

## CORPORATE POLICY



## WHISTLEBLOWER POLICY

**November 2022**

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# Approval and Revision History

Approved by		
Version	Name / Title	Date
3.0	Audit and Risks Committee	11-07-2022
2.2	Jeff Kennedy	09-10-2020
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# Whistleblower Policy

## 1. PURPOSE

The purpose of Jaguar's Whistleblower Policy is to describe the procedures for the intake, receiving/dispatch, investigation and treatment of reports filed in the Whistleblower Hotline, as well as to demonstrate the company's commitment to preserving the confidentiality of the information obtained during the process and to establishing safeguards against retaliation for whistleblowers who file a complaint in good-faith.

## 2. APPLICABILITY/SCOPE

The Whistleblower Policy applies to all directors, employees, third parties, representatives of the company, as well as other stakeholders, such as clients, suppliers, communities, among others.

## 3. FUNCTIONS AND RESPONSIBILITIES

- **Compliance:** Implementing and promoting the maintenance of the Whistleblower Policy guidelines. Conduct an independent and impartial investigation and prepare the investigation report.
- **Chairman of the Audit and Risks Committee:** Evaluating and approving the reports on the investigation of complaints, considering the scope of the investigation, actions and disciplinary measures proposed by the Compliance area.
- **Audit and Risks Committee:** Review and approve the Whistleblower Policy.

## 4. SPEAK-UP CULTURE

Jaguar encourages all employees and third parties who know or suspect that any deviation or irregularity is taking place to report these events through the Whistleblower Hotline. The whistleblower should not be afraid of any kind of retaliation.

Jaguar is constantly committed to ensuring a safe space for reports where analysis will be carried out in complete impartiality and confidentiality.

All reports will be analyzed and verified, and interactions are carried out with the whistleblower through the Whistleblower Hotline.

Actions will be taken to stop deviations and improve processes and the work environment. In order to guarantee confidentiality, the actions will not be shared with the whistleblower but may be observed in the day-to-day work.

## 5. WHISTLEBLOWER POLICY

Jaguar Mining has a Whistleblower Hotline (Ethics Point), available to the internal and external public which allows the reporting of incidents, suspicions or questions about real or potential situations in non-conformance with the Code of Conduct and Ethics, policies and procedures, anti-corruption laws, fraud or any other types of non-compliance issues.

## **5.1. Intake**

Jaguar instructs employees, third parties, representatives and citizens in general to file a report through the Whistleblower Hotline, immediately after becoming aware of or suspecting any failure to comply with company guidelines or inappropriate behavior.

The objective is to ensure that the investigation is conducted by a specialized team and the deviation, if substantiated, is promptly interrupted.

The Whistleblower Hotline is available 24/7 via the following channels:

- Jaguar's Hotline: 1-888-279-5268 (United States and Canada) or 0-800-891-1667 (Brazil);
- Jaguar's Website: [www.jaguarmining.com](http://www.jaguarmining.com); or
- Intranet (Fluig).

The whistleblower may file an identified or anonymous report. Even in case of identified reports, Jaguar commits to restricting the information of the whistleblower's identity to only those responsible for the investigation.

When filing a complaint, whistleblowers are encouraged to provide all available information and evidences (if any) in order to increase the effectiveness of the investigation.

After the filing, the Whistleblower Hotline automatically generates a random key number, which allows the whistleblower to keep track of the progress of the investigation and reply to any questions or requests by the Compliance department to assist the investigation.

## **5.2. Receiving/dispatch**

Ethics Point is a third party service provider that hosts Jaguar's Whistleblower Hotline and website and is responsible for receiving the complaints with confidentiality and security. As an independent third party, Ethics Point receives the report and forwarding it to the Compliance department responsible for its verification and treatment and to the Chairman of the Audit and Risks Committee.

Reports that, eventually, mention employees from Audit, Risks and Compliance department will be instead forwarded directly to Chairman of the Audit and Risks Committee and CEO, who will conduct the investigation, as an exception. This workflow aims to ensure the impartiality of the process, preventing a department or an employee from becoming aware of or carrying out an investigation of themselves (auto-investigation).

Reports that, eventually, mention the Chairman of the Audit and Risk Committee will be forwarded to Audit, Risks and Compliance Manager.

## **5.3. Investigation**

Upon receiving the report, the Compliance department defines an investigation plan that may include communication with the whistleblower, request of additional information, and collection of evidence and, if necessary, hiring specialized third parties.

In addition to the Compliance department, which conducts the investigation, the plan may, eventually, require additional employee(s) from other department(s) to support the process, provided that their involvement is indispensable. However, these employees must be kept to a

minimum and not be related to the reported incident, in order to avoid undue interference or influences.

The plan is submitted to the Chairman of the Audit and Risks Committee for approval, before the investigation begins.

#### **5.4. Case closure**

Due to a variety of complaints, it is not possible to determine an exact time frame to close an investigation. However, Jaguar reinforces the commitment to dealing with complaints as soon as possible without compromising the quality of the investigation.

At the end of each investigation, the Compliance department prepares a report, which may contain recommendations of disciplinary measures or opportunities for improvement. The document is sent to the Chairman of the Audit and Risks Committee for approval, before closing the investigation.

#### **5.5. Disciplinary measure**

If the investigation substantiates the complaint, Jaguar must ensure that deviations are promptly interrupted and the proper measures are applied, according to the Code of Conduct and Ethics and Disciplinary Measures procedure.

#### **5.6. Reporting**

The Compliance department is responsible for periodically reporting the complaints received to:

- **Chairman of the Audit and Risks Committee and CEO:** Reports received in the Whistleblower Hotline, with the proposed actions for investigation, in addition to the final report of each complaint.
- **CFO:** Final report of each complaint received.
- **Audit and Risks Committee:** quarterly summary of reports/investigations and annual benchmark report.
- **Stakeholders:** disclosure of indicators related to complaints received.

### **6. CONFIDENTIALITY AND PROTECTION TO WHISTLEBLOWERS**

Jaguar Mining will not tolerate any act that directly or indirectly harms the whistleblower who, on suspicion or certainty, reports facts and conduct that violate the Values, Purpose, Code of Conduct and Ethics, Jaguar policies, standards, procedures or applicable laws.

Retaliation, persecution and/or exposure of people and companies/institutions with the intention of denigrating their image and violating their reputation will not be allowed.

The whistleblower is guaranteed the right to anonymity in the reports reported on the Whistleblower Hotline, but if he decides to reveal his identity, he will be treated with total confidentiality and his identity will be preserved, free from retaliation.

Employees who cooperate in the investigation of possible violations and whistleblowers who, in good faith, contribute information regarding any misconduct, will not suffer any type of retaliation, sanction and/or any form of embarrassment.

Retaliation against a good-faith whistleblower or against persons who collaborate with an investigation is, in itself, a violation of the Code of Conduct and Ethics and the person responsible for retaliation, regardless of their position within the company, will be subject to disciplinary measure.

However, a false or bad-faith report may lead to the disciplinary measures provided for in Jaguar's Code of Conduct and Ethics.

## **7. EXCEPTIONS**

There are no exceptions to this policy.

## **8. MAINTENANCE**

The Whistleblower Policy must be reviewed every two years or whenever there are changes in the process.