



# Disclosure Policy

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**NYSE**

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## 1. OBJECTIVE

Nexa Resources S.A., a public limited liability company (*société anonyme*) incorporated under the laws of the Grand Duchy of Luxembourg, having its registered office at 37A Avenue J.F. Kennedy, L-1855, Luxembourg, Grand Duchy of Luxembourg and registered with the *Registre de Commerce et des Sociétés* (RCS) in Luxembourg under number B 185.489 (the “Issuer” or “we”) is committed to providing consistent, factual, balanced and timely disclosure of information to the market, including shareholders and other stakeholders, the investment community, media and authorities, in compliance with applicable legal and regulatory requirements. This Disclosure Policy (the “Policy”) outlines the procedures and guidelines for disclosure and aims to protect against the improper use or disclosure of Material Information (as defined below) or confidential information about Issuer. The Policy, adopted under the supervision of the Issuer’s Chief Executive Officer (“CEO”) and Chief Financial Officer (“CFO”) ensures that presentations by the members of the management committee of the Company (“Manco”), financial information on the Issuer’s website, and reports and documents filed or submitted under Luxembourg laws and regulations, Canadian securities laws and the U.S. Securities Exchange Act of 1934, as amended (“Exchange Act”, and collectively the “Applicable Law”), are recorded, processed, summarized, and reported in accordance with the timelines specified by the Regulatory Authorities, including the Luxembourg Stock Exchange (“LuxSE”), the Canadian securities regulatory bodies and the U.S. Securities and Exchange Commission, as applicable (“SEC”, and collectively the “Regulatory Authorities”). The Policy also ensures compliance with the New York Stock Exchange (“NYSE”, or the “Listing Standards”) and formalizes procedures for press releases, website disclosures, and relevant updates.

Accordingly, the Issuer’s policy is to:

- avoid any public disclosures containing untrue statements of material facts or omitting material facts that could render disclosures incomplete or misleading; and
- ensure required disclosures are made on a timely basis, as dictated by Applicable Law and Listing Standards.

If you are uncertain about whether the information is material or public, consult the Investor Relations Department before making any disclosure decisions.

## 2. SCOPE

This Policy applies to all directors, officers, employees, consultants and independent contractors of the Issuer and its Material Subsidiaries, as well as those in a special relationship with the Issuer, regardless of location, as outlined in Appendix “A” of the Issuer’s Insider Trading Policy (“Affected Persons”). It is crucial that individuals with access to confidential corporate information or those authorized to speak on the Issuer’s behalf understand these guidelines. The Policy applies to all disclosure mediums, including communications with shareholders and other stakeholders, the investment community, media, and authorities. This Policy supplements the Issuer’s Insider Trading Policy.

## 3. DEFINITIONS

### 3.1 Material Information

Refers to any event, fact, change, or decision in the Issuer’s business, operations, financial situation, or capital that could reasonably be expected to significantly affect the market price or value of the Issuer’s securities (even if, affecting only one type or category of security). This includes information that a reasonable investor would consider important when making investment decisions.

Examples of Material Information include:

- operating and financial results;



- financial projections, including future revenues, earnings, or losses;
- mergers, acquisitions, or joint ventures;
- divestitures or significant assets sales;
- major changes in control, ManCo, or Board of Directors;
- public or private sales of securities;
- material financings or events of default under agreements;
- dispute with key customers or suppliers;
- natural disasters or other significant environmental, health, or safety events;
- changes in auditors or accounting practices;
- significant pending or threatened litigation or regulatory actions;
- material impairments, write-offs, or restructurings;
- financial obligations, impending bankruptcy, or liquidity issues;
- material cybersecurity incidents or data breaches;
- amendments affecting the respective rights of different categories of securities;
- any change or transfer of the paying agent of a security;
- announcement of any distribution related to a security;
- payment and detachment of interests related to a security;
- coupons related to a security being declared without value;
- redemption of securities in particular before the due date;
- change of the name of the Issuer.

The materiality of information may vary over time and will ultimately be judged based on facts and circumstances. For example, information leading to a change in the Issuer's stock price is likely to be considered material.

### **3.2 Determination of Materiality**

Any officer, in consultation with the CEO, CFO, or other member of the ManCo, is authorized to determine whether information constitutes material non-public information.

### **3.3 Material Subsidiaries**

Refers to any subsidiary of the Issuer that, as of the date of the Issuer's most recent quarterly or annual consolidated balance sheet, constitutes 15% or more of the consolidated total assets of the Issuer.



### 3.4 Trading Day Definition

A “trading day” refers to any day on which the stock exchange(s) where the Issuer’s securities are listed (currently the New York Stock Exchange) are open for trading.

### 3.5 Undisclosed Material Information

Refers to Material Information that has not yet been broadly disclosed to the public. Material Information about the Issuer should be treated as non-public or undisclosed unless there is certainty that it is publicly available. As a general principle, Material Information is considered “broadly disclosed” only after it has been accurately published and widely disseminated through appropriate channels (e.g., press releases or regulatory filings), making it accessible to investors. Additionally, sufficient time must have elapsed for investors to react to the information.

Sufficient time is defined as (1) information released before 9:30 a.m. U.S. Eastern Time on a trading day: It is considered public at 9:30 a.m. on the same trading day; (2) information released after 9:30 a.m. U.S. Eastern Time and during market trading hours: It is considered public at the time of release; and (3) information released after 4:00 p.m. U.S. Eastern Time: It is considered public at 9:30 a.m. on the following trading day.

## 4. GUIDELINES

### 4.1 Assignments of the Investor Relations Department

The Investor Relations Department plays a critical role in ensuring compliance with this Policy and fostering transparent communication with the Issuer’s stakeholders. Working in close collaboration with the Legal and Governance Department, the Investor Relations Department will assist the CEO and CFO in periodically reviewing the design, implementation, and overall effectiveness of this Policy. Any material changes identified during these evaluations will be submitted for recommendation to the Issuer’s audit committee and approval by the board of directors (“Board of Directors”).

To facilitate timely and accurate disclosure of Material Information, the Investor Relations Department serves as a central point for identifying and evaluating such information. Employees at all levels are required to promptly notify the Investor Relations Department or the Legal and Governance Department if they become aware of the events, transactions, or developments that may qualify as Material Information under this Policy.

Once notified, the Investor Relations Department will:

- **Assess the Information:** evaluate the significance of the information in consultation with the Legal and Governance Department to determine whether it qualifies as Material Information requiring disclosure.
- **Coordinate Disclosure:** develop and coordinate the appropriate disclosure strategy, including the preparation of news releases, regulatory filings, or other communications as necessary, ensuring that all stakeholders receive consistent and accurate information.
- **Provide Guidance:** advise employees and other stakeholders on the proper handling and escalation of Material Information, reinforcing the importance of compliance with disclosure obligations.
- **Support Training Initiatives:** work with relevant departments to provide periodic training and awareness programs to ensure that all employees understand their responsibilities related to the identification and reporting of Material Information.



- **Maintain Documentation:** keep detailed records of all notifications, evaluations, and disclosures to ensure compliance and facilitate audits or reviews related to this Policy.

## 4.2 Principles of disclosure of Material Information

To meet continuous disclosure obligations under applicable securities laws and stock exchange rules, the Issuer will adhere to the following principles:

- **Timely Communication:** material Information will be promptly communicated to the public via news releases distributed through widely disseminated newswires and the filing of material change reports, in compliance with Applicable Law;
- **Regulatory Filings:** material change reports will be prepared and filed with Regulatory Authorities in the required format and within the required timeframe, subject to confidential filings when applicable;
- **Confidentiality:** information will remain confidential until it is officially released;
- **Completeness:** disclosure must be comprehensive, including any information necessary to avoid being misleading. Partial or incomplete disclosures are unacceptable;
- **Unfavorable Information:** unfavorable Material Information will not be shared selectively with specific individuals or groups, such as analysts or investors, before public dissemination;
- **Website Disclosure:** information on the Issuer's website will ensure updates are accessible to all investors without selective disclosure. However, website postings alone do not constitute adequate disclosure of Material Information; and
- **Correction of Errors:** if the Issuer learns that previously disclosed information was materially inaccurate or incomplete at the time of disclosure, corrections will be made immediately and communicated as Material Information.

Following public dissemination, all disclosures will be monitored to ensure accurate media reporting, and corrective actions will be taken promptly, if necessary.

A Disclosure Committee will oversee the implementation of the Disclosure Policy, evaluate the best practices, and ensure effective communication of both Material and non-material information to the market. The Committee will also review the Issuer's periodic financial disclosures. Periodically, and as necessary, the Disclosure Committee will review the Issuer's non-GAAP disclosures to assure consistency with its publicly reported non-GAAP financial measures. In so doing, the Disclosure Committee will also review and assess the disclosure controls for non-GAAP measures, and whether non-GAAP policies, guidance, and procedures are effective and require no changes.

The permanent members of the Disclosure Committee, appointed by the Issuer's CEO, will include:

- Senior Vice President of Finance and Group Chief Financial Officer;
- Senior Vice President of Technical Services and Business Development;
- Vice President of Human Resources and Corporate Affairs;
- Vice President of Legal and Governance;
- Head of Compliance, Internal Controls, and Internal Audit;



- Head of Investor Relations;
- Head of Communications Department;
- Head of Legal Corporate and Governance Department.

The composition of permanent members may be reviewed periodically by the CEO without the need to amend this Policy. Additional guests may be invited to participate in specific meetings, depending on the content being discussed.

#### **4.3 Delay in disclosing Material Information**

Under certain circumstances, as permitted by securities legislation, the Issuer may delay the disclosure of Material Information and keep it confidential for a limited period if immediate disclosure would be unduly detrimental to the Issuer. Examples include instances where releasing the information might: (1) prejudice negotiations in a corporate transaction; (2) interfere with the Issuer's pursuit of a specific objective or strategy; (3) be restricted due to third-party confidentiality agreements or event uncertainties; and (4) fall under exceptions in the Applicable Law.

The Investor Relations Department will determine whether to delay disclosure of Material Information. If disclosure is withheld, the Legal and Governance Department will ensure all appropriate confidential filings are made (and renewed, as necessary) with applicable Regulatory Authorities, and establish internal controls to safeguard the information.

#### **4.4 Reviewing of the covered reports ("Covered Reports")**

The Disclosure Committee will support the Issuer's Investor Relations, Communications Department, and other teams in ensuring a timely and accurate flow of information to comply with disclosure obligations as provided in Applicable Law.

Management will be responsible: (1) for gathering, evaluating, and reviewing information for the preparation of financial disclosures in the Covered Reports; and (2) establishing timetables and allocating responsibilities for the preparations and dissemination of Covered Reports at the start of each fiscal period.

The Disclosure Committee will assist in reviewing and making recommendations for Covered Reports, confirming that (1) Covered Reports do not contain untrue statements or omit material facts that would make the reports misleading; and (2) the financial statements fairly present the financial condition, operations, and cash flows of the Issuer for the periods stated.

At the outset of each fiscal period, timetables and allocation of responsibilities for the preparation and dissemination of Covered Reports should be established by management and communicated to all participants in the disclosure process.

These timetables must ensure:

- sufficient time for responsible persons to compile and prepare information;
- adequate time for the Disclosure Committee to review the information; and
- timely filing of Covered Reports after the CEO, CFO, and Disclosure Committee have critically assessed their material accuracy and completeness.

All applicable Regulatory Authorities comments with respect to the Issuer's Covered Reports and other public disclosures or submissions to such authorities will be reviewed and monitored by the Disclosure Committee.

#### **4.5 Disclosure Controls and Procedures**





The Disclosure Committee will assist the Issuer's CEO and CFO, and other members of management in periodically and annually reviewing the effectiveness of the Issuer's disclosure controls and procedures, in compliance with Applicable Law.

#### Evaluation Considerations:

- accuracy: identify inaccuracies or omissions during the reporting process and address patterns in the errors;
- regulatory feedback: review comments from Regulatory Authorities on filings;
- information sources: evaluate personnel and sources used in the gathering process to ensure accuracy and adequacy;
- timetable adequacy: assess time allocated for each process step and necessary reviews;
- adjustments: determine necessary adjustments to controls or process and their implementation timeline;
- personnel involvement: confirm the involvement of appropriate individuals in reviewing Covered Reports and ensure a rigorous review.

#### **4.6 Inadvertent or Selective Disclosure**

If there is reason to believe that previously Undisclosed Material Information has been inadvertently disclosed in any medium to an analyst or any other person outside Issuer not bound by express confidentiality obligation (selectively disclosed), the Investor Relations Department and the Legal and Governance Department must be immediately notified so that appropriate steps can be taken. Issuer shall promptly make public disclosure via a news release of that information as soon as reasonably possible. Parties in receipt of Undisclosed Material Information will be asked to maintain confidentiality and will be advised that such information is material, has not yet been publicly disclosed, and that unauthorized use of such information may have legal implications.

#### **4.7 Annual and Interim Certifications**

The Investor Relations Department shall coordinate with the CEO and CFO (or any other members of ManCo, as appropriate) to execute and file the annual and interim certifications to the Regulatory Authorities as to the Issuer's compliance with the Applicable Law and Listing Standards.

The CEO and CFO shall consult with the Investor Relations Department and Legal Governance and Department, as well as the Audit Committee, when appropriate, regarding the certifications required under Applicable Law concerning the design and effectiveness of the Issuer's disclosure controls and procedures.

#### **4.8 Spokespersons**

To minimize the risk of selective disclosure and to achieve clarity and consistency in the information and messages delivered publicly, the Issuer will designate a limited number of individuals authorized to speak on its behalf when Material Information may be disclosed. The primary spokesperson for the Issuer is the CEO (the "Spokesperson"). The Spokesperson may, from time to time, designate others to speak on behalf of the Issuer to respond to specific inquiries due to the Spokesperson's unavailability and/or the specific nature of the request.

Under no circumstances should directors, officers, employees, or contractors who are not authorized Spokespersons respond to inquiries from Regulatory Authorities, shareholders, the investment community, the media, or others regarding any disclosure that may involve Material Information about Issuer, unless specifically designated to do so by the CEO. In general, communications to the Issuer's stakeholders and media must be referred to the Communications Department



while the Investor Relations Department addresses communications to investors, analysts, rating agencies, and Regulatory Authorities.

#### **4.9 Forward-looking Information**

Issuer may disclose forward-looking information from time to time to provide the public with its view of potential events, conditions, and operational results. Such disclosure will comply with Applicable Law, Listing Standards and best practices, including the guidelines under this Policy. There must be a reasonable basis for making the forward-looking disclosure, having a reasonable basis considering the assumptions and preparation process. It must also clearly be identified as forward-looking by words such as “believe,” “will,” “may,” “may have,” “would,” “estimate,” “continues,” “anticipates,” “intends,” “plans,” “expects,” “budget,” “scheduled,” “forecasts” and similar words intended to identify estimates and forward-looking statements.

Forward-looking information that constitutes Material Information must be disseminated broadly per this Policy. Such disclosure, whether writing or oral, is required to be accompanied by appropriate cautionary language that identifies any Material risk factors or uncertainties that could cause actual results to differ materially and a description of Material assumptions on which the forward-looking information is based. Such cautionary language is required to be accompanied by a statement that disclaims Issuer’s intention or obligation to update or revise the forward-looking information, whether as a result of new information, future events or otherwise, except as required by Applicable Law.

#### **4.10 News Releases**

All Issuer news releases will be managed by the CEO and CFO through the Communications and Investor Relations Departments. Draft news releases will be reviewed by the Disclosure Committee, Legal and Governance, and Investor Relations, as practicable, and other officers, as appropriate depending on the subject, and approved by the CEO or CFO prior to their release. Material non-financial releases will generally be prepared by the Communications or Investor Relations in collaboration with the Legal and Governance Department and relevant personnel, depending on the content. earnings releases (other than financial statements) will be prepared by the Investor Relations Department in collaboration with the CFO, Legal and Governance Department, and relevant personnel. For interim earnings guidance, the CEO or CFO must also be included in the review process.

Issuer distributes news releases via a widely circulated news or wire service that ensures simultaneous national and/or international distribution, including Regulatory Authorities, as well as major financial media outlets. If released during regular business hours, prior notice must be provided to the market surveillance departments of the stock exchange(s) where the Issuer’s securities are listed. If a news release announcing Material Information is issued outside of trading hours, market surveillance must be notified before the market re-opens. News releases will be filed via SEDAR+ and EDGAR, submitted to relevant stock exchanges as required, and promptly posted on the Issuer’s website. Under Listing Standards, the Investor Relations Department shall coordinate the submission and/or prior notification of periodic reports and other Material news announcements to NYSE.

#### **4.11 Conference Calls**

Issuer may schedule conference calls to discuss quarterly financial results, major corporate developments, and other relevant communications, ensuring that key aspects are accessible simultaneously to all interested parties or the public in general. Participants may join the call by telephone, with others listening tools in a listen-only mode or via a webcast over the internet. These calls are not a substitute for the disclosure of Material Information via news release and will be preceded by a news release containing all relevant Material Information. At the beginning of all conference calls, the Spokesperson will provide the appropriate cautionary notification regarding any forward-looking information and direct participants and listeners to publicly available documents containing the assumptions, sensitivities, and a full discussion of the risk factors and uncertainties related to the Issuer’s activities and business.



Issuer will provide advance notice of each conference call and webcast by issuing a news release and posting information on the Issuer's website, which will include the date, time, and details on how interested parties or the public in general can access the call and webcast (if applicable). In addition, the Issuer may send invitations to analysts, institutional investors, the media and others to participate. Any Material or presentation made available during the conference calls will be posted on the Issuer's website, along with a transcript and/or recording of the conference call.

A debriefing meeting will normally be held immediately after each conference call and webcast to confirm that no inadvertent selective disclosure has occurred. If necessary, appropriate action will be taken in accordance with this Policy.

#### **4.12 Contact with Analysts, Investors and Media Outlets**

Issuer meetings with analysts and significant investors are a key element of its investor relations program. Spokespersons or those designated by them may meet with analysts and investors individually or in small groups as needed, whether by telephone, in person, or otherwise. They will initiate the contact or respond analyst, and investor calls in a timely, consistent, and accurate manner, in full compliance with this Policy. These discussions should be limited to explanations or clarifications of previously publicly disclosed information or non-material, non-confidential information.

Spokespersons will document discussions with analysts and investors. Whenever possible, more than one Spokesperson should be present at all individual and group meetings. After any meeting with analysts, investors or media outlets, if a Spokesperson has concerns regarding the information disclosed, they should discuss the matter with the Investor Relations Department and the Legal and Governance Department to determine if any corrective actions are necessary in accordance with this Policy.

#### **4.13 Quiet Periods**

To prevent selective disclosure or the perception of selective disclosure, all directors, officers, and employees of the Issuer must observe a "quiet period" commencing ten (10) days prior to the scheduled earnings release date and concluding upon the public reporting of the quarterly results.

During the quiet period, Issuer's Spokespersons are strictly prohibited from commenting on earnings or financial performance, except to cite or refer to previously disclosed and publicly available guidance. Communications during this time must be limited to publicly available or non-material information to ensure compliance with Applicable Law and Listing Standards. Spokespersons are also required to refrain from initiating meetings (whether in person, by phone, or electronically) with analysts, shareholders, potential investors, other market professionals, or media representatives concerning topics significant to investors. Responses to unsolicited inquiries must be confined to factual information that is already publicly available. Despite these restrictions, the Issuer may continue to participate in investment meetings and conferences organized by external parties, provided that no Material Information that has not been publicly disclosed is selectively shared during such engagements. All participants must adhere strictly to the principles outlined in this Policy to maintain transparency and fairness in communications.

#### **4.14 Analyst Reports**

Issuer will strive to ensure, through regular public dissemination of quantitative and qualitative information, that analysts have the appropriate basis to prepare estimates aligned with the Issuer's own expectations. Issuer will not confirm, attempt to influence, or express comfort with any analyst's opinions, conclusions, financial models, or earnings estimates.

Issuer may review the analyst's draft of research reports or financial models to ensure there are no factual errors, omissions, or obvious misstatements based on publicly disclosed information.

Analyst reports are proprietary products of the analyst firm. Re-circulating a report from any analyst may be viewed as an endorsement by Issuer. For this reason, Issuer will not provide analyst reports to external parties, including posting or linking to such reports on the Issuer's website. However, Issuer may periodically provide these reports to the Board of



Directors, ManCo, or Issuer's financial and professional advisors. Issuer may post on its website a list of all the investment firms and analysts, regardless of their recommendations, who provide research coverage on Issuer.

#### **4.15 Rating Agency Reports**

Rating agency reports shall be prepared by the Investor Relations Department under the direction and supervision of the CFO. These reports will include such information as may be requested by the rating agencies with which the Issuer regularly meets, including financial and operating projections of the Issuer. The CFO shall periodically report to the Audit Committee regarding the types of information to be provided to the rating agencies.

#### **4.16 Maintaining Internal Controls**

The Issuer is required to maintain internal controls in accordance with the rules and regulations of the Regulatory Authorities. Specifically, the Issuer must:

- Make and keep books, records, and accounts that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the Issuer's assets; and
- Devise and maintain a system of internal accounting controls sufficient to provide reasonable assurances that (i) transactions are executed in accordance with management's general or specific authorization; (ii) transactions are recorded as necessary to permit the preparation of financial statements in conformity with International Financing Reporting Standards ("IFRS") (and with respect to any non-GAAP measures) or other applicable criteria and to maintain accountability for assets; (iii) access to assets is permitted only in accordance with management's general or specific authorization; and (iv) the recorded accountability for assets is compared with existing assets at reasonable intervals, and appropriate action is taken regarding any discrepancies.

#### **4.17 Leaks, Rumors and Speculation**

It is the Issuer's general policy not to comment, affirmatively or negatively, on market rumors or speculation. Issuer's Spokespersons will consistently respond to inquiries about rumors by stating that it is the Issuer's policy not to comment on rumors or speculation. If the Regulatory Authorities request or require a definitive statement in response to a market rumor, the CEO, in consultation with the Disclosure Committee, Investor Relations, Legal and Governance, and Communications Departments (if time permits), will respond appropriately. If the Issuer chooses to comment on a rumor, a news release will be issued in accordance with this Policy. Rumors may include comments made over the telephone, in meetings, via social media, online forums, or other internet platforms. Employees of the Issuer should refrain from commenting on any topic related to such rumors when asked.

#### **4.18 Protection of Undisclosed Material and Confidential Information**

Disclosure of Undisclosed Material Information or confidential information about the Issuer is strictly prohibited. Access to such information must be limited to individuals with a legitimate need to know, who should also be informed of their obligation to maintain confidentiality.

To prevent inadvertent disclosure, the following guidelines must be adhered to:

- a) avoid discussing Issuer's business or affairs in public places where conversations might be overheard (e.g., showrooms, trade shows, hallways, elevators, restaurants, airplanes, taxis). Refrain from participating in online activities related to Issuer's business or securities;
- b) do not carry, read, or discard confidential information in exposed or unsecured public spaces;
- c) store documents and files containing confidential information in secure locations with restricted access; and



- d) minimize unnecessary copying or distribution of documents containing confidential information and promptly remove such materials from conference rooms or work areas after meetings.
- e) maintain and manage corporate equipment, including laptops, tablets, and mobile devices, to ensure their proper use for business purposes. To mitigate risks of misuse, data breaches, or unauthorized access, Nexa has implemented measures such as enforcing the use of Virtual Private Networks (VPNs) for secure remote connections, regularly updating endpoint security software (e.g., antivirus and firewalls), and implementing multi-factor authentication (MFA) for access to corporate systems. These measures are designed to prevent connections to unsecured networks, such as public Wi-Fi, and safeguard corporate data.

#### **4.19 Website Disclosure**

The Investor Relations Department is responsible for maintaining and updating the Issuer's Investor Relations website. The department will collaborate with content owners to ensure all information is accurate, current, and approved by appropriate Issuer officers.

The CFO must review and approve all financial information before it is posted online. Periodic reviews and audits of the website will be conducted to verify the accuracy, completeness, and timeliness of financial information. The website will prominently include the Issuer's forward-looking statement disclaimer.

Posting Material Information solely on the Issuer's website does not constitute adequate disclosure. Material Information must first be disclosed through a news release and distributed per this Policy before appearing on the website or any social media platform.

The website will provide direct links to the SEC's website for Exchange Act filings, the SEDAR+ page for filings with Canadian securities regulators and the LuxSE's website for filings concerning any securities listed thereon. The Legal and Governance Department will coordinate the posting of governance guidelines, Board of Directors' internal rules and board committees' charters, and other required materials.

#### **4.20 Electronic Communications and Social Media**

To avoid the inadvertent or selective disclosure of Undisclosed Material Information, Issuer's directors, officers, employees, and contractors are prohibited from using social media, internet chat rooms, online messages boards, blogs, or other digital platforms to discuss, comment on, or reference Issuer's business, affairs, or securities. This restriction includes activities such as posting, hosting, linking, "liking" or "reposting", unless explicitly authorized by the CEO, CFO, or the Investor Relations Department.

#### **4.21 Trading and Tipping Restrictions**

Trading in Issuer's securities or the securities of other publicly traded issues, where applicable, while in possession of Undisclosed Material Information is illegal and strictly prohibited. This restriction also applies to "tipping", or sharing such information, except in the necessary course of business. For more information on trading prohibitions, blackout periods, and other related restrictions, refer to Issuer's Insider Trading Policy.

#### **4.22 Disclosure Record**

The Investor Relations Department is responsible for maintaining a comprehensive file of Issuer's public disclosure over the previous five (5) years. This file will include but is not limited to: (1) documents filed with securities regulators and stock exchanges; (2) press releases; (3) meeting materials provided to the media, analysts, and investors; and (4) analyst reports on Issuer.

#### **4.23 Policy Awareness and Consequences of Violation**



A copy of this Policy will be distributed to all directors, officers, employees, and others authorized to speak on Issuer's behalf or with access to Undisclosed Material Information. It will also be available on Issuer's intranet and website. Updates to the Policy will be communicated promptly whenever significant changes are made.

Compliance with this Policy is essential to Issuer's reputation and success. All individuals subject to this Policy must understand and fulfill their responsibilities under it and under applicable securities laws. Failure to adhere to this Policy may result in severe consequences, including (1) internal disciplinary action, up to and including termination without notice; and (2) legal penalties, fines, or imprisonment under Applicable Laws, or other applicable jurisdictions.

Potential violations of this Policy should be reported via the Issuer's Ethics Line team. The Issuer's Ethics Line Team, in collaboration with the Conduct Committee and Audit Committee (according to the investigation protocol), will investigate these reports and determine appropriate disciplinary actions to be implemented.

#### 4.24 Responsibility for this Policy

The CEO, CFO and Investor Relations Department hold ultimate responsibility for implementation and review of this Policy. Together, they will monitor its implementation in alignment with Applicable Law, Listing Standards, industry best practices, and organizational experience. Periodic recommendations for updates or enhancements will be presented to the Board of Directors. The Investor Relations Department will also report to the CEO regarding the Policy's effectiveness, including the design and operation of related disclosure controls and procedures, and address and escalate any disclosure issues that may arise. Material changes to this Policy will require recommendation from the Issuer's audit committee and approval from the Board of Directors.

#### 4.25 Questions

For any questions or clarifications regarding this Policy, please contact the Investor Relations Department and/or the Legal and Governance Department.

### 5. ATTACHMENTS

#### 5.1 Organizational chart

