

Code of Conduct

This is the right way to reflect our culture



nexa





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Message from the Board of Directors



Nexa is committed to conducting its business with the highest standards of ethics, integrity, transparency, governance, respect for human rights, and social and environmental responsibility. Based on this commitment, Nexa has implemented and is constantly improving its Compliance Program that describes, in detail, the conduct we expect from all our employees and stakeholders in the ordinary course of business and when facing new or unexpected day-to-day situations.



The Board of Directors is one of the main agents promoting Nexa's Compliance Program and we are determined to make sure that the program is followed by all of us so we can run our businesses under these high standards, whilst at the same time being aware of the consequences of non-compliance.



We would like to emphasize that one of the main pillars of this Compliance Program is Nexa's Code of Conduct, which is essential for guiding activities and supporting the decisions made at all levels in our Company. We believe that the culture of an organization is supported by the understanding

and practical experience that employees and stakeholders have of the messages and guidelines that are communicated in the Code of Conduct, which prioritize safe operations and guarantee the integrity of people and assets while being environmentally and socially responsible.

This document is guided by Nexa's Values and Beliefs and is based on our internal behavior and how we interact with different audiences. Also, cognizant of the emerging and evolving risks and opportunities and expectations of regulators and other stakeholders, this updated Code of Conduct includes new topics such as ESG, Plurality and Inclusion, and Personal Data Protection, which are current demands in our society and are aligned with Nexa's strategy.

The Code of Conduct is a public document and as such, we expect it to be shared with all our stakeholders including suppliers, customers, communities, NGOs, government entities, shareholders, public agents and all individuals and organizations with whom we interact, so as to ensure excellence in all our business practices.



Message from Nexa's Executive Officers



We build our history based on the highest ethical standards of integrity and respect for all audiences. We understand that this attitude is what sustains us and that it is renewed daily, with the participation and engagement of all. Often, in our activities, we have relationships with suppliers, customers, business partners, employees, shareholders, members of the communities in which we operate, public agents and society in general.

It is essential that all these relationships are guided by respect for human rights and professional respect, plurality and inclusion ethics and transparency, and that they strictly comply with the required laws and regulations, and commercial, environmental, humanitarian, financial, health and safety practices.

We believe in and practice respect for people and we do not doubt that our attitudes and behavior have the power to influence and encourage ethical practices in professional and personal environments.

This is part of our essence, and we believe our actions will contribute to improving people's lives.

Our decisions and actions are guided by our Code of Conduct, which is based, above all, on integrity, transparency, respect for human beings and prioritize health and safety of our employees and collaborators, respect for the environment, and their sustainability. It has an educational and disciplinary character, reinforcing the importance of ethics and integrity in everything we do and guiding us on how to put it into practice through appropriate attitudes and consistent with our Values and Beliefs.

Everyone's commitment to the values we cultivate is even more fundamental for building the mining of the future, through an increasingly reliable and agile organization and will be a source of pride for all of us.



Nexa's Code of Conduct Highlights



1. The **CODE OF CONDUCT** is an important guide for all Nexa employees, business partners and stakeholders to understand and act according to the highest standards of conduct. This Code is inspired by our culture and committed to the principles of integrity, ethics, human rights, diversity, and social and environmental responsibility.
2. Our culture is the **NEXA WAY** of executing our strategy and sustains all our actions and decisions. We readily encourage a plural and collaborative environment. It also defines our identity, guides our behavior, determines our management model, and inspires this Code of Conduct.
3. 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.

4. Nexa understands the importance of its **THIRD PARTIES** in the continued success of its operations. Nexa expects its third parties and stakeholders to comply with applicable laws and regulations and Nexa's standards, provided by this Code of Conduct, Suppliers' Codes of Conduct and related policies and procedures. Failure to comply with them may entail consequences, including termination of the contractual relationship with Nexa.
5. Nexa has an **ETHICS LINE** which can be accessed by internal and external parties to report breaches of the Code of Conduct, laws and regulations and related policies and procedures. This tool is used to identify, analyze and resolve any potential breach impartially and transparently, ensuring the confidentiality of the information provided, anonymity of everyone accessing it and promoting a better environment for all. Nexa rejects any form of retaliation, discrimination or sanction made against anyone who exposes a genuine concern.

All allegations of retaliation, discrimination or sanction will be thoroughly investigated. Any retaliation, discrimination or sanction will result in disciplinary measures, including termination of employment or the contractual relationship with Nexa.

6. If you are a Nexa **EMPLOYEE** or a **THIRD PARTY**, we expect you to read this Code carefully, understand its content, comply with it and be committed to apply its provisions to your daily work routine. Lack of awareness of this Conduct does not exempt you from complying with it.
7. If you are a **LEADER**, you are responsible for engaging your team in understanding and complying with this Code of Conduct and Nexa's policies and procedures and attending the respective training.



About our Code of Conduct



Nexa Way

Ethical Dilemmas

Code of Conduct and its Application

Ethics Line

Conduct Committee

Breaches of the Code and Disciplinary Measures





Nexa Way



Nexa wants to build the mining of the future, growing in competitiveness through innovative and sustainable processes, considering environmental, social and governance aspects, which create value for our stakeholders and contribute to the development of society.



To keep moving forward, 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, Supplies and Logistics, and Capital Structure, all of which are supported by our culture.



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

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

We hope you can live the Nexa Way and apply them to your daily work routine.



Ethical Dilemmas



In our day-to-day activities, we all can experience ethical dilemmas.

As a general guideline, whenever this dilemma occurs, you should ask yourself the following questions:

Is the fact or decision in accordance with:

1. Applicable Laws and Regulations?
2. Nexa's Way?
3. Nexa's Policies and Procedures?

How would I feel if my decision:

1. Appeared in the media?
2. Was exposed to my family and Nexa's colleagues?
3. Harmed or put someone at risk?

Code of Conduct and its Application



Nexa's Code of Conduct is inspired by our culture and commitment to the principles of integrity, ethics, human rights, plurality, and social and environmental responsibility.

This is an important guide for all Nexa employees, business partners and our stakeholders, and makes them understand and act according to the highest standards of conduct. This Code also refers to the proper way to report potential or clear breaches of conduct, as well as acts that are punishable under the law. It is therefore very important that you fully understand all the chapters of this Code of Conduct.

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.

The approval of this Code, as well as any updates to it, is under the responsibility of the Compliance, Human Resources and Legal areas, Executive Officers and Nexa's Board of Directors. Suggestions for improvement shall be forwarded to Nexa's Compliance area. The Code of Conduct is reviewed regularly to ensure that it is up-to-date and is achieving its purpose. It may be updated based on the results of the review.

Any material changes to this Code shall also be disclosed publicly by appropriate means, including Nexa's documents filed with or submitted to regulators, in compliance with applicable laws and regulations of Brazil, Peru, Luxembourg, the United States, the United Kingdom, Namibia and Canada, and the rules of all self-regulatory organizations and all securities exchanges on which Nexa's securities may be from time to time listed and/or traded, as well as on our website.



What we expect **from you**

We expect you to conduct yourself and your activities in compliance with the standards described in this Code. All employees, including our Executive Officers and Board of Directors, must adhere to the Code, and our business partners and stakeholders are encouraged to adopt similar principles and standards.

Learn and apply the guidelines of this Code and the policies and procedures implemented by Nexa, provided they relate to your activities; help us disseminate these guidelines and

our culture among your colleagues and our stakeholders; and finally, we expect you to participate in all related training.

Reject any form of punishment, disciplinary or retaliatory action made against any person who in good faith reports or assists in dealing with any issue regarding business conduct. If you witness or become aware of suspicious or unethical behavior, you should inform your superiors, the Human Resources, Legal and/or Compliance areas, or report the fact using the Ethics Line. See further details about the Ethics Line.



Example

I have questions about the application of the concepts of the Code and whether my colleagues and managers will take the issues addressed seriously.

In Nexa, we aspire to the highest standards of integrity, transparency and reliability, in a pluralist environment committed to the sustainable development of the Company and its stakeholders (communities, employees, suppliers, customers, among others). We are always seeking to increase awareness among our employees and stakeholders.

We maintain a structure, the Compliance Program, that is ready to deal with these challenges, and we expect our employees

and stakeholders not to accept unethical acts or those that violate applicable laws and regulations or Nexa's standards, Values or Beliefs. We also encourage our employees and stakeholders to consult the Compliance and/or Legal areas and this structure to promote ethical behavior among their colleagues or to report any potential violations through the appropriate channels. If you have questions, our leadership is ready to provide or find the answers.





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 are not covered by the Code of Conduct, including, for example, breaches of specific laws.

The Ethics Line is designed to be impartial and transparent and to guarantee the confidentiality of the information provided, safeguard the identity of anyone accessing it and promote a better environment for all. 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 compliance-related policy, procedure, law or regulation.

Nexa rejects any form of retaliation, discrimination or sanction made against anyone who exposes a genuine concern. All allegations of retaliation, discrimination or sanction will be thoroughly investigated. The retaliation, discrimination or sanction will result in disciplinary measures.

You can access the Ethics Line by phone or through Nexa's website, where you can make a complaint (anonymously if preferred), ask questions or follow up on a previously made complaint. Information on the different ways to access the Ethics Line can be found at

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

All complaints made via the Ethics Line are automatically forwarded to a qualified and independent external entity for preliminary classification and subsequent forwarding to the Conduct Committee, which is responsible for addressing complaints, supervising investigations and recommending appropriate corrective actions, if necessary. The Ethics Lines statistics are presented to the Audit Committee and the Chairman of the Audit Committee has access to the Ethics Line.

Complaints related to financial crimes, fraud, bribery in business transactions or acts involving employees, business partners and our stakeholders should **always be accompanied by supporting facts and data – whenever possible – and will be reported** to Nexa's Audit Committee as well. Depending on the cases reported on the Ethics Line and the results of the investigation, some cases must also be reported to the necessary authorities.

This Ethics Line is available in Portuguese, English and Spanish.

As mentioned before, additional information on the Ethics Line procedures may be found on Nexa's website 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, the Ethics Line should be used in a responsible and serious manner.

If you experience a situation that makes you question the appropriate response or conduct, or if you do not agree with an action or approach taken by a colleague, business partner or stakeholder, you should first talk to your immediate superior. However, in situations where the circumstances make reporting to your immediate superior or unit manager uncomfortable or inappropriate, you can seek advice from the Human Resources, Compliance and/or the Legal areas or, if you feel more comfortable, you can send the question directly through the Ethics Line.



Example

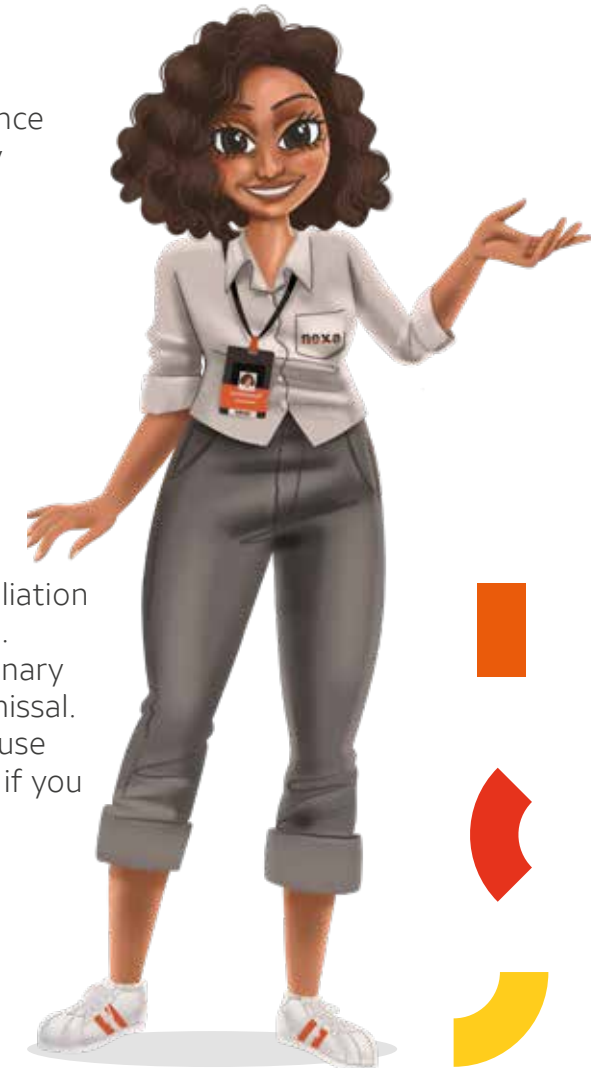
I am worried that my immediate superior or even my manager would punish me if they learned that I contacted the Ethics Line about an issue.

We encourage all employees and stakeholders to use the Ethics Line and report all potential unethical situations that you may be aware of or concerned about. If you are subject to any form of retaliation, discrimination, or sanction, you may contact the Ethics Line as well.

However, in some cases, the situation may be resolved through a conversation with your direct supervisor, the Human Resources or Compliance areas.

We reject any form of retaliation made against anyone who exposes a genuine

concern. All allegations of retaliation will be thoroughly investigated. Retaliation will result in disciplinary action, which may include dismissal. Thus, we hope that you make use of this service and also report if you suffer any kind of retaliation.





Conduct Committee

To promote the dissemination of the Code of Conduct, oversee the implementation of disciplinary measures and ensure the ethical culture in all our businesses, Nexa has a Conduct Committee, made up by individuals prepared to handle issues related to possible deviations of conduct, acts prohibited by law, and general integrity issues.

The Conduct Committee is an executive body composed of Nexa's CEO, CFO, and individuals responsible for the Compliance, Legal, Human Resources, Internal Audit and other areas, as needed.

The Conduct Committee meets quarterly to review the main complaints received during the period, assess the root causes of the problems, and deliberate on improvement actions and the disciplinary measures to be applied, in addition to always evaluating ways to improve Nexa's culture. If the case involves an Executive Officer, the Conduct Committee will forward the issue to the Audit Committee and the Board of Directors, to always ensure the independence of the process.

To the extent that the Audit Committee and the Board of Directors grant a waiver that would constitute a material departure from a provision or procedure of the Code of Conduct to Nexa's President

and Chief Executive Officer, Senior Vice President of Finance and Chief Financial Officer, Principal Accounting Officer or Controller (or any person who performs similar functions), that waiver shall be disclosed in compliance with the applicable laws and regulations of the countries in which Nexa conducts its operations and the rules of all self-regulatory organizations and all securities exchanges on which Nexa's securities may be from time to time listed and/or traded. If the Conduct Committee receives any information that would constitute a material departure from a provision of the Code of Conduct by the mentioned officers, the Conduct Committee shall communicate such a violation to the Investor Relations and Legal teams for appropriate disclosure to regulatory authorities.

In addition, all other complaints received by the Ethics Line are reported to the Conduct Committee, which is responsible for determining and ensuring

the implementation of any necessary measures in response to a breach; promoting the periodical review and update of the Code of Conduct; making administrative decisions in cases involving serious breaches; issuing recommendations in situations involving potential conflicts of interest between related parties; and ensuring the existence and maintenance of the Ethics Line as a permanent and direct communications channel.

The Conduct Committee will report to Nexa's Audit Committee and Board of Directors regarding complaints that could have a significant impact or repercussions on Nexa either financially, legally, or on its reputation.

Depending on the situation and the results of the investigation, some cases may also be reported to the appropriate authorities.



What we expect **from you**

We expect that you will help promote respect, compliance, and improvement of our Code of Conduct.

Being aware of the mission and responsibilities of the Conduct Committee and the practices and attitudes required by this Code, you can help ensure that such practices are followed and complied with.

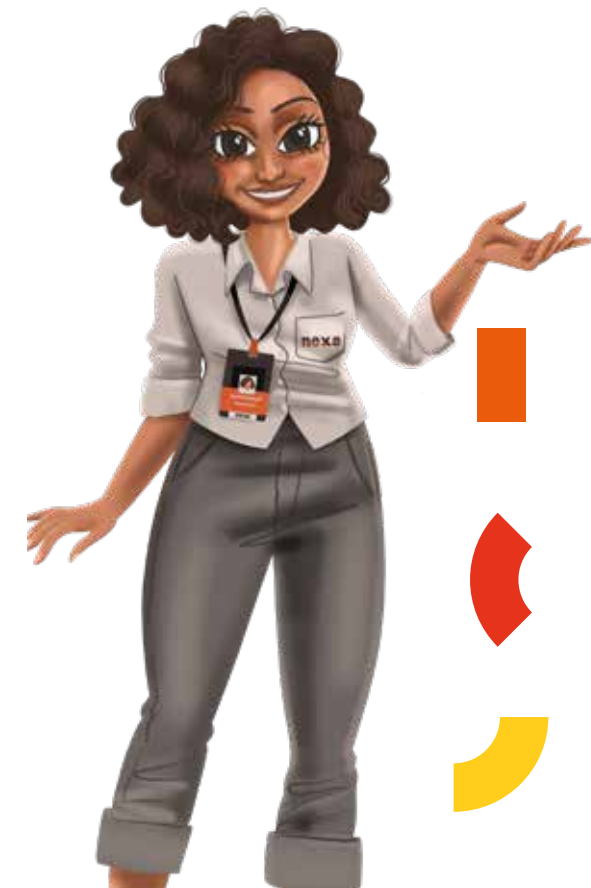


Example

I reported a compliance-related concern through the Ethics Line last month, but nothing happened. I also heard that there was a Conduct Committee meeting, and I have not received any response from my report. I am disappointed with the outcome. Why should I continue reporting possible issues in the future?

All reports and issues made through the Ethics Line undergo an analysis process that searches for all available data and listens to all the parties involved. Some cases will take longer to investigate than others. For privacy reasons, we will not keep you up to date

about the exact outcome of an issue raised. However, if you consider that the subject was not properly addressed, you can get in touch again with the Ethics Line to check the progress of your issue.



Breaches of the Code and Disciplinary Measures

Nexa expects its employees and stakeholders to comply with the applicable laws and regulations and Nexa's standards, provided by this Code of Conduct and its policies and procedures.

Misconduct or failure to comply with such standards or the Code are regarded as inappropriate. They must be taken seriously, should be reported and handled, and could lead to disciplinary measures, which may include termination of employment or contract services. If a breach has occurred, the type of disciplinary or corrective measure shall be determined by the immediate supervisor, Human Resources or the Conduct Committee.

Critical situations such as fraud, corruption, conflict of interest, harassment, discrimination, inappropriate use of resources, disclosure of confidential or inappropriate information shall be handled with the support of the Conduct Committee. The corrective measures will depend on the severity of the breach and on other relevant circumstances, determining the appropriate response which may include but not limited to:

- 1. Reinforce compliance training, education or coaching;**
- 2. Oral or written warning;**
- 3. Suspension; or**
- 4. Employment contract termination.**

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

However, if you face obstacles to comply with the policies, procedures, internal rules or the Code due to outdated policies, lack of infrastructure or inadequate resources, you shall request guidance from your immediate superior, who shall escalate the case to the appropriate level of the organization, through the Compliance and/or Legal areas, to seek for a solution.





What we expect **from you**

Always follow Nexa's Code of Conduct, Policies and Procedures.

If you witness or become aware of any breach of the Code of Conduct, Nexa's Compliance Program in general or any other matter about which you feel uncomfortable, you should report the issues immediately to your immediate supervisor.

If the breach involves your supervisor or you feel uncomfortable reporting to him/her for any reason, you should contact your

unit manager or the Human Resources, Compliance or Legal areas. Remember that you may always directly and anonymously access the Ethics Line. In all cases, you will be expected to cooperate with potential investigations into any reported breach.

Individuals may engage in inappropriate or unacceptable behaviors if they do not have complete and up-to-date information about expected standards of conduct, do not understand that information or are under pressure to complete an activity.

We reinforce that comprehending Nexa's policies and procedures and terms of the Code are vital to our daily activities.

This requires you to inform yourselves actively and regularly about existing requirements and participate in available training. You should understand what the Code expects from you and that you should help people who might be confused or lack understanding of these expectations.

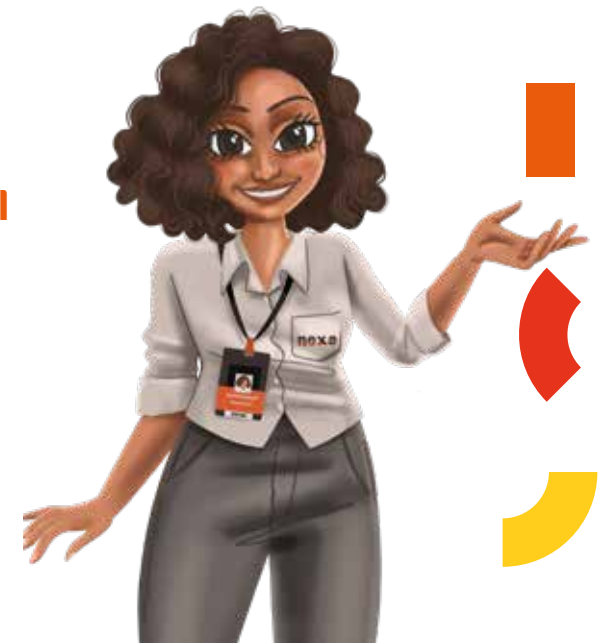


Example

I see that a series of internal policies are not fully complied with. I have discussed the issue with my superior; however, he said that some actions are cultural traditions and therefore, in Nexa, we do not comply with these internal policies. Is this a breach of the Code?

Yes, internal policies determine the roles and responsibilities of individuals in the activities they carry out. Failure to comply with a policy or procedure is a breach of the Code. If you are aware of a policy or procedure that is not being complied with, and

your superior is not interested in helping you, you should report it to your unit manager, the Human Resources, Compliance and/or Legal area or through the Ethics Line.



Employees and the Work Environment



Human Rights

Plurality

Relationship with Shareholders and Related Parties

Conflicts of Interest

Harassment

Health, Safety and Environment

Use of Alcohol and Drugs, Weapons Possession





Human Rights



Nexa is committed to respect and support human rights and dignity of all individuals and stakeholders across all the countries where we operate. In this regard, Nexa promotes the right to equality, life, liberty, personal security, living wage and a work environment free of discrimination, in terms of gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation.

Likewise, Nexa does not tolerate behavior including gestures, language, and physical contact that is sexual, coercive, threatening, abusive or exploitative.

Nexa is also committed to a work environment free of slavery (similar or modern), involuntary prison labor, torture, labor performed with degrading treatment, or with workers submitted to or forced to work in illegal conditions or contrary to human dignity.

To that end, Nexa does not employ or use, directly or indirectly, any kind of forced labor in any stage of its activities other than in accordance with all applicable laws and regulations, allowing all employees the choice to leave their employment freely upon reasonable notice.

Nexa respects the rights of employees to freely associate and bargain collectively and compensates employees fairly and follows local wage regulations and/or collective agreements.

Through adequate contractual arrangements, we make our contractors, suppliers and consultants aware of and expect them to comply with our human rights commitments.

The Company may hire minors, between the ages of 16 and 18, within the legal conditions of work as apprentices, according to the laws of every country where Nexa operates, as long as this hiring does not disrupt their education and training or their physical, mental, social or moral development. Minors are not allowed in dangerous or unhealthy places, or to work at times that do not allow them to attend school or at night.

Finally, Nexa respects all labor laws in the regions where it has employees and third parties. The hours worked by these professionals must strictly comply with these laws and be recorded in the punch card in a timely and complete manner by the respective employees and third parties. Nexa's internal procedures establish the rules and controls of this process, which must be strictly followed.



What we expect **from you**

Participate in all training and e-learnings related to Nexa's Code of Conduct and workshops related to human rights.

Nexa expects that all its employees and stakeholders, particularly those related to our supply chain, are committed to these principles and that if you identify any violation of human rights related to

our employees or third parties, you report it to the responsible area, Human Resources or Legal, or the Ethics Line.

If you become aware of any situation of non-compliance with these principles, reach out to your supervisor, the Human Resources and Compliance areas, or submit a report through the Ethics Line.



Example

I was in one of our mining units and one of the employees told me he had been working for forty-eight hours non-stop and was very tired. What should I do?

You should report the case to the employee's supervisor so he/she can take appropriate actions. If the situation remains or becomes

a habit, you should report it to the Human Resources, Legal or Compliance areas, or to the Ethics Line as soon as possible.



Plurality



Plurality is part of our culture, where we seek to embrace the diverse reality of our society and work environment and ensure that representativeness and inclusion are present in the organization.

The varied and complex points of views, life trajectories and experiences are potentials that act in a complementary way, favoring new problem-solving approaches, bringing creative resources that pushes Nexa forward in a consistent way, strengthening our strategy. For this reason, we provide equal opportunities for jobseekers and employees on career development and compensation, based on meritocracy and business goals.

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

At Nexa we do not tolerate any kind of prejudice and discrimination, regardless of gender, sexual orientation, gender identity, gender expression, physical and medical condition, education, socioeconomic status, race, ethnicity, culture, religion, disability, age, political positioning or accent, among other differences and life styles.

Prejudice: indicates opinion or feeling, favorable or unfavorable, assumed as a result of the hasty generalization of a personal experience or imposed by someone or something, or it can simply be part of a mental structure.

Discrimination: it is the result of prejudice. It is the materialization of this form of thinking. That is, discrimination is the action of segregating something or someone, performing a malicious and partial treatment.

For additional information and guidance, please consult the Human Resources, Legal and Affinity Groups.



What we expect **from you**

At Nexa, considering all the interactions with all Nexa's stakeholders, relationships in the workplace, regardless of hierarchy, shall be guided by mutual respect, trust and team spirit. To build plural and inclusive teams, you should treat everyone with fairness, respect, and dignity, promoting a work environment and a business ecosystem without harassment, prejudice or discrimination.

Empathize with realities different from your own and be open to plurality. If you witness or have been the target of any situation of discrimination, disrespect, humiliation or abusive practice, report it to your supervisor, the Human Resources, Legal or Compliance areas or through the Ethics Line.

Do the right thing and treat all people in a respectful manner. This is the Nexa way.



Example

We are conducting a recruitment process for a position that involves traveling a lot. One of the candidates has excellent qualifications and experience but is a mother of twins and I do not think she will be able to handle all the trips. So, I should exclude her from my shortlist, so she does not waste her time.

By making that assumption, you are violating our Code of Conduct. You should not discriminate or make assumptions about candidates based on their personal attributes, such as their family responsibilities. Our hiring is based on behavioral and technical skills, as well as adherence to our culture.

Therefore, you should give all candidates the information related to the requirements of the position. The candidate may then decide whether they continue with the hiring process or not. If you witness or experience any situation of discrimination, you may consider making a report to the Ethics Line.



Relationship with Shareholders and Related Parties



Nexa is committed to conducting its business in accordance with international accounting principles and rules of governance, specifically in agreement with the listing rules of the exchanges on which Nexa's securities are listed or traded, following internal procedures for disclosing financial and other business information to the market and regulators.

Any transaction and/or communication between Nexa and its related parties, including our shareholders and Board Members, shall be carried out in a precise, transparent, impartial, and timely manner.

Transactions and negotiations with related parties shall be carried out according to the principles of arm's

length, ethical values and transparency, in accordance with Nexa's interests. These Transactions and others involving potential conflicts of interest shall be identified, analyzed, monitored and disclosed in compliance with our Related Parties Policy.

Information related to transactions with related parties shall be complete, reflect the actual operation, conducted on an arm's length basis, contracted with adequate compensation at fair market conditions, recorded in accordance with the applicable legal rules and provisions of regulatory bodies where Nexa and its subsidiaries trade their stocks or file financial reports, such as Luxembourg, United States, Canada, and Peru, in all material respects, and disclosed properly at Nexa's financial reporting.

For more information, see the Related Party Transactions and Conflict of Interest Policy, available on the Nexa Intranet.





What we expect **from you**

You shall participate in the training on Related Parties and Conflict of Interest Policies.

We expect you to consider and act in Nexa's best interests, and therefore, follow the guidelines established in the Related Party Transactions and Conflict of Interest policies. In every transaction involving a related party and before its contracting, you shall contact the Controllershship area for its assessment.



Example

I need to contract a technical consultant for Nexa. During the bidding process I become aware that one of the potential suppliers is owned by one of our Board of Directors members. What shall I do?

You shall inform of this situation to the Related Parties Committee and provide all the information regarding the service,

compensation fees, among others, and this committee will assess if you may proceed with the contracting process.





Conflicts of Interest

A Conflict of Interest in the workplace occurs when a person's vested interests raise a question of whether his or her judgment, decisions, or actions can be unbiased. Situations could arise where an employee's position or his/her considerations, financial interests or other professional or personal interests affect, has the potential to affect, or seems to affect, his/her own judgment and independence.

In your day-to-day activities, you could face decisions that may pose a real, potential, or perceived conflict of interest, with respect to another employee or stakeholder, such as suppliers, customers, members of the community, business partners, shareholders and within the same economic group to which Nexa belongs. In this respect, it is important to understand the situations in which you, a colleague, or a third party could have or appear to have a conflict of interest. You are obliged to make impartial decisions, excluding your own personal, family, or financial interests or those of others that somehow could affect your own judgment.

Some common conflicts may include:

- Involvement, participation or influence in decision-making process, such as hiring, supervising, payments approval or performance appraisal, of your relatives, close friends, or companies you may have personal interest in.
- Having a second job with a Nexa customer, supplier, or competitor.
- Owning, directly or through a relative, a participation interest at a company that has business with Nexa while having decision-making authority over such business relationship.

- Receiving fees, commissions, discounts, gifts, entertainment, services, or cash from a Third Party, directly or indirectly involved with Nexa.
- Having a romantic relationship with a Nexa or supplier employee, under the same area or provision of services, without communicating it to your supervisor, the Human Resources or Compliance areas.
- Searching for business opportunities that will benefit your relatives or close friends, when not in accordance with Supply Chain area procurement procedures.

If you think you may have a conflict of interest, do not hesitate to consult your supervisor, the Human Resources or Compliance areas, and fill the Conflict-of-Interest declaration. This is the best way to mitigate the risks involved.

For additional information and guidance, please consult Nexa's Conflict of Interest Procedure, available at our Intranet and GQI system.



What we expect **from you**

All new employees working at Nexa shall complete a Conflict-of-Interest declaration, available on Nexa's Intranet. We expect you to complete this declaration on a timely basis, be familiar with Nexa's Conflict of Interest procedure and participate in the corresponding training, when invited.

You should avoid negotiations in which conflicts of interest arise or appear to arise, and do not participate in any decision-making processes that influence or could be perceived as influencing your ability to make an objective decision and fulfill your responsibilities.

Also, whenever you identify any potential, real or apparent conflict of interest that could involve you directly or

indirectly, report it to your direct supervisor by preparing the Conflict-of-Interest declaration and following the guidelines established in the procedure. Before participating in or influencing the decision-making processes, your direct superior shall ensure that the situation has been properly addressed by the Compliance area and the business area involved in the potential conflict, including the Human Resources area, if applicable.

You should help Nexa to recognize situations in which Nexa's or Supplier's employees may face a real, potential, or perceived conflict in your daily basis activities. Always report these cases to your direct supervisor, the Human Resources or Compliance areas or issue a report to the Ethics Line.



Example

I am currently working as a Supervisor in the Maintenance area at the Vazante mining unit and recently a new employee started working at Nexa under my responsibility. We started working together and began a romantic relationship. Should I report this situation to someone?

Yes, you should report it to your immediate Supervisor, who will seek guidance from the Human Resources and Compliance areas on how to proceed. According to our policies, an

employee cannot be the supervisor of his/her romantic partner or wife as he will not be able to make his decisions in an impartial way towards his/her partner.





Harassment



No harassment is tolerated, whether of moral, sexual, derived from authority or another kind, or situations that present disrespect, intimidation or threat in the relationship between employees or with service providers and other stakeholders, regardless of hierarchical level.

In addition, Nexa does not tolerate inappropriate professional behavior, such as innuendo, insults or inappropriate jokes, disrespectful treatment of subordinates and colleagues or any kind of persecution of employees, customers, suppliers, visitors or others through disguised or explicit threats, or through arbitrary positioning of power and/or authority, or the exchange of discriminatory, racist, defamatory, violent, obscene or pornographic content that disrespects any individual or entity on Nexa's premises, among others.

Moral Harassment: refers to physical or verbal conduct that humiliates, discriminates, coerces, or threatens anyone on a recurring basis, regardless of hierarchical level. This also concerns the creation of a hostile work environment that interferes with individual performance or affects the dignity and working conditions of those involved.

Sexual Harassment: refers to the uninvited and unwelcome verbal or physical conduct of a sexual nature, embarrassing and pressuring an individual for the real or apparent purpose of obtaining sexual advantages or favors, taking advantage of the influence or professional context of someone, independent of the position or function.

For additional information and guidance, please consult Nexa's Human Resources, Legal or Compliance areas.



What we expect **from you**

We expect you to treat everyone with respect and dignity, promoting a workplace environment free of harassment and participate in all training and e-learnings related to Nexa's Code of Conduct and workshops related to plurality and inclusion.

Help and support other employees and service providers to truly comprehend and embed that harassment is not part of Nexa's culture.

Do not behave in an offensive, insulting, intimidating, malicious or humiliating manner. Do not make, for example, comments

about a person's race, ethnicity, religion, gender, sexual orientation, age, appearance or disability. Never display or distribute offensive material, including inappropriate photos, videos or drawings. Never use Nexa systems, facilities, or equipment to disseminate offensive material, internally or externally.

If you witness and/or experience some of the situations mentioned above as not tolerated, you shall contact your supervisor, the Human Resources, Legal or Compliance areas or submit an allegation through the Ethics Line.



Example

A colleague from the area told me that he constantly receives, from other colleagues, insults, derogatory comments and jokes related to his sexual orientation. I know this is against Nexa's principles and Code of Conduct, how shall I proceed?

Ask your colleague how he feels about this situation and encourage him to talk to his supervisor, the Human Resources and/or Compliance area and consider reporting a complaint through the Ethics Line. This situation

will be investigated, and proper corrective actions will be taken, in case it is proven to be true. If you witness a situation like this, you can also submit an allegation through the Ethics Line.



Health, Safety and Environment



The health, mental and physical integrity of Nexa's employees and service providers, and environment protection are priorities for Nexa and are above any economic or production objectives.

One of the most important practices to be followed by all of our employees are those related to the Golden Rules, which establish clear procedures for specific risk situations. Each one and every one of us are responsible for knowing these rules as well as the policies, procedures and practices related to health, safety, and environment, and strictly fulfilling 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. All employees, suppliers or any other third parties working inside Nexa's facilities are obliged to wear the required personal protection equipment and to report to their supervisor or the Health and Safety team, as soon as possible, the occurrence of any accidents and incidents, being strictly prohibited the concealment or omission of any cases, regardless of the severity.

With respect to safety, we must always be vigilant and protect our personal health, our mental and physical integrity, and those of our co-workers. Each and every one of us shall be responsible for the prevention of accidents in the workplace.

Additionally, by taking care of the physical integrity of our facilities and technical equipment, we avoid the risk of accidents. At Nexa, our **SROA** movement invites all employees to **Stop, Reflect, Observe** and **Act** by complying with the security rules and procedures, reporting any deviations and using the right of refusal of performing any activity that may be considered dangerous.

Concerning the environment, we should always look for a preventive approach to environmental challenges, seeking constant development of practices and technologies that do not harm the environment. It is part of our culture to seek preservation opportunities, so we can provide lasting environmental benefits.

For additional information and guidance, please consult Nexa's Health and Safety Procedures, available at our Intranet and GQI system.



What we expect **from you**

Keep yourself up to date for all health, safety and environmental training and identify, assess and take steps to control health and safety risks associated with your work and the work of others you work with. In this matter, it is imperative that you stop immediately any work that seems unsafe. Be sure that everyone around you is wearing the required personal protection equipment and that you know how to use it in case of any emergency.

If you discover any conduct that could result or has resulted in actual or potential negative environmental or community impact, immediately report the incident or conditions to your supervisor, and, if it can be done without further risk, stop any related work. You must encourage our suppliers, partners, and customers to implement responsible practices to eliminate unsafe practices and minimize environmental impacts.

If you become aware of any situation of non-compliance with Nexa's health, safety and environmental policies and procedures, reach your supervisor, the Human Resources or Compliance areas or submit a report through the Ethics Line.



Example

As part of my day-to-day activities, I work at hazardous heights. Last week, my equipment was presenting some issues and I was not able to use it. I requested new equipment to perform my job; however, there was some delay to receive it due to manufacturing problems at the vendor. I refused to work until the new equipment arrived, but my supervisor insisted that I use the old equipment despite my feelings of apprehension. What should I do?

All safety procedures are necessary and should never be compromised. You should consider first stating your concerns to your supervisor. Remind him of Nexa's Golden Rules and if you feel uncomfortable in doing so, or have not been successful in the attempt,

you should discuss the issue with the leader of the area or business unit, or with the Human Resources area. If the problem remains unresolved, contact the Compliance team or submit a report through the Ethics Line.



Use of Alcohol and Drugs, Weapons Possession

The ingestion of alcoholic beverages and drugs during business hours or the performance of professional activity under their influence is forbidden.

The use of alcohol on Nexa's premises is also forbidden. When applicable, the consumption of alcoholic beverages is restricted to celebrations authorized by the responsible General Manager or VP, outside the work environment, and always with moderation and ensuring that such consumption will neither influence any kind of behavior that will breach the guidelines of this Code nor cause any accidents.

The use, possession or sale of drugs is prohibited. Employees may not perform professional activities while in an altered state that could affect the safety and performance of the employee and/or his/her co-workers.

No weapon is allowed in Nexa's facilities other than those carried by the professionals expressly authorized thereto and subject to local legislation.

For additional information and guidance, please consult Nexa's Golden Rules Procedure, available at our Intranet and GQI system.





What we expect **from you**

Do not offer, sell or consume any alcoholic beverage or any kind of drugs in Nexa's workplace. Never perform any work when you are under the influence of alcohol or drugs (illegal, legal or prescribed that may have adverse effects or affect judgment or abilities).

We expect that you inform your immediate supervisor in case you are not feeling well and safe to perform your work due to the use of any drugs, even if they are prescribed, or alcohol or if your co-worker is in such a situation.

In case you need any support to deal with drug or alcohol use, we encourage you to ask for support at the channels intended for these purposes, available to you by Nexa.

Never drive a vehicle if you are under the influence of any kind of alcoholic beverages or drugs.

Never carry, use or transfer drugs or illegal substances while on the premises of Nexa, its units or offices.

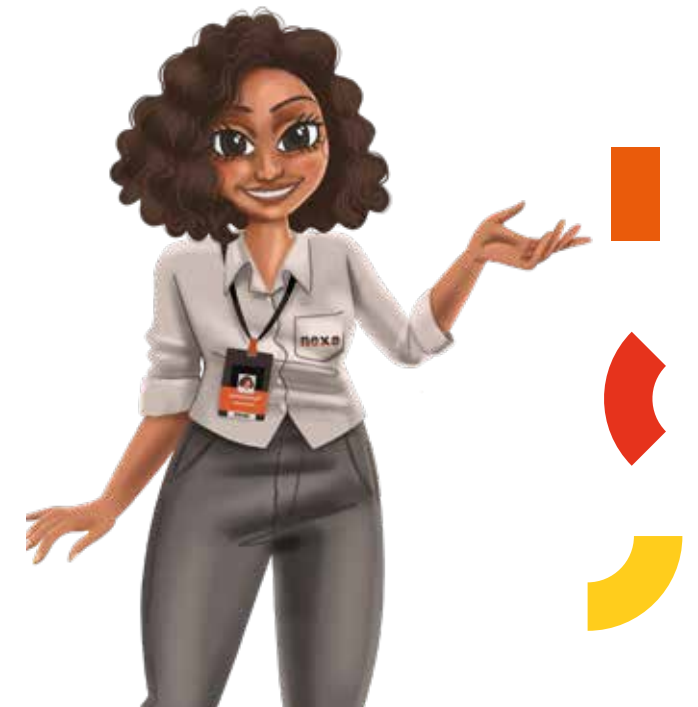
Respect local laws related to the carry and use of weapons.



Example

At the end of the year, a series of celebrations are held between the work teams, in addition to the year-end celebration. Can I drink alcohol at these celebrations?

If you are returning after the celebration to a workplace or office or if you are going to drive, you must not drink alcohol.



Relationship with Outside Groups



Community Relationships

**Relationship with Government Entities and
Government Representatives**

Political Participation and Donations

Relationship with Suppliers and Third Parties

Gifts, Entertainment and Hospitality

Press

Image and Reputation



Community Relationships



Nexa's activities have a significant impact on nearby communities. It is therefore essential to properly know all stakeholders, their needs, and how we intervene and impact their way of life, through a process of continuous communication with communities and their representatives, based on relationships of trust, promotion of social participation and permanent, clear, and transparent dialogue.

We are committed to sustainable development that considers the economic, cultural and social aspects of the communities where we operate. We act according to our values and maintain open and transparent channels of dialogue with all the communities in the regions in which we operate.

When committing to a social development project, we shall be sure that the actions carried out are aligned with Nexa's social strategy, which strives to champion local development and quality of life for all communities.

Also, all verbal or written agreements, terms, contracts, commitments and donations to communities must be discussed or reviewed in advance by the Legal and Compliance areas and follow the Compliance and the Social Management policy and procedures. Moreover, all greenfield and brownfield projects that may have an impact on communities must be previously discussed with the Social Management and Corporate Affairs areas.

For additional information and guidance, please consult the Social Management, Corporate Affairs, Legal or Compliance areas.



What we expect **from you**

We expect you to participate in all training and e-learning related to Nexa's Code of Conduct and the workshops and training provided by the Social Management and Corporate Affairs areas.

You shall comply with all the guidelines established by the Social Management area, which is responsible for the community relationships' strategy, which includes the respect for their cultures and

their different customs, provided that they are not in conflict with this Code or the law.

Nexa employees are responsible for the actions of their contracted third parties in terms of their interactions with the communities and as such, employees shall educate them in Nexa's Code of Conduct, policies and procedures and its strategy to approach them properly.

We expect you to identify and evaluate the interests and demands of all stakeholders, especially those most affected by our operations, considering such aspects in your decision-making process. Consult with the Social Management, Corporate Affairs, Compliance or Legal areas if you have any questions.



Example

A member of my team proposed that Nexa support the remodeling of a local school. What should I do?

Any social investment should be considered and approved in accordance with Nexa's social strategy. You should first consider sharing the idea with your supervisor, the manager of your unit, or a representative from Corporate Affairs or Social Management areas.

Always remember to involve the Legal and Compliance areas to review the agreement or contract, request the due diligence and follow other internal procedures to ensure proper supporting documentation and avoid unnecessary exposure.





Relationship with Government Entities and Government Representatives

Any formal relationship with a governmental entity, including municipal, state, and federal agencies, or an employee thereof should always be established in writing and in accordance with Nexa's Anti-Corruption Policy. The Legal Area can provide additional guidance on such relationships.

Whenever a request is submitted by a government representative, including inspection processes, submission of annual reports, and requests for clarification, you shall immediately notify the Legal and Corporate Affairs areas, who will manage the request, organize the internal dialogues with other areas involved in the subject and guide the procedures to be adopted.

If you represent Nexa in government affairs or with government representatives, you shall ensure that you have authorization for such representation by your supervisor, are properly trained and comply with all applicable laws and regulations and Nexa's Anti-Corruption and Relationship with Government Representatives Policies.

In addition to complying with the requirements above, while representing Nexa in public affairs,

you shall not give, receive, promise, request or offer any gifts, benefits of any nature or favors from/to government representatives, in order to obtain any kind of improper benefit or advantage for Nexa, yourself or any other person or entity.

Likewise, you 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 should you be involved in traffic of influences (real 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.

In addition to the existing procedures that establish the necessary precautions that we must observe when communicating with public agents at all times, Nexa implemented a specific guideline that should be followed for the use of e-mails, communication APPs or video conferencing software such as Microsoft Teams, to enable communications with government representatives.

For additional information, more details about the definition of Government Representatives and guidance, please consult Nexa's Anti-Corruption and Relationship with Government Representatives Policies.



What we expect **from you**

We expect you to participate in all training and e-learning related to Nexa's Code of Conduct and Relationship with Government.

Before engaging or dealing with any government representative, ensure that you have the appropriate authorization(s) and guidance from the Legal and Corporate Affairs areas. Be truthful, accurate, cooperative,

and courteous when dealing with government representatives and act in compliance with the requirements of this Code and Nexa's Anti-Corruption and Relationship with Government Policies.

Except under extreme or extenuating circumstances, every interaction with a government representative should involve the participation of at least two employees of Nexa and use appropriate communication channels or locations. After the interaction takes place, formalized minutes should be prepared and reported to the Compliance area.



Example

A colleague and I had a meeting with the government representative of the environmental agency to discuss procedures for obtaining a license required for our unit. During the meeting, the government representative requested from Nexa to donate equipment and financial resources to continue with the approval of the license. What shall we do?

You should respectfully communicate to the government representative that this request is not in accordance with Nexa's Code of Conduct and leave the meeting. Document the incident and report it to its supervisor, manager and/or general manager, and the Legal, Compliance and Corporate Affairs areas.

Nexa will not provide any donation, sponsorship, or any other kind of financial or nonfinancial support to a government representative or entity aiming to obtain any undue advantage, favors, change, or influence government decision or speed any action.



Political Participation and Donations



Nexa will not make any political donations or participate in its corporate capacity in any political activity.

Nexa respects the individual rights of employees to engage in civic affairs and participate in political processes. However, such participation should occur during an employee's free time and at his/her expense. In this situation, the employee should make clear that any statements made, or public positions taken are done so in a personal capacity and do not necessarily reflect the opinion or position of the Company. It is strictly prohibited to use Nexa's resources, space, or image to advance any personal political or policy interests.

In relation to political donations, employees are forbidden from making any contribution in cash, goods or services to political campaigns or causes on behalf of Nexa.

For additional information, please consult Nexa's Donations, Sponsorship and Relationship with Government Policies or the Legal and Compliance areas.



What we expect **from you**

We expect you to participate in all training and e-learnings related to Nexa's Code of Conduct, Donations, Sponsorship and Relationship with Government.

Never use third parties or intermediaries to provide any political

donations, sponsorship or any other kind of financial or nonfinancial support on behalf of Nexa.

Never use or allow the use of any of Nexa's goods or resources for any political campaign, political party, political candidate, elected government

official or any organization affiliated thereto. Never use your position in Nexa to try to influence another person to make contributions or to support any politician or political party.

Respect the political preferences of your co-workers and colleagues.



Example

There is a political event near our unit and the organizers asked us if a booth could be set up in an area belonging to Nexa. We will not support the event in any other way, just let them set up the booth in our area. Could we do this?

No, we cannot use Nexa's assets or resources for campaigns or political activities. You shall inform the party that they will need to find an alternative site for the event. If you do not feel comfortable rejecting their request, bring it to your supervisor for him/her to handle or escalate, as appropriate.



Relationship with Suppliers and Third Parties



Nexa understands the importance of its third parties in the continued success of its operations. Nexa's suppliers follow contracting policies and procedures that use transparent, impartial, non-discriminatory criteria.

As such, every decision must have technical and economic support, and improper favoritism of any kind is prohibited. When choosing a supplier, you shall take every appropriate precaution and recuse yourself from participating in any decision where you may have a conflict of interest.

Any inappropriate conduct by suppliers could potentially have a negative impact on Nexa's image and reputation and could result in Nexa being found criminally liable for suppliers' actions performed on our behalf. Therefore, it is very important that our suppliers undergo an assessment, as established in the contracting policies and procedures, through which we can determine their suitability and ascertain the rigor of their controls, policies, procedures, and practices related to human rights and compliance with laws, including those relating to bribery and kickbacks, and relevant regulations.

Nexa acknowledges that no Code can address every situation that any given third parties may encounter. As a result, this Code is not a substitute for the accountability and responsibility of a third party to exercise sound judgment and proper business conduct. The principles set forth herein are to govern all dealings with third parties.

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

Notwithstanding the corresponding legal sanctions, Nexa's contracting policies and procedures, which must be complied with, establish that the Company retains the contractual right to terminate any business relation 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 concern about illegal conduct or breach of the guidelines outlined in this Code of Conduct.

Always remember that all the contracts and agreements with suppliers and Third Parties must be formally reviewed by the Legal area and include the anti-corruption, money-laundering prevention and antitrust clauses. Any advance payments granted according to the contract must be monitored in detail, following Nexa's finance guidelines.

Nexa does not allow the payment of invoices for services that have not been performed, completed, formally approved by the responsible areas and are not in accordance with fair market value, which is also applicable for the receipt of any materials, equipment or inputs. No payment can be processed without proper supporting documentation and, when applicable, the contract or agreement.

Nexa's Code also serves as a reference to our suppliers in carrying out their business with Nexa or on behalf of Nexa, where relevant, and in addition, Nexa developed the Supplier Code of Conduct, encompassing general guidelines to be considered and applied during their partnership with Nexa.

For additional information and guidance, please consult the Supply Chain and Compliance areas.





What we expect **from you**

Invite your supplier to read Nexa's Code of Conduct and the Supplier Code of Conduct.

Before contracting with a supplier or signing an agreement or other commitment, the Supply area or contracting area should carry out an appropriate risk assessment and business analysis, including an evaluation of the potential supplier in relation to health, safety, environment and community performance, human rights, reputation, conduct, integrity, qualifications, experience, reliability, compliance with laws and regulations (including but not limited to anti-corruption laws and regulations), due diligence, solvency and ability to fulfill our needs and policies.

The Supply Chain area or contracting area shall also make sure that all the appropriate procedures are followed, obtaining all proper internal approvals including from the Legal area which will ensure, among other things, the existence of all necessary contractual clauses.

Nexa employees are responsible for the actions of their contracted suppliers in terms of their interactions with other third parties (private or governmental entities, communities, and others) and as such, employees shall educate them in Nexa's Code of Conduct, policies and procedures and its strategy to approach them properly. In addition, employees shall monitor and manage their performance and compliance with their contractual obligations.



Example

I really like a supplier we have used for years. They understand our business and already know our Code and our policies. Lately, their invoices seem to be very expensive. Is it just inflation, or should I take action?

As established in Nexa's contracting policies and procedures, all supplier prices should be agreed upon in advance, either through quotes or contracts, and a purchase order must be issued before starting any work.

As part of these procedures, the Supply Chain or contracting areas provides several quotes to ensure that prices are competitive.

The area responsible for the service to be performed should make sure that the price charged is the one negotiated by the Supply Chain area through its contracting policies and procedures. In this way, all the invoices should be checked for accuracy and price, including proper documentation before they are accepted for payment.

All the documentation supporting the payments, such as services measurements or items received must be attached to the SAP system or organized in Nexa's network files or OneDrive.





Gifts, Entertainment and Hospitality

While the receipt or provision of gifts, hospitality, entertainment or participation in business and/or technical events or local or international conferences may be a legitimate way of building good business relationships, these situations may expose Nexa to unnecessary risks.

Regarding gifts, hospitality, entertainment, or anything of value:

- It is prohibited to promise, offer, deliver, solicit, or receive anything of value, direct or indirectly, to improperly influence any commercial decision affecting Nexa or securing any undue advantage for yourself, Nexa or any other person or entity, when acting for or on behalf of Nexa, with a limited exception for institutional gifts with little or no commercial value.
- Institutional Gifts shall display the Company logos and, when providing, should follow the guidelines established in the Gifts and Hospitality Procedure. If any gift or institutional gift received or provided does not meet the requirements set in the procedure, you should return it and immediately inform your supervisor. In some cases, Nexa can evaluate an alternative option, such as donate the gift to a charity institution or simply discard it. If you have any questions, please contact the Compliance area.
- Employees may provide hospitality to Nexa's stakeholders, if permitted by law and when there is an actual business purpose for that. Hospitality expenses shall follow the guidelines established in the Travel and Entertainment Policy.

Regarding courses, training, technical events or business conferences:

- Before accepting an invitation to attend a course or domestic or international conference, you must secure the formal approval of your manager or General Manager who has the responsibility of evaluating the existence of a possible conflict of interest and informing the Compliance area, which will verify the

fairness in the whole process. Invitations to such events will only be accepted if Nexa pays for the travel, hotel and other related expenses. It is important that these invitations are never used to influence any decision-making and, if accepted, the greatest rigor is required not to give the appearance that there has been any undue influence.

- In general, you should refuse offers for paid travel and accommodation. If there is a valid reason to attend an event or course, Nexa shall pay any travel and/or accommodation expenses.
- Invitations to events with expenses paid by customers, suppliers, government agencies and others should only be accepted if Nexa pays for the travel, hotel and other related expenses, if they meet the legitimate business purposes of the Company, when there is a real opportunity for business contact development, where other invitations have also been extended to professionals from other companies and if a formal authorization from your General Manager has been obtained after evaluating that there is no conflict of interest.

It is prohibited for Third Parties acting for or on behalf of Nexa to promise, offer, deliver, solicit or receive any Gift, Hospitality, Entertainment or Institutional Gift.

For additional information, please consult Nexa's Gifts and Hospitality and Travel and Entertainment Policies.



What we expect **from you**

We expect you to participate in all training and e-learning related to Nexa's Code of Conduct, Compliance Policy and Procedures and Travel and Entertainment Policy.

You should take extreme care when dealing with travel, hospitality, entertainment and gifts and should not accept or offer gifts, with a limited exception for institutional gifts. Institutional gift is an item with no commercial value or with low market value, included in the Institutional Gifts catalogue, distributed as a courtesy, promotion or advertisement.

To qualify as an institutional gift, the item must contain the logo of Nexa or of the legal

entity that granted the institutional gift to the employee (examples include calendars, key chains, laptop flash drives, pens, power banks, bags).

If you receive something of value which cannot be returned for some reason, you should report it to the Compliance area and deliver it to the Human Resources or designated area which will evaluate its donation to a charitable organization. The Human Resources and Compliance areas will support you to write the offeror a letter thanking him/her for courtesy and explaining that Nexa's compliance rules prevent you from accepting such items, so the gift has been passed to the Human Resources area.

Be aware of different cultural traditions and expectations and be aware that gifts, hospitalities or entertainment shall be avoided in any circumstance during national or state elections period: If in doubt, ask the Compliance area.

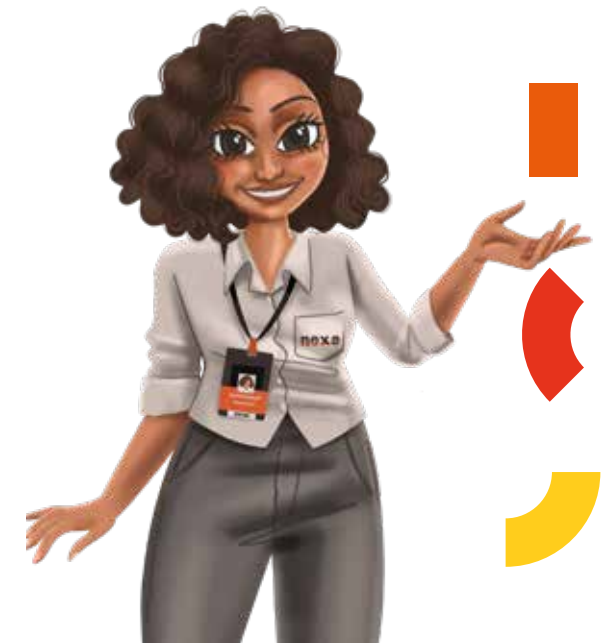
When using the work of third parties to act or interact on behalf of Nexa with suppliers, customers, government representatives or any other kind of stakeholder, you are responsible to educate and monitor their interactions to ensure compliance and reinforce their acknowledgment with this procedure.



Example

I received a Christmas basket from a supplier. Considering that the rejection would be perceived as disrespectful due to cultural realities, can I accept it?

No. The receipt of any form of gift is prohibited. However, if for some reason, it cannot be rejected or returned, you shall report it to the Compliance area and deliver the gift to the Human Resources or designated area.





Press



Contacts with the press will be carried out exclusively by designated spokespersons. It is forbidden for unauthorized employees to contact the press or speak to the press on behalf of Nexa. Any demand received, formally or informally, shall be forwarded to the Corporate Affairs area.

Contact with media professionals should not be treated, under any circumstances, as a business or personal relationship, and therefore it does not involve favors or payments of any kind. Nexa adopts a clear and objective position in disseminating information and seeks to meet the interests of the parties involved.

Employees should neither disclose confidential or untrue information in the press nor pass on any content to journalists, media outlets, be it printed, by radio, TV, web or social influencers.

For more information, please consult Nexa's Disclosure Policy, available at Nexa's website.



What we expect **from you**

In case you receive any request from the press, you shall contact the Corporate Affairs area.

Review the Disclosure Policy which states who can make public statements on behalf of Nexa and, if designated as spokesperson, make sure that all public communications are complete, transparent, accurate, understandable and timely, and that all relevant approvals are obtained before making a public announcement.



Example

A reporter from a local newspaper asked me some questions about Nexa. I can answer these questions very easily. Should I talk to him?

No. You should not talk to the press on behalf of Nexa unless you have been specifically authorized to do so and received prior approval of speech and Company's position by the Corporate Affairs area. If

you receive a call from a journalist, explain to him/her that you are not authorized to comment, take down his/her name and contact details and report this to the Corporate Affairs area.



Image and Reputation



The building and strengthening of the image and reputation of Nexa is also carried out through our dialogue and behavior with the stakeholders with whom we interact. Therefore, our actions, in and out of Nexa, should always be in line with Nexa's culture.

Participation in social media and networks should also comply with applicable laws and regulations. The Nexa name may be linked to personal postings on social networks and similar platforms, provided this will not compromise our image and reputation. Such postings shall not relate to any repudiated conduct by the Company or contain any confidential or inside information.

Nexa respects your right of freedom of speech in your private life, in social media and networks as long as it does not violate any laws and regulations or compromises Nexa's Image and Reputation. Otherwise, the Conduct Committee should be involved to assess the situation and indicate internal disciplinary measures, depending on the case.

As a Nexa employee, you should be mindful of your conduct in public places, whether in the circumstances of your professional activity or in situations of your private life, acting prudently and respectfully, and not putting the company or your career at risk.





What we expect **from you**

We expect that you, as a Nexa's employee, respect and act following the principles, values, and culture of the Company, both in your personal and professional life, respect other's opinions and never share confidential information without the required authorization.



Example

I saw a Facebook publication from a colleague where he posted racist comments. In addition, during working hours, this employee has made similar comments but referring to LGBTQIA+. Shall I report it to the Ethics Line?

Yes. You shall contact your supervisor, the Human Resources, Legal or Compliance areas or make the complaint at the Ethics Line. This situation will be investigated by the Ethics Line and proper disciplinary measures evaluated by the Conduct Committee.





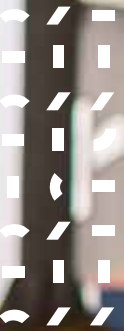
Use of Company's Resources



Company Assets

Information Security and Inappropriate Content

Intellectual Property Rights and Confidentiality





Company Assets



Nexa's assets shall be used exclusively in the daily operations and shall not be used for private purposes, except in specific cases defined and approved by the Company.

Nexa assets include tangible and intangible assets, such as inventory, materials, equipment, facilities, IT and intellectual property, as well as the Company's data and information. Everyone has the obligation to protect Nexa's assets and use them for their intended purposes.

We shall always be vigilant and take measures to prevent the theft, misappropriation, damage, and misuse of any Nexa property. This includes not allowing physical assets to be destroyed, disposed of, sold, loaned or donated without the required authorization. This is also applicable for intangible assets which should not be shared externally without the corresponding authorization.



What we expect **from you**

You are responsible for appropriately using and protecting Nexa's assets and resources, with proper care and safeguarding. If you are requested to donate equipment or scrap, consult your supervisor and the donations procedure before providing any answer.

Consult your supervisor about the proper use of Nexa's assets and any situation of misuse. In case you identify

any case of misuse of the Company's assets, you shall report it to your supervisor or Legal area and submit an allegation through the Ethics Line.

For additional information, please consult the Controlling, Information Technology, Innovation and Projects and/or Compliance Policies.



Example

Our unit has a junk pile for disposal which is becoming increasingly larger, and all items will be destroyed soon. Can I sell it to a local junkyard?

Even if the items are intended for disposal, they are still owned by Nexa and should not be removed without proper authorization. If you believe that there is a viable option for the sale of these products, propose the solution and the total cost to your supervisor for further analysis.

The sale or donation of these items shall be evaluated according to Nexa's policies and procedures.





Information Security and Inappropriate Content

Information should be handled with appropriate diligence and confidentiality. Improper use of IT systems is prohibited and could potentially expose Nexa to several risks, including - but not limited to – financial, reputational and competitive risks as well as potential virus attacks and breaches of information security.

The use of unauthorized/unapproved software (electronic programs) or hardware (physical electronic equipment) is prohibited.

In general, users should not expect privacy when using Nexa's systems and resources. Nexa, at its discretion, may use and monitor any information transmitted or stored in corporate e-mails, computers, desktops or notebooks and corporate cellphones, including the content of data at messaging applications. This guideline covers information written or stored in electronic systems or any other associated Nexa-owned resource. It also includes technically developed information, acquired by associations, acquisitions, licenses or purchases, or otherwise entrusted to Nexa.

Electronic systems and information technology resources are available to employees for the proper and efficient performance of their tasks. Their use for personal matters is allowed provided they do not contravene rules and internal guidelines or undermine work progress.

For employees who use Nexa's computers and mobiles, appropriate steps should be taken, and safeguards implemented to protect

equipment and data from access by others. The username and password information are personal and non-transferable. Sharing them is a serious breach of our policies and procedures, and as such, disciplinary measures would be taken. We expect our employees exercise due care with the information on his/her computer and any other data device, including, to the best of their knowledge, phishing (malicious e-mails aiming at attacking the computer, and consequently, accessing Nexa's network and systems). If you receive suspicious e-mails, you shall contact the IT area or the e-mail sender by telephone.

No software or programs should be copied from or installed on Nexa's computers without the prior authorization of the information technology (IT) area. Finally, the exchange, storage or use of obscene, pornographic, violent, discriminatory, racist or defamatory content that disrespects any individual or entity on Nexa's assets, are prohibited.

For additional information, please consult Nexa's Information Security and Information Technology Policies or the IT department.



What we expect **from you**

We expect you to participate in all training and e-learning related to Nexa's Information Security and Information Technology Policies.

Being familiar with our information security processes is everyone's responsibility. Employees must not store Company data on personal devices, except when necessary to perform their work, provided it is approved by the Company.

Always be suspicious if you receive an e-mail from a supplier, customer or even your Nexa superior, requesting that some invoice is paid or wire transfer is made, for example, on a new bank account information or as an urgent matter. This is probably an attempt of fraud/phishing. In these situations, seek telephone or face-to-face contact with your superior or consult the IT, Legal or Financial areas to verify the authenticity of the message.

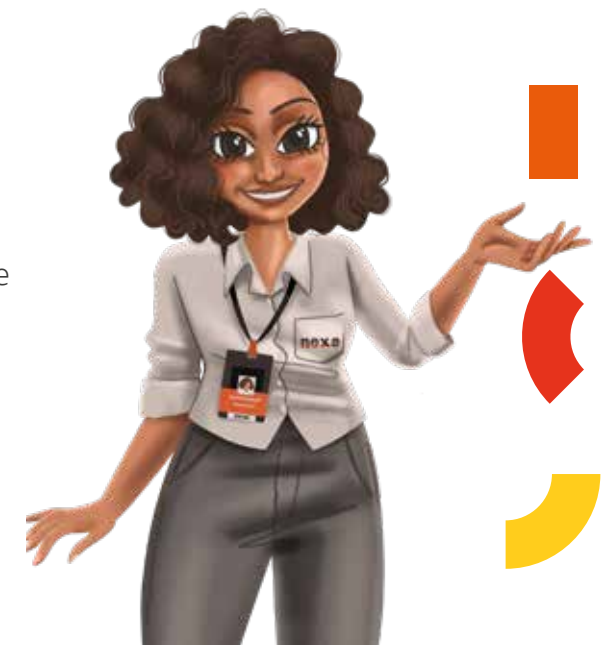


Example

I just received an e-mail from a colleague with no reference to the subject but asking me to click on a link from a website. The e-mail seems suspicious. What should I do?

If you receive a suspicious e-mail from a person you know, check directly with the sender before opening or answering. If the e-mail is a scam or phishing attempt, you must report it to the Cyber Security Team or through the Phish Alert button feature available in Microsoft Outlook.

Keep yourself up to date with all Information Security, Cyber Security and Phishing training provided by the IT area.





Intellectual Property Rights and Confidentiality



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

The results of intellectual work and strategic information generated by the Company are the exclusive property of Nexa. All employees shall safeguard and protect Nexa's intellectual property rights.

Everyone is responsible for treating information about intellectual property that they have access to as a result of their work with reasonable care and in a confidential manner.

Nexa is also committed to respecting the intellectual property rights of its third parties. Nexa expects that all its employees take the intellectual property rights of third parties into due consideration in their daily work.

All information, received or developed, shall be classified according to our procedures, and depending on such classification, the information can be shared with internal or external audience. Find more information on Classification Information Policy, available at our intranet.

For additional information, please consult Nexa's Innovation and Projects areas.



What we expect **from you**

Safeguard and protect Nexa's intellectual property rights, respect the intellectual property rights of third parties and clarify the situation with the experts in case of doubt.

Never accept or use confidential information from another person.

Remember that the information and/or intellectual property developed or acquired during your work at Nexa is still owned by Nexa, even after your departure; it should therefore not be exposed.



Example

I am participating in the mining lab and developing an innovative project. I would like to share the results of this project with a group of friends. After all, the result of this work is also mine. Can I do this?

No. The result of intellectual work is property of Nexa and you shall neither consider as your own nor share with outside groups or benefit from it. Consult with the Information Technology area.



Laws and Regulations



Anti-Corruption

Money Laundering and Terrorism Financing

Antitrust

Insider Trading

Personal Data Protection





Anti-Corruption

Nexa is committed to doing business ethically, with integrity and complying with all applicable anti-corruption laws and regulations where it conducts its business. These laws and regulations prohibit bribery of domestic and foreign Government Representatives as well as representatives from 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 in exchange for any improper advantage or benefit for oneself or for 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 contracting, favors or hiring, 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.

One of the pillars of the Compliance Program is to prevent corruption, and therefore, we have developed the Anti-Corruption and Compliance Policies to guide our efforts, detailing the depth of our commitment to this issue and helping all employees to understand the types of corruption, the potential reputational, legal and financial impacts on Nexa's image and what must be done to avoid such activities.

Everyone is responsible for knowing and following the rules and the controls provided for in our Compliance

Program, as well as reporting, if they are aware of, any questionable conduct, using the available channels.

A key element of Nexa's commitment to its anti-corruption efforts is its record-keeping requirements as well as its system of internal controls. In some cases, we are required to disclose financial reports to government agencies of the countries where Nexa operates.

We must pay attention to the deadlines, transparency and integrity of information. For this purpose, Nexa maintains detailed books, records and accounts that accurately and fairly reflect its transactions. These record-keeping requirements are broad and apply to all books, records and accounts including financial records, accounting records, memoranda, documents and electronic storage devices.

Nexa maintains appropriate financial controls to ensure payments made by or on behalf of Nexa are in accordance with applicable laws, regulations and our Code of Conduct.

Nexa prohibits the unauthorized destruction of or tampering with any records, whether written or in

electronic form, where Nexa is required by law to maintain such records or where it has reason to know of a threatened or pending government investigation or litigation relating to such records.

Nexa's policy is to follow the laws and regulations in place in the regions where it is doing business. In case of any conflict of laws or practices among the regions where Nexa conducts its business, and provided Nexa's standards are more stringent than those of the region, Nexa's more stringent standards will be adopted.

Such commitment will guide all Nexa's Compliance policies and procedures, including its Code of Conduct. In this sense, Nexa's goal is to maintain responsible and ethical business conduct in all circumstances.

For additional information and guidance, please consult Nexa's Anti-Corruption and Compliance Policies, available on our website and intranet. If you have any questions or doubts, consult the Policies, the Legal and Compliance areas and/or submit a question through the Ethics Line before making any decision.



What we expect **from you**

We expect you to be familiar, participate in the Anti-Corruption training and act in accordance with all provisions of the Anti-Corruption and Compliance Policies.

You also need to evaluate the risks of contracting with third parties and dealing with government representatives, as well as the risks

of actions and activities that could constitute a breach of the Anti-Corruption and Compliance Policies and/or applicable law.

You should also encourage your colleagues to consult and comply with the provisions of these Policies, behave yourself and your activities with “Sense of Ownership” and take steps to prevent exposing yourself or Nexa to corruption or fraud risks.

Always make sure you are doing the right thing.



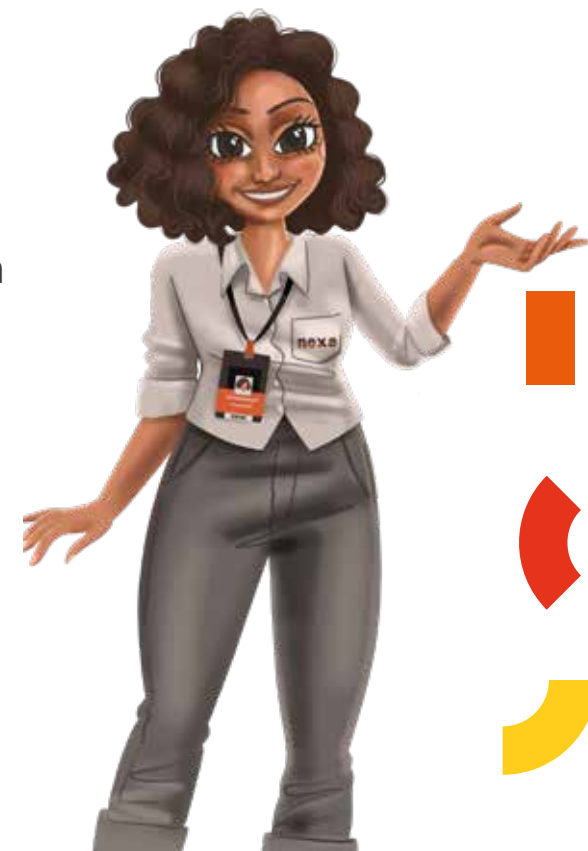
Example

I became aware that a supplier we work with, is being investigated for suspected corruption activities. Considering that this supplier has already been contracted, what shall I do?

You shall immediately communicate this situation to your Manager, the Supply Chain and Compliance areas, who will perform the analysis according to our policies and procedures.

You shall always comply with Nexa’s Anti-Corruption and Compliance Policies as well as key legislation in force where Nexa operates.

If you have questions, contact the Legal and/or Compliance areas for further clarification.



Money Laundering and Terrorism Financing



Nexa is committed to preventing the use of its assets and operations for money laundering, terrorist financing or other illicit purposes. In this way, Nexa complies with all laws and regulations applicable in the countries where it conducts business to prevent these crimes.

Money laundering refers to the process by which the proceeds from criminal activity is disguised to conceal their illicit origins.

Terrorism financing is covert support, financial or not, directly or indirectly, to terrorist organizations or people who promote or are involved in these activities. Terrorism financing is any form of economic action, assistance or mediation that offers assistance and resources of any kind to support the activities of terrorist elements or groups.

To prevent money laundering and terrorism financing, Nexa has adopted and implemented controls and procedures necessary to timely detect unusual and suspicious transactions, to assess relevant risks and to properly scrutinize third parties with which it engages in its economic activities, according to applicable laws and regulations. Moreover, Nexa regularly reviews these controls and procedures to identify any opportunities for improvement.

For additional information and guidance, please consult Nexa's Money Laundering and Terrorism Financing Prevention Policy available on our website and intranet.



What we expect **from you**

You shall read, understand your responsibilities, and participate in the training related to Nexa's Money Laundering and Terrorism Financing Prevention Policy, so you can help mitigate and monitor actions that could result in these risks, including the actions carried out by third parties acting on behalf of Nexa.

You shall also report suspicious activities and advise other Nexa employees and third parties not to involve in money laundering and terrorism financing.

If you identify a bad practice, use the existing channels to report to your superior, the Compliance or Legal areas or submit an allegation through the Ethics Line.



Example

Seven months ago, we contracted a local service provider, and during this time, we made the payments on its local bank account. The Treasury area of the service provider requested the last payment to be transferred to an account at a foreign bank that belongs to its parent company. Shall we proceed?

You shall ask the service provider the reasons for such request. With this information, you shall contact Nexa's Treasury, Tax and Compliance areas, who will evaluate its appropriateness and law requirements. Depending on this assessment, we may or may not proceed.

If you have questions, contact the Compliance area for further clarification.





Antitrust



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

Nexa complies with competition laws in every country where it operates in order to provide a free, vigorous and competitive marketplace for the benefit of consumers and competition; with the active involvement and cooperation with the corresponding authorities; and compliance with the competition laws against third parties acting in an anticompetitive manner.

To avoid antitrust risks, employees and Third Parties acting 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, costs of production/services costs, sales territories, marketing plans, measures to hinder or prevent the entry of other competitors or any other competitively sensitive information with Nexa's competitors. Third parties and/or employee's interactions with competitors must be discussed and approved by its general manager.

One of the pillars of the Compliance Program is the defense of free competition. Everyone is responsible for knowing and applying the rules and following the procedures of the Compliance Program, as well as reporting any suspected or known questionable conduct, using the available channels. All market information, legitimate and necessary to the business, will be obtained through legal, transparent and appropriate practices.

Employees participating in negotiations of any kind of mergers, acquisitions, joint ventures, cooperatives, association agreements, exchange of assets and consortia between companies shall have in mind that such transactions may be subject to submission in advance to antitrust authorities for approval, if required by law. Employees shall consult the Legal area to verify the need to submit the transaction to these authorities and to assess any other impact from an antitrust perspective.

For additional information and guidance, please consult Nexa's Antitrust Policy, available on our website and intranet.



What we expect **from you**

You shall read, understand your responsibilities, and participate in the training related to Nexa's Antitrust Policy.

Please contact the Legal or Compliance areas in any of the following situations: before joining a

trade association involving competitors; when an inappropriate contact is initiated by a competitor, customer or supplier; when considering any kind of cooperation agreement with a competitor, for example, the production or joint marketing and shared logistics; when you suspect that a third party is acting in anti-competitive way affecting Nexa.



Example

I am attending an industry conference and a competitor approached me suggesting we exchange information about our price forecasts. Shall I share that information?

No. The exchange of confidential sensitive information with competitors, especially information such as price forecasts, volumes, areas of expertise, and marketing and commercials actions violates competition laws.

Care should be taken in any discussions with competitors. In the scenario presented, you must stop the conversation immediately and say you do not feel free to continue. If the competitor insists, step aside. Report the incident to the Compliance and/or Legal areas.

If you have questions, contact the Legal and/or Compliance areas for further clarification.





Insider Trading

Inside information is understood as information related to Nexa that may influence the market value of shares, such as changes in the management model, investment or divestment plan, news about results, information about important contracts, proposals for acquisitions or mergers, issues related to exploration, development, contents, tonnages, resources and/or reserves of properties owned or managed by Nexa or in which it may have an interest, contingencies or administrative, judicial or arbitration supervenience, or management changes.

This information shall be kept confidential until the Investor Relations area decides and transmits it appropriately to the investor community and the market in general, following the procedures established by regulatory and supervisory bodies, when applicable.

It is the responsibility of all employees to ensure the secrecy and confidentiality of privileged information. The information, methodologies and technologies owned by the Company are confidential and for internal use only.

As a publicly held company, Nexa and all of its employees, regardless of where they are located, are subject to the securities laws applicable to the handling of material, non-public information and the sale of securities of Nexa and other companies.

The disclosure of any restricted data needs to be previously authorized by the Executive Officers, as well as the technologies developed internally must be preserved, even if there is a break of the bond with the company and its shareholders.

Any Nexa employee, shareholder, or third party who has access to inside information, shall respect the Blackout Period and is forbidden to advise, buy or sell Nexa securities, or disclose this information to third parties to do so, in the 30 days prior to and three days after the disclosure of the quarterly information to the market, in addition to the disclosure of material facts. No employee, shareholder or third party may benefit from privileged information for the sale or purchase of shares directly or through third parties.

Nexa is committed to acting in an absolutely symmetrical, impartial and non-privileged manner, basing its actions on the following criteria:

- Adopt good corporate governance practices – transparency, accountability and equal treatment to all involved regardless of the number of shares they

hold, ensuring equity in the flow of information, keeping the market aware of its performance;

- Inform immediately, through the Investor Relations area, about the main actions or decisions, aiming at constant updating regarding Nexa; and
- Respect the Blackout Period. Employees involved in any type of information related to results are unable to negotiate the sale and acquisition of shares in the period of 30 days prior to the disclosure of the numbers to the market and three days after the disclosure. No employee may benefit from privileged information for the sale or purchase of shares directly or through third parties.

Failure to comply with the Blackout Period or misuse of this information is illegal and may result in civil, administrative and criminal sanctions.

For additional information and guidance, please consult Nexa's Insider Information Policy, available on our website and intranet or reach the Investor Relations area.



What we expect **from you**

Investor Relations (IR) area, as defined in the legislation, is Nexa's official spokesperson with the capital markets. All disclosure and market relations activities carried out by the IR team therefore have their responsibility for the Company's reputation. It is up to all employees, not only those who work in the IR area, to behave in a manner consistent with Nexa's interests in the capital market.

You shall be aware of the laws related to inside information and also read, understand your responsibilities and participate in the training related to Nexa's Insider Trading Policy.

You are also responsible for ensuring that if you intend to trade securities of Nexa or the companies with which we do business, you comply with the provisions of all applicable laws relating to inside information.

Know how to identify and refuse to answer trick questions that may have the objective of obtaining privileged information or leave you in awkward situations.



Example

You are part of the team performing the due diligence of a company that Nexa is considering acquiring. The nature of this transaction is confidential among all employees. During a family gathering, in an informal conversation you talk about it and share information with your brother who seems interested in purchasing Nexa's shares. Is this attitude in accordance with our Code of Conduct and with required laws and regulations?

No, it is not. According to laws, regulations and our policies, the purchase of Nexa's share because of the disclosure of confidential information is prohibited, and stricter restrictions apply when you are part of the team in charge of the due diligence process to acquire a company by Nexa.

It is also important to make sure that the Legal, Compliance and Investors Relationship areas are aware of the situation, so that they can take the appropriate measures.





Personal data Protection

This chapter's information should help us make decisions in our daily work environment because it provides us a high-level overview of what we should and should not do in terms of data protection.

Nexa, as a company, is required to comply with all applicable data protection legislation, self-regulation and aim to implement best practices. It is also critical that Nexa facilitates the seamless flow of personal data required for its business activities while protecting the rights of the data individuals involved.

In this sense, Nexa adopts all necessary practices and standards to ensure the appropriate and secure personal data processing to its employees, business partners, third parties and stakeholders, all of which is reflected in Nexa's Data Protection policies and internal procedures, as well as in its Cybersecurity policy and procedures available in Nexa's intranet.

It is the responsibility of all employees and third parties acting on behalf of Nexa to ensure that personal data is handled according to the policies and procedures on Personal Data Protection.

For additional information and guidance, please consult Nexa's Personal Data Protection Policy, available on our website and intranet or reach the Legal team.





What we expect **from you**

You shall read, understand your responsibilities, and participate in the training related to Nexa's Personal Data Protection Policy.

You shall always be aware of personal data protection regulations in your country and ensure that if you intend to process personal

data as part of your daily work, you shall be in compliance with the provisions of all applicable laws and policies on the subject and consult the Legal area in case of any doubts.

It is very important that you understand how to identify and refuse to answer questions that may involve the incorrect processing of personal data and keep in mind that if you are unsure whether something qualifies as personal data or how it should be handled, you can always seek advice from the Legal team.



Example

What should I do if a provider sends me an e-mail requesting the ethnic origin of a group of Nexa employees?

You should always consider the type of information you are being asked for, who is asking for it and what they intend to do with that information. In this case, because it is sensitive personal data, the information should not be shared unless you have the consent of the data individuals involved and are aware that the

recipient will not process the information for purposes unrelated to the data collection.

Moreover, assuming you can share the information requested, always follow the correspondent protocols to do so. If you have questions, contact the Legal area for further clarification.





Declaration of Receipt



Upon submitting my electronic signature, I declare that I have received Nexa's Code of Conduct on this date. Likewise, I declare that I am aware that this Code brings together Nexa's culture and the guidelines that I must consider during my work activities, with the objective of maintaining and constantly raising my commitment to the organization's ethical standards.

Electronic Signature