



# Code of Conduct



**GRUPO CURIMBABA**

# MISSION



Curimbaba Group's mission is to provide high quality industrial minerals, fertilizers and services with the effective use of its deposits and vertical integration of its processes, in order to guarantee the supply of its products and services for decades to come.

# VALUES



Curimbaba Group conducts its business activities guided by a set of values that seek to ensure credibility, security and preserve the Group's image, in the short and long term, in the markets in which it regularly operates. They are:

- Focus on sustainable long-term results;
- Growth with low financial leverage;
- Valuing the entrepreneurial spirit of its employees.
- Preservation of built heritage, aiming to provide security to shareholders.

All administrators and employees, whether direct or not, must be committed to the principles of honesty, trust and respect for others, whereby they are responsible for disseminating and practicing these values.

In this context, Curimbaba Group's Code of Conduct aims to bring together the set of guidelines that guide our actions and point out the horizon towards which we want to move in order to achieve the standards of ethical conduct appropriate to the exercise of our professional and social activities, thus corresponding to our cultural identity, representing our commitment to responsible, ethical, transparent and mutually respectful action with all the audiences with which we interact, with the aim of gaining everyone's trust and respect.

## TO WHOM IT IS INTENDED



This Code applies to all members of the Curimbaba Group, as well as to all relationships established with partners, customers, suppliers, labor unions, communities, government, society and the media.

## CORE PRINCIPLES



The following are core principles for the Curimbaba Group:

- Respect for life, with preventive action, care for the well-being at work, the health and safety of people, facilities and processes of the Curimbaba Group Companies, by valuing its members;

- Observing good corporate governance practices, good accounting and management principles and practices, clear, objective and timely communication to its partners;
- Protection, promotion and awareness of Human Rights in its activities and throughout its production chain, in compliance with the principles of the Universal Declaration of Human Rights<sup>1</sup>; and
- Achieving its business objectives with corporate social responsibility, acting in a conscious and responsible manner regarding the socioeconomic and environmental aspects of its activities and contributing to the development of the communities in which it operates, including encouraging the exercise of citizenship.

These principles must be observed in other entities in which the Curimbaba Group has a stake, in Brazil and abroad.

The following are core principles for members of the management body and their advisory committees, whether directly employed or not, and interns at the Curimbaba Group:

- Adherence to the highest ethical standards of professional conduct, preserving responsible, honest, loyal and respectable performance in order to guarantee integrity in all activities;
- Compliance with laws and regulations (national and international), standards and internal policies applicable to the Curimbaba Group's businesses; and
- Reporting suspicions or violations of laws, regulations, rules and internal policies of the Curimbaba Group to the competent areas, with a guarantee of non-retaliation.

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<sup>1</sup> <https://nacoesunidas.org/wp-content/uploads/2018/10/DUDH.pdf>

# RULES OF CONDUCT



## **1.The following are expected behaviors:**

- 1.1. Carry out your activities in compliance with this Code and follow the internal policies and standards of the Curimbaba Group Companies, encouraging and guiding your colleagues in this regard;
- 1.2. Maintain a positive, dignified, loyal, honest, mutually respectful, trustworthy, impartial, objective, transparent and courteous professional attitude in relationships with administrators, co-workers, suppliers, customers, partners and investors;
- 1.3. Act in strict compliance with all applicable laws, including anti-bribery and anti-corruption laws, which apply to the operations of Group Companies in the countries where it operates;
- 1.4. Use available electronic communication resources solely and exclusively for professional purposes, within legal requirements and subject to ethical principles.
- 1.5. Preserve the assets of the Curimbaba Group, including its image and reputation, facilities, equipment and materials, using them only for the purposes for which they are intended, avoiding waste and eliminating unnecessary costs and expenses;
- 1.6. Defend the interests of Group Companies in matters in which they are participating;
- 1.7. Be diligent and responsible in relationships with Authorities, customers, competitors, suppliers, community members and all other individuals, companies and

organizations with which the Curimbaba Group interacts in the exercise of its regular activities, always seeking to preserve its good reputation, image and company relations;

- 1.8. Avoid situations in which a conflict of your own interests may occur with the interests of the Curimbaba Group and, when this is not possible, refrain from representing the Group in the matter in question, by communicating the fact immediately to your immediate superior;
- 1.9. Ensure that communications and information to partners are made exclusively by authorized members and are in compliance with the policies, controls and procedures of the Curimbaba Group Companies and with applicable legislation;
- 1.10. Not to establish commercial relationships with companies or individuals that do not observe ethical, health and safety and human rights standards compatible with those of the Curimbaba Group, as well as the anti-bribery and anti-corruption practices adopted by the Group;
- 1.11. Avoid disclosing any confidential or sensitive information or strategy of the Group to which you have access, even as a third party, including if you are no longer linked to the Group, in addition to maintaining confidentiality regarding insider information;
- 1.12. Commit to the sustainable development of the regions where the Curimbaba Group companies operate and compliance with environmental legislation;
- 1.13. Act with social responsibility and respect for human dignity;
- 1.14. Carry out daily activities respecting the health and safety guidelines defined by the company;
- 1.15. Resolve professional differences in a respectful and professional manner, without acts of violence, threats,

coercion or intimidation.

- 1.16. Act on social media respecting the values of the Curimbaba Group and this Code;
- 1.17. Report violations or suspected violations of Laws, Regulations, Standards and Internal Policies of the Group to the competent areas;
- 1.18. On an annual basis, participate in training to develop understanding of the ethical requirements described in this Code, as well as any and all training provided by the company;
- 1.19. Pursuant to Law N. 13.709/18 - General Data Protection Law (LGPD), Curimbaba Group employees must take all appropriate measures to ensure that data classified as personal and sensitive be collected, accessed and/or processed only by people who need this information in order to carry out their work activities;
- 1.20. Know, disseminate and fully respect the Internal Conduct Handbook for Visitors and the GC Code of Conduct for Suppliers; and
- 1.21. Contact the Curimbaba Group whistleblowing channel when you observe or become aware of inappropriate behavior or activities and/or that are in disagreement with our Code of Conduct.

**2. The following are intolerable conducts and subject to disciplinary measures:**

- 2.1. Using your position to obtain personal advantages, facilities or any other form of favor or illegitimate personal benefit, or for third parties in your relationship;
- 2.2. Discrimination based on ethnicity, origin, gender, sexual orientation, religious belief, labor union membership,

political or ideological conviction, social class, disability status, marital status or age;

- 2.3. Harassment of any nature, including moral or sexual, causing embarrassment to others;
- 2.4. Without the consent and authorization of the Presidency/Board of Directors and/or in disagreement with the Internal Conduct Handbook for visitors, political, religious or commercial advertising is not permitted on the premises of Group companies. Likewise, the use of resources, name, image, physical facilities and other assets of Group entities to serve personal, commercial, political-party and religious interests is not permitted;
- 2.5. Preferential or privileged treatment to any customer or supplier in disagreement with the policies and standards of the Curimbaba Group;
- 2.6. Offering or receiving gifts in violation to the policies and standards of the Curimbaba Group and as a means of exerting undue influence, or obtaining personal gain or award for oneself or for third parties;
- 2.7. Offering hospitality or entertainment, making donations or social contributions on behalf of the Curimbaba Group in violation to its policies and standards or without obtaining the necessary internal authorization;
- 2.8. Offering, paying, promising or authorizing a personal benefit (whether payment or any other type of personal benefit), directly or indirectly, to any Government Official;
- 2.9. Accepting and/or offering payments, services or benefits with the aim of gaining advantages for the Group, its members or oneself.
- 2.10. Contacting a competing company with the Curimbaba Group Companies with the aim of discussing prices, markets, promotional programs or terms of sale, in



violation to applicable competition legislation;

- 2.11. Drinking alcoholic beverages and performing professional duties under the influence of alcohol.
- 2.12. Using and/or carrying drugs, as well as remaining in the workplace in a state altered by the use of narcotics;
- 2.13. Carrying any type of weapon in the workplace, unless expressly requested by property security and authorized by the Group's management;
- 2.14. Failure to comply with occupational health and safety standards and rules and/or putting one's own life and that of other employees at risk;
- 2.15. Distorting the figures or accounting characterization of items that may be reflected in the management reports or financial statements of the Curimbaba Group;
- 2.16. Using any type of research, study, text, computer program, file or work of the Curimbaba Group for private purposes, without the authorization of your superior;
- 2.17. Using company technologies to download, view or submit materials that contain obscene, offensive, discriminatory, illegal, unethical content or that are not compatible with the strict exercise of your professional role;
- 2.18. Sharing access passwords with co-workers or third parties;
- 2.19. Installing software and/or programs on Curimbaba Group computers without prior authorization from the Information Technology area;
- 2.20. Practice retaliation as a result of reporting violations or suspected violations of the Laws, Regulations, Standards and Internal Policies of the Curimbaba Group;
- 2.21. Disclose personal data collected and maintained by the Curimbaba Group, especially with respect to data classified as sensitive by the LGPD;
- 2.22. Omission in the face of knowledge of inappropriate

behaviors and/or activities, as well as potential violations of conduct that are in disagreement with our Code of Conduct.

## QUESTIONS AND OMISSIONS



The guidelines of the Curimbaba Group's Code of Conduct allow us to evaluate most situations and minimize the subjectivity of interpretations of ethical principles and conduct, but they do not necessarily detail all situations that may arise in each person's daily life.

Therefore, in case of doubt regarding the application of the guidelines of this Code in a given situation, the immediate leader must be consulted in advance and, if necessary, Curimbaba Group's Compliance Department.

## COMMUNICATION CHANNELS



Curimbaba Group has a means of communication that guarantees anonymity and allows anyone to report any misconduct concerning the provisions of the Code of Conduct.

The Reporting Channel is a mechanism available in 4 different forms:

- Telephone: 0800 800 1277 (Brazil)
- Telephone: 1 (800) 734-6716 (USA)
  
- Website:
- [www.contatoseguro.com.br/grupocurimbaba](http://www.contatoseguro.com.br/grupocurimbaba)  
Electronic address:
- [canaldedenuncia@grupocurimbaba.com.br](mailto:canaldedenuncia@grupocurimbaba.com.br)  
Correspondences:  
C/o Risk Department and Compliance.  
Av. João Pinheiro, 3665, Poços de Caldas - MG - 37704-746

If you have any questions, you can also contact the Compliance area via email:  
[compliance@grupocurimbaba.com.br](mailto:compliance@grupocurimbaba.com.br)

## PENALTIES



Violation to the guidelines of this Code of Conduct or other rules of the Curimbaba Group, whether committed by its direct or indirect members, administrators, representatives, suppliers or service providers, will have disciplinary consequences.

The following are potential punishments:

- Verbal warning;
- Written warning;
- Suspension;
- Dismissal without just cause;
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Dismissal with just cause;

- Notification or even contractual termination for legal entities.

Disciplinary measures must be applied after the offense committed.

A longer period of time is allowed for the application of a penalty when the fault requires an investigation of the facts and responsibilities.

Sanctions must be fair, reasonable and proportionate to the offense committed. Similar offenses should receive similar sanctions.

Human Resources Management must always be consulted concerning the disciplinary measure to be applied and, when necessary, also consult the Legal Department.

**It is important to emphasize that the company has monitoring mechanisms in place and uses them daily.**