



Anti-Corruption Policy

| 1 - INTRODUCTION

Elumini and its collaborators are unequivocally committed to combating any form of corruption and favoritism. Corruption poses a significant threat to our mission, values, and society as a whole. Besides being harmful to the corporate environment and its relationships, Law 12.846/2013, known as the Anti-Corruption Law, holds companies accountable in cases of corruption against the Public Administration, imposing fines that can reach up to 20% of the company's annual gross revenue.

This Anti-Corruption Policy aims to prevent, detect, and combat corrupt practices at all levels of our organization and its relationships.

| 2 - FUNDAMENTAL PRINCIPLES

Elumini is committed to permanent compliance with anti-corruption legislation, adopting good practices of corporate governance and ethical conduct in conducting its business. We embrace the following fundamental principles as the basis for our anti-corruption policy:

| 2.1 - INTEGRITY AND ETHICS

All members of the organization, including employees, directors, contractors, suppliers, and partners, must act with integrity, ethics, and honesty in all their interactions and transactions, in accordance with our Code of Conduct and Ethics.

| 2.2 - LEGAL COMPLIANCE

Comply with all applicable anti-corruption laws, regulations, and standards in all jurisdictions where the organization operates.

| 2.3 - ZERO TOLERANCE

We advocate a zero-tolerance policy regarding corruption, bribery, extortion, direct or indirect undue advantage, and other corrupt practices. Such practices are not limited to cash payments and may include, depending on the circumstances, gifts, meals, travel, job offers, among other benefits.

| 2.4 - TRANSPARENCY

The organization promotes transparency in its financial and administrative operations, providing accurate and complete information whenever required by law or ethical principles.

| 3 - CODE OF CONDUCT AND ETHICS

Elumini maintains a Code of Conduct and Ethics that establishes specific guidelines and expectations regarding ethical conduct and integrity. All organization employees have access to this Code, which aims to establish guidelines and conduct standards to guide their behavior in internal activities and in their relationships with public agents and third parties.

| 4 - DISCLOSURE AND AWARENESS

Elumini disseminates the Anti-Corruption Policy, as well as the Code of Conduct and Ethics, to all its employees and relevant stakeholders. Awareness about the risks and consequences of corruption is a fundamental practice within our commitment to prevention.

| 5 - ETHICS COMMITTEE

Elumini has established an ethics committee composed of three company directors and two employees who meet regularly to deliberate on any complaints, investigate the facts, and establish consequences for acts that breach the Anti-Corruption Policy and the Code of Conduct and Ethics.

If one of the directors is involved in a potential complaint, the other two committee members will be responsible for deliberating on the matter.

| 6 - DUE DILIGENCE

Before initiating business partnerships or hiring suppliers, we conduct integrity checks to ensure that there is no involvement of parties with a history of corruption.

| 7 - INTERNAL CONTROLS AND AUDITS

We implement robust internal control systems to detect and prevent corrupt activities, including regular internal audits.

| 8 - HOSPITALITY

We have adopted a limit of \$50.00 (fifty dollars) for the giving and receiving of gifts, giveaways, and invitations to events of any nature, provided they do not represent potential advantages and do not compromise the integrity of relationships, either among employees or especially with our clients. Any exception must be submitted for discussion in the Ethics Committee.

| 9 - REPORTING CHANNELS

To promote an environment of integrity and free from irregularities in the workplace, we provide a reporting channel open to criticisms, suggestions, and the submission of reports concerning violations of this Policy.

Complaints will be received by an independent company and forwarded to Elumini's Ethics Committee, handled anonymously and confidentially. Retaliation or punishments are not tolerated.

Email address for the reporting channel: ouvidoriaelumini@qualityrhrio.com.br.

| 10 - SANCTIONS AND CONSEQUENCES

Clear disciplinary measures are established for those involved in corruption, including verbal warnings, written warnings, dismissal, fines, and legal actions when appropriate.

The Ethics Committee is responsible for deliberating on possible sanctions and consequences for acts that violate the Code of Conduct and Ethics and the Anti-Corruption Policy.

| 11 - COLLABORATION WITH AUTHORITIES

We fully collaborate with the competent authorities in combating corruption by providing information and support in criminal investigations, if necessary.

| 12 - MONITORING AND REVIEW

The effectiveness of this Anti-Corruption Policy is periodically evaluated, with adjustments made as necessary to address new threats and challenges.

This Anti-Corruption Policy reflects Elumini's commitment to promoting integrity, ethics, and transparency in all its operations. All members of the organization are encouraged to comply with and uphold these principles in their daily work.

[Click here to access Elumini's Code of Conduct.](#)