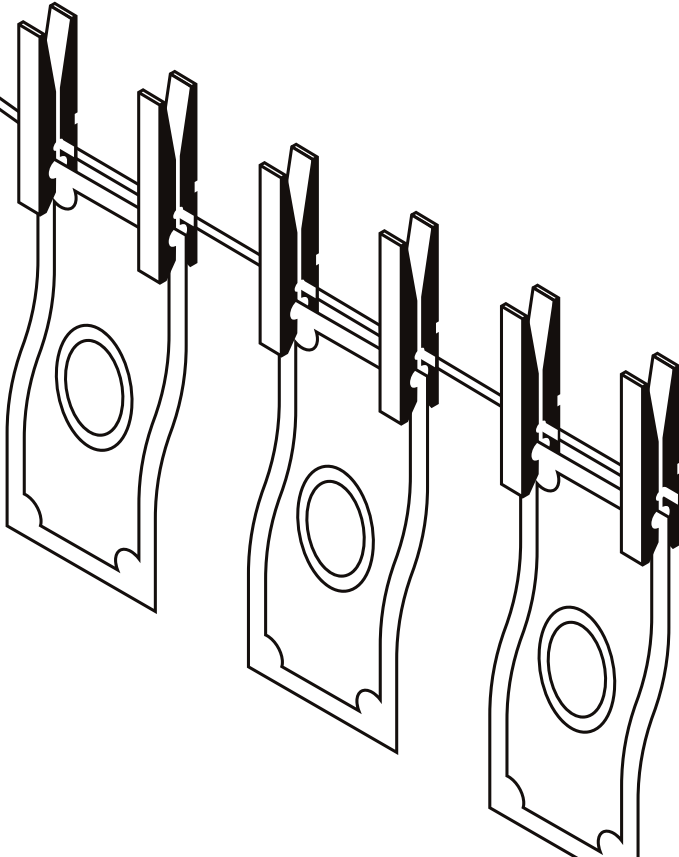


4.5 COMBAT MONEY LAUNDERING

We are committed to the laws on **money laundering** and combating **the financing of terrorism**.

Money laundering is any procedure by which criminals transfer the proceeds of their criminal activity to legitimate organizations to give the money 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 terrorist activity. Renova is committed to avoiding participation in any of these activities.





4.6 SUPPLIERS AND BUSINESS PARTNERS

The 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 contribute significantly 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 hiring processes, and any situations related to potential conflicts of interest or favoritism are prohibited. Therefore, all suppliers must receive impartial and equal treatment in the contracting processes and clear information about our expectations, standards and requirements.

Renova always looks for suppliers who share our commitment to:

- legal business practices conducted in accordance with a high ethical standard;
- management practices that respect the rights of 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 these values in their organizations.



Business partner

This term describes any third party who, in the context of their activities, has the authority, power or capacity to make decisions, negotiate or make commitments with public agents on behalf or for the benefit of the Foundation, including arbitration demands involving public or private agents. Any improper conduct by business partners may cause damage to the reputation of Renova Foundation and its collaborators, in addition to being subject to criminal, civil, administrative and other sanctions.

Business partners must be subject to due diligence procedures to assess risks of corruption, human rights violations and damage to reputation before hiring. When hiring a business partner, you must certify their reputation, competence and qualifications to perform the service for which they were hired and ensure that the remuneration requested is reasonable, in addition to taking measures to ensure that their performance is monitored and evaluated and necessary training is carried out. This will require, at the very least, checking progress measurements thoroughly and questioning the business partner about any unclear or excessive costs. See Renova's Compliance policies for better guidance on hiring these partners.

Due Diligence Procedure

It sets out in detail the due diligence required by the Foundation for different types of suppliers and third parties (including business partners). Collaborators responsible for conducting due diligence processes relating to third parties, including those in the Compliance area, must read and familiarize themselves with this document.

If there are any doubts or concerns regarding the supplier or business partner (or potential suppliers and business partners) about their integrity or fitness to perform the contract, it is necessary to ensure that these issues are addressed immediately by raising the matter with Compliance or Legal.



NEVER

- Avoid or try to avoid the formal hiring procedure.
- Hire a supplier contrary to the determination that it presents significant risks to Renova, without adopting control measures that can mitigate such risks.
- Exclude terms and conditions from contracts with suppliers without proper internal approval. Contracts must reflect the entire agreement and include all conditions and concessions agreed by Renova and the supplier.
- Offer or receive undue advantages.
- Allow differentiated treatment for suppliers and partners.
- Ignore warning signs that a supplier may be engaging in prohibited conduct. Warning signs include unusual demands for reimbursement, disproportionate compensation, or efforts by the supplier to withhold your identity or receipt of payment.
- Use business partners as intermediaries to offer, give or receive gifts, hospitality or any things of value that are prohibited under the Anti-Corruption Policy.
- Use non-standard contracts instead of Renova's standard supply contracts without due legal assessment and approval to do so.
- Hire suppliers who use irresponsible or environmentally unsafe products or services, violate laws and regulations, use forced or child labor or use physical punishment to discipline employees, even if this is permitted by local law.
- Change billing deadlines so that they become inconsistent with contracts.
- Use or continue to use a vendor if you are aware of or suspect inappropriate behavior. Any problems must be fully investigated and resolved satisfactorily. Furthermore, the decision must be adequately documented if the business contract is to continue.
- Structure or manipulate transactions or contracts for personal advantage or undue advantage to a third party. Manipulation of proposals, quotes or budget is prohibited.



NEVER

- Provide confidential information about a supplier's business (e.g. bid prices, winning bid information, and the like) directly or indirectly to another supplier or to any other person who is not expressly authorized to receive such information.

ALWAYS

- Seek to obtain a competitive offer in appropriate circumstances.
- Use the due diligence procedure in acquisition processes to hire suppliers/partners and respect the Compliance area's assessment.
- Base procurement decisions on the best technical and commercial conditions received, taking into account the merits of price, quality, performance, history and sustainability to meet Renova's standards.
- Immediately report any deviation to the supplier and/or partner manager.
- Give feedback on positive and negative aspects, seeking continuous improvement.
- Inform suppliers of the Foundation's values and standards, including Renova's Code of Conduct.
- Help our suppliers understand Renova's conduct and Compliance requirements.
- Ensure contracts clearly set out the services or products to be provided, the basis for receipt of payment, the applicable amount and remuneration.
- Conduct regular assessments of supplier relationships and performance.



ALWAYS

- Ensure that, before entering into a contract or commitment with a supplier, you have obtained:
 - an adequate risk assessment and commercial review, with due diligence on the potential supplier's reputation, conduct, integrity, qualifications and experience, credibility and suitability to meet Renova's standards; in addition to the health and safety assessment, if applicable;
 - all appropriate internal approvals, including legal review
- Check that the invoices clearly and fairly represent the goods and services provided, as well as whether the entire inspection and measurement process produced results consistent with what was actually delivered to Renova.
- Monitor the conduct of business partners, including checking invoices and challenging any suspicious or unclear amounts.
- Make payments only to the person or organization that actually provided the goods and services. Payment must be made in the supplier's country of origin, place of business or where the goods were sold or provided, unless approval has been obtained from the Compliance representative to do otherwise.
- Be alert to report any supplier activity that is inconsistent with our business conduct requirements to your leadership.
- Hire suppliers that respect freedom of association and collective bargaining; that guarantee a decent salary (including the payment of social contributions); that respect non-excessive working hours; that prevent and reject: child labor, forced labor and slavery-like labor, exposure to degrading working conditions, harassment, discrimination, other forms of treatment disrespectful and sexual exploitation of children and adolescents.



5. 5. POLITICAL POSITION AND RELATIONSHIP WITH PUBLIC AUTHORITIES

5.1. POLITICAL ACTIVITY

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

Although the Renova Foundation encourages collaborators, directors and advisors to exercise their right to participate in political activities, such activity must occur strictly in a private and individual capacity, and not in the name of Renova. Personal political activity may not be conducted during work hours and no one may use institution property or equipment for political purposes.

Any employee, director or advisor 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 one's own expense and political opinions must not be presented as those of Renova. No candidate may request donations from co-workers or at the Institution's locations.



NEVER

- Make contributions (cash or in kind) or incur expenses using the Renova account to any political campaign, political party, political candidate, elected official or any affiliated organizations.
- Use or allow others to use any Renova assets or resources in a political campaign, political party, for a political candidate, elected official or any of its affiliated organizations.
- Use charity donations as a substitute for a political contribution.
- Use your position at Renova to try to influence someone else to give or accept a position, function, political contribution or public support. If this could create a conflict of interest, you must document the case in writing.

ALWAYS

- Conduct institutional relationships on behalf of Renova with any politician or party, elected official or candidate public office in any country in accordance with the Code of Conduct and all applicable laws and regulations related to combating corruption and corporate participation in public affairs.
- Be aware of Renova's reputation and how the public would view your actions when engaging with government authorities.
- If you are not formally representing Renova, make it clear that you are speaking on your own behalf, and not on behalf of the Foundation.
- Communicate in advance to your leadership your intention to run for public office.



5.2 RELATIONS WITH GOVERNMENT ENTITIES

Our relationship with government entities is guided by our value of Integrity. The Renova Foundation has an Institutional Board that formally represents the organization before public institutions, supporting technical areas in dialogue with public agents. If you have any questions when relating to public institutions, contact the Institutional Relations area for support and guidance. In the event of any complications in interactions with representatives of public authorities, Compliance must be involved, in accordance with the Policy on Interaction with Public Agents.

The Renova Foundation respects all those who hold public functions, in all spheres (legislative, executive and judiciary), and believes in ethics and fairness in conducting its activities.

Although this is not the rule, the Renova Foundation understands that some individuals, whether in the public or private sector, may be willing to act in violation of laws and regulations. As a result, Renova implemented controls that aim to prevent deviations not only in private relations, but also in public-private relations.

Renova Foundation representatives must act honestly, transparently and truthfully in their discussions with representatives of public bodies and agents, and maintain cooperative relationships with governments and their agents, in accordance with the Policy on Interaction with Public Agents.

The Legal department must be notified of any inquiries, investigations or requests for information received from public agents or public bodies and must approve the corresponding response. If you provide information to governments on behalf of Renova, you must ensure that all information is accurate and suitable for the purpose in question. Errors or omissions may cause damage to the Foundation's reputation and be illegal. Records of meetings with public agents must be kept, in accordance with the guidelines of the Policy on Interaction with Public Agents.

