

Code:	POL-CAU-001
Revision No.:	05
Developer:	Roberta Guasti Porto
Approver:	Board of Trustees
Approval date:	18/08/2023
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ANTI-CORRUPTION POLICY

1. Objective

The Foundation undertakes to conduct all business in compliance with current legislation and the highest ethical standards. During its operations, the Renova Foundation seeks to avoid even the appearance of impropriety in the actions of its directors, advisors and collaborators. We rely on everyone to always exercise good judgment, discretion, and moderation when conducting Foundation business.

The Code of Conduct undertakes that integrity is the core value of the Foundation. This Anti-Corruption Policy ("Policy") reiterates our commitment to integrity, defines the specific requirements and prohibitions applicable to our operations in compliance with anti-corruption legislation, including, but not limited to, Law No. 12,846 of 2013 (Anti-Corruption Law), Foreign Corrupt Practices Act of 1977 ("FCPA"), as well as providing information to prevent and reduce the risks of corruption and bribery related to the Foundation's activities.

The Foundation will take all necessary steps to ensure that corruption and bribery do not occur in its activities and will not tolerate any violations.

Briefly, in service to the FCPA, it is illegal to offer, pay or provide anything of value to a person in exchange for using that person's government or private organization's position for own benefit or the organization. Providing "anything of value" practically means any type of arrangement where an advantage is provided that benefits the person receiving it rather than the organization or government entity that the person represents. Within the scope of this Policy, we will call such benefits as Personal Advantages. It is also illegal to solicit or receive Personal Advantages in exchange for providing improper benefits.

The most common types of Personal Advantage offered in violation of anti-corruption laws are financial, such as advance payment in kind or bribery arrangements. However, less obvious Personal Advantages, such as promising anyone a job interview, are also prohibited if the intention behind the offer is to influence the person to misuse their authority by virtue of their official position. We firmly believe that corruption and bribery, in whatever form they take, ultimately undermine the integrity of government and decision-making, in addition to harming the entire community. The foundation will not participate in or tolerate corruption or bribery actions in its relations with public and private agents.

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Penalties for violating these laws are serious and can expose the Renova Foundation to large fines and serious damage to its reputation. In addition, individuals who violate these laws and other legislation may also be subject to imprisonment and fines.

This policy sets out the Foundation's expectations and requirements regarding compliance with these laws, being directly applicable to all collaborators (including directors and advisors). We also hope that all third parties we work with will also adopt these same standards in their relationship with the Foundation.

2. Target Audience

All interns, employees, third parties and members of the Renova Foundation's management bodies, including the Board of Trustees, Executive Board, Supervisory Board and Advisory Board, as well as all business partners representing the Foundation, whether through a power of attorney or by characteristic of doing service.

3. Complementary documents

The following documents are complementary to this policy:

- Code of Conduct;
- Code of Conduct for Third Parties;
- Compliance Integrity Program Policy.

4. Responsibilities

Who elaborates	Who should be consulted	Who approves
Compliance Manager	-	Board of Trustees

5. Glossary

- **Agreement:** Adjustment agreement signed between Samarco, Vale, BHPB and various government authorities on March 2, 2016.
- **Benefits:** Any gifts, presents, meals, entertainment, hospitality, or other things of value, which may be named jointly and/or separately.

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- **Business Partner:** any third party that, in the context of its activities for the Foundation, has authority, power or capacity to make decisions, negotiate or assume commitments with Public Officials on behalf of or for the benefit of Renova, including arbitration claims involving public or private agents.
- **Collaborators:** All interns, collaborators, partners and members of the Foundation's management bodies, including the Board of Trustees, Executive Board, Audit Committee and Advisory Board, as well as all business partners who represent the Foundation, either by means of an attorney's power or by the nature of the service;
- **Due Diligence:** Reviewing information about suppliers or other third parties who receive any income from the Foundation.
- **Entertainment:** sporting, cultural or social events, concerts, plays, technical and business conferences as an integral part of a current or future commercial relationship.
- **Facilitation Payment:** Facilitation payment is a nominal payment to a public official for the purpose of guarantee or accelerate the execution of a routine and non-discretionary action by the government. Examples of facilitation payments are: Streamlining the process of obtaining licenses, permits or visas; Obtaining a tax benefit; or Obtaining police protection.
- **Gifts:** are tangible items, with commercial value, and that do not necessarily remind the institutional brand of a company or institution. Examples: flowers, fountain pens or branded pens of relevant value, watches, backpacks, electronics, leather briefcases, pictures, books, CDs, DVDs, blu-rays, sculptures and works of art, ornaments, Christmas basket (or referring to another commemorative date) and alcoholic beverage.
- **Gifts:** Items of normally low nominal value, negligible or that have no commercial value, which in some way remind the institutional brand of a company or institution. Examples: personalized pens, watches, mechanical pencils, folders, wallets, key chains, diaries, notebooks, picture frames, calendars, pen drives, card holders, notepads, mugs, recyclable bags, office ornaments, among others.
- **Governmental authority:** Governmental authority is any nation or any nation's political subdivision, whether state or municipal, and any agency, authority, instrumentality, regulatory agency, court, state bank, or any entity exercising

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executive, legislative, judicial, tax, regulatory or administrative matters to or from a government.

- **Hospitality:** situations in which airline tickets, ground transportation, meals, lodging, participation in technical and business events or conferences may be offered as an integral part of a current or future commercial relationship and which presuppose a commute from your work address.
- **Meals:** breakfast, snack, lunch, or dinner during which business discussions can be conducted.
- **Other Things of Value:** any benefit, tangible, or intangible, that does not qualify as a Gift, Presents, Meal, Entertainment or Hospitality under the terms of this Policy. Examples: employment offers, promises of recommendation (e.g., speaking well of someone in favor of them or moving someone's resume to the top of the list), offering fuel for business or operational purposes, discounts on loans, receiving or attempting to receipt of discounts other than the regular market practice or other benefits, in the acquisition of goods or services for personal use or consumption, due to their position at Renova Foundation.
- **Personal Advantage:** Personal Advantage and anything of value given or performed for the benefit of the recipient. There is no minimum value for a Personal Advantage, including, but not limited to, cash (such as gift cards), presents, trips, meals, entertainment, use of vehicles, lodging, favors such as educational and employment opportunities for friends or relatives, or received by a person.
- **Public Agent:** (i) any person who, even if temporarily or without remuneration, exercises a mandate, position, job or public function in institutions, governmental entities or in diplomatic representations, as well as in legal entities controlled, directly or indirectly, by Theo public power or in public international organizations; (ii) political party, its member, collaborator, agent or other person acting for or on behalf of the political party¹ ; or (iii) candidate for political or elected position.

¹ Mere membership in a political party does not fit the concept of a civil servant.

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- **Supplier:** Suppliers are contractors, organizations, associations, foundations, groups or individuals (other than collaborators) hired to perform services for the Foundation or appointed to perform obligations set forth in the Agreement.

6. Principles and Rules

6.1. General Prohibitions

6.1.1 Corruption

No collaborator (including directors and advisors) of the Renova Foundation may offer, promise, authorize the payment, pay or provide, directly or through a third party, a Personal Advantage to a public agent with the intention of inducing or rewarding any type of undue execution of any duty, responsibility or obligation of that public agent, such as making a decision that benefits the Foundation or its interested parties (stakeholders).

6.1.2 Commercial Bribery

No collaborator (including directors and advisors) of the Renova Foundation may offer, promise, authorize the payment, pay or provide, directly or through a third party, a Personal Advantage to any collaborator, agent or representative of another company, with the intention of inducing or rewarding the improper performance of any professional duty, responsibility or obligation of the recipient.

6.1.3 Facilitation Payments

No collaborator (including directors and advisors) of the Renova Foundation may offer, promise, authorize the payment, pay or provide, directly or through a third party, Facilitation Payments.

6.1.4 Fraud in Government Contracts

No collaborator (including directors and advisors) of the Renova Foundation may: 1) thwart or defraud, through collusion, arrangement or otherwise, the competitive nature of public procurement procedures; 2) prevent, embarrass or defraud the performance of any act in a public procurement process; 3) disqualify a competing bidder through fraud or by offering any kind of advantage; 4) defraud a public procurement procedure or a contract derived

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therefrom; 5) fraudulently creating a legal entity to participate in public procurement procedures, or to enter into contracts with a government authority; 6) fraudulently obtain an improper advantage or benefit arising from amendments or extensions to contracts with the public administration, without legal authorization established by law, by the terms of the public procurement process or by the respective contracts; 7) manipulate or defraud the economic and financial balance of contracts with the public administration; or 8) obstruct the investigation or audit capacity of public bodies, entities or agents, interfering with their work.

6.1.5 Accepting Improper Personal Advantage

No collaborator (including directors and advisors) of the Renova Foundation may solicit, agree to receive, or accept, directly or indirectly, a Personal Advantage as an inducement or reward for improper performance of any duty, responsibility, or obligation of their position at the Foundation to influence decisions such as hiring staff, entering contracts, or selecting Foundation priorities.

6.2. Additional guidelines

Transactions that violate national or international anti-corruption laws, the Code of Conduct and internal rules of Renova Foundation can come in many forms and personal gain can encompass “arrangements” in addition to obvious situations such as payment in kind or bribery. For the avoidance of doubt, these transactions are prohibited even if they are only offered or promised but not actually performed.

The following example list of Personal Advantages is intended to demonstrate how comprehensive the definition of “something of value” can be:

- Gifts, hospitality, or other things of any values;
- Education opportunities, job interviews or offers, letters of recommendation, medical services;
- Donations (including to charity) to organizations with some kind of direct or indirect relationship with third parties or public agents;
- Referral of contracts to a certain supplier linked to a third party or a public agent;

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- Allowing the use of Foundation resources (eg, allowing unlimited access to Foundation vehicles for personal use);
- Refund of unjustified expenses to a collaborator or a supplier.
- Contributions to a political party or candidates' campaign (donations, facilities for political events or campaign workspace, sponsorship of events, transportation, etc.).

6.3. Gifts, Hospitality and Other Things of Value

6.3.1 Preliminary guidelines

For granting or receiving gifts, presents, hospitality or other things of value by Renova Foundation collaborators, it is important to reinforce some fundamental assumptions, namely:

- Benefits granted or received must not be exorbitant or extravagant, but must be occasional and of modest value;
- Benefits must be made or received in an open and transparent manner;
- Must have a legitimate commercial and institutional purpose;
- Must not involve offering/receiving money to/from third parties;
- The circumstances must not appear to be in bad faith or be confused with acts of corruption and fraud,
- By becoming public, they cannot impact their own or the company's reputation;
- Frequency must not create the appearance of misconduct.

6.3.2 Permitted Limited Benefits

In compliance with anti-corruption legislation, the Foundation prohibits giving or offering a personal advantage in an attempt to influence a third party to commit abuse in relation to their professional position. This is contrary to laws and Foundation policies. However, there are times when the Foundation's activities will involve offering or receiving gifts, presents, meals, entertainment or other hospitality or accepting travel, meals or lodging as a courtesy or in furtherance of the Foundation's projects and purposes.

Code:	POL-CAU-001
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6.3.3 Requirement of Prior Approval

For granting, offering or receiving any benefit listed below, it is necessary to obtain the approval of the Manager of the responsible area (or the Director, when applicable) and of the Compliance area **before** offering, giving or receive any of the following items:

- a) Gifts (i.e., given as a courtesy or in recognition of services rendered, or to promote goodwill), presents, meals, entertainment, or other hospitality **involving a private agent** (whether or not such hospitality is provided at the Foundation's office or at a restaurant, conference venue or other) with a **total value greater than BRL \$200.00** (for the event). It is worth remembering that all hospitality must be reasonable, must have a business purpose and be in line with the role of the guests or recipients.
- b) Any gifts, presents, meals, entertainment or hospitality involving a public official, **regardless of the amount.**
- c) **Other things of value** independent of the counterparty and the amount involved require prior approval from the responsible manager and the compliance area. These cases include unusual requests, such as supplying fuel or hiring a relative, among others.

For illustrative purposes, the following table shows the need for prior approvals:

Classification of the counterpart	Benefit to be granted, offered, or received	Requires prior approval from the responsible Manager** (or Director, when applicable)	Requires approval from the Compliance area
Private	Gifts, presents, hospitality or other things of value above BRL \$200 reais.	If the total amount exceeds BRL \$200 reais	If the total amount exceeds BRL \$200 reais
Public	Gifts, presents, meals, entertainment, hospitality or other things of value regardless of value	Always	Always
Private/Public	Other things of value, regardless of the counterparty and the amount involved	Always	Always

*Benefits should be considered cumulatively per event.

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** When the applicant for the concession is a manager, the approval of the respective Director must be requested.

6.3.4 Exception of prior approval / regularization

Exceptionally, certain hospitality (meals) may be granted or accepted, such as lunch or dinner, as a courtesy and as long as they involve reasonable amounts, without the prior approval of the manager responsible and the Compliance area. These situations must arise from events or meetings in which there was no prior invitation to the meal, and must be subsequently registered with the Compliance area within 7 business days, counting from the first business day of the date of the event.

6.3.5 How to call the compliance area

The collaborator (including directors and advisors) who wish to provide or grant a benefit or who expect to receive a gift, present, hospitality or anything else of value must fill out the Gifts and Presents Form available at Sharepoint. The analysis process is automated, considering that, when completing the form, automatic emails are sent to those responsible for analysis and approval. After fulling of the form by the employee, the technical manager or technical director, as applicable, must approve the request. The Form must contain all relevant information, including but not limited to:

- Names and affiliations of all beneficiaries and/or participants;
- Whether the institution involved is public or private;
- Total value of the benefit;
- Justification for granting or receiving the benefit,
- Well-defined plan for documenting expected expenses.

The Compliance area will conduct the analysis of the request with verification of the information filled in, may request any clarifications, if necessary, in addition to assessing whether the granting or receipt of benefit is in compliance with the Foundation's policies and procedures. The Compliance area may also, at its discretion, escalate the matter to the Compliance Committee.

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The request may be approved or rejected by the compliance area. Further details on documents and process flow are described in the specific work instruction on the topic.

In the case of granting a benefit to a public agent (for example, travel expenses, coffee break, lunch, dinner or others) the compliance area may ask the applicant for evidence of the expenses actually incurred, as well as the demonstration of payment in a specific accounting account for this purpose.

6.3.6 All Other Presumably Prohibited Personal Advantage

No collaborator (including directors and advisors) of the Renova Foundation may offer, promise, authorize payment, pay or provide, directly or through a third party, any form of Personal Advantage not described in 6.3.1 - 6.3.3 without permission from the Compliance area. These cases include unusual requests such as supplying fuel directly to an individual or hiring a relative of a relevant third party.

6.3.7 Prohibited solicitation

Collaborator (including directors and advisors) of the Renova Foundation may not solicit any Personal Advantage from third parties. Nor may they act in a manner that would place any third party in a position where they would feel compelled to provide a Personal Advantage in order to do business or continue to do business with the Foundation.

6.3.8 Payment of Personal Advantages

a) Preference for Direct Payment: Collaborator (including directors and advisors) of the Renova Foundation must follow internal rules to make direct payment to the supplier for any personal advantages approved to be offered to third parties. If it is not feasible or possible for the Foundation to pay suppliers directly, the third-party recipient of the Personal Advantage may pay for the service and request reimbursement from the Foundation.

b) Refund with Documentation Only

No collaborator (including directors and advisors) of the Renova Foundation may authorize or pay any claim for a Personal Advantage that exceeds the offer or is submitted

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without verifiable copies of original receipts in accordance with Foundation finance regulations. This policy must be communicated to any third-party in the event that the Foundation is unable to pay the vendor directly.

6.3.9 Does not fall under the concept of hospitality

Any expenses with meals or transportation granted on visits to Renova's facilities and offices with internal governance publics and external publics with a technical-operational focus (technical visit, monitoring of progress of programs/works), involving sponsors, commissions and public inspection bodies, public agents, among other guests. Such visits aim to technically present the progress of the works/deliveries, being organized, and carried out directly by the technical areas responsible for the relationship with the public concerned. Technical visits do not require follow-up by the institutional relationship team. The amounts spent on meals and transportation cannot exceed the limits per person provided for in Renova's travel expenses policy, following the same standard travel parameters applied to all collaborators.

6.3.10 Violations

In case of violation of this Policy, Renova Foundation will apply defined criteria in its Consequences Management Policy. If the infraction also violates the Anti-Corruption Laws, other sanctions may be applied to the offending collaborator (including directors and advisors).

6.3.11 Additional guidelines

In case of doubt about accepting or offering a benefit, consult the Compliance area in advance. The fact of not being aware of the legislation or this Policy cannot be used as justification for any violation.

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Revision No.:	05
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6.4. Relationships with Third Parties, Communities and Authorities

6.4.1 Authority to Enter into Agreements

Only individuals duly authorized by the Foundation's Board of Directors may enter into agreements or make promises to third parties on behalf of the Foundation.

6.4.2 Required "Due Diligence" Policies and Procedures

The Compliance area shall enact and maintain policies and procedures establishing the necessary "Due Diligence" reviews in relation to this subsection. Each specific policy must establish: (i) the conditions that define when due diligence must be performed; (ii) the specific actions that must be carried out; (iii) the term of each action; and (iv) the person responsible for each action. In addition, the Compliance area is responsible for preparing additional procedures that may be necessary to ensure that this Policy is effective in the Foundation's specific programs and projects.

- a) Third Party Analysis:** No supplier can be hired, or start work on behalf of the Foundation, for whatever purpose, without going through the compliance procedures for third party Analysis, in accordance with the provisions of the procedures. The Due Diligence will be applied to suppliers that present red flags.
- b) "Due Diligence" Program:** No program, investment, concession, project or any obligation of the Foundation established in the Agreement involving a public agent can be started without the risk assessment, technical analysis, "Due Diligence" process and approval of the Compliance area, all with proper documentation.
- c) Joint Initiative "Due Diligence":** The Foundation cannot establish a partnership with any individual, group or organization in a joint initiative or sponsorship, unless the third party has been submitted to a "Due Diligence" process and approved by the Compliance area.
- d) Donor "Due Diligence":** The Foundation cannot accept large donations from any individual, group, or organization, unless the third party has been subject to a "Due Diligence" process and approved by the Compliance area.

Code:	POL-CAU-001
Revision No.:	05
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6.4.3 Contracts

All disbursements made by the Foundation under the Agreement must include a formal written contract containing: (i) clear definition of the program; (ii) anti-corruption clause; (iii) accountability clause (whenever applicable); and (iv) any other clause necessary for compliance with this Policy and to avoid risk of corruption.

6.4.4 Third Parties Meeting Our Standards

The Foundation will only transact with trustworthy and ethical individuals, groups, or organizations. The Foundation will include in contracts with suppliers, third parties and Business Partners: (i) commitment clauses with the Code of Conduct and other applicable compliance policies; (ii) representation regarding the proper use of funds; and (iii) possibility of contract's termination in case of violation of policies, representations, or clauses.

6.4.5 – Authority and Responsibility for Conducting “Due Diligence”

Those responsible for the actions described in the procedure of the “due diligence” policy has the obligation to perform their responsibilities in the manner described. Failure to comply with this requirement will be considered a violation of this Policy.

6.4.6 – Authority and Responsibility to Assess Compliance Risks

The Compliance area is responsible for assessing all compliance risks.

6.5. Payments

6.5.1 Prohibited “In-Kind” Payments

No collaborator (including directors and advisors) of the Renova Foundation may authorize or make payments in-kind of any kind to third parties, except for conditions authorized in the regulations relating to corporate travel.

Code:	POL-CAU-001
Revision No.:	05
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6.5.2 Payments to Unverified or Unidentified Accounts

No collaborator (including directors and advisors) of the Renova Foundation may make a bank payment of any kind into a third-party account without first verifying that the account number is linked to the recipient's tax ID.

6.5.3 Restriction of Personal Funds

No collaborator (including directors and advisors) of the Renova Foundation may use personal funds to provide anything of value to others in a manner that, if paid directly by the Foundation, would be prohibited under this Policy.

6.6. Books and Records

6.6.1 Full Transparency

All collaborator (including directors and advisors) of the Renova Foundation must faithfully and accurately describe the purpose and amount of each transaction for which they were responsible.

6.6.2 Prohibition of "Creative Accounting" Practices

No collaborator (including directors and advisors) of the Renova Foundation may record a transaction amount or description inaccurately or in an attempt to conceal the true nature of the transaction. Any attempt to do so will constitute grounds for terminating the contract.

6.6.3 Cooperation with Accounting Audits

A sample of all entries and respective documentation must be periodically reviewed by the Foundation's internal audit area or external auditor to identify discrepancies, errors and omissions. All collaborator (including directors and advisors) of the Renova Foundation must offer full cooperation with requests of this nature. Failure to comply with this requirement will constitute grounds for terminating the contract.

Code:	POL-CAU-001
Revision No.:	05
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6.7. Training and Certification

6.7.1 Authority and Responsibility for Training

The Compliance area is responsible for preparing, updating and providing anti-corruption training, including practical guidelines on the Integrity Program, for all collaborator (including directors and advisors) of the Renova Foundation, as well as any representatives of business partners who have interface with Public Agents on behalf of the Foundation.

6.7.2 Mandatory Initial Training

Renova Foundation collaborators, advisers and directors must complete anti-corruption training within 60 days of joining the Foundation.

6.7.3 Mandatory Annual Training

Renova Foundation collaborators, advisers and directors must complete anti-corruption training once a year. Failure to comply with this requirement will be considered a violation of this Policy.

6.8. Suspicion of External Violations

6.8.1 Reaction to External Violators

Collaborator (including directors and advisors) of the Renova Foundation who receive a request or demand for a Facilitation Payment, kickback, bribe or any prohibited Personal Advantage, or even receive an offer of a bribe or other Personal Advantage in an attempt to influence the execution of their Foundation responsibilities, should take the following steps (if possible):

- (1) Make sure you have not overheard or misunderstood the other party.
- (2) Clearly and deliberately refuse to cooperate.
- (3) Close discussions as soon as possible.
- (4) Promptly report the improper request or demand to your superior and the Compliance area as soon as you leave the meeting.
- (5) Document the incident report in writing as soon as possible.

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(6) Be prepared to offer full cooperation to the Compliance investigation team.

Third parties who are working on behalf of the Foundation and who receive such requests, demands or offers in connection with work for the Foundation must decline to cooperate and report the incident to their Foundation contact before taking any further action.

6.8.2 Health and Safety Priority

The Foundation will not tolerate corruption or bribery, but the health and safety of our collaborators and agents is our highest priority: If any prohibited payment is solicited or offered in a form or context that presents immediate danger to the safety of the agent involved, the agent must use its best judgment to resolve the situation safely. Once you are out of immediate danger, report the threatening situation to local authorities and your actions to your manager and the Compliance manager.

6.9. Suspicion of Internal Violations

6.9.1 Duty to Report/Denounce

collaborator (including directors and advisors) of the Renova Foundation must immediately report to the Compliance area any knowledge or reasonable suspicion that a person associated with the Foundation has violated or intends to violate this Policy. Not reporting violations can result in consequences as severe as those violations, including disciplinary action.

The Foundation encourages anyone with suspicions to be as transparent and honest as possible when making a denouncement, as this will contribute to a full and effective response to the situation. The Foundation will investigate reports discreetly and confidentially and will use its best efforts to keep the identity of the whistleblower confidential.

6.9.2 Other denounces

The Foundation maintains a confidential channel for reporting suspected violations of this or other policies, Code of Conduct, national and international anti-corruption law. Reports can be made through the website www.canalconfidencial.com.br/fundacaorenova, email canalconfidencial@fundacaorenova.org or telephone 0800 721 0717.

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6.9.3 Prohibited Retaliation

No collaborator (including directors and advisors) of the Renova Foundation may initiate, participate in or tolerate any form of relationship against anyone who has raised genuine suspicion about complying with this Policy. Retaliation is justification for disciplinary action, including dismissal.

Any suspicion of retaliation must be immediately reported to the Compliance area. All allegations of retaliation will be rigorously investigated as violations of this Policy.

6.10. Investigations and Audits

6.10.1 Authority and Responsibility to Investigate

The Compliance area is responsible for coordinating and supervising investigations of alleged violations of this Policy, including any situations related to retaliation. Compliance must ensure that all allegations of violations of this Policy go through screening in a timely manner, treated seriously, rigorously investigated and fairly evaluated. No violation or potential violation investigation can be completed without the express consent of the Compliance area.

6.10.2 Requirement of Discretion

Any Renova Foundation collaborator (including directors and advisors) involved in an investigation must conduct preliminary investigations of allegations of violation of this Policy discreetly, whenever possible, unless and until evidence is discovered.

6.10.3 Confidentiality

If requested by a whistleblower, any Renova Foundation collaborator (including directors and advisors) involved in an investigation must keep, as much as possible, the identity of the whistleblower confidential.

6.10.4 Authority and Responsibility to Audit

The Compliance Manager must, directly and in conjunction with external auditors, perform regular audit, evaluation, testing and measurement of the effectiveness of the Compliance Program and this policy.

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6.10.5 Duty to Cooperate

Collaborator (including directors and advisors) of the Renova Foundation must cooperate fully with any investigation or audit. This includes full cooperation with any internal audit team, external auditors, or external legal counsel.

6.10.6 Overlapping with Other Areas

The Compliance area defines the scope of Investigations and may use resources from other areas to support investigations of potential violations:

6.10.7 Record Keeping

The Compliance area is responsible for recording all reported violations, as well as for documenting the Foundation's response to each of them: These records must be kept for at least 5 years.

6.10.8 Issuance of Reports

The Compliance Manager shall issue periodic reports regarding investigations, enforcement actions and significant findings of any audits relating to this policy to the Curator Council, as well as for any other contacts designated by interested parties: Any serious event must be reported in real time.

6.11. Consequences of Violations

6.11.1 Potential Violations:

- Willfully or intentionally violate the law or this Policy;
- Directing others to violate the law or this Policy;
- Failure to cooperate in an investigation into possible violations by another;
- Exercising retaliation against a supplier or collaborator for reporting a suspicion or violation;
- Not effectively monitoring subordinate's actions.

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Revision No.:	05
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6.11.2 Potential Legal Consequences

Violations of these policies or any anti-corruption legislation may result in substantial fines for the Foundation and its interested parties, as well as legal actions for damages to third parties against the Foundation and its interested parties, and lawsuits criminal charges and possible arrest of individuals personally involved.

6.11.3 Potential Labor Consequences

Disciplinary actions will depend on the seriousness of the violation and other relevant circumstances. The Foundation will apply disciplinary actions in accordance with the Consequence Management Policy, which includes, but is not limited to, termination of employment contract (dismissal).

7. Items revised in relation to the last version

POL Version	What was changed
01	<ul style="list-style-type: none"> • Change in Prior Approval Requirement items; • Added Expense/Reimbursement Reconciliation Form. • Exclusion of the item "Management Reports and interested parties (stakeholders)"; • Changing the topic "Third Parties Meeting Our Standards"; • Term of Mandatory Initial Training changed from 30 days to 60 days; • Added information about the complaint channel; • Alteration of the item "Potential Labor Consequences".
02	<ul style="list-style-type: none"> • Changed the "Objective" item, with corrections in the legislation information; • Changed the item "Target audience"; • Changed item "Complementary Documents"; • Changed the item "Responsibilities"; • Proper formatting of the document.

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03	<ul style="list-style-type: none"> • Changed item 1 referring to the “Objective”, with adaptation of the applicable legislation; • Changed item 5 referring to the concept of “Gifts” and inclusion of “Benefits” and “Gifts”; • Changed the item 6.3 referring to the Gifts, Presents and Hospitality process; • Adequacy in the essay with few adjustments.
4	<ul style="list-style-type: none"> • Changed concept of public agent in item 5; • Changed the concept of business partner in item 5; • Added concept of collaborators in item 5; • Changed in item 6.3.3 the maximum number of benefits that can be granted/received without prior approval; • Added observation about hospitality concept in item 6.3.9; • Included note on authorized conditions in corporate travel regulations.
5	<ul style="list-style-type: none"> • Specific changes to the text of the policy; • Inclusion of the term “third parties” in the definition of the concept of “collaborator”; • Item 6.4.2a: replacement of the term “Due Diligence” with “Third-Party Analysis” and adaptation of the text; • Item 6.3.5: information inserted about the need for approval of the request by the technical manager or technical director, as applicable.

8. Attachments

Do not apply.