



Code of Conduct for Suppliers



nexa



Message from the Executives

We construct our history based on the highest ethical standards of integrity and respect for all audiences. We understand that this belief is what inspires us and that it is renewed every day, with the participation and commitment from all of us. It is essential that the relationship between Nexa and its suppliers is guided by professional respect, plurality and inclusion, ethics and transparency; and you, as our stakeholders strictly comply with the laws, regulations, commercial, environmental, social, financial, health and safety practices required.

We believe in and practice respect for all people and we have no doubts that our beliefs and behavior have the power to influence and enhance ethical practices in our professional and personal environments. This belief is part of our essence and we consider that our actions will contribute to improving people's lives.

Our guidelines are established in our Code of Conduct, which is based, especially, on integrity, transparency, respect for people and seeks to prioritize the health and safety of our employees, the environment, and its sustainability.

We are all committed to our essential values for building the mining of the future, creating a more reliable and efficient organization which is a reason for all of us to be proud.



Message from the Commercial & Supply Chain Vice President

This Code of Conduct for Suppliers seeks to establish the rules which shall guide our suppliers on their ethical and socio-environmental behavior. The principles presented here are directly related to Nexa's Code of Conduct, reflecting a responsible and transparent performance.

In the different stages of our supply chain, we have the collaboration of companies from different locations, different sizes, and with their histories and challenges; however, we believe that our values, principles, and practices can be applied in the daily activities of all our suppliers for the common benefit, regardless of their proper characteristics. Thus, the standards and guidelines published seek to promote among them the implementation of a management process regarding specific socio-environmental and governance practices as well as legal service standards, which should be properly communicated to the entire value chain.

Nexa is convinced that all our suppliers and service providers support the strict fulfillment of these guidelines and that they will participate in the training on the Code of Conduct and Anti-Corruption Practice therefore, we trust this partnership will develop the mining of the future.



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1. NEXA WAY

Nexa expects to build the mining of the future, growing in competitiveness through innovative and sustainable processes, considering environmental, social, and governance practices that promote value among our stakeholders and contribute to the evolution of society.

To maintain our leading position, Nexa's strategy is based on two axes and eight enablers. Our two axes are Growth and Operational Excellence. Our eight enablers include People and Organization, Sustainability, Project Management, Commercial, Risk Management, Technology and Automation, Logistics and Procurement, and Capital Structure, all these topics are supported by our culture.

Our culture is the Nexa Way of executing our strategy: This supports all our actions and decisions. We strongly encourage a plural and collaborative environment.

These issues define our identity, guide our behavior, lead our management model and inspire this Code of Conduct.

2. CODE OF CONDUCT FOR SUPPLIERS AND ITS APPLICATION

Nexa's Code of Conduct for Suppliers is inspired by our culture and commitment to the principles of integrity, ethics, human rights, plurality, and social and environmental responsibility. This is an essential guide for all our suppliers (of goods, services, or subcontractors) to understand and act according to the highest standards of conduct. This Code also refers to the proper way to report suspicious or clear violations of conduct, as well as non-compliance with applicable laws.

Nexa's values and beliefs are the principles that motivate our employees, drive our results, and strengthen our relationship with all stakeholders. Many of these values and beliefs may be similar to our suppliers' organizational cultures. We respect the culture of all our suppliers and invite them to know, accept and apply Nexa's values and beliefs in our professional relationships.

As a global company, we are subject to the laws and regulations of the countries in which we operate and where we list our securities. In case of any conflict of laws or practices among the regions where Nexa conducts its business, and Nexa's standards are stricter than those of the region, Nexa's stricter standards will be adopted. Thus, it is very important that our suppliers know Nexa's policies and procedures regarding the provision of services or goods, and comply with them when acting with or on behalf of Nexa.

Nexa's Code of Conduct can be found at:

<https://www.nexaresources.com/en/about-us/#corporate-policies>

In addition, this Code of Conduct for Suppliers is available on the [Nexa website](#).





What we expect from you

We expect that you will learn and apply the guidelines of this Code as well as the policies and procedures implemented by Nexa as they relate to your activities and help us to disseminate Nexa's guidelines and our values among your employees and subcontractors. Finally, we look forward to your participation in all related training.

We reject any form of punishment, disciplinary or retaliatory actions made against any person who, in good faith, reports or supports the solution of any issue regarding business conduct. If you witness or know of suspicious or unethical behavior, you should inform your supervisors at Nexa or report the fact using the Ethics Line. Read more details on the topic: Ethics Line.

3. HUMAN RELATIONSHIPS

HUMAN RIGHTS

Nexa is committed to respecting and supporting the human rights and dignity of all people and partners in all countries where we operate. Thus, Nexa promotes the right to equality, life, liberty, personal integrity, a decent wage and a work environment free from discrimination, due to gender, age, race, nationality, religion, physical or mental disability, freedom of union association, politics or sexual orientation. In addition, Nexa does not tolerate improper behavior, including rude treatment, language, and/or any kind of physical contact considered as sexual, coercive, threatening, abusive, or exploitative.

Nexa is also committed to promoting a work environment free from slavery (ancient or modern), forced labor, torture, work in degrading conditions, and with workers submitted to or forced to illegal employer domain conditions or contrary to human dignity. To that end, Nexa does not employ or use, directly or indirectly, any type of forced labor regardless of the implementation of the activities, following all applicable laws and regulations.

Through proper contracting policies, we ensure our contractors, suppliers and consultants act in line with our principles and we expect that they comply with all commitments related to human rights.

Finally, Nexa and its suppliers should comply with all labor laws in the regions where they have their employees or subcontractors.

What we expect from you

We expect our suppliers to attend all trainings or e-learnings on Nexa's Code of Conduct as well as workshops on human rights.

Nexa expects all its employees, stakeholders, particularly those linked to our Supply Chain, suppliers, service providers and subcontractors, to comply with these principles. If you know about any breach of human rights that involves our employees or subcontractors, we recommend that you follow the procedures established by your company, report the issue to the area responsible at Nexa or, if you prefer, report a complaint directly using the Nexa's Ethics Line.



PLURALITY AND INCLUSION

Plurality is part of our culture. We seek diversity and propose that representation and inclusion should be promoted in the organization and our relationships with our stakeholders.

The variety and complexity of points of view, way of life, and experiences are potentials that act in a complementary way, which allow new approaches to solving problems, building creative resources that constantly enhance Nexa and strengthen our strategy.

Nexa believes that a friendly and collaborative work environment with committed people, who feel valued, has a positive impact on results and our society. We seek a plural and inclusive environment in which each individual can express their individuality. We value innovation and do not tolerate any type of discriminatory or disrespectful behavior.

What we expect from you

Workplace relationships, regardless of hierarchical level, should be guided by mutual respect, trust and team spirit. To build plural and inclusive teams, we expect you to treat everyone fairly, respectfully and decently, promoting a work environment and business ecosystem free from harassment, disrespect and discrimination.

Nexa expects its suppliers, service providers and subcontractors to fully comply with local laws and Nexa's standards regarding plurality and human inclusion. If you become aware of any situation of prejudice or discrimination involving your employees, Nexa's employees or other suppliers' employees and/or this situation is occurring on Nexa's facilities, we recommend that you follow the procedures established by your company, report to the manager of the area responsible for your management at Nexa, or if you prefer, send a complaint through Nexa's Ethics Line.

HARASSMENT

Nexa does not tolerate any type of harassment, whether derived from authority, sexual, moral or otherwise, or situations that represent disrespect, intimidation or threat in the relationship between employees or with suppliers of goods and services or others, regardless of their hierarchical level.

In addition, Nexa does not tolerate inappropriate professional behavior, such as insults or inappropriate jokes, disrespectful treatment of subordinates and colleagues, or any kind of persecution of employees, customers, suppliers, service providers, subcontractors, visitors or others through explicit or disguised threats, or by exercising an arbitrary position of power and/or authority, or making offensive comments about discrimination, race, defamation, violence, obscene or pornographic material that disrespects any individual or entity.





What we expect from you

Nexa expects its suppliers to fully comply with Nexa's guidelines and implement internal training to educate their employees to avoid situations of harassment among their employees, Nexa's employees or other suppliers'.

If you become aware of any harassment situation involving your employees, Nexa's employees, or other suppliers' and/or this situation is occurring on Nexa's facilities, we recommend that you follow the procedures established by your company, report the issue to the area responsible at Nexa or, if you prefer, report a complaint using the Nexa's Ethics Line.

CONFLICT OF INTERESTS

A Conflict of Interest in the workplace occurs when the private interests of a person seem to affect the impartiality of his/her judgment, decisions or actions. Situations could arise where an employee's position or his/her considerations, financial interests or other professional or personal interests affects, has the potential to affect, or seems to affect his/her judgment and independence.

A supplier, its employees and subcontractors working with Nexa or on behalf of Nexa must avoid conducting business in which involve or seem to involve conflicts of interest.

In situations involving an actual, potential, or perceived conflict of interest, concerning a Nexa's employee or other stakeholders (such as suppliers, customers, community members, business partners, shareholders, and other individuals or organizations which belong to the same economic group) Nexa's suppliers and their representatives are obligated to make impartial decisions, excluding personal or third parties' financial interests that somehow could affect their judgment.

It is also compulsory to report such conflict to Nexa since the beginning of the business relationship or when a new conflict of interest may arise.

Contracting companies that are owned, represented, or managed by former employees of Nexa must be addressed according to the standard procedures to avoid being Nexa exposed to risks and that those companies be treated with no privileges, always respecting technical and commercial criteria and considering the quarantine period required by law in Brazil, when applicable.

If any potential conflict of interest is identified, as a supplier of Nexa, you should consult on this case with the Supply Chain area or the manager responsible for contracting in Nexa. This is the best alternative to mitigate any risks.





What we expect from you

We expect all suppliers know Nexa's Conflict of Interest procedure, participate in the training when invited, and report the conflicts to the manager of the responsible area.

We also ensure that our suppliers and their representatives should avoid negotiations that may cause actual or potential conflicts of interest, separating themselves from any decision-making process that influences or could be perceived as influencing their ability to make a decision or comply with their responsibilities.

RELATIONSHIP WITH NEXA'S EMPLOYEES

Our relationship with suppliers is based on trust, mutual respect, openness, a fair balance of interests, and equal opportunities, and both parties should understand that the protection of health, social, environmental standards, and human rights are important for mutual, lasting, and successful cooperation.

Nexa's employees are responsible for the actions of their suppliers regarding their interactions with third parties (private or governmental entities, communities, and others). Therefore, Nexa's employees shall educate their suppliers about this Code, Nexa's Code of Conduct, policies, and procedures. In addition, employees shall monitor and manage the performance of contracted third parties and compliance with their contractual obligations.

Any inappropriate conduct by suppliers could harm Nexa's image and reputation and may expose it to legal co-responsibility for the supplier's actions taken on behalf of Nexa. Therefore, our suppliers shall always act appropriately, following strict controls, policies, procedures, and good practices related to human rights and compliance with laws, including those related to bribery and kickbacks, and relevant regulations.

What we expect from you

Nexa recognizes that no Code can address every situation in which our suppliers may encounter. Therefore, we understand that this Code does not restrict the responsibility of our suppliers and their employees to exercise common sense and appropriate professional conduct. The principles established in this Code shall guide all negotiations with third parties and subcontractors.





RELATIONSHIP WITH COMMUNITIES

Nexa's activities have a significant impact on the communities near we operate. Therefore, it is essential that our suppliers know their needs and how we intervene and impact their way of life.

We are committed to sustainable development considering the economic, cultural, and social aspects of the communities where Nexa operates.

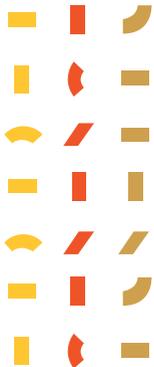
Suppliers that interact with communities due to Nexa activities shall comply with the procedures and guidelines established by Nexa. We encourage our suppliers to maintain a continuous communication with local communities, based on a positive agenda for promoting sustainable local development, respecting freedom of expression and peaceful demonstrations, following applicable law.

Therefore, all types of agreements, contracts, and commitments signed by our suppliers with the communities in Nexa's area of influence shall be executed in writing and in accordance with local legislation. Nexa's Legal area shall be reported about problems and potential conflicts concerning communities.

What we expect from you

Nexa expects that our suppliers will join us in our relationships with the communities, always providing high-quality services and products to support Nexa in fulfilling the demands and projects of the community.

We also expect our suppliers and their subcontractors to comply with all the guidelines established by Legal and Social Management areas. For further information, consult the Legal or Social Management and Institutional Relations areas.





4. HEALTH, SAFETY AND ENVIRONMENT

The health, mental and physical integrity of Nexa's employees and its suppliers as well as the protection of the environment are priorities for Nexa and are above any economic or production objectives. One of the most important practices to be followed by all our employees are those related to the Golden Rules that establish clear procedures for specific risk situations. Each one of the employees of our suppliers is responsible for knowing these standards as well as the policies, procedures, and practices related to health, safety, and environment, and strictly complying with them.

We are transparent in handling all information concerning the health, safety and environment that may have a significant impact on our employees, suppliers, communities, or the environment.

Concerning safety, we shall always be vigilant and ensure our health, mental and physical integrity, and those of our co-workers. Each of us shall take responsibility for preventing accidents in the workplace. Likewise, our suppliers shall ensure that all their employees receive training in health, safety, and environmental topics.

Additionally, by taking care of the physical integrity of our facilities and technical equipment, we avoid potential risks of accidents. At Nexa, our SROA movement invites all our employees and those of our suppliers to Stop, Reflect, Observe and Act in compliance with safety regulations, report unsafe procedures, and refuse to perform any activity that could be considered dangerous.

We emphasize that the ingestion of alcoholic beverages and drugs during business hours or the performance of professional activity under the influence of alcohol is forbidden. The use of alcohol on Nexa's premises is also forbidden. Likewise, the use, possession or sale of drugs is prohibited. Employees shall not perform any professional activities while in an altered state that may affect the safety and performance of the employee and/or his/her co-workers. No weapon is allowed on Nexa's facilities, other than those carried out by professionals expressly authorized and subject to local legislation.

Concerning the environment, our suppliers shall always look for a preventive approach to environmental challenges, promoting the constant development of practices and technologies that do not harm the environment. In addition, suppliers shall comply with and maintain their processes in accordance with applicable environmental legislation (including licenses required to perform their activities and adjustment plans for non-compliance) and report any accidents or incidents to Nexa's Environment team.

What we expect from you

Nexa expects its suppliers and subcontractors to fully comply with local laws and Nexa's policies and procedures concerning health, safety and environment, and to report unsafe procedures immediately.

All suppliers or third parties working in Nexa's facilities are required to wear the personal protective equipment and report to the supervisor or Health and Safety team, as soon as possible, all cases of accidents and incidents occurred. It is strictly forbidden to cover or omit any incident, regardless of severity.



5. REGISTRATION AND COMPLIANCE DUE DILIGENCE

Before contracting or signing a contract, all suppliers undergo an assessment carried out by the Supply or the contracting area, which includes an assessment of their potential regarding health, safety, environment and community performance, human rights, reputation, conduct, integrity, qualifications, experience, reliability, compliance with laws and regulations (including but not limited to laws and regulations of anti-corruption, prevention of money laundering and financing of terrorism and fraud), solvency and ability to comply with our requirements and policies.

In addition, all suppliers undergo periodic analysis of due diligence to (i) evaluate the existence of integrity risks that threaten Nexa's image and reputation due to non-compliance with rules that are in force or in accordance with laws and regulations and Nexa's policies and procedures and potential engagement to Bribery, Corruption, Money Laundering and/or Terrorist Financing, Fraud, Antitrust; (ii) comply with the terms established in the contract, (iii) ensure the quality of the goods or service provided, among others.

What we expect from you

We expect our suppliers to ensure that they will provide all documentation and information necessary to perform this assessment.

Nexa recommends that its suppliers apply similar controls for evaluating their stakeholders.

6. SUPPLY OF GOODS AND SERVICE PROVIDERS

Nexa understands the importance of its suppliers for the continued success of its operations. We recommend that Nexa's suppliers follow contracting policies and procedures using transparent, impartial and non-discriminatory criteria. Thus, every decision shall have technical and economic support, and it is forbidden any kind of undue favoritism.

Nexa does not allow the payment of invoices for services that have not been performed, completed, formally approved by the responsible areas or that are not in accordance with the fair market value, which also applies to the receipt of any materials, equipment, or raw materials. Nexa will not make payments without proper supporting documentation, when applicable, and a contract or agreement.

Notwithstanding the corresponding legal sanctions, Nexa's contracting policies and procedures, which shall be complied with, establish that Nexa has the contractual right to terminate any business relationship based on a breach of the Code of Conduct.

Likewise, no retaliation against a supplier will be allowed or tolerated if he/she reports in good faith any concerns about illegal conduct or breach of the guidelines set forth in Nexa's Code of Conduct and this Code.





What we expect from you

Nexa expects its suppliers and subcontractors to fully comply with local laws and Nexa's policies and procedures concerning health, safety and environment, and to report unsafe procedures immediately.

7. INTELLECTUAL PROPERTY RIGHTS AND CONFIDENTIALITY

Intellectual property includes trademarks, patents, industrial designs, domain names, copyrights, innovations, improvements, processes or products, designs or models, financial, commercial or market information, ideas, knowledge or any other non-material activity developed by Nexa or its contractors, among other items that would benefit a competitor if they had this knowledge.

The results of intellectual work and strategic information generated by the Company are the exclusive property of Nexa. Therefore, everyone (Nexa employees and third parties) is responsible for protecting the intellectual property and confidential information that they have access to as a result of their work. In the case of subcontracting, confidential information shall be done with Nexa's consent.

Confidential information refers to all information and data, including but not limited to commercial, fiscal/tax, financial, operational, logistic and legal, reports, drawings, specifications, formulas (as samples, products and others) research, interpretation, forecasting, business strategies and analysis, trade secrets, marketing and/or business plans, marketing plans, know-how, mental impression, technical or legal assets, ideas, personal information and sales, products or prices, samples, information about customers or prospects, information about suppliers or prospects, information about systems, including communication and information systems, and information about the capability of, or plans for, existing or future technologies.

Nexa is also committed to respecting the intellectual property rights of its suppliers and third parties.

What we expect from you

We expect suppliers to protect Nexa's intellectual property rights by respecting the intellectual property rights of third parties and explaining any question with our experts.





8. LAWS, REGULATIONS, POLICIES AND PROCEDURES

NEXA'S CODE OF CONDUCT

Nexa's Code of Conduct is inspired by our Values, Beliefs and commitment to the principles of integrity, ethics, human rights, diversity and social and environmental responsibility. This Code is a must-read document for our suppliers, used as a reference for their business activities with or on behalf of Nexa, as it describes in detail the attitudes expected of our employees and third parties in different situations, as well as examples that reinforce their knowledge.

We firmly believe that a Code of Conduct is an essential document that every company should have, regardless of its size, geographic coverage and number of employees. Therefore, we invite our suppliers to consider implementing and publishing a Code of Conduct to their employees and stakeholders. This can be a significant qualitative advantage for our supplier approval process and integrity audit.

The Nexa's Code of Conduct can be found at:

<https://www.nexaresources.com/en/about-us/#corporate-policies>

What we expect from you

Read Nexa's Code of Conduct and if you have a question, contact the Nexa supervisor responsible for your contract or the procurement team.

Nexa expects all its employees and third parties, particularly those linked to our supply chain, to comply with the principles expressed in our Code of Conduct and if you identify any breach, regarding our employees or third parties, we recommend that you follow the procedures established by your company, report to the supervisor of the responsible area at Nexa or, if you prefer, report a complaint using the Nexa Ethics Line.

RELATIONSHIP WITH GOVERNMENT

In general, no supplier is authorized to negotiate with government entities or representatives on behalf of Nexa. In exceptional cases, Nexa will establish in a contract the limits of this representation, the anti-corruption, anti-money laundering and antitrust clauses and will establish the respective internal controls for this activity. All suppliers acting on behalf of Nexa shall be fully trained in Nexa's Compliance policy and procedures and shall have limited power for decision-making on behalf of Nexa established in its contract.

In case of suppliers representing Nexa in government affairs or with government representatives, it is necessary to ensure that the supplier's employee is authorized for this representation by Nexa, that he/she is properly trained and complies with all applicable laws and regulations, Nexa's Anti-Corruption Policy and Relationships with Government Representatives Procedure.

In addition to complying with the requirements above, while representing Nexa in public affairs, the supplier's employee shall not give, receive, promise, request or offer any gifts, benefits of any nature or favors from/to government representatives to obtain any kind of improper benefit or advantage for Nexa, the supplier or any other person or entity.



Likewise, suppliers shall not engage in undue negotiation, agreement or relationship with a government representative that could violate any anti-corruption law or regulation, even if it does not involve the payment of gifts or benefits, nor shall be involved in trafficking of influences (actual or perceived) involving government representatives, either paying someone to use such influence for the benefit of Nexa or another person or entity or offering those influences in exchange for an undue benefit.

Facilitating payments or urgency fees (such as payments intended to accelerate or ensure the performance of routine non-discretionary actions) are strictly prohibited.

What we expect from you

We expect that before engaging or dealing with any government representative on behalf of Nexa, suppliers and subcontractors shall ensure that they have the appropriate authorizations and guidance from the Legal and the Institutional Relationship areas.

ANTI-CORRUPTION POLICY

Nexa is committed to doing business ethically, with integrity and in compliance with all applicable anti-corruption laws and regulations where Nexa conducts business. These laws and regulations do not allow bribery of representatives from national or foreign governments, as well as the private sector.

Nexa rejects any form of corruption and defines it as the intent or act of behaving unethically or dishonestly, in the pursuit of or exchange for an improper advantage or benefit for itself or a third party, including activities prohibited by law or regulations. This includes illegal payments of any kind (direct or indirect), bribes, kickbacks, improper gifts and preferential contracts, favors, as well as certain charitable contributions, political donations or sponsorships that have an illicit purpose. Corruption harms society and causes political, economic and social damage.

All employees of Nexa's suppliers are responsible for knowing and following the rules and controls provided in our Anti-Corruption Policy during their business relationship with Nexa, as well as reporting any questionable conduct, using the available channels.

In addition, an offer of money, entertainment, or gift shall not be accepted by Nexa's employees, with a limited exception for the courtesies commonly accepted in business practices, such as promotional or institutional gifts. Suppliers cannot deliver on behalf of Nexa to third parties, whether public or private, gifts, hospitality, entertainment, donations or sponsorships.

What we expect from you

Suppliers shall strictly comply with all applicable laws, including global anti-bribery and anti-corruption laws and those that apply to the countries where Nexa operates. To meet deadlines, transparency and integrity of information, they should also maintain detailed books, records and accounts that accurately and fairly reflect their transactions.

If you need to request reimbursement for expenses as part of providing services to Nexa or in your activities on behalf of Nexa, with Third Parties or Government Representatives or Entities, you shall have Nexa's authorization to incur them and provide all supporting documentation for these expenses.



MONEY LAUNDERING AND TERRORIST FINANCING

Nexa is committed to preventing the use of its assets and operations for money laundering, terrorist financing or other illicit purposes. Therefore, Nexa and its suppliers shall comply with all applicable laws and regulations in the countries where they do business to prevent these crimes.

Money laundering refers to the process by which the funds of criminal activity are disguised to conceal their illicit origins.

The financing of terrorists is the secret support, financial or not, directly or indirectly, to terrorist organizations or people who promote or are involved in these activities. Financing of terrorism is any form of economic action, assistance or mediation that provides assistance and resources of any kind to support the activities of terrorist elements or groups.

What we expect from you

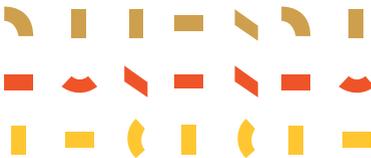
To prevent money laundering and terrorist financing, we recommend Nexa's suppliers implement controls and procedures to timely detect unusual and suspicious transactions, assess relevant risks, and properly examine third parties with whom it engages in its economic activities, based on the applicable laws and regulations.

ANTITRUST POLICY

Nexa is committed to free enterprise and fair competition and rejects illegal practices such as cartel formation, bidding fraud or abuse of market power.

Nexa complies with competition laws in all countries where it operates to promote a free, dynamic and competitive market for the benefit of consumers and competition; with active participation and cooperation with the corresponding authorities; and compliance with competition laws against third parties using anti-competitive practices.

To avoid antitrust risks, employees and third parties who act themselves or on behalf of Nexa shall not disclose or discuss current or future prices, terms or conditions of sale, profit margins, discount policies, capacity, processes, methods, production/services costs, commercial territories, marketing plans, measures to prevent the entry to other competitors or any other sensitive information on the competition with Nexa's competitors and suppliers. Any negotiation of third parties with the competitors shall be discussed and approved by Nexa.





What we expect from you

We expect our suppliers to let us know (by contacting our Legal or Compliance areas) if improper contact is initiated by a competitor, customer, or supplier, concerning any type of cooperation agreement with a competitor, for example, joint production, marketing, or logistics; when there is a suspicion that a third party is using anti-competitive practices that could involve Nexa.

PERSONAL DATA PROTECTION

Nexa is subject to compliance with the obligations provided for in the data protection legislation in force in the countries in which it operates, as well as having the objective of implementing the best practices on the subject in its routine. It is also critical that Nexa facilitates the continuous flow of personal data necessary for its business activities, protecting the rights of the individuals involved.

To identify, analyze and resolve any potential breaches of the Code of Conduct, Nexa has an Ethics Line, which can be accessed by internal and external parties. The Ethics Line can also be used to report any issues that go beyond the Code of Conduct, including, for example, breaches of specific laws.

Thus, Nexa adopts all practices and standards necessary to ensure the proper and secure processing of personal data for its employees, business partners, third parties and stakeholders, which is reflected in Nexa's Data Protection policies and procedures, as well as its Cybersecurity policy and procedures.

It is the responsibility of all suppliers and subcontractors, who work with and/or on behalf of Nexa, to ensure that personal data is handled in accordance with Personal Data Protection policies and procedures and with current legislation. For additional information and guidance, see Nexa's Personal Data Protection Policy available on our website or contact our Legal area.

What we expect from you

We expect that suppliers are always up to date on personal data protection rules in their countries and ensure that in cases where the processing of personal data is part of their work routine, the provisions of all applicable laws and policies on the matter are being complied with and consult the Legal area in case of doubts. It is very important that you understand how to identify and refuse to answer questions that may involve incorrect processing of personal data.

If you have any doubts about which data is considered personal data for the purposes of applicable legislation or how personal data should be treated, you shall always seek legal advice.





9. ETHICS LINE

To identify, analyze and resolve any potential breaches of the Code of Conduct, Nexa has an Ethics Line, which can be accessed by internal and external parties. The Ethics Line can also be used to report any issues that go beyond the Code of Conduct, including, for example, breaches of specific laws.

The Ethics Line is impartial, transparent and guarantees the confidentiality of the information provided, safeguard the identity of anyone who accesses the Ethics Line, and promote a better environment for everyone. All Nexa's stakeholders are encouraged to use the Ethics Line to request clarification on compliance-related issues or to report potential breaches of the Code of Conduct or any policy, procedure, law or regulation.

Nexa rejects any form of retaliation, discrimination or sanction against any person who in good faith reports a genuine concern. All allegations of retaliation, discrimination or sanction will be thoroughly investigated, and according to the results could lead to a disciplinary measure.

The Ethics Line is available in Portuguese, English, and Spanish, this Line can be accessed by phone or via Nexa's website, where a person can make a complaint (anonymously, if preferred), ask questions or follow-up a claim previously made.

Information on the different ways to access the Ethics Line can be found at:

<https://www.contatoseguro.com.br/en/nexaresources>

What we expect from you

As a dedicated channel for reports, complaints and information related to the Code of Conduct and other Compliance Policies and Procedures, we expect you use the Ethics Line responsibly and seriously.

DISCIPLINARY MEASURES

Nexa expects its suppliers and their subcontractors to comply with applicable laws and Nexa's standards provided by this Code and its policies and procedures.

Any misconduct or failure to comply with these standards and this Code is inappropriate, should be taken seriously, reported and treated, and may lead to disciplinary measures, which may include termination of the contract for supplying or providing services.

If a breach occurs, the disciplinary or corrective measure will be established by the contracting area, Procurement area or the Conduct Committee.

Critical situations such as fraud, corruption, conflict of interest, harassment, discrimination, undue use of resources, disclosure of confidential or inappropriate information will be dealt with by the Conduct Committee. The corrective measure will depend on the significance of the breach and other relevant circumstances, determining the appropriate response which could include, but is not limited to:





1. Guidance for improvement;
2. Strengthen Compliance training;
3. Application of sanctions established in the contract; and
4. Termination of the contract for the supply services.

These disciplinary measures shall be imposed as soon as possible after the conclusion of the investigation.

What we expect from you

We expect you to promote respect and compliance with this Code of Conduct.

10. COMPLIANCE

Nexa trusts that its Suppliers will comply with all applicable laws and regulations, and especially the guidelines described in this document and that they will make their best effort to comply with standards and best practices in the industry.

The acceptance of the Supplier's Code of Conduct is a prerequisite for all supply contracts signed with Nexa. By accepting a purchase order, the supplier acknowledges its commitment that its entire operation is subject to the provisions contained in this document.



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