CORPORATE POLICY

POL.003-07 – Anti-Bribery and Anti-Corruption Policy

February 2026

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Revision	Revision Date	Change Description	Responsible	
			Prepared by	Approved by
01	16/12/2016	-	-	Rodney Lamond CEO
02	20/03/2017	-	-	Audit Committee
03	08/05/2018	-	-	Rodney Lamond CEO Audit Committee
04	04/11/2020	-	Joyce Seixas	Audit Committee
05	07/11/2022	-	Joyce Seixas	Audit and Risk Committee
06	08/08/2023	10. Whistleblower hotline	Joyce Seixas	Audit and Risk Committee
07	25/02/2026	Update and alignment with the IMS (Integrated Management System)	Lucas Pinto Fernandes – Internal Audit and Compliance Department	Daniel Karrqvist - CFO

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1 OBJECTIVE

The purpose of this Policy is to prevent, detect, and establish the framework for consequences regarding acts of corruption and bribery, while encouraging the reporting of any irregularities. Accordingly, this Policy sets forth guidelines and rules mandatory for all employees, partners, and other related parties, regardless of their contractual relationship, position, seniority level, or operational site.

2 SCOPE

Corporate and Third Parties, as defined below:

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

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3 REFERENCE DOCUMENTS

- Code of Ethics and Conduct;
- Supplier Code of Ethics and Conduct;
- Conflict of Interest Policy;
- Compliance Policy;
- Travel Policy;
- Jaguar Mining Private Social Investment Policy;
- Whistleblower hotline Policy;
- Disciplinary Measures Procedure;
- Integrated Management System Manual.

4 KEY CONCEPTS/DEFINITIONS

a) Public Official: Person holding a legislative, administrative, or judicial office at any level of government (federal, district, state, or municipal), whether by appointment, election, honorary position, or any person performing a public function — including for a public authority or state-owned entity, whether domestic or international — as well as any candidate for public office or employee of a political party;

b) Government Authority: Any agency, entity, or department of the Public Administration, whether direct or indirect, within the Legislative, Executive, or Judicial branches, at any level of government (federal, district, state, or municipal); any legal entity incorporated into public assets or whose creation or funding is more than fifty percent financed by Public Treasury resources (e.g., public universities and foundations). This also includes entities over which the State exercises dominant influence (such as State-Owned Enterprises like Petrobras, Banco do Brasil, and Caixa Econômica Federal), foreign diplomatic agencies and entities, persons or entities controlled directly or indirectly by a foreign government, and international public organizations, including sovereign wealth funds and entities under their control;

c) Gifts: Items of nominal economic value, distributed on a widespread basis as a courtesy, for advertising purposes, or as customary promotional disclosure;

d) Corruption: Any misconduct intended to obtain an advantage for oneself or third parties, through money, assets, or favors, inducing an individual to act in violation of the law, ethics, or established customs;

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e) Entertainment: Sporting, cultural, or social events, performances, theatrical plays, technical or business conferences, such as congresses and seminars;

f) Extortion: The act of obtaining money or any undue advantage through coercion or force, involving actual or perceived threats to an individual's health, safety, or liberty;

g) Terrorist Financing: Providing, collecting, safeguarding, or transferring resources of any nature with the objective of supporting terrorist activities or groups that promote them, regardless of the lawful or unlawful origin of the funds;

h) Hospitality: The provision of services or coverage of expenses related to travel, meals, accommodation, training, seminars, congresses, events, trade fairs, or entertainment activities, granted for the legitimate business or institutional interest of the agency or entity where the individual performs their duties;

i) Money Laundering: The process of concealing or disguising the illicit origin of resources derived from criminal activities, integrating them into the economic or financial system to give them the appearance of legitimacy;

j) Facilitation Payments: Small-value payments made to an individual, whether a public official or not, directly or through an intermediary, to secure or expedite the performance of a routine, non-discretionary action, such as the issuance of visas, work permits, or customs clearance;

k) Presents: Anything of value, including assets, services, or advantages of any kind, offered by an individual or entity that does not qualify as a promotional item (token gift) or hospitality;

l) Kickback / Bribe: A payment or anything of value provided in exchange for a favor or an undue advantage, which may include discounts, cash, or other forms of incentives;

m) Bribery: Offering, promising, giving, accepting, or receiving, directly or indirectly, any undue advantage as an incentive or reward for a person to perform a function improperly;

n) Undue Advantage: Any benefit (whether financial, economic, informational, or otherwise) that results in improper favoritism, such that the outcome would not have occurred but for the granting of such advantage.

5 RESPONSIBILITIES

It is the responsibility of the respective areas to:

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5.1 Audit and Risk Committee

- To establish the guidelines to be followed by Jaguar Mining and in all dealings with external parties, whether third parties, representatives, or government officials;
- Assess opinions on risks of bribery and corruption, misconduct, and non-compliance with Jaguar's guidelines;
- Approve recommendations for disciplinary actions and measures to be enforced;
- Provide clarification on the interpretation of internal guidelines and recommend revisions to internal policies and procedures as necessary.

5.2 Internal Audit and Compliance Department

- Implement and ensure the maintenance of Jaguar's Compliance Program, fostering a culture of integrity and ethics across the company in all relationships;
- Maintain documentation of all training sessions and initiatives that support the implementation of this Policy;
- Provide support to Management and the Audit and Risk Committee, monitoring compliance risks related to bribery and corruption.

6 GUIDELINES

Acts of corruption and bribery are incompatible with Jaguar's mission, vision, values, and purpose. Beyond damaging the company's reputation, such practices may result in severe administrative, civil, and criminal sanctions, as well as fines and other significant costs, regardless of the location of operations.

Anti-corruption laws prohibit bribery and corruption in both the public and private sectors. Therefore, Professionals and Third Parties are prohibited from offering, paying, promising, or authorizing any act of bribery or corruption, directly or indirectly (including through family members or third parties), whether to government officials, community leaders, union leaders, suppliers, contractors, or non-governmental organizations (NGOs).

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These laws may have extraterritorial effect, meaning they can be applied even if the act occurs outside the country that enacted the law.

Jaguar adopts all necessary measures to prevent acts of corruption and bribery in its relationships. Among them:

- Fully comply with all applicable anti-corruption laws, including but not limited to Law No. 12,846/2013 (Brazilian Anti-Corruption Law), FCPA (Foreign Corrupt Practices Act - USA), CFPOA (Corruption of Foreign Public Officials Act - Canada), ESTMA (Extractive Sector Transparency Measures Act - Canada), and any other anti-bribery laws in jurisdictions where Jaguar operates;
- Prohibit the offering, receipt, promise, or authorization, directly or indirectly, of benefits or any other undue advantage;
- Ensure that all Professionals and Third Parties know and comply with Jaguar's values and policies;
- Avoid business or partnerships with individuals or companies that do not share Jaguar's values or that may damage its reputation;
- Continuously monitor and audit compliance with these rules.

If someone requests, demands, or offers a bribe, politely refuse and immediately report the incident to the Whistleblower hotline, without fear of retaliation. It does not matter whether the bribe was accepted or not.

Failure to report the offer or attempted bribe will result in the application of disciplinary measures.

6.1.1 Corruption and bribery

Jaguar prohibits any form of corruption or bribery. Therefore, all individuals who work for or maintain relationships with Jaguar, including contractors and business partners, must:

- Act with integrity, in compliance with the law and the company’s values;
- Refuse and report any request for or offer of a bribe;
- Avoid relationships with individuals or companies that do not share Jaguar’s values;

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- Be familiar with and comply with this Policy, the Code of Ethics, and all company compliance rules.

As bribery and corruption may take many forms, always consider the following questions to guide your actions:

- Can I openly record this situation in the company's books and records?
- Is the purpose of this conduct to improperly influence someone's decision?
- Does any party involved want this situation to remain secret?
- If this situation became public, could it harm Jaguar or any individual?
- Will the party receiving the benefit feel obligated to do something in return?
- Do I have any doubt whether this situation is unlawful, improper, or unethical?

If the answer to any of these questions is "yes" or "I don't know," the conduct may be considered corruption or bribery.

In such cases, the situation must be avoided or, if that is not possible, immediately escalated to the Internal Audit and Compliance department.

All cases involving suspected or attempted bribery must be reported through the Whistleblower hotline without fear of retaliation. Reporting is mandatory, even if the bribe was not accepted.

6.1.2 Corruption in the private sector

Jaguar maintains a zero-tolerance stance toward private-sector corruption, acknowledging that bribery and the provision of undue advantages in business-to-business (B2B) relationships constitute illicit acts that violate the organization's core ethical principles.

Professionals and Third Parties acting on behalf of Jaguar are strictly prohibited from offering, promising, authorizing, soliciting, or receiving—directly or indirectly—any form of payment, benefit, gift, advantage, or favor intended to obtain, retain, or direct business, improperly influence commercial decisions, or secure any form of undue advantage in dealings with private entities.

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This prohibition applies to any individual, regardless of whether they hold a public or private position, including, but not limited to:

- Employees and executives of private companies;
- Union leaders;
- Representatives of non-governmental organizations (NGOs);
- Community leaders or representatives of civil associations;
- Contractors, suppliers, and service providers.

Any attempt, solicitation, or indication of private corruption practices must be immediately reported to the Internal Audit and Compliance department, without fear of retaliation, which will conduct the due inquiry into the facts.

6.1.3 Potential risks and red flags

Jaguar provides below a list of situations that warrant special attention. If you become aware of or suspect the occurrence of any of these, you must immediately report it to the Whistleblower hotline, without fear of retaliation. These red flags help identify potential risks of corruption or bribery from a legal perspective.

Examples of red flags:

- Knowledge that a Professional or Third Party has a poor reputation or a history of improper business practices;
- Awareness that a Professional or Third Party is known to pay or demand bribes;
- Insistence on receiving payments before contract signing or the performance of services;
- Requests for cash payments and/or refusal to provide a formal contract, invoice, or receipt;
- Requests for payments to be made in countries other than the Third Party's place of residence or business location;
- Unexpected fees or commissions charged to "facilitate" services;
- Requests for additional payments with promises of future reimbursement;
- Demands for expensive entertainment or gifts before or during negotiations;
- Requests for payments to "overlook" potential legal violations;

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- Requests for employment or favors for friends or relatives;
- Awareness of unexplained preferences for certain subcontractors;
- Frequent invitations for expensive meals funded by Jaguar's budget;
- Receipt of invoices or bills that do not follow standards or appear customized;
- Charging of abnormal commissions or fees for services provided;
- Creation of unusual or unexplained bank accounts or funds;
- Business dealings in countries known for regular bribery or corruption practices;
- Requests to include unknown agents, intermediaries, consultants, distributors, or suppliers not directly linked to the activity;
- Excessive use of consultants or intermediaries without clear justification;
- Payments with vague justifications or incomplete documentation;
- Frequent or suspicious changes to contracts or payment terms without adequate explanation;
- Pressure to keep transactions or negotiations secret without a legitimate justification.

Note: This list is non-exhaustive and does not cover all possible scenarios. It is intended solely to guide the identification of risks and suspicious activities. Whenever in doubt, the situation must be reported to the Whistleblower hotline, without fear of retaliation.

6.1.4 Payment and record-keeping

All Professionals and Third Parties must ensure that any expense related to hospitality, gifts, travel, or corporate activities is accurately recorded and properly justified, in accordance with Jaguar's Travel Policy.

Each expense must be supported by clear documentation (such as invoices, payment receipts, attendee lists, and business justification) to demonstrate the legitimate purpose and business benefit of the expenditure.

All of Jaguar's financial records, including accounts, invoices, receipts, expense reports, and other documents, must be prepared and maintained with accuracy, integrity, and transparency, in compliance with internal controls, applicable accounting standards, and anti-corruption laws.

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The maintenance of "off-book" accounts, parallel records, document falsification, or any practice intended to conceal, disguise, or facilitate improper payments is strictly prohibited.

Information and records must:

- Be complete, accurate, and easily traceable;
- Be stored securely and accessible for auditing purposes;
- Be retained for the minimum periods required by law and internal policies;
- Be periodically reviewed by the Internal Audit and Compliance department.

In compliance with the Canadian Extractive Sector Transparency Measures Act (ESTMA), Jaguar must include in its Annual Transparency Report—submitted to Natural Resources Canada and published on the company's website within 150 days of the end of the fiscal year—all payments made to payees defined as:

- Federal, state, provincial, regional, municipal, or indigenous governments, in Canada or other countries;
- Two or more governments; or
- Boards, commissions, corporations, or authorities performing governmental functions related to the commercial exploration of oil, gas, or minerals.

The types of payments to be reported include, among others:

- Taxes (excluding consumption and personal income taxes);
- Royalties;
- Fees, including rental, entry, and regulatory charges, as well as license or concession fees;
- Productions entitlements;
- Bonuses (signature, discovery, or production);
- Dividends other than those paid as an ordinary shareholder;
- Payments related to infrastructure improvements; and
- Other categories prescribed by applicable legislation.

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Strict compliance with these rules reinforces Jaguar's commitment to transparency, integrity, and corruption prevention, which are essential pillars of its Compliance Program.

6.2 Specific Guidelines

6.2.1 Relationship with Public Officials and Government Authorities

At Jaguar, all relationships must be ethical, transparent, respectful, and responsible. This applies equally to interactions with public officials and government authorities, which require special attention to ensure the integrity of these relationships and prevent any perception of undue favoritism.

6.2.2 Dealings and contact

All dealings and contacts with public officials or government authorities, on behalf of Jaguar or related to its interests, must be conducted in an ethical, transparent, and duly recorded manner.

This includes, specifically, interactions aimed at obtaining licenses, permits, concessions, or other administrative acts.

It is mandatory that all contacts be documented and conducted exclusively through official channels, such as institutional email addresses, public office telephone lines, formal protocolized correspondence, or official electronic systems.

The use of private communication methods, such as personal emails or phone numbers, non-corporate instant messaging applications, or informal meetings without prior record and authorization, is strictly prohibited.

Records must clearly state the date, method of contact, professionals involved, and the subject matter discussed, ensuring traceability and compliance with internal controls and applicable anti-corruption laws.

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6.2.3 Reunions

- Must be scheduled in advance, with a defined agenda, at institutional times and locations, and formalized via email or official correspondence;
- Must include at least two participants from each party;
- Must be recorded in minutes or a report, containing the date, time, topic, participants, and a summary of discussions. The document must be archived and made available to the Internal Audit and Compliance department.

6.2.4 Benefits

It is prohibited to offer, promise, authorize, or receive gifts, hospitality, donations, or any type of benefit ("Benefits") that could be interpreted as an attempt to influence the decisions of public officials or third parties related to them.

This restriction also extends to close family members of public officials, including spouses, children, parents, and siblings.

Any meal, entertainment, or hospitality provided to a public official must be recorded in detail within Jaguar's internal controls, specifying:

- Type of benefit;
- Value;
- Date;
- Name and corporate position of the beneficiary;
- Business purpose of the event.

All expenses must strictly comply with the Travel and Expense Policy and require prior approval from the Internal Audit and Compliance department.

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6.2.5 Travels

In exceptional situations, when public bodies lack resources for activities directly related to Jaguar's business, financial or logistical support may be requested.

Any support of this nature must be pre-approved by the Internal Audit and Compliance department and by the CEO or CFO prior to its confirmation.

Payments must be made directly to the service provider (e.g., airline, hotel, transportation company), never to the public official.

The payment or reimbursement of expenses for spouses, family members, or guests of the public official is prohibited, as are recreational or entertainment expenses.

Amounts must be restricted to the costs strictly necessary for the legitimate purpose of the trip.

6.2.6 Inspections

Professionals and Third Parties must fully cooperate with public authorities during inspections, audits, or investigations.

Assistance must be professional, objective, and transparent, in accordance with applicable legislation.

All requests, notifications, assessments, and official communications must be immediately forwarded to the Legal or Internal Audit and Compliance department for a formal response.

It is prohibited to:

- Destroy or alter documents;
- Provide false or misleading information;
- Offer any advantage to a public official to delay, omit, or influence the results of inspections.

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6.2.7 Examples of Public Officials Relevant to Jaguar's Business

Since the term Public Official has a broad definition and may encompass different individuals, positions, and functions, even outside traditional public service, we list below some examples of public officials with whom Jaguar may interact in its activities in Brazil and other countries:

- Mayors, deputy mayors, municipal and state secretaries, and other members of local government;
- Civil servants and public employees of direct administration agencies, autarchies, foundations, public companies, and mixed-economy entities (for example, ANM, Ibama, Federal Police, Caixa Econômica Federal, Petrobras, Cemig, among others);
- Civil police officers, military police, firefighters, and members of the Armed Forces;
- Tax inspectors, auditors, and agents of regulatory or control agencies;
- Judges, prosecutors, public prosecutors, and public defenders;
- Lawmakers (city councilors, deputies, and senators) and their advisors;
- State Ministers and other holders of commissioned positions in the Executive Branch;
- Directors and employees of state-owned enterprises, mixed-economy entities, or companies controlled by the public sector;
- Representatives of political parties and candidates for elective office;
- Members of councils, commissions, or entities performing public functions; and
- Officials of international public organizations (such as the UN, World Bank, IDB, or IFC).

If there is any uncertainty about whether a person is a public official, contact the Internal Audit and Compliance department in advance to receive proper guidance.

6.3 Gifts, presentes and hospitality ("Benefits")

Jaguar recognizes that the offering or receipt of gifts, promotional items, and hospitality may occur in legitimate institutional relationship contexts. However, these practices must be conducted with good judgment, transparency, and always in compliance with this Policy and applicable anti-corruption laws.

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It is prohibited to offer, promise, grant, request, or accept gifts, promotional items, travel, meals, entertainment, or any other benefit that could be interpreted as an attempt to influence decisions, obtain improper advantages, or reward past conduct.

Due to their more personal and targeted nature, gifts must not be offered or accepted, except in exceptional circumstances and subject to prior approval from the Internal Audit and Compliance department, in compliance with internally defined values and conditions.

Promotional itens are permitted when they:

- Have an institutional nature, featuring the organization's or partner's logo;
- Are of symbolic value and compatible with local standards;
- Do not involve cash, gift cards, or high-value goods;
- Are delivered or received transparently, preferably with the knowledge of immediate leadership.

Hospitality may only be offered or accepted when:

- It serves a legitimate business purpose, such as meetings, training, or institutional events;
- Costs are reasonable and proportionate to the occasion;
- It does not involve companions or personal expenses;
- It is compatible with local and market standards;
- Prior approval is obtained from the Internal Audit and Compliance department, when required by internal regulations.

Invitations to participate in workshops, lectures, congresses, and/or events promoted by Third Parties, if covering travel, accommodation, and other expenses, may be considered a gift. Therefore, the participation of Jaguar employees requires authorization from the Internal Audit and Compliance department.

Modest costs frequently incurred can, when aggregated, represent lavish and potentially improper payments. For this reason, if they are frequently offered, they must not be accepted.

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6.3.1 Registration and control

All gifts, promotional items, and hospitality offered or received must be properly recorded, including information on:

- The name and position of the offerer and the beneficiary;
- The date, location, and estimated value;
- The reason for and context of the offering or receipt; and
- Confirmation that the item or invitation is not related to pending business decisions.

The records must be submitted to the Internal Audit and Compliance department within the deadline and in the format established by the organization, and may be made through an electronic form, internal system, or other official control method.

Failure to comply with the rules set out in this item may result in disciplinary sanctions and any other applicable measures, in accordance with the Code of Conduct and applicable internal policies.

6.4 Projects, Donations, Contributions, and Sponsorships ("Support")

Jaguar recognizes the importance of contributing to the social, economic, and environmental development of the communities where it operates. To this end, it permits the execution of donations and sponsorships in a responsible, transparent manner, aligned with ethical principles and national and international anti-corruption laws.

No donation or sponsorship may be used for improper purposes, to obtain undue advantage, to influence the decisions of public authorities, or as a disguised form of bribery.

6.4.1 General requirements and conditions

All donations and sponsorships must:

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- Be destined exclusively to reputable, ethical, and legally constituted entities whose activities are compatible with Jaguar's values;
- Comply with Jaguar's Private Social Investment Policy and other applicable internal policies;
- Be formally reported and approved through the Donations and Sponsorships Form, available on the intranet;
- Fully comply with the Authority Matrix, with the necessary records and approvals;
- Be duly documented, including the justification for the allocation of funds, the purpose of the support, and the expected impact; and
- Be accounted for and archived with all supporting documents (proposals, contracts, accountability reports, payment receipts, and relevant communications).

6.4.2 Restrictions and prohibited conduct

It is expressly prohibited to offer, promise, or make donations or sponsorships:

- In exchange for any action, omission, decision, or favoritism on the part of the recipient;
- With the aim of obtaining, maintaining, or directing business to Jaguar, directly or indirectly;
- That may represent an undue advantage or characterize a conflict of interest;
- That benefit public employees, government authorities, their family members, or persons related to them, directly or indirectly;
- To political parties, candidates, election campaigns, or causes of a partisan political nature; and
- To individuals, with contributions only permitted to formally constituted institutions.

6.4.3 Approval process

Before the approval of any donation or sponsorship, the Internal Audit and Compliance department must conduct an integrity review (due diligence) of the beneficiary institution, with the purpose of:

- Verifying its legitimacy and legal standing;
- Assessing the reputation and integrity of its officers;
- Confirming the absence of ties or interests that could create a conflict; and

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- Ensuring that the funds are not diverted to illegal purposes.

Final approval may only occur after the conclusion of this review and the proper recording of the decision.

6.4.4 Accountability and Transparency

After the execution of the donation or sponsorship, the beneficiary institution must submit an accountability report, containing:

- A detailed description of the activities performed;
- The actual amounts utilized; and
- Evidence (invoices, receipts, photographic records, or reports) proving the correct application of funds.

Jaguar will archive all records and supporting documentation for the minimum period required by internal policies and applicable legislation.

6.4.5 Compliance with International Law

When applicable, donations and sponsorships shall comply with the requirements of the Government of Canada's Extractive Sector Transparency Measures Act (ESTMA). In such cases, eligible payments will be reported in the Annual Transparency Report, to be submitted to Natural Resources Canada and published on Jaguar's website within the statutory deadline.

6.5 Facilitation Payments and Bribery

Jaguar absolutely prohibits any form of facilitation payment or bribery, whether direct or indirect, regardless of whether it is permitted under local law, whether on behalf of the company, by its employees, directors, third parties, consultants, representatives, or any person acting in its interest.

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6.6 Relationship with thid parties

Third Parties are part of Jaguar's supply chain and play a significant role in the conduct of its activities. For this reason, the company shall only engage with partners who share the same standards of ethics, integrity, responsibility, professionalism, and legal compliance.

6.6.1 Due Diligence and Integrity Assessment

The Procurement area is responsible for conducting the Due Diligence process to assess the Third Party's technical qualifications, the services to be provided, the consideration to be provided by Jaguar, and the reasonableness of the amounts involved.

Additionally, the Internal Audit and Compliance department shall perform the integrity assessment, considering the Third Party's integrity, reputation, and track record in conducting business, in line with ethical and legal standards.

Upon completion of these reviews, a formal and summarized record of the conclusions must be prepared and filed for traceability and control purposes.

6.6.2 Contractual Requirements

Subject to the exceptions set forth in the Procurement Policy, all relationships with Third Parties must be formalized through a contract that clearly defines the scope of services, payment terms, and the parties' obligations.

Contracts must mandatorily include:

- Anti-corruption and anti-bribery clause, stipulating permanent compliance with this Policy and applicable laws;
- Audit rights in favor of Jaguar, should there be indications or suspicions of violation of anti-corruption and anti-bribery standards; and

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- Right of immediate termination, if there are reasonable grounds to believe that the Third Party has committed or participated in an illegal or fraudulent act, or one contrary to current legislation.

6.6.3 Ongoing monitoring

Due Diligence shall be reassessed periodically, or whenever a Third Party classified as critical has its contract renewed or updated, taking into account the current circumstances and risks.

6.6.4 Obligations of Professionals and Compliance Criteria

Jaguar Professionals must make every effort to ensure that any Third Party:

- Is not a public official, nor employs, subcontracts, or has a significant shareholder who is;
- Has no history or indications of bribery, corruption, or other unethical conduct;
- Performs the services in compliance with this Policy, the contract, and applicable local laws;
- Receives fair compensation compatible with their experience, the nature and complexity of the services, the expected results, and the market in the country of performance;
- Does not receive payments exceeding the amounts contractually established; and
- Is reimbursed only for previously authorized and duly supported expenses.

6.7 Money Laundering and Terrorist Financing

Jaguar adopts a zero-tolerance approach to money laundering and terrorist financing, conducting its operations with integrity, transparency, and in compliance with applicable laws and regulations in all countries where it operates.

All Jaguar Professionals must:

- Conduct business only with legitimate counterparties, whose source of funds and commercial activities are demonstrably lawful;
- Verify and confirm the identity and reputation of clients, suppliers, partners, and other third parties before initiating any business relationship;

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- Refuse to participate in operations that present indications of irregularity, inconsistency, or lack of transparency;
- Ensure that all transactions are documented, recorded, and traceable, enabling verification of their legitimacy;
- Avoid receiving or making payments in cash, especially in high amounts, fractional payments, or of unproven origin;
- Immediately report to the Internal Audit and Compliance department any suspicion or attempted practice related to money laundering or terrorist financing; and
- Fully cooperate with authorities and the Internal Audit and Compliance department in any investigations or information requests.

Professionals must pay special attention to situations that may indicate risk of money laundering or terrorist financing, such as:

- Cash payments in high amounts or divided into atypical installments;
- Requests for payment to third parties or accounts located in other countries;
- Complex corporate structures or those located in tax havens;
- Refusal to disclose the ultimate beneficiary or source of funds;
- Transactions inconsistent with the economic or operational profile of the counterparty.

Upon identifying any of these situations, the professional must suspend the transaction and immediately report the matter to the Internal Audit and Compliance department.

6.8 Extortion

The protection of life, safety, health, freedom, and physical integrity must always prevail. Therefore, any Professionals and Third Parties who may be subject to extortion must guide their actions toward safeguarding these interests.

Any payment made under such circumstances must be reasonable and proportionate, and must be immediately reported to the Internal Audit and Compliance department and to the CEO or CFO as soon as possible. Such payments must be accurately recorded and identified in expense reports and other books and records.

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Jaguar reserves the right to undertake the necessary due diligence measures to bring the situation to an end and prevent recurrence and, if it deems appropriate, or if required by law, will report the payment to the competent authorities.

6.9 Reporting to competent authorities

Jaguar encourages all employees to report internally, through available internal channels, such as the Whistleblower hotline, any situation or suspicion of irregularities described herein or others of which they become aware.

When there are indications of violations of applicable legislation or regulations that require external communication, the engagement of competent authorities will be conducted exclusively by the legal area, ensuring that the company and employees are protected and that the communication is made in an appropriate and structured manner.

The decision to engage external authorities will always follow criteria of legality, proportionality, and legal guidance, reinforcing Jaguar's commitment to ethics, compliance, and transparency.

Should an employee perceive an attempt or practice of any act of corruption or bribery, their active contribution to the knowledge, clarification of the act committed and its consequences, appropriate and timely reporting to the Whistleblower hotline, as well as to the improvement of investigation procedures will be recognized and valued, and their conduct will be fully protected by Jaguar's anti-retaliation commitment.

6.10 Whistleblower hotline

Jaguar has a secure and confidential Whistleblower hotline through which employees (both direct and third-party), suppliers, the community, and any other interested parties may report irregularities, including situations involving non-compliance with this Policy or with any law.

The channel is not intended for complaints, compliments, questions, or requests for information.

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Jaguar Mining's Whistleblower hotline is available 24 hours a day, 7 days a week, for reporting situations or suspicions of:

- Non-compliance with the Code of Ethics and Conduct, internal policies and procedures, or any law;
- Breach of contract;
- Discrimination, harassment (moral and sexual), or inappropriate conduct;
- Conflict of interest;
- Corruption (pursuant to Laws No. 12.846/2013 (Brazilian Anti-Corruption Law), FCPA (*Foreign Corrupt Practices Act* – U.S.), CFPOA (*Corruption of Foreign Public Officials Act* – Canada), **UK Bribery Act*) or bribery;
- Fraud;
- Theft or misappropriation;
- Improper use of company assets.

All reports are reviewed confidentially, ensuring anonymity and security throughout the investigation process.

Reports may be submitted anonymously or identified, through the following channels:

- Via Jaguar's website, through the Sustainability Menu > Whistleblower hotline (https://jaguarmining.com/);
- Direct link to the Ethics Channel: (https://jaguarmining.becompliance.com/canal-etica/canal-denuncias);
- By telephone at 0800 591 3457. Telephone service is available Monday to Friday, from 9:00 a.m. to 6:00 p.m. (Brasília time), excluding national holidays;
- Or through the kiosks available at the operational units.

6.11 Anti-retaliation

Jaguar will not tolerate retaliation against individuals who, in good faith:

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- Report what they believe to be a violation of Jaguar's values, its Code of Ethics and Conduct, its Policies, or the law;
- Raise a question or seek guidance about a particular practice, decision, or conduct;
- Cooperate in the investigation of a possible violation.

Any person, regardless of position, who engages in retaliatory behavior will be subject to disciplinary action.

Jaguar encourages all employees who know of or suspect that retaliation has occurred or is occurring to report such events through the Whistleblower hotline.

6.12 Consequences of Non-Compliance

Non-compliance with this or any other Jaguar Policy, its Code of Ethics and Conduct, internal procedures, or external laws and regulations is not acceptable and may result in disciplinary measures.

All employees, regardless of position or function, are subject to the same rules. The disciplinary measures applied are intended to immediately stop irregular acts or violations of this Policy and will be applied in a manner proportionate to each case.

If an employee contributes to the practice of any act that may be classified as corruption or bribery, provided that such conduct occurred due to an error caused by processes, systems, or structures within their area of activity, the employee's immediate self-reporting, active contribution to the awareness, identification, and clarification of the active error and the latent error, as well as to the improvement of investigation procedures, will be a determining factor in the disciplinary consequences.

The detailed rules for the application of disciplinary measures are set forth in Jaguar's Disciplinary Measures Procedure.

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6.13 Final provisions

Each individual is responsible for knowing, understanding, and applying the guidelines established herein in the performance of their activities, as well as seeking guidance from the competent departments and professionals whenever they have questions or identify situations that may pose ethical, legal, or reputational risks to the company.

Jaguar shall review this Policy periodically to ensure it remains current and in compliance with applicable legislation, market best practices, and corporate values.

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.

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