

Code of

# CONDUCT

for customers

# nexa



Nexa's **Code of Conduct for customers** is inspired by our culture and commitment to the principles of integrity, ethics, human rights, plurality and socio-environmental responsibility. Nexa's culture is the factor that motivates our employees, drives our results and strengthens our relationships with all stakeholders.

Our purpose is to integrate mining into an ever-changing world, as an opportunity for sustainable development. We seek to grow in competitiveness through innovative and sustainable processes, considering environmental, social and governance aspects, which create value for our stakeholders and contribute to the evolution of society.

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.

We respect the culture of all our customers and invite them to learn about and reflect on the application of Nexa's values in their activities.



## 1. Human Relationships

- **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 actively encourages the reporting of conduct that goes against these principles.

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, in accordance with all applicable laws and regulations.

Nexa does not employ child labor. Any hiring of minors, as apprentices, occurs in accordance with the legislation of the countries in which we operate to contribute to their training and not interrupt their formal education and physical, mental, social and moral development. Minors are not allowed in dangerous or unhealthy places, or at night, or at times that affect their school attendance.

### **What we expect from you**

Nexa expects that all its customers to commit to these principles, respecting legal obligations to preserve commercial relations with Nexa. To build plural and inclusive teams, we expect you to treat everyone with fairness, respect and dignity, promoting a work environment and business ecosystem free of harassment, prejudice and discrimination.

- **Plurality And Inclusion**

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.

### **What we expect from you**

Nexa expects its customers to comply with local laws and invites them to adopt best practices related to plurality and inclusion in their activities.



## 1. Human Relationships

- **Harassment**

Nexa does not tolerate harassment, whether it is of moral, sexual, derived from authority or another kind, or situations that present disrespect, intimidation, or threat in the relationship between employees or customer or other stakeholders, regardless of hierarchical level.

**What we expect from you**

Nexa expects its customers to observe these guidelines and implement internal training for their employees to avoid harassment situations.

- **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. When identifying situations of real conflict of interest, it is essential that those involved abstain or observe measures that guarantee an impartial decision.

**What we expect from you**

Nexa expects that its customers act based on transparency and openly communicate us any potential or real conflict of interest. Furthermore, it is expected that they do not participate in decision-making processes that affect their judgment or the correct fulfillment of their professional responsibilities.

- **Community Relationships**

Nexa's activities have a significant impact on nearby communities. Therefore, we are committed to sustainable development that considers the economic, cultural and social aspects of the communities where we operate

**What we expect from you**

Nexa expects that our customers join us in this relationship with communities, acting to promote a positive impact on the communities in which they operate. We seek that our customers, when carrying out their own activities, respect the rights of the communities in which they operate, recognizing that maintaining a harmonious environment with these communities will contribute to the sustainability of our value chain.





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

It is part of our culture to seek preservation opportunities, so we can provide long lasting environmental benefits. Nexa is committed to social, environmental and corporate governance challenges related to climate change, emissions, water recirculation, ethics and the circular economy. Furthermore, we comply with and maintain our processes in accordance with applicable legislation.

### What we expect from you

Nexa expects its customers to fully comply with current legislation (local and international) relating to health, safety and environment. For the products sold, Nexa provides its respective Safety Data Sheet (SDS) and expects its customers to pay attention to the guidelines contained in these documents to promote a safe working environment and contribute to environmental preservation. Our customers are expected to implement an environmental management system, which includes the appropriate management of waste and liquid effluents generated in their processes, in accordance with the laws applicable to the topic. Furthermore, our customers are expected to act preventively in the face of environmental and sustainability challenges, including climate change and greenhouse gases emissions.

## 3. Intellectual Property Rights and Confidentiality

The results of intellectual work and strategic information generated by the Company are the exclusive property of Nexa. All employees (Nexa employees and third parties) are responsible for treating information about intellectual property and other confidential topics that they have access because of their work with reasonable care and in a confidential manner.

Nexa is also committed to respecting the intellectual property rights of its customers and business partners and to comply with confidentiality obligations in commercial relationships in which they enter.

### What we expect from you

We expect our customers to adequately safeguard confidential information and protect Nexa's intellectual property rights, including cases of audits, treating the information shared ethically and transparently.



## 4. Laws and Regulations

- **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.

### **What we expect from you**

Customers must act in strict compliance with all applicable laws, including global anti-bribery and anti-corruption laws and those that apply to Nexa's operations in the countries where it operates, recognizing that, for Nexa, the good reputation of all your stakeholders is essential to preserving your business relationships.

- **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.

### **What we expect from you**

We expect our customers to comply with all applicable laws and regulations in the countries where they conduct business to prevent these crimes.

- **Antitrust**

Nexa is committed to free enterprise and fair competition and rejects illegal practices such as cartel formation, bidding fraud, abuse of market power, limitation of production, sharing of customers or markets, among others that may cause damage to the free market and free competition.

### **What we expect from you**

We expect our customers to comply with competition laws in all countries where they operate to promote a free, vigorous and competitive market for the benefit of consumers and the economic order, with active involvement and cooperation with the corresponding authorities.

- **Personal Data Protection**

Nexa, as a company, is required to comply with all applicable data protection legislation in the countries in which it operates. 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.

### **What we expect from you**

We expect our customers to comply with the personal data protection rules that apply to them, respecting users' rights in addition to legal provisions related to the correct collection, use, storage and sharing of personal data.

## 5. Homologation and Compliance Due Diligence

For a company to establish a commercial transaction with Nexa, it is mandatory to go through a due diligence process. This process aims to verify that a customer or supplier is a legitimate and trustworthy person/entity and that they do not engage in unethical or illegal conduct or activities that could create legal, reputation or integrity risks for Nexa, considering compliance policies and standards.

### What we expect from you

We expect our customers to act in a serious, transparent and reliable manner, contributing to the delivery of all documentation or information necessary to carry out these internal processes.

## 6. Ethics Line

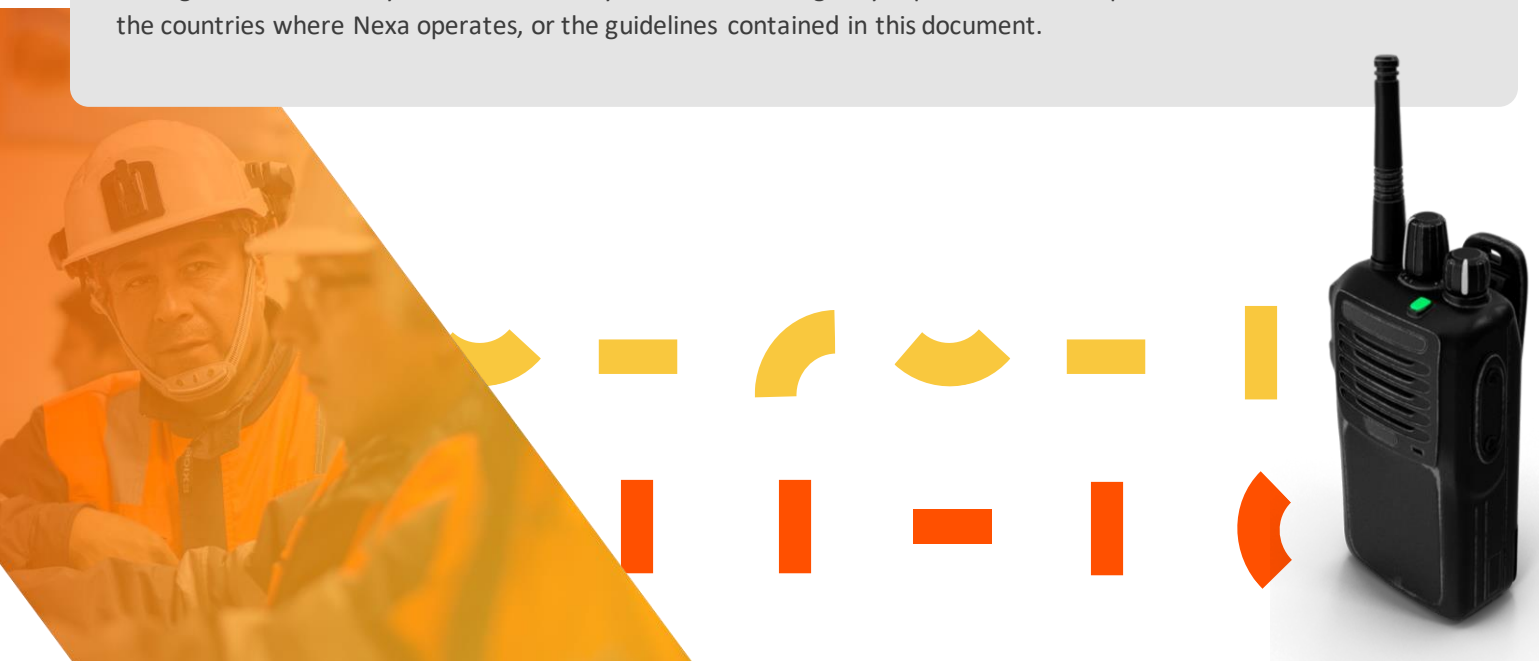
To identify, analyze, resolve and request clarification on possible violations of the Code of Conduct or any policy, procedure, law or regulation, Nexa has an Ethics Line, which can be accessed by all its audiences and stakeholders.

The Ethics Line is impartial, transparent and guarantees the confidentiality of the information provided, safeguard the identity of anyone who accesses the Ethics Line and promote a better environment for everyone.

The Ethics Line is available in Portuguese, English and Spanish and it can be accessed by phone or via Nexa's website or via application, where complaints can be submitted (anonymously, if you prefer), questions or follow-up on a previously made complaint. Information about the different ways to access the Ethics Line can be found at: [www.contatoseguro.com.br/en/nexaresources](http://www.contatoseguro.com.br/en/nexaresources).

### What we expect from you

As a dedicated channel for reports, complaints and information related to the Code of Conduct and other Compliance Policies and Procedures, we expect you use the Ethics Line responsibly and seriously and timely to communicate through this channel any situations that in your understanding may represent non-compliance with the laws in force in the countries where Nexa operates, or the guidelines contained in this document.



## 7. Conformity

Nexa believes that its customers will comply with all current laws and regulations and the guidelines described in this document, and that they will use their best efforts to act in accordance with the best practices in the sector.

The acceptance of the Code of Conduct for Customers is a prerequisite for all supply contracts signed with Nexa. Thus, the customer affirms its commitment to the provisions contained in this document.

Contrary conducts to this Code may lead to the application of penalties contained in the contract or in accordance with applicable legislation, and even to its termination, without prejudice to applicable legal responsibilities.

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

\_\_\_\_\_  
**Signature** (legal responsible)

Name:

Responsibility:

\_\_\_\_\_  
**Signature** (witness)

Name:

Responsibility:



THAT MINING  
CHANGES THE  
WORLD

**nexa**

For more information contact us

[assistencia.tecnica@nexaresources.com](mailto:assistencia.tecnica@nexaresources.com)