



Code of

ETHICS AND CONDUCT

The background features several thin, angular lines in green and yellow. A prominent green line starts from the left edge, goes horizontally, then diagonally down to the right, and then horizontally again. Another green line starts from the left edge, goes diagonally up to the right, then diagonally down to the right, and then horizontally again. A yellow line starts from the top left, goes diagonally down to the right, then horizontally, then diagonally up to the right, then horizontally, and finally diagonally up to the right. Another yellow line starts from the top left, goes diagonally down to the right, then horizontally, then diagonally up to the right, then horizontally, and finally diagonally up to the right. The word "CONTENT" is written in a bold, green, sans-serif font, centered horizontally and positioned in the lower half of the image.

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Message from the **PRESIDENT**

Dear Colleagues,

At Serra Verde, all of our activities are based on values designed to ensure safety, well-being, fair treatment, respect for people, continuous improvement of our processes and transparency in all communications. The central elements of our strategic decisions are environmental protection and social responsibility, the pillars of Mineração Serra Verde's sustainability. These are our values – Truth, Fairness, Responsibility, Development, Excellence and Safety – V.E.R.D.E.S, for the acronym in Portuguese.

We are deeply committed to conducting our business with the highest ethical standards and integrity. As a result, all of Mineração Serra Verde's activities and operations are carried out in compliance with internal policies and procedures and applicable laws.

The Code of Ethics and Conduct ("Code") is the instrument that establishes the guidelines and commitments that all directors, officers, employees and third parties must assume when performing their activities, making decisions, and interacting with our stakeholders.

If you believe that any employee or vendor is not complying with our expectations in terms of conduct, report the situation through our Reporting Channel. We want (and need) to hear from you.

Together we will build a legacy of integrity and transparency so that Serra Verde is recognized as an ethical, environmentally responsible and socially safe company.

Best regards,

Ricardo Grossi Neves

President



1.

OBJECTIVE

The goal of this Code of Conduct is to consolidate and present the principles and standards of behavior that the company expects from its employees, officers, vendors and business partners. These principles are aligned with the values that guide all of the company's activities.

The Code is a document of principles and does not intend to address in detail all aspects of our employees' daily lives. If questions arise regarding the Code, we encourage everyone to contact the Compliance team, via email: compliance@svpm.com.br.

Furthermore, it is essential that all those responsible for the operation of Mineração Serra Verde are committed to disseminating and ensuring the application of the Code among all company employees. The rules contained in this Code must be followed by all Mineração Serra Verde personnel, regardless of their position or place of work. They must also be observed by vendors and business partners of the company. No person has the authority to violate any provision of this Code or request that another person do so.

2.1. Respect for Human Rights

Mineração Serra Verde is committed to conducting its operations in compliance with various international standards and applicable laws, including the Universal Declaration of Human Rights, the laws of the countries where it operates, the UN Guiding Principles on Business and Human Rights and the United Nations Declaration on the Rights of Indigenous Peoples.

To fulfill this principle, Mineração Serra Verde is constantly evaluating actions connected to its operations that may negatively affect human rights. The company works collaboratively with external stakeholders to identify key challenges in company projects, especially in those areas where mining, construction and reclamation activities are being carried out or planned for.

Mineração Serra Verde stands firm against any form of slave-like or child labor in its operations. We go to great lengths to ensure that the company complies with local and international norms that protect workers' rights. The company does not partner with vendors that use this type of labor.



2.2. Fostering diversity

Mineração Serra Verde is fully committed to creating a work environment that promotes diversity and is free from any form of discrimination.

We respect and value everyone, regardless of cultural and ideological differences (including political and religious issues), physical and intellectual condition, gender, gender identity, ethnicity, nationality, origin, age, social class, affective-sexual orientation or any other intrinsic attribute to human plurality.



2.3. Workplace Harassment, Sexual Harassment and Importuning for Sex

Mineração Serra Verde adopts a zero-tolerance policy in relation to attitudes or situations that may be considered workplace harassment, sexual harassment or importuning for sex in the workplace. All employees are encouraged to report, immediately, via our Reporting Channel, any suspicion of such practices.



2.3.1. Workplace Harassment

Workplace harassment is characterized by the exposure of a person, in a continuous or reiterated way, to humiliating, ridiculing, belittling, demeaning, embarrassing or offensive situations, causing them psychological and physical suffering in the performance of their activities or in the relationship with co-workers, especially with superiors, inside or outside the company. It is generally manifest by behavior, words, acts, gestures or written communication that cause harm to the personality, dignity or physical and emotional integrity of the person, thus endangering performance and the work environment.

2.3.2. Sexual Harassment

Sexual harassment can manifest itself in two ways: blackmail, which involves demands made by a superior to a subordinate to obtain sexual favors, under threat of loss of job or benefits arising from the employment relationship; or intimidation, which consists of sexual inducements from other employees, harming a person's professional performance or creating an offensive, hostile or abusive environment.

2.3.3 Importuning for Sex

Importuning for Sex is a crime typified by Law 13,718/18 and is characterized by engaging in a libidinous act in the presence of someone without their consent. It refers to inappropriate and offensive behavior of a sexual nature, which involves non-consensual approaches, obscene gestures, unwanted physical contact or other actions of a sexual nature that cause discomfort, embarrassment or harassment to the victim.



3.

Our relationship with the

COMMUNITY

Mineração Serra Verde is firmly committed to continuously improving communication with the community. The goal is to contribute to local development, improve quality of life, provide training to the local workforce and create employment and personal development opportunities.

The relationship between Mineração Serra Verde and the communities affected by company activities is based on the principles of social responsibility and sustainable development. To successfully reach this goal requires respect for the different cultures and social institutions of each community. The company must also ensure that it is engaged in environmental protection and recovery and in sharing benefits and resources with these communities. This approach is aligned with the Sustainable Development Goals (SDGs) as defined by the United Nations (UN) 2030 Agenda, and with specific guidelines related to compliance with legislation and agreements required for the socio-environmental licensing process.

Mineração Serra Verde is committed to supporting the customs and traditions of the communities where it operates. Company employees must show respect for the culture and for the people of these communities. They must also work in accordance with the best practices when visiting Mineração Serra Verde work sites.



4.

Our relationship with the

ENVIRONMENT AND OUR ESG APPROACH



Mineração Serra Verde adopts a management model based on ESG (Environmental, Social, Governance) principles. They guide company actions, decisions and business strategies which are based on transparency, environmental protection and social responsibility.

Since we operate in a region known for its great biodiversity, the company is dedicated to developing initiatives and programs that ensure the environment is managed in a responsible manner. These actions and programs cover the use of renewable energy sources. They also include preserving and monitoring the local flora and rescuing and rehabilitating the local fauna. Monitoring different types of fauna (winged, aquatic and terrestrial) and endangered species is also an important aspect of this program.



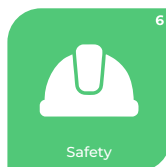
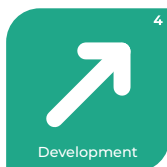
5.

Commitment and

CARE

5.1. Behaviors that are Expected in the work Environment

Mineração Serra Verde workers must exhibit a behavior in keeping with company values (V.E.R.D.E.S), to wit:



These values are based on the concept of safety, well-being, fair treatment, and a respectful attitude towards everyone. Additionally, they aim at prioritizing the continuous improvement of our processes and transparency in communications.

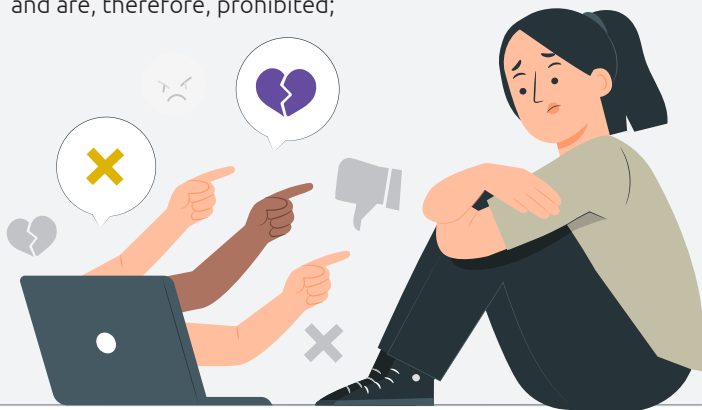
Strategic decisions must also take into consideration the central elements regarding environmental protection and social responsibility, the pillars that sustain Mineração Serra Verde.

5.2. Image and Reputation

How Mineração Serra Verde employees interact on social media also influences the company image. Therefore, it is crucial to remember that:

- Any information about Mineração Serra Verde disclosed by employees and vendors must be in keeping with the company internal guidelines and this Code;

- The disclosure of confidential information, such as texts, images, screen shots of company systems and presentations containing non-public data about Mineração Serra Verde, such as its business, financial performance, results or prospects, is strictly prohibited;
- Discrimination, harassment and abuse on social networks or instant messaging applications, even if not related to the company, are incompatible with the principles and values of Mineração Serra Verde and are, therefore, prohibited;



- Authorization must be secured in advance before publishing any media content related to Mineração Serra Verde. Any action that may cause harm to the image and reputation of Mineração Serra Verde is subject to disciplinary measures. If you become aware of any activity that can harm the company image, use our Reporting Channels to report it;
- The Mineração Serra Verde brand, including its name and logo, must not be used in websites, blogs or social profiles other than official ones;
- Access to Mineração Serra Verde accounts on social networks is only allowed to employees authorized by the Board of Directors;

- Uniforms and other clothing bearing the Mineração Serra Verde brand may only be worn inside company workplaces, and while on the way to and from these locations. They should not be worn during off time or in non-work-related places.

5.3. Road Transport and Safety

Directors, officers, employees and third parties acting for or on behalf of Mineração Serra Verde must comply with safe driving rules and traffic laws, including, but not limited to, speed limits, when operating vehicles inside or outside company premises.

Drivers of Mineração Serra Verde or third-party vehicles are prohibited from transporting anyone who is not a director, officer, employee, or a person previously authorized by the company.

When driving vehicles on the way to the Mineração Serra Verde industrial plant, drivers are advised not to stop on the way, except for activities directly related to work or in case of emergencies. Moreover, using Mineração Serra Verde vehicles for personal purposes is not permitted, unless prior and express authorization is granted by the Board of Directors.



5.4. Intellectual Property

The most valuable assets of Mineração Serra Verde are our intangible assets, such as research work, trademarks, domain names, industrial designs, inventions, patents, products, trade secrets and know-how. The unauthorized or inadequate use of these assets may cause loss of value. Intellectual property is considered confidential information and should not be used or disclosed without ensuring that appropriate legal protections are in place.

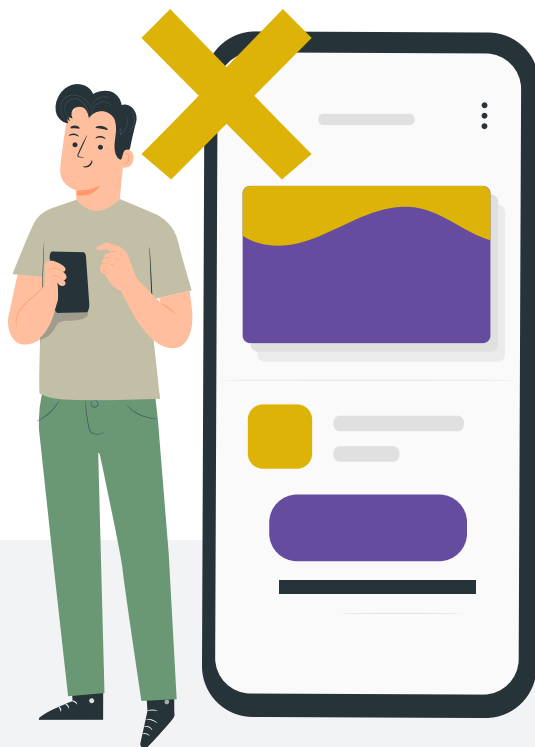
Mineração Serra Verde is the sole and exclusive owner of intellectual property, including data, spreadsheets, reports, technologies, innovations, presentations and engineering works produced by employees and/or service providers, and transfer of ownership to third parties without prior and express authorization of the Board is strictly prohibited.

5.5. Use of Alcohol, Drugs and Carrying Weapons

The use of alcohol, drugs and the possession of any unauthorized weapons are strictly prohibited on Serra Verde's premises. All employees and third parties working at Serra Verde must not be under the influence of any substance that can compromise the safe and efficient performance of their activities.

Carrying and using firearms, except the armed security hired by Mineração Serra Verde, is strictly prohibited, except in circumstances allowed by law, such as the case of police officers that may need to enter company facilities while carrying out their official duties.





5.6. Use of Mobile Phones

The use of mobile phones by drivers of Mineração Serra Verde vehicles while driving is strictly prohibited, whether inside or outside the company premises.

Furthermore, all drivers must be in full compliance with the rules that prohibit the use of mobile phones or any other equipment that diverts their attention while in the operations areas of Mineração Serra Verde. Guidelines that guarantee safety in the work environment must be complied with at all times.



6.

Commitment to

**BUSINESS
ETHICS**

1. Repudiation of Acts of Corruption and Undue Advantage

Corruption is defined as the action of giving, promising, offering, facilitating or authorizing the transfer, directly or indirectly, of any undue benefit to a public agent. This misappropriation of resources undermines the integrity of government decisions, reinforces a lack of trust and causes significant damage to the company. Furthermore, it compromises the principles of corporate governance in internal processes, resulting in financial losses, damage to reputation and other adverse consequences.

Operations of this nature are strictly prohibited both by the fundamental principles of Mineração Serra Verde and by the laws of the territories where we conduct our activities. When dealing with public officials, company employees must fully comply with the provisions of the Anti-Bribery and Anti-Corruption Policy.



6.2. Political Participation

Mineração Serra Verde respects the right of its employees to become involved in civic affairs and/or to participate in the political process. However, such participation must take place outside working hours and at their own expense. It is important that the employee in question clearly expresses that the political manifestations are their own and do not reflect Mineração Serra Verde's opinions or positions. Additionally, company resources, space and image cannot be used to serve the personal political or partisan interests of any employee.

The use of caps, T-shirts or any other material promoting candidates or political parties is prohibited on company premises. In accordance with the law, Serra Verde does not make donations to electoral campaigns, candidates for public offices or political parties.

6.3. Giveaways, Gifts and Hospitality

Giveaways and gifts are considered items of low economic value that are generally distributed as a gesture of courtesy. On the other hand, hospitality refers to expenses connected to transportation, food, accommodation, entertainment, courses and other benefits granted to public or private agents.

Receiving or offering gifts, giveaways or other benefits to third parties must be restricted to a maximum value of R\$ 200.00 (two hundred Brazilian reais), or an equivalent sum in local currency. Any benefit exceeding this amount must be refused and returned. If refusing or returning an item is not possible, such benefit must be referred to the Compliance area.

Invitations to events, trips to workshops and similar offers must be communicated to the direct leadership for evaluation and decision. The Compliance area must always be part of this decision process. Offering giveaways, gifts and hospitality to civil servants is subject to approval by the Compliance area and must comply with local laws and Mineração Serra Verde's anti-corruption guidelines.

6.4. Donations and Sponsorships

One way to support local communities is by establishing strategic partnerships with local governments, non-governmental organizations or individuals. By establishing these partnerships, the company contributes to the development of local communities, by providing financial, intellectual or material resources or services, in the form of donations or sponsorships.

All of these activities must be carried out according to the guidelines established in the Donations and Sponsorship Policy document, to ensure that their purpose is achieved and that Mineração Serra Verde's resources are used to promote the development of the communities in which it operates. According to this policy, any donation or sponsorship proposal must be approved in advance by senior management and the Compliance team.



6.5. Conflicts of Interest

A conflict of interest arises when an employee's personal interests interfere (or have the potential to interfere) with their objectivity and independence in relation to a given matter. Common examples of conflicts of interest include, but are not limited to:

- Seeking business opportunities for personal benefit or to favor third parties such as close family members or friends, using their position or internal information at Mineração Serra Verde as a result of their role in the company;
- Signing an agreement with a vendor whose employees are related to the Mineração Serra Verde contract manager;
- Investing, directly or indirectly, in a company that has been signed on as a vendor to Mineração Serra Verde;
- Maintaining jobs or parallel activities that may affect or influence the work carried out at Mineração Serra Verde;
- Offering or acting in a way that guarantees personal benefit to relatives, friends or romantic partners or to hire them in the same department or as a subordinate;
- A romantic relationship between employees with different direct or indirect hierarchical positions.

Any situation that may represent a conflict of interest, including scenarios not mentioned in the examples above, must be reported to the Compliance area.

6.6. SVPM Resources and Records

Mineração Serra Verde's resources and systems, such as equipment, materials and records, must be used conscientiously and responsibly, exclusively during working hours and strictly for corporate purposes.

Mineração Serra Verde employees are responsible for protecting the company's assets against loss, damage, theft, misuse and waste.

The company will not tolerate proven cases of fraud, theft or intentional damage to Mineração Serra Verde's assets and records, such as falsifying documents (such as performance measurement reports, vendor invoices, purchase or service invoices, erasures in documents used for reimbursement purposes) and inappropriate handling of accounting records and interference with systems (such as time control systems, weighing scales, internal monitoring systems and turnstiles).

Mineração Serra Verde's financial records must be in full compliance with internal guidelines, applicable laws, regulations and with governance and accounting principles, so as to ensure that they completely and accurately reflect all of the company's transactions.

Should you become aware of any case of fraud occurring within Mineração Serra Verde, please contact us through the Reporting Channels (item 8).

6.7. Privacy and Data Protection

Mineração Serra Verde is committed to privacy and protection of personal data as established by the Lei Geral de Proteção de Dados, the Brazilian General Data Protection Law, and internal policies and procedures.

Therefore, everyone must adhere to the principles that guide the appropriate processing of personal data. This includes only collecting personal data that is strictly necessary for the performance of activities, storing the data in a safe place, whether in physical or digital format, and keeping personal data only for as long as necessary.

For more information on compliance with data protection laws, please see Mineração Serra Verde's Privacy and Personal Data Protection

Policy and other regulatory instruments covered in the Personal Data Protection and Privacy Program.

6.8. Confidentiality of Information

The responsibility for the safe storage, use and disclosure of sensitive information falls on everyone, and requires the adoption of everyday behaviors, such as:

- Avoid leaving confidential information in easily accessible places such as tables, printers, common areas or places with easy public access.
- Only official corporate means of communication such as the company network infrastructure, email and telephone, are to be used for storing and sending confidential information.



- Make sure that all employees and/or business partners involved in communications with confidential content have the appropriate authorization and authority to receive or share such information.

Disclosure of non-public information may result in internal disciplinary action and legal action. Company employees must use technological resources and information provided by the company in an ethical, professional, safe and lawful manner. Personal use of Mineração Serra Verde equipment and means of communication (telephones, e-mail, internet, etc.) must be restricted to the minimum necessary. Under no circumstances may company's devices be used to transmit or receive information of an offensive, aggressive, discriminatory, pornographic, political or religious nature.

Mineração Serra Verde reserves the right to track all user access to computer systems or resources, making these records available for analysis by system administrators and any person authorized by them, when requested.

6.9. Fair Trading and Free Trade

Recognizing the importance of free competition and fair and transparent business, Mineração Serra Verde operates with integrity and seeks to create a business environment that is immune to fraud and manipulation, when entering into contracts with both public and private entities.

Mineração Serra Verde employees must treat their business partners, vendors and competitors fairly, according to commercial practices with a focus on quality, price, availability, service, reputation and other direct factors that affect products, services, assets or providers.

It is strictly prohibited for Mineração Serra Verde employees to exploit or take advantage of anyone by employing unfair trading practices, such as illegal manipulation, abuse of privileged information, making false statements of material facts, or other actions that aim to harm the parties involved.



7.

Reports and

INVESTIGATION

Any misconduct must be reported to the Reporting Channel, found on the company website or via the telephone number provided in this Code.

The Mineração Serra Verde Reporting Channel guarantees that any communication remains absolutely confidential since it has been set up in such a way as to safeguard the anonymity of the party. When making a report, and in order to facilitate investigations, it is requested that all relevant information be provided. All reports are evaluated and will undergo a credibility analysis before any action is taken.

Mineração Serra Verde guarantees that those involved in internal investigations and parties who, in good faith, contribute information related to any behavior or situation that violates the Code or current laws, will not suffer any type of retaliation, sanction, persecution or embarrassment. The identity of such party, if provided, will be protected, and no act that directly or indirectly causes any harm to such party will be tolerated, should there be suspicion or confirmation of reports relating to violations of the standards established in laws or guidelines of this Code.



8.

Serra Verde

REPORTING CHANNEL



Site:

www.helloethics.com/mineracaoserraverde



Telephone:

0800 892 2293



E-mail:

mineracaoserraverde@helloethics.com



WhatsApp:

+1 (415) 200-2619

When starting the report through the WhatsApp Chatbot, enter the code “serraverde”.

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9.

CONSEQUENCE

management

In situations of misconduct, whether on the part of a Mineração Serra Verde employee or a vendor, the appropriate disciplinary measures will be applied after the investigation process is completed. These measures will take into consideration the type of relationship that exists between the parties involved and can include:

For SVPM staff:

- A warning;
- Training;
- Suspension;
- Termination;
- Notification to the competent authorities;
- Other legal measures.

For vendors:

- Suspension of activities and/or contract termination;
- Withholding payment until completion of investigation;
- Contract termination;
- Other legal measures.



10.

Record of

REVISIONS

This Code of Ethics and Conduct will be revised whenever an express need arises or, at least, every three years.

Rev.	Description	Issued by	Reviewer	Approved by	Date
00	Drafting	LFB	LFB	LFB	14/Feb/2018
01	Revision	LFB	LRP	CEC	14/Feb/2022
02	Revision				Oct. 2023

Acceptance Instrument

I, _____, hereby, state and declare, for all legal purposes, that I have received a full copy of the Code of Ethics and Conduct ("Code") issued by Mineração Serra Verde, and have taken note of the provisions of the document and of the existence of the Anti-Bribery and Anti-Corruption Policy, the Norms for Donations and Sponsorships, Norms for Giveaways and Gifts, Privacy and Personal Data Protection Policy and ESG Policy.

I also state and declare that I have been informed of the obligation to comply with the Code in all situations and circumstances that are, directly or indirectly, linked to the activities provided by Mineração Serra Verde, and that it is my responsibility to communicate, ensure understanding and compliance with the values contained herein by my employees, partners, shareholders, advisors, contractors and subcontractors. Furthermore, I state and declare that I am aware of the commitment to maintaining the confidentiality of Mineração Serra Verde's information, and that I will be subject to the applicable disciplinary measures in case of non-compliance.

If I become aware of any violations of the Mineração Serra Verde Code, policies or legislation, whether completed or intended, I undertake to report this information.

PLACE AND DATE

FULL NAME



mineração
SERRA
VERDE