



CODE OF CONDUCT

RENOVA FOUNDATION





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Fauna and flora on the banks of the Doce River.



The purpose of this Code of Conduct is to establish clear guidelines on the expected behavior of all employees during the conduct of reparation-related activities.

For the purposes of interpreting this document, the term “employees” will be used to refer to advisors, directors, managers and all employees of the Renova Foundation. The guidelines presented here are applicable to all members of this group.

The Code of Conduct must be applied in all your activities.

The Renova Foundation trusts its employees and assumes that there is integrity and good faith in all acts carried out by them.

Therefore, you must know this Code of Conduct and use it as a guide for conducting your activities. If you encounter any situation that is not expressly covered by this document and you are in doubt about how to act, use the **Compass of Integrity** for guidance or consult the Compliance department.

If you are part of the leadership, it is your duty to consistently demonstrate exemplary behavior. Discuss the Code of Conduct guidelines with your team and be available for employees to share concerns and suggestions with you.

Value and recognize initiatives of integrity and of diversity and respect.



Compliance to the Code of Conduct

By working for or with the Renova Foundation, you agree to follow the terms contained in the Code of Conduct. You commit to knowing, complying with and employing all standards, policies and procedures applicable to your activities. You must promote the value of integrity among our suppliers, respect the human rights of those affected and report any potential or actual violation of the Code of Conduct.

COMPASS OF INTEGRITY



Act with integrity and ethics. Do not carry out this action or rethink the way of carrying it out.

- 1) Is it aligned with the guidelines of the Code of Conduct of the Renova Foundation?
- 2) Was the procedure related to this action duly followed?
- 3) Was the process duly documented and archived?
- 4) Was there transparency in the communication of risk to the interested parties?
- 5) Am I certain that the existing controls actively contribute to risk mitigation?
- 6) If it came out on a newspaper, would it negatively affect the image of the Renova Foundation?
- 7) It seems that you can move forward.

MESSAGE FROM THE BOARD OF GOVERNORS AND THE PRESIDENCY

We are responsible for conducting reparation activities based on our values:

**Integrity, Diversity and Respect,
Collective Construction and
Commitment to Delivery.**

Our duty goes far beyond complying with rules. We must all take active action to ensure compliance with the rules and procedures applicable to our activities and also ensure that all our decisions are made based on the highest ethical standards.

Therefore, we take the lead in our deliveries. We identify the risks inherent to our activities, we proactively implement controls to reduce them and involve support departments so that they contribute to the conformity of the actions.

We recognize that the responsibility for promoting our values is not restricted to any specific department of the Renova Foundation, it is shared by all of us.

Therefore, we must know and follow the guidelines of our Code of Conduct. It is an important guide for applying our values in practice. Read it carefully and, whenever necessary, come back to clarify any doubts.

Convey the messages in this document to the audiences with whom we interact, highlighting the importance of an honest attitude.

Let's keep moving together, always improving!

Camilo de Lelis Farace

Gustavo Selayjim



Integrity

Act ethically, transparently and in compliance, knowing and complying with established rules, laws, processes and procedures and adopting respectful conduct with all interlocutors.

Expected attitudes:

- act in accordance with what you says, aligning speech and practice;
- guarantee reliability in your actions and their traceability;
- inform yourself and keep yourself updated on how to proceed;
- incorporate the processes necessary for compliance into your work routine;
- provide information and notifications whenever it is felt necessary to alert colleagues and/or the institution about risk situations.

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 room for individuality.

Expected attitudes:

- respect differences and the expression of each person 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 respecting, you promote the inclusion of diversity;
- take care of your own physical and emotional health, safety and quality of life, as well as that of your coworkers;
- Show yourself as you truly are, respecting and honoring yourself and others.

Collective Construction

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

Expected attitudes:

- inform people and/or departments involved about the progress of processes;
- know governance and involve the necessary actors in time appropriately and strategically;
- apply institutional solutions, sharing resources and involving necessary departments;
- build solutions with different perspectives, increasing the possibility of viability in the governance system and success in implementation;
- position yourself and defend the solutions technically constructed by the Foundation.

Commitment to Delivery

Take responsibility for the commitments made, meeting the conditions of predictability, quality, cost and deadline, with the aim of delivering the reparation efficiently and definitively.

Expected attitudes:

- have an “owner attitude” and a sense of urgency, working to meet goals and make effective deliveries;
- anticipate planning and resolutions and make use of instruments and good practices of management, taking into account the complexity of the processes to be fulfilled;
- you are rigorous and responsible in the application of resources;
- meet deadlines and agreements signed with internal and external stakeholders;
- take the lead in the search for results,

VALUES THAT GUIDE REPARATION



acting to solve problems and

make things happen.

REPARATION MUST BE CARRIED OUT WITH INTEGRITY



The Integrity Program actively works to prevent, detect and correct acts of fraud, corruption, misconduct and/or actions that are contrary to our Code of Conduct and applicable legislation. It encourages not only compliance with established norms and laws, but also raising awareness among all employees about the importance of maintaining the highest ethical standards in our relationships and activities related to reparation .

To learn more about the Integrity Program's actions, visit www.fundacaorenova.org/integridade/.

Fight against corruption.

We are committed to acting in strict compliance with national and international anti-corruption legislation, including the Foreign Corrupt Practices Act, Anti-money laundering legislation and the fight against terrorism. All employees are prohibited from offering, promising, authorizing, granting, accepting or receiving any undue advantage with the aim of influencing (or appearing to influence) a public or private official or obtaining any unfair advantage, whether for themselves, for Renova or for the maintainers.

Undue advantages do not always materialize in the form of money.

They can occur through offering gifts, hospitality,

job offers, letters of recommendation, medical services, donations, referrals, contributions to political parties, payment of agents and in many other ways. For this reason, the offering, granting, acquisition or receipt of gifts, presents, hospitality and other valuable items must follow the guidelines of the Renova Foundation's Anti-Corruption Policy, respect current legislation and internal approval authority. They must be carried out in a transparent manner, have a legitimate institutional objective, and must not involve extravagant amounts or the transfer of money. The frequency and act must not give the appearance of bad faith, corruption or fraud and, when made public, must not create the appearance of improper conduct.

The use of personal funds to provide anything of value to third parties is prohibited, so that, if it were paid directly by the Foundation, it would be subject to internal verification and approval procedures.

No employee should request donations, hospitality items or favors of any value from people or companies, nor act in a way that places any third party in a position in which they feel obligated to make a donation, provide hospitality items or provide personal favors in exchange for business with Renova.

Access the [POL-CAU-001 - Anti-Corruption Policy](#) to find out more.

Clearly and deliberately refuse any request or offer of undue advantage and end discussions as quickly as possible. Then report the situation immediately to your leadership and Compliance, document the incident in writing and be prepared to cooperate with investigations by the Compliance department and competent authorities.

The health and safety of employees is a priority. If you are in a situation where an undue advantage is accepted or granted as a result of an imminent direct or associated threat to health or safety, preserve your physical and mental integrity and report the incident to your leadership and the Compliance department immediately.



Regência, in Espírito Santo.

REPARATION MUST BE CARRIED OUT WITH INTEGRITY



Financial transactions must be transparent and recorded accurately and in detail in accounting books and records.

Any and all requests for reimbursement of expenses must be accompanied by a valid invoice and legitimate supporting documents, following the applicable internal rules. Any attempts to obfuscate or conceal the true nature of any expense are expressly prohibited.

The Renova Foundation does not contribute funds to any political party, elected official, or candidate for public office in any country. Therefore, personal political activities cannot be conducted during working hours. The institution's workplaces or equipment must not be used for these purposes, and no political donations should be requested from third parties in our locations.

We are responsible for preventing the improper sharing and leaking of restricted and confidential information, even after the end of the contractual relationship with Renova. Protect information according to applicable confidentiality and criticality, ensure that work meetings are held in secure and private locations, access only information related to your activities, as long as authorized, and dispose of documents in a suitable manner.

Preserve personal data in the exclusive sphere of those involved in the process, use only for the purposes for which they were collected and protect in accordance with the applicable confidentiality and criticality. Respect the General Personal Data Protection Law (LGPD) – Law No. 13,709/2018 and other applicable regulatory standards.

Data and information must be accurate, detailed and in accessible language.

Falsification, concealment, alteration, destruction, leaking or any other type of manipulation of information is not tolerated, nor is the creation of information that is misleading.

During internal and external audits, as well as in any investigation by the Confidential Channel or the Ombudsman, provide all requested information and any other information you consider relevant to clarify the facts.

Interactions related to our activities must be carried out from corporate devices provided by the Renova Foundation, which, in turn, should be used predominantly for professional purposes. Any use for personal purposes must be moderate, must not interfere with the execution of your activities and must be in accordance with the guidelines of this Code.

It is the responsibility of each employee to maintain the confidentiality, integrity and security of all information accessed or created during the exercise of professional activities.

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



Regência, in Espírito Santo.

PREVENTION OF CONFLICT OF INTEREST



A **conflict of interest** arises when the position of an employee — their considerations, financial or personal interests — may affect or has the potential to affect their criteria, objectivity or independence in decision-making during the conduct of their activities at the Renova Foundation . All employees have the duty to conduct their activities with impartiality and professionalism. If any relationship is identified that could give rise to a conflict of interest, report it immediately to your leadership and to Compliance, by completing the Declaration of Relationships.



School in Paracatu, Minas Gerais.

Learn about some possible conflicts of interest

- Use information to which you have access as a result of the activities you carry out for the Renova Foundation to obtain or grant undue advantages to third parties.
- Hire, promote, or directly supervise a family member unless specifically authorized to do so.
- Offer, request or accept gifts, presents, hospitality and/or other things of value from an organization or a person involved in the process of contracting or amending a contract with the Foundation, unless this has been previously approved.
- Using resources from the Renova Foundation or your position at the institution to influence external activities or third parties, with personal interests in mind.
- Holding positions or investments in organizations that do business with the Foundation (partners, suppliers, or your own or family company) if you are in a position to influence transactions or if the relationship itself creates an actual, potential, or apparent conflict of interest.
- 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.
- Running for political office or holding political office, as well as participating in third-party political campaigns while having an active contract with the Renova Foundation .

Remember: for the above hypotheses, consult the applicable current regulations and the rules set out in this Code.



Relationship with public officials. The Renova Foundation respects all those who hold public office, in all spheres (legislative, executive and judiciary), and believes in the ethics and integrity of their activities.

Some individuals, whether in the public or private sector, may be willing to act in violation of laws and regulations. For this reason, the Renova Foundation has implemented controls that aim to prevent deviations not only in private relationships, but also in public-private ones.

Employees must act honestly, transparently and truthfully in all their interactions with public officials. For that, they must know the guidelines.

Contact the Institutional Board if you have any questions about the processes of interaction with public officials. Remember to follow the guidelines set out in the items Fight against corruption and Undue Advantages of this Code and in **POL-CPL-003 Policy on Interaction with public officials**.

The relationship with suppliers must be based on mutual respect, honesty and transparency.

The hiring of suppliers must be fair, equal, transparent and value the improvement of integrity practices by third parties.

If you are a contract manager or inspector, take steps to ensure that the supplier is aware of the contents of the Code of Conduct for Third Parties, as well as the contacts for the Confidential Channel and Ombudsman. Explain to the contractor that Renova has an Integrity Program and that it is available to support third parties.

Ensure that the supplier is aware of all standards and procedures applicable to the activities they will perform.

If the supplier is a business partner, ensure that this information is correctly flagged in internal systems and that the additional integrity controls applicable to this category are being followed.

“Business partner” corresponds to any third party who, in the context of their activities for the Foundation, has authority, power or ability to make decisions, negotiate, represent or assume commitments with public officials on behalf of or for the benefit of Renova, including arbitration demands involving public or private agents.





The Human Rights Respect Program presents guidelines, internal regulations and pillars of action with the purpose of promoting respect for human rights throughout the reparation process.

Respect for the rights of all people with whom we interact. Respect the rights of all direct and third-party employees, supplier companies, affected communities, partner organizations, government and civil society.

Respect for the people and communities affected. Identify and consider the concerns and expectations of all stakeholders and those impacted by our operations and take their demands into account when making decisions.

Encourage and disseminate the culture of human rights, recognize and respect places, traditions, customs, structures and objects that have historical, traditional or cultural value.

Respect the rights, culture, identity, traditions and customs of indigenous peoples and traditional communities.

Discrimination, prejudice and disrespectful treatment are unacceptable, whether in relation to gender, sexual orientation, race, ethnicity, origin, age, religion, disability, pregnancy, conditions of health or other factors.

Derogatory jokes or comments about anyone are strictly prohibited. The Foundation's resources (email, telephone, computers and laptops) must not be used to distribute or access offensive materials, including inappropriate images, drawings and sexual content.

Disrespectful treatment, harassment (moral or sexual) and discrimination in the workplace. Any humiliating, intimidating or offensive action, conduct or behavior during work relationships is strictly prohibited, and the use of the hierarchical superior status or institutional influence to constrain any person with the intention of obtaining an advantage is prohibited. or favoritism.

Report to the Confidential Channel any indications, complaints and reports regarding possible disrespect for human rights, in an ethical, agile and transparent manner, so that they can be investigated through the institution's channels.

Health and Safety. The Renova Foundation is committed to creating a safe and healthy work environment.

Therefore, it is everyone's duty to know the procedures necessary to carry out their activities safely for themselves and for everyone around them.

Before starting any activity, assess the risks involved. If unsafe conditions are identified that expose you or third parties to risks, activities must be stopped immediately. These conditions and any notice or information relating to accidents, incidents, injuries or illnesses must be immediately communicated to your management and the Health and Safety department.

It is your responsibility to know and pass on to third parties the procedures and standards relating to the prevention of accidents and occupational diseases, as well as the actions of emergencies applicable to each activity they are going to perform.





Quality of Life at Work. Here at Renova, mental health and quality of life are serious matters. In this sense, the Quality of Life Program at Work (PQVT) is more than a set of well-being actions. It is a way of thinking, acting and planning, so that we remain cohesive, healthy and whole in the work of reparation. We believe that well-being and mental health come from the individual/work relationship. Therefore, everyone - employees, leaders and the institution - are jointly responsible for thinking about and implementing solutions that promote quality of life at work. Learn about the Program's actions on the Intranet.

We only carry out our activities if we are technically, physically and emotionally fit to do so. Therefore, it is essential that all employees are trained to carry out the activities for which they are responsible. This includes reading and understanding applicable standards and completing the necessary training within the stipulated timeframe.

The use of alcohol and any other drugs not prescribed by a health professional during working hours is prohibited, as is the performance of tasks under effect of these drugs.

Never carry, use, sell, consume, offer or pass on drugs, alcohol or illegal substances on the Foundation's premises or while working, including on the way to and from work.

In the case of drugs prescribed by a doctor, discuss with occupational medicine the compatibility between the execution of your duties and the use of the prescribed drug.

We actively work to restore the environment and support affected communities with innovative and sustainable solutions.

Each employee must be aware of the environmental risks of the tasks they perform, ensure that they are considered in decision-making processes and adopt the necessary controls to minimize them. If you identify

an unmapped environmental risk, stop the activity immediately and communicate it to your leadership.

Suggestions for sustainable solutions are welcome. If you identify opportunities for improvement, talk to your leadership.

Respect for human rights applies to all departments and programs from the Renova Foundation and our entire supply chain. Request verifications or investigations, as appropriate, to identify, prevent and remedy the adverse human rights impact of our activities, projects and programs.

Incorporate the Voluntary Principles on Safety and Human Rights and work with suppliers to ensure that our activities are conducted in accordance with these principles.

Incorporate zero tolerance policies for human rights violations in relation to suppliers of goods and services, including combating child labor, forced labor or labor similar to slavery or degrading or inhumane working conditions.





Only the Communications Management is authorized to maintain relationships with the media and carry out public disclosures on behalf of the Renova Foundation .

If you are not a spokesperson authorized by the Communications Management, do not make external statements on behalf of Renova.

If you are contacted by any media outlet or journalist, ask that the request be forwarded to the email **press@fundacaorenova.org**.

When using social media, employees must speak on their own behalf and never on behalf of the Renova Foundation . We must be aware that our posts and comments on private social networks may be interpreted as a reflection of Renova's opinions or may affect its reputation. For this reason, we must be careful and ethical when using our social networks and act in a legal and prudent manner. We must not carry out political-partisan demonstrations on social media using resources from the Renova Foundation or any means that links, even indirectly, the image of the Renova Foundation to the demonstration.

We must obtain prior approval to carry out external communication that may expose the image of the Renova Foundation . Obtain authorization from the manager or director of the information and legal department to promote lectures, conferences, presentations and any other form of communication with the external public through which concepts, plans, results, strategies, internal processes, name and image of the Renova Foundation are exposed.

Sharing official publications from the Renova Foundation on social media is authorized, as long as it is done with caution.

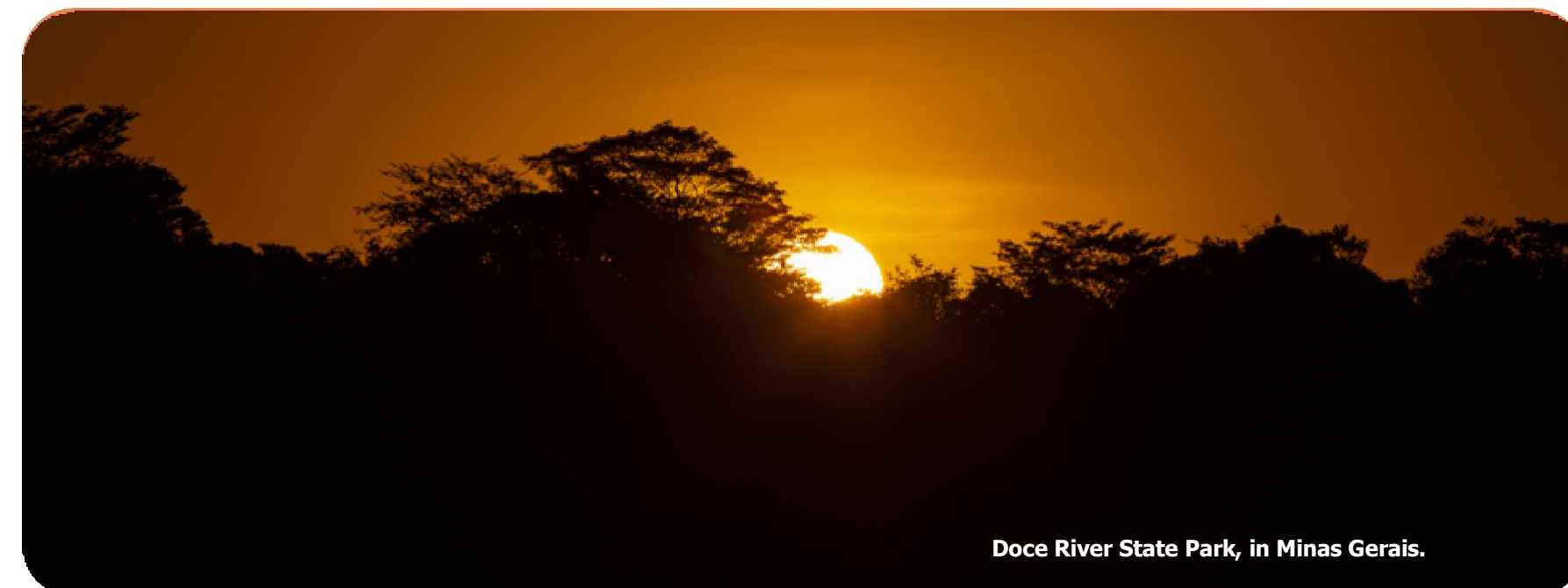




If you identify a potential or actual violation of our Code of Conduct, you have the responsibility to report the situation to your leadership and to the responsible departments.

The Confidential Channel is the official means of reporting conduct of advisors, directors, managers, own employees, third-party employees, suppliers and subcontractors, who may violate our Code of Conduct, laws in force or institutional obligations. If you are involved in the investigation of a Confidential Channel report, cooperate with the investigations, provide accurate information, act with honesty, transparency, seriousness, confidentiality and professionalism.

The investigation of reports is conducted in an ethical and impartial manner and the confidentiality and secrecy of the information obtained is ensured.



Doce River State Park, in Minas Gerais.

The General Ombudsman's Office is the official means of the Renova Foundation for any citizen to present suggestions, compliments, requests, complaints and reports related to the reparation activities, especially from the perspective of the affected people. Complaints are received, treated, forwarded, monitored and responded to impartially, ethically and confidentially.

To open a report on the Confidential Channel, please contact

 **Telephone:** 0800 721 0717 (open from 7am to 7pm, Monday to Friday, except holidays)

 **Website:** www.canalconfidencial.com.br/fundacaorenova

 **Email:** canalconfidencial@fundacaorenova.org

To register a complaint with the Ombudsman, please contact

 **Telephone:** 0800 721 0717 (open from 7am to 7pm, Monday to Friday, except holidays)

 **Website:** canalconfidencial.com.br/fundacaorenovacomunidade/

 **Email:** ouvidoria@fundacaorenova.org

The Renova Foundation is committed to not retaliating against employees and suppliers who, in good faith, report a violation of the Code of Conduct or contribute to an investigation.

Retaliation occurs when someone, whether a manager or a colleague at the same hierarchical level, contract manager or contract inspector, takes action against another employee, third party or against a supplier, as a form of persecution or punishment for the intention of opening a report, for actually opening it, or for collaborating with an investigation. In relation to employees, examples of retaliation are: reduction of responsibilities and possibilities of action of the person as a result of the fact, unjustified transfers, threats, professional opinion ignored, among others. With regard to suppliers and third parties, examples of retaliation include: when, as a result of the fact, there is a reduction in the contracted scope, failure to open service orders, unfair application of contractual penalties, among others. Any suspicion of retaliation must be immediately reported to the Compliance department. All allegations of retaliation and/or open reports of bad faith intended to harm third parties will be rigorously investigated as violations of the Code of Conduct.

If a violation of the Code of Conduct is confirmed, corrective or disciplinary measures may be adopted as a form of guidance and improvement. These measures may include verbal or written warnings, suspension, termination, among others, in accordance with the Policy of Consequence Management of the Renova Foundation.

VIOLATIONS OF THE CODE OF CONDUCT





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