

"stourts"
with Me"

SAMARCO
CODE OF CONDUCT

Revision 8 - 2019





A WORD FROM MANAGEMENT

Samarco believes that it is possible, through its activities, to add value to society. For this, it is essential to act responsibly, ethically and transparently. This is our commitment, which we can only fulfill with the participation of all.

Therefore, our company expects you, our employee, to follow the rules of this code because you agree with what it says. We want people who embrace the values and ideals which we have chosen to guide our business activities and our relationship with society. The behavior of each and every one of us must be consistent with the principles of this code, cultivating loyalty and mutual trust among our stakeholders.

This code has been reviewed in a participatory manner and is here to guide our daily work, helping us to reflect on actions taken and the planning of our next steps. It demonstrates how to apply values in a practical manner in accordance with internal policies and procedures.

Read it with attention and commitment. This is how we want to build our future and pursue our journey.

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GETTING STARTED

Our Code of Conduct applies to everyone - employees, including managers, collaborators, contractors, and senior management, as well as members of the Board of Directors, without exception. We all have the duty to behave with integrity, regardless of position and function. The code is based on the company values that guide our behavior, as highlighted below:

Company policies, procedures and other rules must be based on the provisions of this code. Always refer to it when in doubt.



We expect all stakeholders mentioned in this code to abide by the highest standards of ethical conduct, even when there is no specific law on the subject.

Employees are responsible for their behavior at work and disciplinary action may be taken in the event of a violation of the Code depending on the identified non-compliance, the circumstances and the people involved.

Company leaders are also responsible for helping their team to understand and enforce the Code, promoting the practice of Samarco values. Leaders should be models of ethical conduct in their actions.



Respect for people

We consider human life a non-negotiable value and treat all people equally. We do not allow discrimination of any kind and welcome the free expression of ideas and opinions at all times.



We are fully dedicated to compliance with laws and respect for moral principles, emphasizing dignity and ethics in relationships. We adopt an honest and transparent attitude towards all parties involved in our business relations.



Mobilization for results

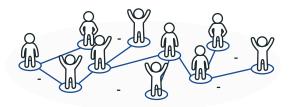
We act in total alignment with the company's guidelines, goals and objectives and its commitments to society, in a collaborative and systemic manner, deploying high performance teams, and pursuing optimum global business





We base our conduct and attitudes on safety, supported by our commitment to comprehensive and efficient risk management. The concept of safety permeates all aspects of business: financial, legal, operational, labor and environmental.

WHO'S WHO



Government entity: Q

any Brazilian or foreign government body, agency or company, at any level of government, as well as any entity which is controlled, directly or indirectly, by any Brazilian or foreign government body, agency or company.

Business Partners: Q

Any third party who provides services for Samarco and who interacts with, or is expected to interact with, Government Officials or Government Entities on Samarco's behalf and that of its controlled or affiliated companies.

Collaborators: Q

Suppliers, Third Parties, Partners, Samarco Representatives and Business Partners/Intermediaries, in Brazil and abroad.

Employees: Q

all employees (including directors), interns, trainees, minor apprentices and temporary employees.

Relatives: Q

spouse, domestic partner, siblings, parents, children or stepchildren, grandparents, grandchildren, sons and daughters in law, aunts, uncles, nephews and nieces, cousins, brothers and sisters in law and parents in law.

Suppliers: Q

any and all individuals or legal entities, including financial institutions, who provide consumables, materials, goods or services to Samarco. This also includes contractors whose employees provide services at Samarco's facilities.

Government Official: ♀

Any individual who, even if working on a temporary basis or without remuneration, is an employee of, or who holds an office, job or function in a Government Entity or at a company which provides services, under contract or agreement, which involve an activity which is under concession from a Government Entity, (ii) is a member or employee of a political party, or who otherwise acts on behalf of a political party, (iii) is a candidate for any public office; (iv) represents the interests of a class or group, such as a community or union leader. Example: governors, councilors, judges, prosecutors, auditors and inspectors.

Partners: Q

individuals or legal entities with whom Samarco maintains a relation formalized through agreements, terms of cooperation or similar instruments, including investors.

Representatives: Q

individuals or legal entities who may or may not have an employment relationship with Samarco, yet work in the interest or behalf of Samarco vis-à-vis third parties.





PEOPLE

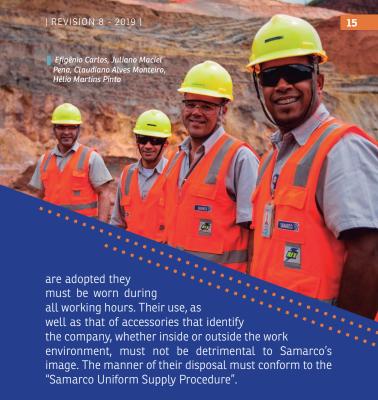
YOU AND THE COMPANY

Employees are one of our main strengths. The company's relationship with its employees is based on respect, trust and professionalism, in accordance with current laws, Samarco's bylaws, policies, rules and procedures. We respect collective bargaining and the right to free association with political parties, non-governmental organizations, religious entities and trade unions.

Each person is unique and should be viewed as such. We do not allow prejudice, discrimination, sexual or moral harassment, nor abusive practices of any kind. The health and physical integrity of employees have priority over economic interests.

Discrimination in recruitment, selection or promotion processes is also not tolerated. Employees applying for other internal vacancies will be evaluated only on the basis of the job requirements, competing on an equal basis with outside candidates. Family members of employees will compete on equal terms, but direct subordination between members of the same family will not be allowed. Should this occur, the parties must immediately inform the company's Human Resources or Compliance area.

Uniforms are safety items and a way of showing adherence to company principles. In the units where they



Employees who work abroad must, in addition to complying with Samarco's rules and procedures, know and comply with the laws and customs of the country in which they live and work. Volunteering activities are authorized and supported by the company. However,

Volunteering activities are authorized and supported by the company. However, if undertaken during business hours, they require prior authorization by the immediate supervisor.

During working hours, matters of personal interest should be kept to a bare minimum.

Personal information relating to employees is treated with professionalism and ethics by Samarco, with access thereto given only on a need-to-know basis, in accordance with the pertinent legislation.

Samarco assets, equipment and facilities are intended for use in company operations, and employees are required to protect them against unauthorized or improper use.

Samarco does not allow political, religious or commercial advertising to be carried out on its premises or with the deployment of its resources. Therefore, any sort of commercial dealings are prohibited during office hours and / or using company resources.

Finally, it is important to emphasize that the company is always open to dialogue in the pursuit of conciliation between its interests and those of the employee.



ALWAYS:

Respect differences and report any type of actual or potential discrimination, harassment or abuse of human or labor rights in our activities or among companies engaged by Samarco.

Treat all people the way you expect to be treated, always with dignity, respect and consideration.

Help new employees in their integration with their colleagues and the work environment.



NEVER:

Wear company uniforms at events and festivities when you are not representing Samarco.

Accept any action that may result in an affront to human or labor rights of co-workers, communities or stakeholders.

Ignore any human rights abuses by suppliers, customers and other partners.

Use Samarco's name, logo and resources in political campaigns and candidate propaganda.

Make donations on behalf of the company without prior authorization of the manager, public affairs and Compliance team

UNIONS



We recognize unions as legal representatives of employees and strive to achieve, through respectful and responsible negotiations, the best solutions conciliating their interests with those of the company.

CONFLICTS OF INTEREST



Employees must be loyal to Samarco, pledging to defend the company's interests.

Conflicts of interest may arise when an employee's personal interests conflict or may conflict with the performance of his or her activities in an impartial manner in the best interests of the company or when the employees' private activities are incompatible with their obligations and responsibilities to Samarco.



ALWAYS:

Be transparent and ethical and report to the Compliance area whenever issues related to family ties at work occur.

Report any actual or potential conflict of interest.



NEVER:

Allow direct subordination between an employee and a family member, even if one of them works for a Samarco contractor;

Hold a position that would allow you to interfere with the employment terms of family members within the Company, such as their assignment, definition and measurement of activities and tasks, remuneration, performance evaluation and advancement;

Participate in a hiring process that involves a company in which the employee or his / her family members are partners, directors, representatives or employees;

Acquire or constitute easement of urban and rural real estate in which the employee participated in the process of identification, project definition, choice and / or negotiation of the property and whose owner is the employee himself or his/her family member.

Provide services or hold positions in companies that are Samarco's customers, competitors, suppliers or representatives, even outside working hours, with or without remuneration;

Maintain a business relationship with an individual or legal entity who has been hired by the employee himself.

In the process of acquisition or constitution of easement of urban and rural real estate whose owners are employees (including directors) and their respective family members, there has to be a prior evaluation by Compliance regarding potential conflict of interest.

The mere possession by a Samarco employee of shares or interest in another company does not necessarily create a conflict of interest, unless it is a company with which Samarco maintains business relations and the Samarco employee in question has the power to influence decisions related thereto.

Employees, in carrying out their activities, must inform their immediate managers of situations that may lead to a conflict of interest. It is the responsibility of the immediate manager of the employee to take measures to eliminate / mitigate the risk linked to such conflict, always consulting the Compliance area.

Every year the Compliance area issues a form to be filled out by all employees to update their declaration of kinship and conflict of interest within the Company. We rely on the transparency and ethics of all employees to provide correct and truthful information. Should the kinship or conflict of interest conditions change at any time before the year is up, the employee must submit a new form to the Compliance area (compliance asamarco.com) with the updated information.

Situations involving a conflict of interest are not always obvious or easily resolved. For this reason, any situation of actual or potential conflict of interest should be immediately reported to the immediate manager, the Ombudsman and / or the Compliance area, so that they may make the assessment and make the appropriate decision, always protecting Samarco interests.

GIFTS AND HOSPITALITY



Negotiations and professional relationships with customers, suppliers, partners, competitors, the community and representatives of the government, among others, may involve situations involving gifts. In such cases, it is necessary to be cautious and follow the guidelines of the "Gifts, Benefits and Hospitality Policy".

Employees or collaborators are prohibited from soliciting gifts of any kind, as well as the granting of gifts, tokens or hospitality (e.g., meals, entertainment, airline tickets and lodging) to public or private sector employees in violation of the "Gifts, Benefits and Hospitality Policy".

Anyone wishing to grant a benefit to a third party on behalf of Samarco or who has received or will receive a benefit from a Samarco business partner should refer to the "Gifts, Benefits and Hospitality Policy" for proper reporting and approval.



ALWAYS:

Report the gift, benefit, or hospitality offered or received from government officials to the Compliance area, as outlined in the "Gifts, Benefits and Hospitality Policy". Please note that pre-approval is required for values over R\$100 or US\$50.



NEVER:

Request gifts of any kind, no grant any gifts, benefits or hospitality (e.g. meals, entertainment, airline tickets and lodging) to public or private employees in violation of the "Gifts, Benefits and Hospitality Policy".





SAFETY

HEALTH AND SAFETY

For us, safety takes precedence over economic interests.

The operation of equipment or the performance of any activity may only be carried out by qualified, trained and authorized personnel. Samarco requires compliance with standards and precautions that prevent accidents and provide a safe and healthy work environment, including the use of protective equipment defined as mandatory.

All Samarco employees or employees must be aware of the health and safety risks related to their activities. They have the right and duty to refuse tasks that could place them in health and safety risk situations for which no controls are in place.

Cleanliness and organization in the workplace, including clean and tidy uniforms (compatible with the type of work performed) contribute to the safety and good image of the company.

Alcoholic beverages and other drugs are not compatible with a healthy and safe work environment. Consequently, it is forbidden to work at Samarco under the influence of drugs, or to use them during working hours. Moderate use of alcoholic beverages at company parties and at business / institutional meetings is permitted (as long as the following day is not a work day).



ALWAYS:

Use personal and collective protective equipment.

Immediately report the loss or the need for replacement of safety equipment.

Observe and alert your colleagues about the importance of using PPE.

Perform risk assessment of the activities to be undertaken

Perform periodic medical examinations.

Immediately report any discomfort, indisposition or emotional problem.

Participate in DDS (daily safety dialogues) and H&S area actions.

Practice defensive driving



NEVER:

Perform an activity for which you are not prepared, trained or do not have the necessary equipment.

Consume alcoholic beverages and other drugs before and during your workday.

Perform tasks that may put you at risk for health and safety without taking appropriate precautionary measures.

FRAUD AND CORRUPTION



We are firmly committed to complying with all anticorruption and anti-bribery laws in effect in Brazil and other countries in which we do business. We do not make improper payments for the purpose of conducting business, influencing decisions or inducing persons to grant improper permissions for our benefit.

Employees or employees may not offer, give or promise, directly or indirectly, any improper advantage to a government official or private enterprise employee. Likewise, they may not receive undue advantage or accept promise of payment or reward from government officials or private enterprise employees. The concept of improper advantage even considers anything of value that can be perceived as improper advantage.

The "Fraud and Corruption Prevention Policy" provides further details on this subject.



ALWAYS

Contact the Compliance area if you have any questions about anything offered, promised or received from a government or private entity.



NEVER

Offer, give, promise or accept undue advantage to/ from a government official or any third party, supplier, or representative of a private entity.

The following non-exhaustive list of Undue Advantages is intended to demonstrate the wide scope of "something of value":



Gifts, travel, meals, or lodging;

Educational opportunities, job interviews or offers, letters of recommendation, medical services.

Donations (including charitable ones) to organizations that are directly or indirectly related to a third party or Governmental Official.

Steering contracts to a certain supplier tied to a third party or to a Governmental Official.

Allowing the use of Samarco resources (e.g., allowing access to Samarco vehicles for personal use).

Reimbursement for a third party's or a supplier's unjustifiable expenses.

Political party or candidate campaign contributions (e.g., donations, providing facilities for political events or campaign workspace, event sponsorships, transportation).

FINANCIAL COMMITMENTS



All payments and financial commitments assumed by Samarco must be authorized by the competent authority level in accordance with company policies and procedures and supported by legal documentation, and must be accurately, fully and faithfully reported in the accounting records

It is important to use Samarco's financial resources correctly and to accurately report any outlays.



INFORMATION TECHNOLOGY

The technological resources - computer equipment, programs, data and information stored in computerized systems - made available by the company must be used in a professional, ethical, safe and legal manner and protected against damage, loss, duplication, alteration or unauthorized access.

All technological resources provided by Samarco are provided for professional use. Samarco can oversee and monitor everything that is produced or accessed through these technological resources. Monitoring includes any content stored, posted, displayed, used, transmitted and performed through these media. Use of these resources is not permitted for the dissemination, display, use, transmission and execution of content and materials that violate laws and moral codes.

Although they are provided for professional use, we allow moderate and responsible use of communication media (telephone, email and internet) for personal purposes, provided that such use does not violate internal rules and quidelines or impair work performance.

Passwords and logins are individual, confidential and should not be shared.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY



Employees or employees must protect Samarco's proprietary information and ensure the confidentiality of the information to which they have access due to their activities, in addition to ensuring the proper handling of documents and information, allowing their control and availability to authorized personnel. It is everyone's duty to protect the confidentiality, integrity and availability of information assets, both in physical and digital formats. Samarco proprietary information may not be disclosed externally, even after termination of employment with Samarco, unless expressly divulged by areas or persons authorized to do so.

It is important to assure the protection of Samarco's intellectual property rights, including patents, inventions, models, trademarks, copyrights, trade secrets, and computer program rights. Similarly, it is necessary to respect the intellectual property rights of others and not use or reproduce any protected material or item without permission.

Samarco is the sole and exclusive owner of the intellectual property rights over all results developed by employees or collaborators within the scope of their activities or that have been developed through resources, data, materials, facilities, equipment or information provided by Samarco. Accordingly, any inventions or improvements resulting from the collaborator's or employee's specific contribution that have relied upon Company resources, data, means, materials, facilities or equipment will be the sole and perpetual property of Samarco and may be used globally.

In the relationship with suppliers and partners all technical data, information and results made available to them by Samarco are confidential, and suppliers or partners may not use them for their own benefit or that of third parties, without the express authorization of the company.





SOCIETY

ENVIRONMENT

For us, the environment is of paramount importance. We seek to reconcile our activities with sustainable development and environmental preservation and we expect all employees to do the same. You can contribute

- Respecting the environment;
- Valuing biodiversity;
- Making efficient use of nonrenewable resources;





COMMUNITIES

We are aware of our role in the territories where we operate, as well as our commitment to social transformation. And we attach great importance to the historical and cultural values and the well-being of the neighboring people and communities with whom we interact. We share value with society in order to provide opportunities and improve living conditions.

Samarco respects the right to information of the communities located in its areas of influence, providing access to information in accessible, appropriate and understandable language, enabling understanding by all stakeholders.

CUSTOMERS



- Our conduct with customers and prospects is guided by the following principles:
- mutual respect and honesty;
- Truth and clarity about product and service characteristics;
- Compliance with local and international laws, especially those that combat corruption, bribery, fraud and acts against government entities, and those related to antitrust laws.



ALWAYS

- Treat others with respect and transparency, aiming at a fair negotiation
- Receive and evaluate criticism and suggestions



NEVER

Offer, promise or accept undue advantages

SUPPLIERS AND PARTNERS



Our relationship with suppliers is based on mutual respect, transparency and honesty. Actions, operations and business must obey the rules of free competition. More details:

Any vendor may apply for registration as a potential supplier, said application to be evaluated by Samarco Procurement Management;

Qualified suppliers will receive equal treatment in all bidding processes:

Suppliers cannot include companies whose partners are directors, representatives or employees, family members of employees and / or family members of collaborators involved in the definition and requisition of purchases, as well as in the technical analysis, measurement, management and hiring process, bidding process and procurement.

We expect clarity from our suppliers in the description of their products and services, and for them to always seek the best results in terms of quality, cost effectiveness, technical and financial reliability.

We require our suppliers to comply with their legal, tax, socioenvironmental, labor, occupational health and safety obligations and assure respect for human rights - child or slave-like labor is not allowed under any circumstances.

We value the initiative of suppliers and partners in building Integrity Programs that aim to promote these values in their organizations.

Suppliers must commit to properly use Samarco equipment and facilities, providing the services specifically defined within their contractual scope.

In addition to the code of conduct, relationships with suppliers must comply with the "Corruption and Fraud Prevention Policy", the "Gifts, Benefits and Hospitality Policy" and the "Antitrust Policy". Non-compliance therewith may result in contract termination.

The provisions contained in this item also apply, where applicable, to Partners.



ALWAYS

Inform suppliers of Samarco's values and standards of conduct.

Obey current laws.

Give positive and negative feedbacks, seeking continuous improvement.

 Report any deviations to the supplier manager and / or partner immediately.



NEVER

Offer or receive undue advantages.

Allow differentiated treatment for suppliers and partners.

REPRESENTATIVES 🙊



The hiring of representatives, in Brazil or abroad, must follow criteria selected to ensure compliance with our principles and to avoid causing sanctions to the company, employees and collaborators or harm to our image.

should be adopted when hiring representatives.

SHAREHOLDERS ခိုက်ိုင်္ဂ



We consider it fair and important to provide a suitable return on shareholder investment.

and investors, in compliance with applicable law and our shareholders' agreement, bylaws and "Antitrust Policy".

confidential acts or facts, preserving the interests of Samarco and its shareholders, nor can they use this information to gain advantage for themselves or others. Any questions and clarifications regarding information sharing with shareholders and or third parties should be directed to compliance as a marco.com or governanca a



COMPETITORS

Competition is vital to business. We are committed to the laws of defense and protection of competition in Brazil and abroad. Our principles determine that employees and collaborators must comply with the "Antitrust Policy":



ALWAYS

Respect freedom of initiative and free competition;

Adopt legitimate competitive strategies;

Reject anti-competitive practices;



NEVER

Disclose commercially sensitive information about Samarco to third parties, including Samarco shareholders

GOVERNMENT ENTITIES AND POLITICAL PARTIES



We respect local government officials anywhere around the world where we operate and provide them with the information required by applicable laws and regulations.

We believe public good prevails over any political/party dispute at any level of power. We are impartial and do not make financial donations to parties or candidates for public office. However, we may at times participate in public debates about political issues that may affect the company.

Samarco may only be represented in formal contacts with Government Officials by Samarco employees designated in the liaison matrix with Government Entities, and all Employees and Collaborators must always be accompanied by another Samarco Employee. This rule does not apply only in the case of court hearings, regular

protocols, simple business orders and general orders. In the case of orders in general, the Compliance area must be informed in advance by email compliance@samarco. com.

The Compliance area should be informed in case of formal meetings of Employees and Collaborators with Government Officials to address matters of the company's interest. After the meeting, an email should be sent to compliance@samarco.com, attaching the duly filled out "Form for Report on Government Official Meeting" available on the Samarco Intranet, or through some other company tool, attaching the minutes of the meeting, if available.

The Employee or Collaborator shall report (submitting the form or record added of the minutes of the meeting, when there are it) to the Compliance area all formal meetings with Government Officials within five (5) business days from the date of the meeting. If some other company reporting tool is used, questions by Compliance must be answered and the respective minutes of the meeting attached.

Failure to report formal and other meetings of Employees mapped out in the liaison matrix and of Collaborators with Government Officials may lead to the application of consequence management to those responsible for the event.

In the event of any adverse situation arising during the meeting, the employee or collaborator must immediately inform the Compliance team.

In relations with the Public Administration or political parties, employees and collaborators shall observe the "Fraud and Corruption Prevention Policy", "Gifts, Benefits and Hospitality Policy" and "Spending Allocation Procedure with Government Officials".



ALWAYS

Treat any party/ political position with respect.

Report dialogue with government officials and political parties as soon as possible.



NEVER

Participate in political campaigns as a representative of the company

Donate on behalf of Samarco without prior authorization

Offer undue advantages or promises

PRESS AND DIGITAL MEDIA



Communicating our actions and information to society is very important. Therefore, our relationship with communication vehicles (newspapers, magazines, radios, TVs, websites, social media etc. ...) is based on trust and respect. In addition to respecting legislation and ethical precepts, we are clear and transparent.

Unauthorized employees and collaborators are prohibited from interacting with the press on behalf of Samarco. We have a specific department and personnel for this purpose.

Employees and collaborators must be careful when using social media, expressing only their own opinion, never speaking in Samarco's behalf. Even so, it is important to be aware that references to the company in their social networks can be interpreted as Samarco's opinion and affect its image. Therefore, attention and caution are always called for.

Information, content, images and documents about Samarco, its shareholders, suppliers, partners and representatives may not be disclosed in any media (including social networks and WhatsApp groups) without prior authorization from the relevant area. Sharing of information about the company in social networks will only be allowed provided the original content has been previously posted by Samarco through its own social media.

Postgraduate, masters or doctoral research on Samarco's production process, technology, sustainability, among other specific activities of the organization, must be previously evaluated and authorized by the Legal and Compliance area for publication purposes.





ALWAYS

Keep up with company news on media and social networks

Immediately inform the Communication and Stakeholder Management of any request for interviews or participation in public events.

Be careful about content posted on social networks, avoiding the spread of fake news.



NEVER

Grant interviews or attend events representing the company without prior authorization.

Disclose Samarco Internal Data to Third Parties

Post photos of the Samarco operating area and offices without permission

Post to your private social networks on behalf of the company without approval





CODE

COMPLIANCE WITH THE CODE



It is the obligation of all Samarco employees or collaborators to comply with the precepts of this code, practicing and promoting its enforcement in any action or business that involves the company's interests.

Any breach of or non-compliance with the provisions of this code or other Samarco rules and policies will subject those responsible to disciplinary measures defined by the company, and may involve termination of the work relationship with Samarco, as well as applicable penalties based on current law.



MANAGEMENT OF THE CODE

Management of the Code of Conduct is the responsibility of Samarco's Compliance Team, together with the Conduct and Compliance Committee.

This document should be reviewed every two years.

Approval of the content of this Code of Conduct is the responsibility of the Conduct and Compliance Committee.

Managers, at all levels, must take the necessary measures to assure that employees and collaborators know and apply this code when performing their activities for Samarco, emphasizing the following:

- Be an example of conduct to be followed by everyone;
- Use the Code of Conduct as a management tool, adopting the necessary measures to ensure its applicability;
- Assure that your team conducts annual training on the topic and has a full understanding of the code;
- Answer questions and doubts about the rules contained in the Code of Conduct and, if in doubt, refer them to the Compliance area or to the Samarco Ombudsman

HOW TO SUBMIT A REPORT

In the event of a violation or suspected violation of any laws or rules set forth in this code, and the Company procedures and policies, reports should be addressed to the following contacts:



Toll free: 0800 377 8002



E-mail ombudsman@samarco.com/



Website |

www.canalconfidencial.com.br/ouvidoriasamarco

Reports may also be forwarded to our shareholders, BHP Billiton and Vale:

BHP

Ethics.team@bhp.com www.bhp.com/our-approach/our-company/our-codeof-conduct/using-our-code/speaking-up Phone: 0800 892 3110 (toll free)

Valley

ombudsman@vale.com

Phone: 0800 892 1827 (toll free)

Reports will be duly recorded, verified and investigated. The Ombudsman will analyze and investigate any reports, together with the Conduct and Compliance Committee. Investigations will be conducted with impartiality, focusing on the confidentiality of the whistleblower's identity and the content of the report. When requested by the Ombudsman, all Samarco employees are required to provide accurate information and to cooperate with Samarco misconduct investigations. Reports may be made either in an identified or anonymous form. However, identified records are very helpful to a speedy and objective investigation process.

Samarco expressly prohibits any retaliation against an employee or collaborator who reports a possible violation of this code, or who cooperates with the investigation of the possible violation, even if the person who made the report is mistaken. Acts of retaliation must be reported immediately and will result in disciplinary action by the company. The prohibition against retaliation also extends to any employee or collaborator who cooperates with the investigation.

DOUBTS? ASK!



Questions and clarifications regarding the Code of Conduct can be directed to Samarco's manager, Compliance area or Ombudsman by e-mail ouvidoria@samarco.com or compliance@samarco.com.

Questions forwarded to the Ombudsman will be recorded and answered by the Ombudsman with the assistance of the Conduct and Compliance Committee, if necessary.



ACKNOWLEDGEMENT FORM - COMPLIANCE WITH CODE OF CONDUCT

This code will only be an effective instrument for guiding conduct if it has your full support. That is why your commitment to our way of being and acting is so important.

- I declare that I am fully aware of the existence and content of the Samarco Code of Conduct, which I have received, read and understood:
- I understand that compliance with the Code as a whole becomes part of my duties as an employee, along with the Fraud and Corruption Prevention Policy and the Gifts, Benefits and Hospitality Policy, as well as other rules of conduct adopted by the company;
- I undertake to fully comply with the terms and conditions set forth in the Code;
- I am fully aware that from this date forward, my failure to comply with the Code may be deemed serious misconduct, a fact that may lead to the application of pertinent penalties, including termination of contract, depending on the severity and repetition of the violation, at the company's discretion and in accordance with applicable law
- I agree to abide by this Code of my own free will.



COMPLIANCE WITH CODE OF CONDUCT

0800 033 8485 www.samarco.com

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