



CODE OF ETHICS AND CONDUCT

Message from the Board:

We believe that it is from individual attitudes, guided by the Law and ethical principles, that a company of excellence is formed, within the scope of its management and operation.

It is each person's behavior that provides a safe and environmentally responsible operation, capable of guaranteeing the integrity of life and assets.

People, therefore, are at the center of our decisions and we present to them the 3A Code of Conduct, which supports our Compliance Program.

The Code of Conduct presents our purposes, principles and values, which aim to ensure ethics within the company, helping us in our daily judgments. It is aimed not only at our employees, but also at everyone who takes part in our activities, in any capacity.

We ask you to carefully read our Code of Conduct, delve deeper into its content, and put its principles into practice in your decisions.

You have an important role in building a responsible and ethical company!

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1. Purpose, Values and Principles

Our company aims to improve people's lives through mining, an activity that is essential for the economic and social development of the country.

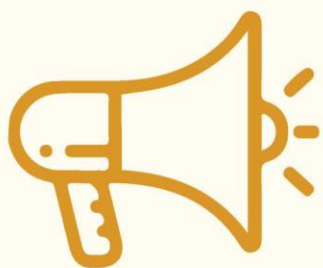
3A's values and principles are based on ethics. They are:



Responsibility for people's lives and the environment, safety, respect for diversity, sustainability, efficiency, honesty and transparency.



We respect and promote Human Rights; We value diversity and promote an inclusive environment, always encouraging open and transparent dialogue between people.



We encourage everyone involved in our activities to report situations of disrespect for such values and principles, providing a Reporting Channel.

2. Business reputation

Business reputation is the image that the company conveys. When the company's reputation, built over the years, is positive, it helps in structuring the business, solidifying it and highlighting it in its operation market.

We understand that building a good reputation for 3A depends on daily effort, through transparent, honest, responsible actions, always within the law, respecting the company's values and the well-being of society.

3. Occupational safety and health protection.

3A's policy is respect for quality of life, health and safety of its employees, which is why it requires its suppliers and business partners to provide their employees with full health and safety conditions in the work environment, meeting the requirements of applicable legislation, as well as internal standards and procedures.

To promote a healthy and safe work environment, 3A carries out continuous monitoring to identify, treat and eliminate and/or reduce the exposure of our employees to safety risks.

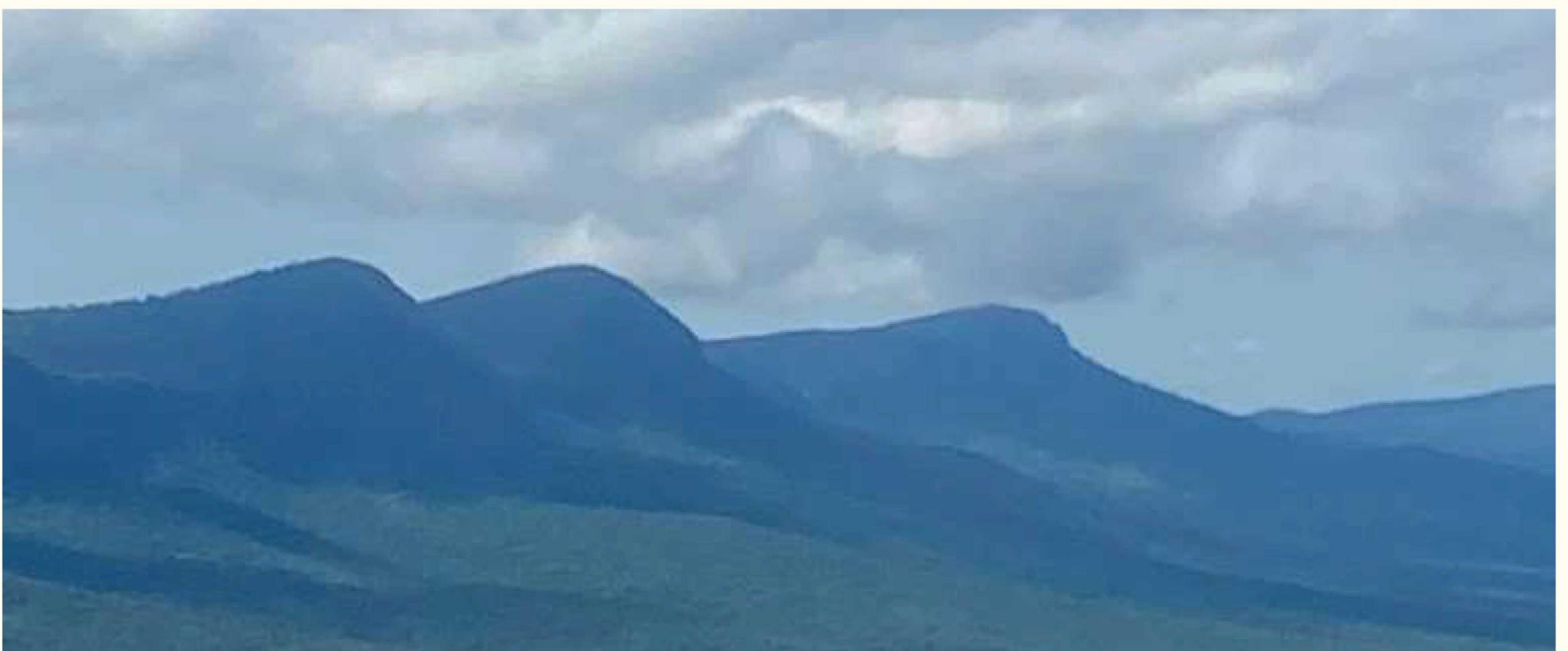
4 Sustainability and environment

We respect the environment by managing the risks and impacts of our operations.

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.

We hope that all our employees and business partners 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 compliance with current local and international standards applicable to environmental protection.

Likewise, we respect the communities that are located in territory close to our operations.



5. Conflict of interest

Conflicts of interest occur when someone acts for their own benefit or to benefit -those close to them. They can occur, among:



Family relationships between the supplier and its employees with company collaborators;



In decision-making that may result in personal interest, to the detriment of the company's interest.

Conflicts of interest are not permitted and must be reported immediately to senior management.

6. Intolerance to corruption or any undue advantage

3A does not tolerate corruption and bribery. It is prohibited to take advantage of your position to offer, give or undertake to give to anyone, or demand, accept or undertake to accept from anyone, whether on your own or through someone else, any payment, gift, donation, compensation, financial or non-financial advantages or benefits of any kind that constitute an illegal or corrupt practice.

7. Relationship with government and political parties

The duties of management and employees are:



Respect applicable legislation and the ethical principles of this code in relationships established with public bodies in general;



Establish relationships with authorities, politicians and public agents based on ethics, professionalism and transparency, immediately reporting to 3A any form of pressure, offer or request from a public agent contrary to these principles;



Do not offer gifts, promotional gifts or any type of financial advantage in violation of Brazilian legislation, to any public agent, politician or people related to them.

It is expressly prohibited for company employees in contracts and tenders with the Public Authorities:



Previous agreements or combinations with competitors, which aim to defraud the competitive nature of the bidding procedure established by Law 8.666/93 and other applicable rules;



Frauding the execution of any bid or resulting contract, including practices that aim to illegally remove competitors, including by offering any type of advantage;



Hinder investigation or inspection activities of public bodies, entities or agents, or intervene in their activities.

8. Fair competition

We value free competition in doing business, as a way of enabling the efficient functioning of the market. It is free competition that enhances competitiveness and increases the encouragement of companies in search of the best possible economic performance.

We ensure fair competition, acting with integrity and promoting a fraud-free business environment.

It is expressly prohibited to provide confidential information, in any form, to any third parties, including, but not limited to, competitors; in the same way that obtaining and using confidential information from competitors is prohibited.

9. Use of company assets and information

3A's assets (assets, properties, equipment, software, hardware, etc.) must be used exclusively for professional purposes and in the company's interests.

It is prohibited to generate or transmit information that incites racial prejudice, violence or other criminal acts or sexually offensive content.

It is not permitted to make video or audio recordings, which are related in any way to the company, without the consent of the superior.

It is necessary to ensure information security and conscious use of the data at your disposal; maintain confidentiality with regard to internal business matters that have not become public knowledge. This obligation will continue to apply even after the employment relationship ends.

10. Business reputation

Donations, contributions and sponsorships may never be used to influence decisions and/or obtain undue advantages. They must have an institutional character and cannot have any type of conflict of interest.

A donation will only be permitted if it is transparent, complying with applicable legislation.

Donations are prohibited:

- for profit-making institutions;
- for political parties, candidates for public office or political campaigns;
- for sects or ethnic groups;
- for football teams and samba schools; and
- in cash. Transactions must be made via bank (transparent accounts and beneficiary names).

Any contribution in the form of sponsorship must be transparent, based on a written contract, have a legal business purpose and be appropriate to the compensation offered.

It is not permitted to promise, offer or provide contributions with the purpose of guaranteeing unjustified competitive benefits and contributions cannot be made to events organized by people or organizations with that objective.

11. Relationship with suppliers

Our actions in relationships with suppliers, including their selection, must be guided by good faith, honesty, ethics and transparency, always complying with this Code of Conduct.

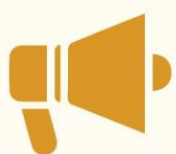
It is necessary to act with integrity and permanent effort to uphold the highest ethical and moral standards, with strict compliance with applicable legislation, in order to prevent any acts of corruption by suppliers.

12. Relationship with commercial partners

In addition to requirements relating to suppliers, our employees must:



Evaluate the qualifications and reputation of these third parties before hiring (through due diligence);



Disclose our company's principles to partners so that they align with them;



Do not, under any circumstances, use partners that contradict the requirements of this Code of Ethics and Conduct.

13. Money laundering

3A conducts business with the highest level of customers, suppliers, consultants and business partners.

We do not promote or engage in any activity that could constitute or give rise to money laundering.

14. Relationship with commercial partners

We aim to achieve results that are always aligned with our values, guided by social responsibility and sustainability.

We recognize the existence of risk in our activity, so we maintain a structure to prevent, treat and mitigate such risks.

Our operation observes applicable national and international laws. We do not practice informal, covert or hidden activities.

15. Additional requirements for those occupying Leadership positions

Anyone who holds a leadership role within 3A must:



Clearly communicate the importance of ethics and integrity and encourage your employees to use the Code of Ethics and Conduct as a reference in their daily lives, as well as communicate that violations of the code are unacceptable and will result in disciplinary measures, in addition to legal consequences; and



Monitor compliance with company guidelines, compliance with laws and the requirements of this Code.

16. Compliance with general data protection law

The collection, use, retention, transfer and disclosure of personal data processed by 3A must comply with the provisions of Law No. 13,709/2018, and other applicable laws.

Data protection is based on the rights to freedom and privacy, the free development of personality, freedom of expression, the unviability of honor and image, dignity and the exercise of citizenship.

Personal data will be processed in good faith, as well as the principles of purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, and accountability.

17. Compliance system

Our Compliance system is established with the purpose of contributing to meeting the guidelines of this Code of Ethics and Conduct. Therefore, it is the duty of all employees to support and engage in the activities, processes and controls of this system, in order to keep it constantly effective, in faithful compliance with all applicable laws and zero tolerance with any act of corruption or bribery.

In particular, the prohibition of granting or offering bribes, bribery, facilitation payments and any other benefit that constitutes an undue advantage, whether directly or through third parties, is emphasized. Any type of fraud, dissemination of false information, formation of cartels and unfair competition is also prohibited.

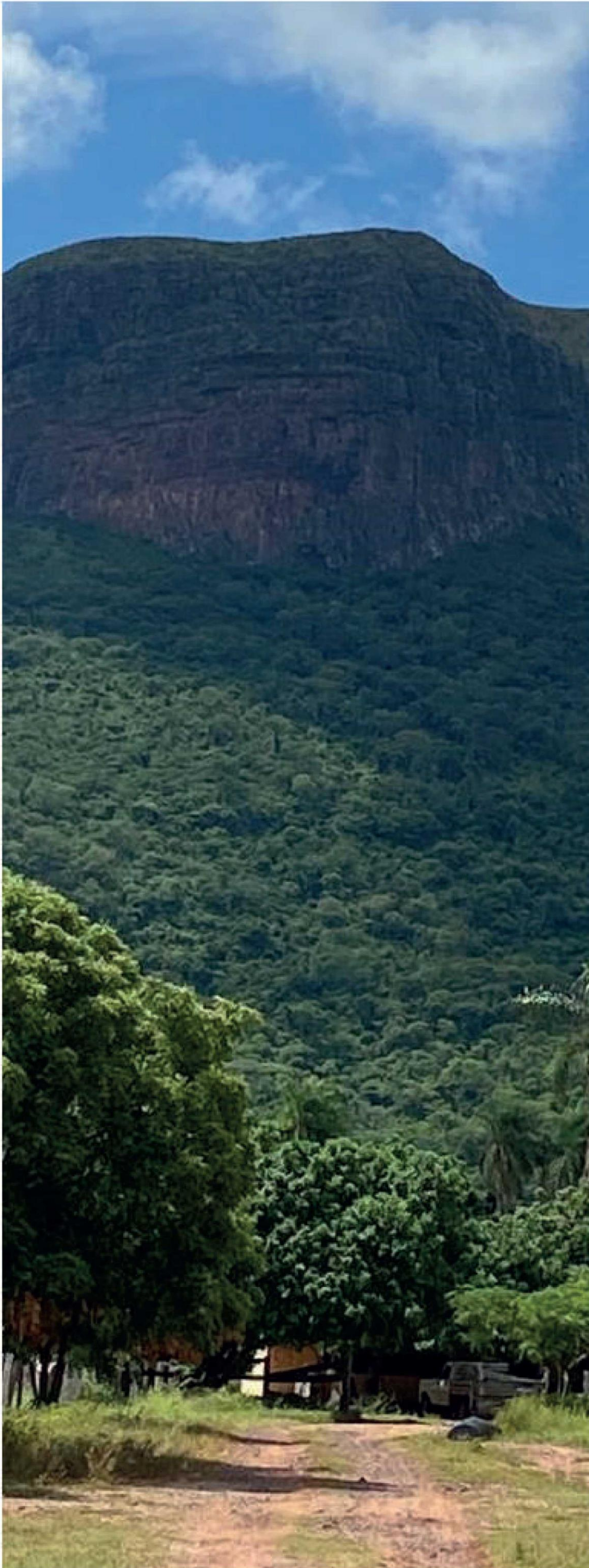
All Compliance cases are treated confidentially and without retaliation.

18. Violations of the code of ethics of 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 8420/2015 will be subject to disciplinary measures and/or consequences based on applicable legislation.

It is up to each employee to formally notify their immediate superior or through the Ethics Channel, whenever they become aware of a possible violation of the terms of this Code.

19. Commitment Term



All Directors, management members and employees are responsible for knowing, accepting, respecting and disclosing the information in this Code of Ethics and Conduct, in addition to ensuring strict compliance with its provisions. They must also remain vigilant in preventing and detecting violations of this Code, reporting any violation to the company.

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

I, _____, CPF No. _____, as an employee of 3A Mining S.A., DECLARE that I have become aware of and understood the provisions contained in the 3A Code of Ethics and Conduct, prepared on March 30, 2022, where the provisions of the Law No. 12.846/2013 (Anti-Corruption Law) and Decree No. 8420/2015 were incorporated, regarding the relationship with the Public Power, a copy of which was given to me in this act, and which I undertake to respect, in the performance of my activities, in 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