

# CODE OF CONDUCT AND ETHICS

APRIL / 2020



**JAGUAR**

MINING INC.

# CEO MESSAGE



*"Ethics and integrity are two intrinsic factors in Jaguar's every day activities. In a business environment where changes constant, it is essential to keep an honest, transparent and respectful culture. The Jaguar Code of Conduct and Ethics contains rules and guidelines that must be followed in all relationships, whether with co-workers, third parties, government or the general public. This teamwork and commitment of all of us can take us far, and help maintain our corporate integrity and support ethical decision making.*

*This Code applies to all employees and third parties reminding each of us that it is critical in ensuring that we all behave correctly, helping the company have a stronger and safer working environment, following the highest standards of ethics and honesty. Compliance with the law and ethical principles is not optional, it's essential.*

*Please, read the Code of Conduct with the attention it deserves and ask questions as needed. This Code should always be used in your professional routine. I count on each of you to fulfill this commitment."*

**Vernon Baker**  
**CEO Jaguar Mining Inc**



# JAGUAR

MINING INC.

## MISSION

Create and grow sustainable value for our stakeholders through the application of best practices in mining and our commitment on protecting the health and wellbeing of our employees and the environment in the communities where we work.

## VISION

To be a recognized gold mining company focused on growing sustainable production, delivering on our commitments for excellence and valuing and developing our employees.

## VALUES



**Zero Harm:** Zero harm to our employees, the environment and communities is our goal.



**Dignity and Respect:** Equal treatment and opportunity for all employees with transparent processes founded on dignity and respect and encouraging a sense of ownership.



**Sustainability:** Sustainable growth supported by a safe, profitable and socially responsible business while developing long-term resources.



**Collaboration:** Productive and ethical working relationships, transparent and responsive dialogue with surrounding communities and public agencies for the benefit of all stakeholders.



**Excellence:** A commitment to focus on a culture of best business practices.

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## 1 INTRODUCTION

Jaguar increasingly seeks ethics and transparency in the conduct of its business. This conduct strongly contributes to the company's credibility in the national and international market and society.

All guidelines contained in this Code must be strictly observed, serving this document as a reference to guide our conduct, actions and decisions, so that the credibility of our company is always preserved. These guidelines demonstrate Senior Management's commitment to the search of integrity in all relationships and are disseminated at all levels and to third parties (suppliers, partners and customers).

## 2 OBJECTIVE

The objective of the Jaguar Mining Inc. (Jaguar) Code of Conduct and Ethics (Code) is to be an instrument that reflects the organizational identity, providing guidelines for employee and third parties behavior and conduct expected by the company.

The policy also establishes guidelines for:

- Honest and ethical conduct, including the appropriate handling of actual or apparent conflicts of interest between personal and professional relationships;

- Fighting against corruption practices and bribery at national and international level;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Jaguar files with, or submits to any stock exchange on which stock of Jaguar is listed and in other public communications made by Jaguar, valuing transparency;
- Compliance with applicable laws, rules and regulations;
- Reporting in good faith on the Whistleblower hotline and their due diligence, ; and
- Accountability for adherence to the Code.

## 3 APPLICABILITY/SCOPE

This Code must be followed by Jaguar Mining INC. and subsidiaries, in addition to all companies that make up business units. Thus, all procedures described with the Jaguar Mining brand must be followed by subsidiaries and branch office, in addition to all the companies that make up business units.

The Code is applied to all directors, officers, employees and third parties who include, but are not limited to, service providers, suppliers, consultants, temporary workers and other workers, including personnel affiliated with related parties.



## 4 CONDUCT STANDARDS

All employees and third parties must comply with and advocate the principles set out in this Code governing their professional and ethical conduct in the fulfillment of their responsibilities.

When faced with a situation that requires an evaluation of what is and what is not, proper business conduct the following criteria are the starting point:

- Is the course of conduct legal?
- Is the course of conduct in accordance with the guidelines set forth in the Code of Conduct and Ethics and with Jaguar's policies and procedures?
- Would you or the company be compromised or embarrassed if the situation were known by your co-workers, your relatives, or the public?
- Does the intended course of conduct have the appearance of impropriety?

If you are unable to answer these questions with certainty, please seek advice from your superior.



### 4.1 | Conflict of Interests

Conflicts of interest can arise when personal interest of an individual unduly interferes with the interests of the company, influencing the actions of employees' third parties in exercising their functions and duties.

Employees or third parties are prohibited to establish corporate or business relationships, personally or through family (spouse, first or second-degree family member), with business partners, service providers, suppliers and/or competitors of Jaguar.

All family or possibly conflicting relationships should be stated in the Transparency Statement available at the end of this document. Any omission, as the case may be, may result in administrative measures.



### 4.2 | Hiring

Jaguar values the **COLLABORATION** of all and receives nomination of candidates for participation in open processes. Hiring relatives is allowed if:

- Relatives occupy positions where there is no relationship of subordination between them;

- Relatives of employees are approved in all stages of the selection process;
- The participation of a relative in a selection process is submitted to Human Resources analysis and approval.
- The participation of a relative in a selection process is submitted to Human Resources analysis and approval. If there is relationship between resource department employees and a candidate, the conflict must be related to the HR manager and the selection process should be conducted by HR team of another unit.
- Employees and directors must formally notify the Department of Human Resources the existence of relatives in the Organization, suppliers and customers, through the Declaration of Transparency.

Hiring (former) public agents is permitted provided that the activities previously performed by the candidate do not negatively impact or compromise Jaguar's internal processes. All hires must follow the guidelines of the Human Resources Policy.



### 4.3 | Illicit Drugs, Alcohol Consumption and Weapons

Alcohol consumption during work hours, as well as the exercise of professional function while intoxicated is forbidden. The use and possession of illicit drugs is also prohibited, as to remain in the workplace in an altered state by the use of these substances, which

can affect the safety and performance of both the employee and his coworkers.

It is strictly forbidden the possession of weapons of any kind, be they melee weapons (switchblades, knives, etc.), fire, shock, lethal, non-lethal and ammunition. The carrying of weapons is permitted only and exclusively for security professionals (which provide service through the hiring of third party specialized in armed surveillance), in the exercise of activities that ensure the safety of Jaguar and its employees.

The employee and third parties found using or under the influence of drugs, including alcohol, as well those found with possession of weapons, will be immediately removed from their functions and may even suffer the appropriate disciplinary measures.



### 4.4 | Exploration of the adult or child labor

Jaguar reinforces its commitment to its workers and third parties, respecting the laws and rights of children and adolescents, also complying with the **SUSTAINABILITY** guidelines, not practicing and eradicating any and all practices of child and / or slave-like labor.

Therefore, Jaguar does not allow any form of exploitation of adult or child labor, as well as maintaining relationships with suppliers, entity

or institutions that are complicit with this practice. It is understood as slave labour, exploiting the working adult as provided in Article #149 of the Brazilian Penal Code.



#### 4.5 | Products Trade

The marketing (supply, purchase or sale) of products of any nature on company premises, whether during or outside of working hours is forbidden for employees and third part.



#### 4.6 | Gambling

Gambling involving values is not allowed in Jaguar dependencies, including computer and internet games.



#### 4.7 | Activities and Demonstrations Politics

Jaguar respects the individual right of each employee to engage in political activities. However, individual and collective manifestations within the Jaguar's dependencies are prohibited.

It is also established that the disrespect and intimidation on someone's political position, or any kind of harassment are

unacceptable, especially in the work environment.



#### 4.8 | Harassment

Jaguar values **DIGNITY AND RESPECT** for all its stakeholders and the good work environment. Striving for Integrity, the company reinforces that it does not allow harassment, such as sexual, economic, moral or any other nature, or situations that constitute disrespect, intimidation or threat in the relationship between workers and third parties, regardless of their hierarchical level.

> **Moral harassment** occurs when someone is exposed to situations of humiliation during the workday and in the performance of their duties.

> **Sexual harassment** generates embarrassment and has a sexual connotation, especially as a superior to the exercise of job, position or function.

This attitude can be clear or subtle; can be spoken or only hinted at; can be explained in writing or gestures; can come in the form of duress, or also in the form of extortion.

An ethical behavior among subordinates and peers is expected at Jaguar as well as fair employment practices and a workplace in which all individuals be treated with dignity and respect.

The employee who finds himself in a situation of discrimination, humiliation or subjected to prejudice, pressure, abuse or disrespect and feel embarrassed to discuss the matter with their supervisor must report it to the Human Resources Department or through the Whistleblower hotline.



## 4.9 | Discrimination

Discrimination of any kind is not allowed within the company, which is against its values. The individual opinions of all parties should be respected, considering moral and ethics principles. Thus, it is expected that all employees:

- Respect diversity;
- Promote the right to freedom through the exchange of thoughts, ideas and opinions, without prejudice or discrimination;
- Condemn aggressive or embarrassing attitudes;
- Abstain of discriminatory behavior and other acts that detract from the dignity of people in relation to race, origin, gender, personal aesthetics, physical limitations, nationality, sex, age, marital status, sexual orientation, social status, religion or other individual characteristics used to marginalize a person or group of people.



## 4.10 | Gifts and presents

The offer and / or solicitation of gifts and presents can be interpreted as a way to influence the decision making of the company and / or partner and supplier in business relations, generating a conflict of interest. Jaguar employees may only accept or offer institutional gifts without commercial value.

As a standard rule, do not solicit or accept, for personal or other benefit, business or similar opportunities that conflict with Jaguar's interests.

Employees and third party or family members may never accept bribes, kickbacks, or other types of unusual payments from any organization or individual seeking to do business with, doing business with, or competing with Jaguar. If you receive a gift, you must immediately decline and should notify Whistleblower hotline. Institutional gifts received must be informed via Gifts Form.

The invitation to participate in workshops, lectures, congresses and / or events promoted by third parties may be considered as present, if there are travel costs, lodging and other expenses covered by third party. Participation in these events by Jaguar employees must be authorized by Compliance area and CEO.



## 4.11 | Donation and Sponsorships \_\_\_\_\_

All donations and sponsorships granted by Jaguar must be authorized in accordance with the Delegation of Authority matrix, and obide the Company's Corporate Social Responsibility for Donations and Sponsorship Policy. Donations and Sponsorship made to integrity and ethics charities can never be offered, promised or given by or on behalf of Jaguar if:

- In exchange for an act or omission of the person who receives them;
- In exchange for personal advantage or benefit of a public official;
- To obtain or secure business for the company, directly or indirectly;
- To obtain undue advantage; and / or
- To induce or reward illegal or improper conduct.

Jaguar's employees and third parties are not authorized to make any contribution in value, goods or services to campaigns and political causes on behalf of Jaguar.

To ensure transparency in relationships and process traceability, following donations and sponsorships, the institution should be accountable for the use of the funds received, by reporting on the activities undertaken.

Donations and sponsorships to candidates or political parties on behalf of Jaguar are prohibited.

All supporting donation documentation must be properly archived and available for possible future consultation.



## 4.12 | Company Property and Assets \_\_\_\_\_

Company property and assets must be used responsibly during the work day and for corporate purposes. All Jaguar employees are expected to refrain from using company assets for personal reasons and to protect those assets from loss, theft, misuse and waste.

Jaguar resources are considered as follows: information technology and telecommunications resources, office space and supplies, vehicles, material at sites, company equipment, etc.

The misuse of assets, if confirmed, may lead to disciplinary measures and the payment of the asset by the employee.



## 4.13 | Confidential Information \_\_\_\_\_

Confidential Information means any nonpublic information pertaining to company's business. Confidential information includes information disclosed by company to you, and information developed and learned by you or as a result of your employment contract. Confidential information includes, without limitation, information and documents concerning Jaguar processes; suppliers; customer lists; business strategies; profit margins; goals, objectives

and projections; files; salary, staffing and employment information (including information about performance of other executives); "know-how", internal maps, photos and etc.

All employees and third parties should respect the confidentiality of information acquired or obtained in the course of performance of their responsibilities, never use them for personal advantage, and disclose confidential information of Jaguar or third parties, only when such disclosure is legally required or is otherwise authorized by the Board of Directors and the Chairman of the Audit Committee;

All matters relating to the media, thus comprising requests for information and / or interviews should be sent to Jaguar's Communication Department.



#### 4.14 | Intellectual property

Jaguar owns the results of each employee's activities during the work schedule or contract unless approved in advance, including those related to intellectual and technical improvements, inventions, and similar devices.

The right to use trademark and patent is exclusive to Jaguar. The same rule applies to any material produced by Jaguar, whether

correspondence (including email), contracts, reports, presentations, etc.

According to the employment contract, the intellectual property created by employees is transferred and assigned to Jaguar, guaranteed by the terms of this respective contract and by law or other agreement, except as provided in international agreements, laws and their contract with Jaguar and advanced approval.



#### 4.15 | Use of electronic information systems

The password to access the system is of exclusive and personal use, not being granted to third parties, even if a coworker permits it.

Software or programs should not be copied or installed on Company computers without prior authorization from the Information Technology Department.

Electronic systems and computer resources are available to employees and third parties to support the performance of their function, being prohibited to exchange, download, store or use obscene, pornographic, violent, discriminatory, racist, defamatory files that disregard any individual or entity and are contrary to the policies and interests of Jaguar. Games and chain emails are also not permitted.

Users in general should have no expectation of privacy in the use of these systems and resources. For this reason, Jaguar may, at its discretion, use and monitor any information transmitted or resident in these media. This rule covers written or stored in an electronic information system and any associated media, computers, mobile phone (and its applications) and similar devices. Also includes information developed technically, gained by associations, licensing or acquisition entrusted to the Company.



#### 4.16 | Fraud and theft

Based on integrity principles, Jaguar values transparency and does not allow fraudulent practices in the company and its value chain. All suspicions, instances of misconduct or violations of the Code of Ethics and Conduct guidelines, policies, procedures or legislation should be reported through the Whistleblower Hotline.



## 5 MANAGEMENT CONDUCT

Leaders are responsible for disseminating Jaguar's values and fostering a sound and ethical culture within the company. They should be examples in leading the right processes and should encourage teamwork and an excellent work environment. They are also responsible for maintaining compliance with Jaguar's established Policies for their specific area, providing support in team development seeking positive results and the highest level of performance.

Any mistakes made by employees or third parties must be pointed out by with the information and guidelines necessary to avoid recurrence. The repetition of errors resulting from carelessness, negligence or lack of interest must be result in adequated disciplinary measures.



#### 5.1 | Shareholders

Jaguar encourages solid practices aimed at promoting the well-being and continuous development of the company, always with the ultimate goal of the best long-term interests of the company and the valuation of all shareholders.

When applicable, Jaguar must provide stock exchanges, shareholders, investors and other relevant segments with complete, fair, accurate, timely and understandable information and reports. No data changes, fraud or omission of information are permitted.



## 5.2 | Environment and Community

In communities where it operates, Jaguar seeks to support cultural, educational activities as a contribution to the development of these communities, creating and cultivating sustainable values.

Protection of health, safety and environmental pollution prevention are essential goals of Jaguar, according to Zero Harm value and Jaguar's Health and Safety Policy.

All employees and third parties must conduct their activities and duties in accordance with applicable laws and industry standards relating to health and safety in the workplace and the prevention of environmental impacts.



## 5.3 | Government

Jaguar's employees and third parties are expected to comply with applicable laws and regulations of domestic and foreign

governments, and government agencies having jurisdiction over Jaguar and with applicable regulations of private or selfregulatory authorities.

Jaguar does not participate in bidding or public campaigns. However, any relationship with government entities, non-governmental organizations, community associations, professional associations, trade unions must be properly documented and available for possible future consultations.

Additionally, any meeting with public and governmental bodies and / or employees must be held with at least two members of each party. For these situations, minutes should also be written with the content of the meetings, as well as be signed by the participants.

Documentation needed included: contracts, bidding, provision of accounts, licenses deferred and / or rejected, minutes and when necessary, additional documents.



## 6 SUPPLIERS

We must always pursue to do business with suppliers who operate under the same standard of ethics adopted by Jaguar and in accordance with applicable laws, against corruption and bribery acts.

The selection and contracting of suppliers are competence of the Procurement Department and should be based on transparent, technical, professional and financial criteria, while preserving the interests of Jaguar, according to rules established in this Code.

It is expected of all employees and third parties, to exercise prudence in incurring and approving business expenses, and work to minimize them to ensure that they are reasonable and serve Jaguar's business interests.

It is responsible for the Procurement Department the disclosure of this Code to all Jaguar suppliers, which must comply with the guidelines established.



## 7 POLICIES AND PROCEDURES

All employees and third parties are expected to comply with Jaguar Code of Ethics and Conduct, policies, procedures and legislation applicable to Jaguar.

In addition to complying with the laws of Canada, USA and Brazil, you must also comply with the laws of countries in which we conduct business. In countries where legal requirements and

common business practices may be less restrictive than those that are customary in Canada or Brazil, it is Jaguar's policy to adhere to Canadian and Brazilian standards.



### 7.1 | Compliance Policy

Jaguar's Compliance Program guidelines focus on ensuring compliance with legal requirements, code of ethics and conduct, policies and procedures are available in the **Compliance Policy**. This policy also provides guidance to fight corruption and bribery, encouraging a compliance culture based on values, conformity and ethics and influence stakeholders to adopt integrity programs and / or actions.



### 7.2 | Anti-Bribery and Anti-Corruption Policy

Jaguar does not tolerate any act of corruption, such as offering or paying bribes, direct or indirectly, or anything of value to public officials to get an unfair advantage, retain business, and divert funds, property or business opportunities; or improperly using company assets. This definition does not exclude other concepts and definitions of corruption provided for in applicable local laws. All guidelines are available in the **Anti-Bribery and Anti-Corruption Policy**.

The anti-corruption laws of certain countries include some

exceptions for “facilitation payments” or “hospitality expenses”. Facilitation payments are typically small amounts paid to facilitate an act of office routine whose realization is required by law or involves little or no discretion, as a customs clearance.

Jaguar does not accept any form of retaliation against individuals who, in good faith, report a potential violation related to the Brazilian Anticorruption Law (Law 12.846/13), the Anti-Bribery and Anti-Corruption Policy or other matters provided concerning this Code.

Detailed information on legal implications and compliance with FCPA (Foreign Corrupt Practices Act), CFPOA (Corruption of Foreign Public Officials Act) and Brazilian Anti-Bribery Law are available on the Anti-Bribery and Anti-Corruption Policy.



## 8 WHISTLE-BLOWER HOTLINE

If you suspect non-compliance, or have a question about the right attitude in a particular situation, talk to your supervisor or manager.

Please do not feel uncomfortable discussing your concerns with your supervisor or Jaguar managers. However, if you do not feel comfortable and have a question to be reported, contact the

Whistleblower Hotline with the assurance that all contacts will be treated with due confidentiality and will be consistent with the spirit of this Code of Conduct.

In order for possible situations of fraud, corruption or any other type of non-compliance to be known and immediately discontinued, Jaguar has an independent Whistleblower Hotline, which is available to internal and external audiences and can be accessed as follows.

TELEPHONE	INTERNET
Brazil: 0800 891-1667 US and Canadá: 1-888-279-5268	<a href="http://www.jaguarmining.com.br/denuncia">www.jaguarmining.com.br/denuncia</a>

All reports may be made anonymously if the whistleblower is interested.



### 8.1 Non-Retaliation

An employee cannot be retaliated against for reporting concerns. Jaguar is committed to protecting the rights of those individuals who report issues and will not retaliate or allow retaliation against a person who in good faith:

- > Reports what he or she believes is a violation of our values, our

Code, our policies, or the law;

- Raises a compliance question or seeks advice about a particular business practice, decision or action;
- Cooperates in an investigation of a potential violation.

Retaliation against an employee for reporting an issue in good faith is itself a violation of our Code. Any person, regardless of position, who engages in retaliatory behavior will be subject to the disciplinary measure.

Jaguar encourages all employees who know or suspect retaliation or is occurring to report these events through the Whistleblower Hotline so that the process can be adjusted after the fact has been ascertained and confirmed.



## 9 PENALTIES

Non-compliance with internal policies, external laws and regulations are not acceptable and can result in disciplinary measures. Similar acts should receive similar sanctions, without distinction between employees and hierarchy level. Disciplinary measures will be applied for the immediate interruption of irregular acts and / or infractions to this Code.

The following are disciplinary measures adopted by Jaguar:

- Verbal warning
- Written warning
- Suspension
- Dismissal without cause
- Dismissal for cause

All guidelines for disciplinary action are available in the Disciplinary Measures Procedure.

In relation to third parties, for proven cases of misconduct, non-compliance with Jaguar Code of Conduct and Ethics guidelines or applicable laws, the penalties may be:

- Suspension of contract
- Cancellation of contract
- Termination of contract

In addition, other penalties may apply as per the contractual terms determined by Jaguar.



## 10 COMMUNICATION TO THE COMPETENT AUTHORITIES

At Jaguar's discretion, suspicions or reports of fraud, misconduct and corruption, when applicable, will be referred to the authorities competent authorities.

In cases of infractions occurring that contravene the current laws, Jaguar may communicate the competent authorities for investigations, inquiries, processes and alike. This communication should be carried out by the Company's Legal Department.

Employees and third parties must comply with the guidelines established by the company, be a facilitator in maintaining Jaguar's compliance culture and should report any identified or suspected unauthorized misconduct to Management or through Whistleblower hotline.

This version was approved by the Audit Committee in November - 2019.

The continued relevance and effectiveness of this Code will be reviewed every two years and revised as needed.



## 11 ROLES AND RESPONSIBILITIES

The Chief Executive Officer is the owner of this Code. The Board members and the Chairman of the Audit Committee are responsible for ensuring that the Code is consistently applied.

# RECEIPT TERMS CODE OF CONDUCT AND ETHICS

I, \_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Office)

Declare that I have received the Jaguar Mining Inc. CODE OF CONDUCT AND ETHICS and I agree with the guidelines contained therein, assuming my commitment to comply and enforce them. I also declare knowledge of WHISTLEBLOWER HOTLINE.

In additional, attest my understanding that failure to comply with the rules may result in disciplinary measures, including termination of my employment contract with Jaguar / Mineração Serras do Oeste Eireli, regardless of other legal sanctions applicable to the case.

\_\_\_\_\_  
(Local)

\_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_ / \_\_\_\_\_  
(Month, date and year)

\_\_\_\_\_  
Signature

## DECLARATION OF TRANSPARENCY

This declaration must be completed and signed by all employees and third parties of Mineração Serras do Oeste Eireli (MSOL) and / or Jaguar Mining Inc., mainly those who will have access to the company's facilities.

Should be referred to Compliance, if there is any situation that could represent a real or potential conflict of interest with the company's business in accordance with the rules set out in the Code of Conduct.

If you have nothing to declare, this declaration must be signed and forwarded to the Human Resources Department.

- 1.** Are you a former employee of MSOL / Jaguar or do you hold / held political positions (politician, secretary, server, etc), positions in government, associations or professional associations?

Yes | Company: \_\_\_\_\_  
 No | Relation: \_\_\_\_\_

- 2.** Do you have any relative or close relationship with another MSOL / Jaguar Mining employee or with any service provider, partner, customer, competitor or with a former government employee / employee or political positions (politician, secretary, server, etc)?

Yes | Name(s): \_\_\_\_\_  
 No | Company(s): \_\_\_\_\_  
Department(s): \_\_\_\_\_  
Relationship: \_\_\_\_\_

- 3.** Are you a partner, controlling shareholder, executive, commercial representative or are an advisor, administrator or occupy senior management positions in MSOL / Jaguar Mining suppliers, service providers, partners or customers?

Yes | Company: \_\_\_\_\_  
 No | Relation: \_\_\_\_\_

I declare that the information provided by me in this document is true, and there is no omission of any information that may influence decisions that the company needs to make about this statement.

Name: \_\_\_\_\_ Area: \_\_\_\_\_

Date: \_\_\_\_\_

Signature



## RECEIPT TERMS CODE OF CONDUCT AND ETHICS

I, \_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Office)

Declare that I have received the Jaguar Mining Inc. CODE OF CONDUCT AND ETHICS and I agree with the guidelines contained therein, assuming my commitment to comply and enforce them. I also declare knowledge of WHISTLEBLOWER HOTLINE.

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\_\_\_\_\_  
(Local)

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
(Month, date and year)

\_\_\_\_\_  
Signature



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This declaration must be completed and signed by all employees and third parties of Mineração Serras do Oeste Eireli (MSOL) and / or Jaguar Mining Inc., mainly those who will have access to the company's facilities.

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If you have nothing to declare, this declaration must be signed and forwarded to the Human Resources Department.

- 1.** Are you a former employee of MSOL / Jaguar or do you hold / held political positions (politician, secretary, server, etc), positions in government, associations or professional associations?

Yes | Company: \_\_\_\_\_  
 No | Relation: \_\_\_\_\_

- 2.** Do you have any relative or close relationship with another MSOL / Jaguar Mining employee or with any service provider, partner, customer, competitor or with a former government employee / employee or political positions (politician, secretary, server, etc)?

Yes | Name(s): \_\_\_\_\_  
 No | Company(s): \_\_\_\_\_  
Department(s): \_\_\_\_\_  
Relationship: \_\_\_\_\_

- 3.** Are you a partner, controlling shareholder, executive, commercial representative or are an advisor, administrator or occupy senior management positions in MSOL / Jaguar Mining suppliers, service providers, partners or customers?

Yes | Company: \_\_\_\_\_  
 No | Relation: \_\_\_\_\_

I declare that the information provided by me in this document is true, and there is no omission of any information that may influence decisions that the company needs to make about this statement.

Name: \_\_\_\_\_ Area: \_\_\_\_\_

Date: \_\_\_\_\_

Signature

JAGUAR

MINING INC.

