

CORPORATE POLICY



POL.007-05 – Compliance Policy

February 2026

Revision	Revision Date	Change Description	Responsible	
			Prepared by	Approved by
01	13/11/2018	Document drafting	Joyce Seixas	Audit and Risk Committee
02	04/11/2020	General document review	Joyce Seixas	Audit and Risk Committee
03	15/03/2022	General document review	Joyce Seixas Patrícia Luz Pereira	Audit and Risk Committee
04	08/08/2023	Update of item 5.7.1 Whistleblower Hotline	Joyce Seixas	Audit and Risk Committee
05	25/02/2026	Update and alignment with the IMS (Integrated Management System)	Lucas Pinto Fernandes Internal Audit and Compliance Department	Daniel Karrqvist - CFO

1 OBJECTIVE

The purpose of this policy is to describe the guidelines of Jaguar's Compliance Program, with a focus on ensuring compliance with legal requirements, the Code of Ethics and Conduct (CEC), policies, and procedures. This policy also aims to provide guidance for combating corruption and bribery practices, thereby fostering a culture of Compliance based on Jaguar's values, compliance, and ethics, as well as encouraging its stakeholders to adopt integrity programs and/or actions.

2 SCOPE

This policy applies to corporate employees and third parties, understood as:

- a) All employees, directors, board members, and other members of Jaguar's governance bodies ("Professionals");
- b) Third parties who maintain a legal and/or institutional relationship with Jaguar, including but not limited to suppliers, service providers, shareholders, consultants, business partners, temporary workers, outsourced personnel, and other workers directly or indirectly linked to the company ("Third Parties").

3 REFERENCE DOCUMENTS

- Jaguar's Code of Ethics and Conduct;
- Supplier Code of Ethics and Conduct;



- Anti-bribery and Anti-Corruption Policy;
- ISO 19600:2014 – Compliance Management System;
- ISO 37001:2017 – Anti-Bribery Management Systems;
- Integrated Management System Manual.

4 KEY CONCEPTS/DEFINITIONS

- a) **CEC:** Jaguar Mining Code of Ethics and Conduct;
- b) **CEIS:** Registry of Debarred and Suspended Companies;
- c) **CEPIM:** Registry of Private Non-Profit Entities Barred from Receiving Funds;
- d) **CFPOA:** Corruption of Foreign Public Officials Act - is an anti-corruption law in force in Canada, enacted in 1999;
- e) **CNEP:** National Registry of Punished Companies;
- f) **Compliance:** A social science that brings together tools, methods, techniques, controls, and behaviors aimed at ensuring compliance with laws, the code of ethics, internal policies, and procedures, as well as ensuring the ongoing alignment of conduct with the company's principles, achieving ethics, integrity, honesty, and transparency;
- g) **Compliance Culture:** Values, practices, and beliefs that exist throughout the organization and interact with the organization's structures and control systems to produce standards of behavior that support compliance outcomes;
- h) **Employees:** Jaguar's directors, officers, employees, and contractors;
- i) **FCPA:** Foreign Corrupt Practices Act - is a United States federal law enacted in 1977 to combat the bribery of foreign public officials. The FCPA contains two main provisions: 1) anti-bribery provisions and 2) books and records and internal control provisions, which address accounting practices. The FCPA applies to prohibited conduct anywhere in the world and extends to U.S. publicly traded companies;
- j) **Jaguar Mining:** Jaguar Mining Inc., its subsidiaries and affiliates, as well as all companies that make up its business units;
- k) **Law nº 12.846/13:** Brazilian anti-corruption law that provides for the administrative and civil liability of legal entities for acts committed against the public administration, whether domestic or foreign;
- l) **Compliance Program:** A set of actions for the prevention, detection, and remediation of harmful acts provided for in Law 12,846/2013, focused on combating not only bribery and corruption, but also fraud in bidding processes and in the execution of contracts with the public sector;



m) Representative: An individual or legal entity, whether or not employed, who may legally act on behalf of Jaguar Mining;

n) Third parties: Companies engaged due to their more specialized knowledge base to provide services of any nature to meet the needs of Jaguar Mining's area(s). These include, but are not limited to, suppliers, service providers, partners, competitors, and others.

5 RESPONSIBILITIES

5.1 Board of Directors

Responsible for defining the guidelines to be followed at Jaguar Mining and its subsidiaries, and in all relationships with external parties, whether third parties, representatives, or government agents. It is committed to the implementation, development, maintenance, and continuous improvement of Jaguar's Compliance Program.

5.2 Audit and Risk Committee

Assess and issue opinions on Compliance risks, misconduct, and non-compliance with Jaguar's guidelines. In addition, it recommends the actions and disciplinary measures that may be applied; clarifies any doubts regarding the interpretation of internal guidelines, recommending their review, including the CEC; among others.

5.3 Compliance Area

Responsible for implementing and ensuring the maintenance of Jaguar's Compliance Program, fostering a culture of integrity and ethics within the company across all relationships.

5.4 Jaguar Employees, Third Parties, and Representatives

Comply with the guidelines established by the company and act as facilitators in maintaining the Compliance culture at Jaguar.

6 GUIDELINES

6.1 JAGUAR COMPLIANCE PROGRAM

Jaguar’s Compliance Program takes into account the company’s mission, vision, values, and policies, and aims to ensure the highest standards of ethics and transparency in the company’s relationships, whether internal or external, with a focus on combating corruption and bribery practices and promoting an ethical and principled work environment.

To this end, it establishes a set of procedures and controls aimed at preventing, detecting, correcting, and controlling misconduct that fails to comply with applicable rules, whether laws, the CEC, or internal policies and procedures.

Jaguar prohibits acts of fraud, corruption, bribery, or tax evasion, whether directly or indirectly, as well as misconduct and/or money laundering, and rejects any activity, agreement, or partnership that may involve illegal practices. Attention to legislation applicable to the business is mandatory, especially Law No. 12,846/2013, known as the Anti-Corruption Law or Clean Company Act, the FCPA, and the CFPOA, which are used as the basis for defining Jaguar’s Compliance Program.

Jaguar’s Compliance Program and its pillars are represented in the image below:





It is the responsibility of all employees, third parties, and representatives to comply with the guidelines established by the company and to act as a facilitator in maintaining the Compliance culture at Jaguar.

6.2 Support from Senior Management

Jaguar is committed to good corporate governance practices and believes that compliance and accountability are core components of the company's culture.

With Dignity and Respect and Collaboration as values, Jaguar understands that discussion of integrity and ethics issues is increasingly important within the business environment and therefore values transparency in its activities and decision-making.

For this reason, Senior Management is committed to the implementation, development, maintenance, and continuous improvement of the Compliance Program, with a focus on:

- Combating corruption and bribery;
- Strengthening and promoting relationships based on integrity and ethics;
- Contributing to an increasingly fair society.

In addition, Senior Management plays a fundamental role in encouraging everyone to maintain the compliance culture, report non-compliance, and uphold non-retaliation practices.

Senior Management must ensure that compliance is incorporated into the company's culture, identifying and acting to correct misconduct.

The results of the implementation and monitoring actions of the Compliance Program are tracked quarterly at Audit and Risk Committee meetings.

6.3 Risk

The Risk Management pillar defines the methodology for the identification, assessment, treatment, reporting, and monitoring of Jaguar's risks and provides guidance on the methodology for overseeing risk management within the company. Risks must be related to the activities,

products, services, and relationships to which Jaguar is exposed, both internally and externally, in order to identify possible situations of non-compliance.

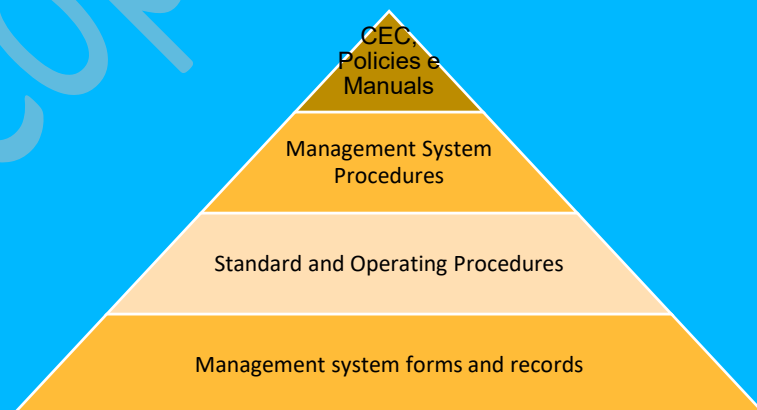
The risks are linked to the company's strategic objectives, and mitigation actions are monitored through action plans developed jointly with those responsible. Reporting to Senior Management is carried out quarterly.

6.4 Laws and regulations

Jaguar complies with all legislation applicable to the company, especially, but not limited to, those aimed at the prevention of and fight against corruption, Brazilian Law No. 12,846/13, the FCPA, and the CFPOA, and extends this obligation to all parties with whom it has relationships and to all persons who perform activities on Jaguar's premises or on its behalf.

Jaguar also seeks compliance with the Canadian Extractive Sector Transparency Measures Act (ESTMA), which aims to contribute to global efforts to increase transparency and prevent corruption in the sector. In addition, Jaguar has a Code of Ethics and Conduct (CEC), policies, and internal procedures that establish the guidelines and expected behaviors for all employees and stakeholders.

Standardized procedures are communicated and made available to all those responsible and involved in the processes, following the structure below:





6.5 Internal Controls

Jaguar management maintains a system of internal controls to facilitate and monitor adherence to legislation and compliance with the CEC, laws, policies, and procedures, in addition to promoting a culture of integrity and maintaining ethical standards throughout Jaguar. Furthermore, internal controls seek to minimize operational and compliance risks, ensuring that accounting and financial records reflect the company's reality and are traceable.

The internal control structure is composed of:

6.5.1 Board of Directors

It is composed of four committees:

- a) Audit and Risk Committee;
- b) Corporate Governance and Compensation Committee;
- c) Finance and Corporate Development Committee;
- d) Safety, Environment, Technical, and Reserves Committee.

The Audit and Risk Committee is composed of three or more company directors and meets at least once every three months to discuss matters related to the Compliance Program and the performance of the actions carried out, as well as to monitor and deliberate on reports received through the Whistleblower Hotline and on continuous improvement matters.

In addition to cooperating with and supporting the Compliance function, as well as encouraging employees to do the same, the main objectives of the Audit and Risk Committee can be summarized as supporting the oversight of:

- The integrity of the company's financial statements;
- The qualifications and independence of the company's external auditor and of the Audit and Risk Committee;
- The performance of both the company's internal audit function and the external audit;
- Matters related to compliance with ethics and anti-corruption legislation.



6.5.2 Compliance

Jaguar's Compliance area is responsible for implementing and monitoring the Compliance Program, disseminating good conduct practices, and fostering adherence to regulations within the company.

Reporting to the company's CFO, it has unrestricted access to Senior Management and to management. It operates independently in carrying out actions across all areas to ensure impartiality in all its operations and controls.

To maintain its independence, Compliance reports to the Audit and Risk Committee at least once every three months, in addition to periodic follow-up meetings attended by the CEO, CFO, Vice Presidents, and, in some cases, Managers.

The responsibilities of the Compliance area include:

- Implementing and monitoring the Compliance Program;
- Mapping, assessing, and mitigating compliance risks;
- Promote conduct based on the company's CEC;
- Integrate compliance obligations into existing policies, procedures, and processes;
- Monitor the performance of due diligence on suppliers, third parties, and partners, issuing recommendations regarding engagements when necessary;
- Monitor identified conflict of interest situations, such as the receipt of gifts, presents, and hospitality;
- Support the prevention of corruption and reputational risks in relationships with external parties, including suppliers, service providers, partners, government agents, and/or communities;
- Support the creation and/or improvement of processes and internal rules that ensure adherence to ethics and integrity guidelines across the areas;
- Promote continuous communication with all parties involved in Jaguar's Compliance Program, including Senior Management;
- Provide or organize ongoing training for employees, ensuring that relevant employees are trained regularly;
- Monitor and improve the internal control structure of the main compliance risks;
- Clarify questions and support the application of the CEC, policies, procedures, and regulations related to ethics and compliance;



- Investigate reports received through the whistleblower hotline, recommending actions in confirmed cases of misconduct and/or non-compliance with the company's guidelines;
- Foster anti-corruption efforts and ethical behavior, encouraging the implementation of the Compliance Program in companies with which it maintains relationships;
- Promote the continuous improvement and enhancement of Jaguar's Compliance Program.

6.5.3 Internal Audit

The company reviews and audits the formal internal control framework, always seeking transparency in the publication of financial statements.

Internal Audit defines the scope of the areas to be audited, analyzes processes, policies, and procedures, prepares the area Manual, reports the final report with the tests performed to the Audit and Risk Committee, and follows up on the proposed actions to ensure proper implementation.

6.6 Communication and training

The Communication and Training pillar comprises a set of actions aimed at disseminating information and building employee capability through proactive and ongoing communication to raise awareness of the importance of an ethical and integrity-driven culture within the company.

Training sessions are conducted periodically, and the content is tailored to the participants' reality and activities. One of the objectives of the training is to ensure that all employees are aware of the program and are competent to perform their role in a manner consistent with the Compliance culture.

6.7 Due Diligence

Jaguar conducts prior assessments of certain suppliers, third parties, and institutions in order to ensure transparency in the company's business relationships and to mitigate the risks of corruption, fraud, bribery, or reputational damage.



Among other factors, the corruption and bribery history of companies, partners, and shareholders is analyzed regarding their reputation for bribery, fraud, dishonesty, or similar misconduct, or whether they have been investigated, convicted, sanctioned, or debarred due to bribery or similar criminal conduct. This is conducted through data and information searches in legally available public and private databases (open sources), and non-compliance registries such as CEIS, CNEP, and CEPIM, among others.

Additionally, the existence of relationships between company employees, suppliers, or government agents is verified to identify potential conflicts of interest.

All third-party contracts include mandatory compliance clauses regarding the CEC, laws, policies, and procedures, as well as all applicable anti-corruption and anti-bribery laws.

6.8 Whistleblower Hotline and disciplinary measures

6.8.1 Whistleblower Hotline

Jaguar Mining Inc. has a Whistleblower Channel available to both internal and external audiences, which allows the reporting of non-compliance with the Code of Ethics and Conduct, policies and procedures, anti-corruption laws, fraud, or any other types of non-compliance, as well as suspicions of non-compliance and questions related to these topics.

With 24-hour service, the Whistleblower Hotline receives reports anonymously and confidentially.

6.8.2 Disciplinary measures

Non-compliance with CEC guidelines, policies and procedures, and anti-corruption laws, as well as the commission of fraud or any other types of non-compliance, are unacceptable and may result in the application of disciplinary measures for the immediate cessation of irregular acts and/or infractions. These measures may include:

- Employee: Verbal warning, written warning, suspension, and termination of employment;
- Third Party: Suspension, contract termination, or any other measure in accordance with the law;



In both cases, depending on the severity of the non-compliance, Jaguar Mining reserves the right to notify public authorities for the necessary investigations.

6.9 Monitoring

To measure and verify the effectiveness and maturity of the Compliance Program, Jaguar has established a continuous assessment process aimed at identifying whether the pillars of the program are operating as planned, whether awareness actions are being reflected in employees' behavior, and whether compliance risks are being controlled. This process includes area indicators and participation/evaluation in public and/or private initiatives.

6.10 Final provisions

Non-compliance with the CEC, internal policies, laws, and external regulations is unacceptable and may result in the application of disciplinary measures.

In the case of third parties, violation of this Policy may result in the suspension, cancellation, or termination of a contract without prior notice, or in the measures provided by law.

Jaguar is committed to good corporate governance practices and believes that compliance and accountability are core components of the company's culture.

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For this reason, Senior Management is committed to the implementation, development, maintenance, and continuous improvement of the Compliance Program, with a focus on:

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In addition, Senior Management plays a fundamental role in encouraging everyone to maintain the compliance culture, report non-compliance, and uphold non-retaliation practices.

Senior Management must ensure that compliance is embedded in the company's culture, identifying and acting to correct deviations.

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7 HSE GUIDELINES

Area	Guideline description	Reference
Environment	When drafting new documents, follow the guidelines of the Environment Manual.	Environment Manual
Safety	When drafting new documents, follow the guidelines of the Safety Manual.	Safety Manual

8 ANNEXES

Not applicable.