



SUPPLIER CODE OF ETHICS AND CONDUCT

3A Supplier Code of Ethics and Conduct:

Dear supplier,

We present the 3A Mining S.A. Supplier Code of Ethics and Conduct.

It aims to guide you on the main guidelines on which the relationship between 3A and its Suppliers is based, in faithful compliance with applicable legislation.

Accepting this code means committing to act in accordance with the standards established by 3A.

Yours sincerely,

Compliance Department

Index

1. Integrity	04
2. Corruption	04
3. Working conditions and human rights	05
4. Offering gifts, promotional gifts and trips to employees	06
5. Environment	06
6. Secrecy and confidentiality	07
7. Internal disclosure	07
8. Code compliance	07
9. Declaration of adherence to the “Code of Ethics and Conduct”	08

1. Integrity

Our suppliers must act with integrity and permanent effort to uphold the highest ethical and moral standards, with strict compliance with applicable legislation, including those aimed at combating corruption, fraud, money laundering and cartels, always respecting human rights and the environment.

It is the responsibility of Suppliers of goods or services to take the appropriate measures, when they become aware of irregularities committed by third parties, in order to protect the good name and interests of 3A.

2. Corruption

3A repudiates any act related to corruption or fraudulent practices in its business environment. We strive for meritocracy and free competition and expect the same attitude from our Suppliers.

It is prohibited for Suppliers of goods or services, or any of their partners, directors, employees, agents or collaborators, to offer, give or undertake to give to anyone, or accept or undertake to accept from anyone, whether on your own or through others, any payment, donation, compensation, financial or non-financial advantages or benefits of any kind that constitute an illegal or corrupt practice, whether directly or indirectly.

3. Working conditions and human rights

3A's policy is to respect the quality of life, health and safety of its employees, which is why it demands from its Suppliers, when providing services on its premises:



Provide its employees with full health and safety conditions in the workplace, meeting the requirements of labor and social security legislation, labor agreements and collective conventions, with their rules and parameters established according to the region in which they operate;



Pay your employees fairly, with dignity and based on objective evaluation criteria, providing all legally determined benefits;



Prohibit, at any time, the use of child, slave, forced or compulsory labor, or engaging in or supporting human trafficking;



Prohibit any type of misconduct on the part of the Supplier or authorized partner, which may subject the worker to corporal punishment, abuse, sexual, moral, racial, political, religious or harassment of any nature;



Suppress any practice or act of prejudice or discrimination against people, whether based on race, color, gender, ethnicity, social class, age, physical characteristics, nationality, religion, disability, marital status, sexual orientation, union membership, party affiliation or political conviction;



Prohibit the use of any type of narcotics within 3A premises.

4. Offering gifts, promotional gifts and trips to employees

Cash bonuses, entertainment and any type of gift must not be offered to 3A partners, employees and collaborators. Exceptions are courtesies commonly accepted in commercial practices, such as promotional gifts and institutional invitations without significant value.

5. Environment

The conservation of our planet's biodiversity, aiming to protect fauna and flora through the elimination or reduction of ecological imbalances, is part of 3A's concerns and commitment to the environment.

Suppliers must contribute to ecologically sustainable development, continually seeking measures to reduce the environmental impact of their inputs, manufacturing processes, products and services, encouraging research and application of new environmentally effective technologies, always acting in accordance with current local regulations and international standards applicable to environmental protection.

6. Secrecy and Confidentiality

Any and all information obtained by Suppliers of goods or services, as well as their related and controlled companies, as a result of the relationship with 3A, must be treated with absolute secrecy, confidentiality and protection of intellectual property rights.

7. Internal disclosure

It is the responsibility of 3A's Suppliers of Goods or services, as well as their related and contracted companies, to disclose the existence of this Code in its entirety, guiding their partners, shareholders, employees, collaborators in general and/or commercial partners to faithfully comply with the moral and ethical principles established here.

8. Code Compliance

All 3A Suppliers of goods or services, as well as their related and controlled companies, must comply with the “3A Supplier Code of Ethics and Conduct”.

Any failure to comply with the obligations and guarantees provided for in this Code, in any of its aspects, or the practice of any of the acts described in article 5 of Law No. 12.846/2013 (Anti-Corruption Law) and Decree No. 8420/2015, will give rise to the immediate termination of the contract with the Supplier, regardless of any notification, without prejudice to the application of applicable penalties.

09

Declaration of adherence to the "3A Supplier Code of Ethics and Conduct"

I, _____ (name),
CPF No. _____, _____ (function or
position), as legal representative in accordance with the Articles of
Association/Bylaws _____ of
_____ (company
name), CNPJ No. _____, Municipal Registration No.
_____ located
at _____

_____ (Street, District, City, State, CEP), I DECLARE that I have become aware
of and understood the provisions contained in the 3A Supplier Code of Ethics
and Conduct, prepared on April 14, 2022, a copy of which was given to me
herein, and that I undertake to respect, in the performance of my activities,
all its terms, conditions and ethical principles.

I further DECLARE that in case of doubt or knowledge of any violation of the
terms of this Code and Law 12.846/13, I will immediately inform 3A
Compliance, directly or through the available channels.

(Place and Date)

Signature