



RESPONSIBLE MINERAL SOURCING POLICY



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Introduction

Our commitment to responsible sourcing is fundamental to our operations, and our goal is to identify and mitigate the main social and environmental risks throughout our supply chain.

Our employees, officers, and executives are firmly committed to conducting our business in compliance with applicable laws and to the highest standards of honesty and ethics. We believe that integrity, ethics, and transparency are essential to building the trust of our customers, business partners, shareholders, and the communities in which we operate. To ensure our activities align with these principles, we have developed a robust set of policies, codes, and guidelines.

Our approach to corporate responsibility is formalized in our “Sustainable Procurement Policy,” “ESG Strategy,” and “Code of Conduct,” which apply to all Nexa units.

Everyone’s commitment to the values we cultivate is essential for building the mining of the future, creating a company that is increasingly trustworthy and agile — one we can all be proud of.



1. RESPONSIBLE SOURCING

Recognizing the potential for significant adverse impacts associated with the extraction, trade, handling, and export of minerals from conflict-affected and high-risk areas, Nexa acknowledges its duty to respect human rights and avoid contributing to conflicts. We expect the same commitment from all third parties involved in our supply chain. To this end, we have implemented, broadly communicated, and incorporated into supplier contracts and agreements our Responsible Mineral Sourcing Policy. This policy serves as a guide for conflict-sensitive sourcing practices and supplier risk awareness, covering the entire process from extraction to end user, in accordance with the five-step due diligence process defined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition.

Nexa is committed to identifying, assessing, and appropriately responding to all risks of adverse impacts described in Annex II of the OECD Guidelines, including, but not limited to serious human rights abuses, financing of armed groups, direct or indirect support to public or private security forces, corruption, money laundering, and illegal taxation.

Through this document, Nexa also reaffirms its commitment to avoiding any action that could finance conflicts, as well as to complying with relevant United Nations sanctions resolutions or, where applicable, national laws that regulate such resolutions.

2. OUR COMMITMENT AND EXPECTATIONS REGARDING OUR SUPPLIERS

Regarding serious abuses associated with the extraction, transport, or trade of minerals

When sourcing minerals from conflict-affected and high-risk areas or conducting operations in such regions, Nexa will not tolerate, profit from, contribute to, assist with, or facilitate the commission of any of the following actions by any entity:

- i. Any form of torture, cruel, inhuman, or degrading treatment;
- ii. Any form of forced or compulsory labor;
- iii. Any form of child labor;
- iv. Other serious violations and abuses of human rights;
- v. War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.





Nexa will immediately suspend or terminate its relationship with upstream supply chain suppliers if we identify a reasonable risk that they are sourcing minerals from, or are linked to, any entity involved in serious abuses.

Regarding direct or indirect support to non-state armed groups

Nexa will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. "Direct or indirect support" to non-state armed groups includes, but is not limited to, sourcing minerals from, making payments to, or providing logistical assistance or equipment to non-state armed groups or their affiliates that:

- i. Illegally control mining sites, transportation routes, mineral trading points, and upstream supply chain actors; and/or
- ii. Illegally tax or extort money or minerals at access points to mining sites, along transportation routes, or at mineral trading points; and/o
- iii. Illegally tax or extort intermediaries, exporting companies, or international traders.

Nexa will immediately suspend or terminate its relationship with upstream supply chain suppliers if we identify a reasonable risk that they are sourcing minerals from, or are linked to, any entity providing direct or indirect support to non-state armed groups, as described in the paragraph above.

Regarding public or private security forces

Nexa is committed to eliminating any direct or indirect support to public or private security forces that:

- i) Illegally control mining sites, transportation routes, or upstream supply chain actors; and/or
- ii) Illegally tax or extort money or minerals at access points to mining sites, along transportation routes, or at trading locations; and/or
- iii) Illegally tax or extort intermediaries, exporting companies, or international traders.

We recognize that the role of public or private security forces at mining sites, in surrounding areas, and along transportation routes must be exclusively to maintain lawful order. **This includes the protection of human rights, the safety of mining workers, equipment and facilities, as well as the protection of the mining site or transportation routes against interference with legitimate extraction and trading activities.**

When Nexa or any company in our supply chain hires public or private security forces, we are committed to ensuring that such security forces act in accordance with the **Voluntary Principles on Security and Human Rights**.

Specifically, we support or will implement selection policies to ensure that individuals or units of security forces known to have committed serious human rights abuses are not hired.





Nexa will support efforts or take action to collaborate with central or local authorities, international organizations, and civil society groups to develop effective solutions that increase transparency, proportionality, and accountability in payments made to public security forces for security services.

Likewise, we will support efforts or take action to engage with local authorities, international organizations, and civil society groups in order to prevent or reduce the exposure of vulnerable groups—especially artisanal miners—to adverse impacts associated with the presence of public or private security forces at mining sites, particularly when minerals in the supply chain are sourced through artisanal or small-scale mining.

In line with our specific position in the supply chain, we will develop, adopt, and timely implement a risk management plan with upstream supply chain suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces when a reasonable risk is identified.

If mitigation efforts fail within six months of adopting the risk management plan, we will suspend or terminate our relationship with the upstream supply chain suppliers. We will follow the same procedure in response to any identified reasonable risk of inconsistent activities.

Regarding bribery and fraudulent misrepresentation of mineral origin

Nexa is committed to not offering, promising, giving, or soliciting any form of bribery. Likewise, we reject any requests for bribes intended to conceal or disguise the origin of minerals, or to falsify taxes, fees, and royalties paid to governments in connection with the extraction, trade, handling, transport, and export of minerals.





Regarding money laundering

Nexa supports efforts and takes measures to effectively eliminate money laundering when a reasonable risk is identified in connection with the extraction, trade, handling, transport, or export of minerals. This is achieved through a rigorous due diligence process to identify suppliers and the origin of the minerals acquired.

In addition, Nexa conducts internal audits, continuously monitors suspicious transactions, trains its employees in anti-money laundering practices, and ensures compliance with international regulations.

Regarding the payment of taxes, fees, and royalties owed to governments

All taxes, fees, and royalties related to the extraction, trade, and export of minerals from conflict-affected and high-risk areas are paid to governments. In line with our position in the supply chain, Nexa is committed to disclosing these payments in accordance with the principles established by the Extractive Industries Transparency Initiative (EITI) or an equivalent reporting framework and requires the same conduct from its suppliers.

What We Expect from You

We expect our employees and contractors to feel comfortable raising any concerns about potential violations of Nexa's Code of Conduct and this policy, whether with their manager, supervisor, or through the available reporting channels.

Our whistleblower platform is open to employees, contractors, and external parties and can be accessed at:

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

Nexa takes all concerns seriously and is committed to resolving them promptly and effectively.

This policy is effective as of March 1, 2025.



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