

**INTEGRITY AND COMPLIANCE POLICY**

Approved by: CONSAD –

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1. PURPOSE

- 1.1. To establish the Integrity and Compliance Policy of the Brazilian Mint – CMB.

2. PRINCIPLES

- 2.1. Seeking to raise its compliance standards, achieve its strategic objectives, and conduct its business in a sustainable, legal, ethical, and transparent manner, the CMB commits to:
- 2.1.1. Act proactively to prevent risks of loss and fraud, and combat potential acts of corruption, bribery, nepotism, conflicts of interest, or conduct that could cause financial loss or damage the company's reputation;
 - 2.1.2. Comply with laws, external regulations, internal guidelines, and best practices in corporate governance;
 - 2.1.3. Foster commitment so that the company and its employees can carry out their activities with excellence and safety;
 - 2.1.4. Formalize and keep internal Policies and Guidelines up to date, as well as promote their dissemination to the workforce through specific systems and training;
 - 2.1.5. Ensure the adequacy, strengthening, and functioning of reliable internal controls to mitigate risks, considering the complexity of each process, and protect institutional information;
 - 2.1.6. Observe the principle of segregation of duties in its activities, processes, and areas of authority, in order to prevent conflicts of interest;
 - 2.1.7. Promote the training of its staff to enable them to perform their duties;
 - 2.1.8. Promote a participatory and inclusive environment through open and transparent communication across all levels of the organization and encourage respectful, proactive, and constructive questioning in all its activities;

- 2.1.9. Promote a culture of integrity through the awareness and education of its employees and business partners, based on its principles and values, the associated risks, and its Code of Ethics, Conduct, and Integrity;
- 2.1.10. Promote maximum transparency in the company's financial and asset valuation, with the rotation of independent auditors being a best practice.
- 2.1.11. Ensure that members of Management (Board of Directors and Executive Board) commit to the ethical and integrity standards established to: serve as a model of conduct; support the strengthening and continuous monitoring of the Integrity Program; and ensure the proper handling of any and all situations that may constitute a violation of the behaviors and attitudes of which they become aware;
- 2.1.12. Provide authority, independence, resources, access to the information necessary to carry out activities, and the necessary training to the areas responsible for integrity; as well as provide formal guarantees to prevent arbitrary punishment of its agents and enable them to carry out their activities with autonomy, with a guarantee of non-retaliation;
- 2.1.13. Conduct appropriate integrity due diligence for the hiring and supervision of third parties, as well as the inclusion of anti-corruption and integrity clauses in contracts entered into with CMB;
- 2.1.14. Establish specific procedures to prevent fraud and illegal acts in the context of bidding processes, the execution of administrative contracts, or any interaction with the public sector, even when mediated by third parties;
- 2.1.15. Establish procedures for making donations, providing sponsorships, offering gifts, hospitality, and presents, which must comply with internal regulations and applicable laws, as well as align with CMB's strategic planning and interests, and none of these actions shall be offered or promised for the purpose of directly or indirectly influencing business decisions or the action, omission, or decision of a public agency or official.