



## **CBL – Companhia Brasileira de Lítio**

**Compliance Program**

Estimated colleagues,

The corporate values and principles of Companhia Brasileira de Lítio (or simply CBL) provide the appropriate guidance for our behavior and relationships in business.

For this reason, CBL Administrative Board formally approves and fully supports the initiatives that aim at promoting the implementation of this Compliance Program.

Maintaining a culture of mutual reliance that encourages the free exchange of viewpoints at all organizational levels provides a catalytic work environment for the success of this Program. Each employee must have an appreciation for open discussion and active role development in the decision-making process in accordance with CBL's values.

We are all responsible for the promotion and protection of CBL's image, so please take the time to read and understand the Code of Conduct and Ethics.

Seek help and guidance whenever you have questions about appropriate business conduct and Compliance issues.

We believe that our obligation as citizens is to be aligned with principles that strengthen transparency and ethics, collaborating with an even fairer society.

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## **REVIEW HISTORY**

| <b>Version</b> | <b>Date</b> | <b>Description</b>                          | <b>Person Responsible</b> |
|----------------|-------------|---|---------------------------|
| 1.0            | 12/16/2019  | Initial issue                               | Ethics Committee          |
| 2.0            | 02/06/2020  | Update of the Organizational Chart          | Ethics Committee          |
| 3.0            | 03/30/2021  | General Review                              | Compliance Agents         |
| 4.0            | 10/11/2023  | General Review - fulfillment of ESG / 16001 | Compliance Agents         |

## **PURPOSE**

With corporate commitment and responsibility, CBL - Companhia Brasileira de Lítio, through this document, establishes the fundamental principles and necessary tools for the implementation and maintenance of the Compliance Program, seeking to improve the relationship with all employees, partners, investors, suppliers, customers, public authorities and the general public.

Through the preparation, release, and application of the concepts envisaged in this document, CBL seeks to convey to its collaborators the importance dedicated to its corporate ethics and its transparent behavior before their interested parties, guided by our culture, mission, and values of integrity, sustainability, honesty, transparency, and good practice.

The actions envisaged herein correspond to the set of practices and behaviors related to the laws, rules, and procedures in all performance spheres, strengthening its corporate governance structure with integrity, competence, efficiency, and competitiveness.

Among the actions, the following must be highlighted: preparation of the Code of Ethics and Conduct, the formation of the Ethics Committee, the preparation of the Reporting Channel, the preparation of the relationship policy with the Public Power, the definition of the new evaluation process of the employees and a series of trainings aimed at the donation and improvement of the culture practice at CBL.

It is important to emphasize that the actions of the Ethics Committee are guided by the best national and international practices of governance, risk management, and ethics, and they adhere to the legislation in force.

The awareness of the contents of this document by the members of the organizational structure will be demonstrated by signing the awareness form at the end of this document.

## **APPLICABILITY**

Being aware of the importance of establishing ethical standard for the conduct of internal and external relations, CBL establishes this document for application in all areas and to all employees of the Company, including leaders and members of the Management Board and other professionals who may represent CBL's interests, including investors, third parties and partners.

The application of the envisaged premises is duly aligned with the updated policies and rules, both legible and illegible, with versions available for the access of the collaborators, and its compliance is a prerequisite for the prevention, detection and response to attitudes of behavioral deviation by persons, processes or systems established in CBL's operations.

It is the responsibility of the Board of Directors to ensure that the processes for the application of the Compliance Program throughout the Company are appropriate to the risk exposure, to define the criteria and methods necessary to ensure that the management, operation and monitoring of these processes are efficient, taking into account the availability of resources and the information necessary to support the operation, and to raise awareness among employees of the importance of a Compliance system and the need for its effective application.

It is the responsibility of the Top Management to ensure, appropriately and steadfastly, the evaluation and management of risks that are part of our professional responsibilities.

It is the responsibility of the managers to instruct and monitor the actions of the employees for whom they are responsible, including Compliance aspects in the evaluation of the respective collaborator's performance.

It is the responsibility of all collaborators to ensure that the behavior in business are in accordance with the applicable policies and rules, as well as in accordance with CBL's integrity, by acknowledging compliance management responsibilities.

## **GLOSSARY**

In order to standardize the terms and expressions used herein, the following capitalized words shall have the following meanings:

“Top Management”: Team of professionals, including members of the management board, or executives who may have authority to make major decisions for the company.

“Compliance”: From the English verb “to comply”, the term is used herein to indicate actions in compliance with internal or external laws and rules, as well as to refer to the function performed by the company or its departments and employees in order to comply with the main requirements or “pillars” envisaged in this document.

“Control” or “internal control”: Mechanism or activity performed aimed at mitigating risks, promoting the effectiveness and efficiency of resources, the reliability of the financial information, and the fulfillment of the established laws and rules; Controls can be preventive or detective, being carried out more or less frequently, according to the definition of the CBL defined risk level.

“Management Board”: A team of professionals elected by the shareholders and nominees for strategic decision-making at CBL.

“Risk level”: The risk level that CBL considers acceptable or is suitable to assume while trying to reach its goals.

“Internal rule”: Documentation prepared and released by the leadership aimed at conveying instructions and further information necessary for compliance with CBL goals. It is split into rules, procedures, and work instructions.

“Procedure”: A sequence of activities made by the company, involving one or multiple departments, persons, and systems, aimed at reaching the established goals.

“Risk”: In the corporate environment, the risk is defined by the combination of the probability of an event occurring and its negative impact on business goals. Negative impacts may occur in the financial, operational, strategic, or Compliance areas.

“System”: Software used to centralize and integrate CBL’s data and procedures.

“Third Party” or “Partner”: Any person, whether as a legal entity or private individual, who works on behalf of CBL, or for its interest or benefit, who provides services, or provides other assets, as well as commercial partners who provides services to CBL, directly related to the achievement, retention, or facilitation of businesses, or for the handling of CBL’s matters, including, without limitation, any distributors, agents, brokers, dispatchers, facilitators, partners of the supply chain, consultants, resellers, contractors, and other providers of professionals services.

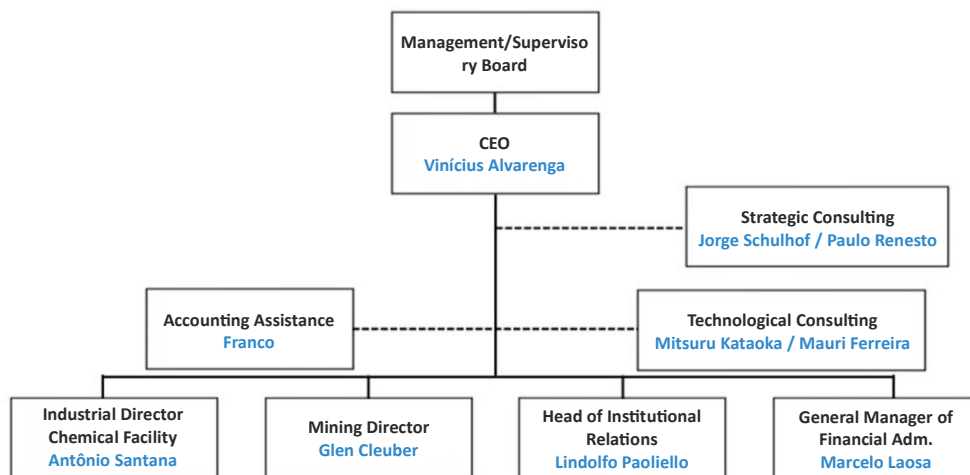
## COMPLIANCE STRUCTURE

CBL strategic planning was reformulated and the Compliance and Ethics guidelines were incorporated into the company's strategic drivers.

CBL Compliance Structure, represented by the Superintendent Director, is currently and directly related to the Top Management, and it relies on several supporting areas, according to the organizational charts below:

### CBL General Organizational Chart – AR / SP / DA Units

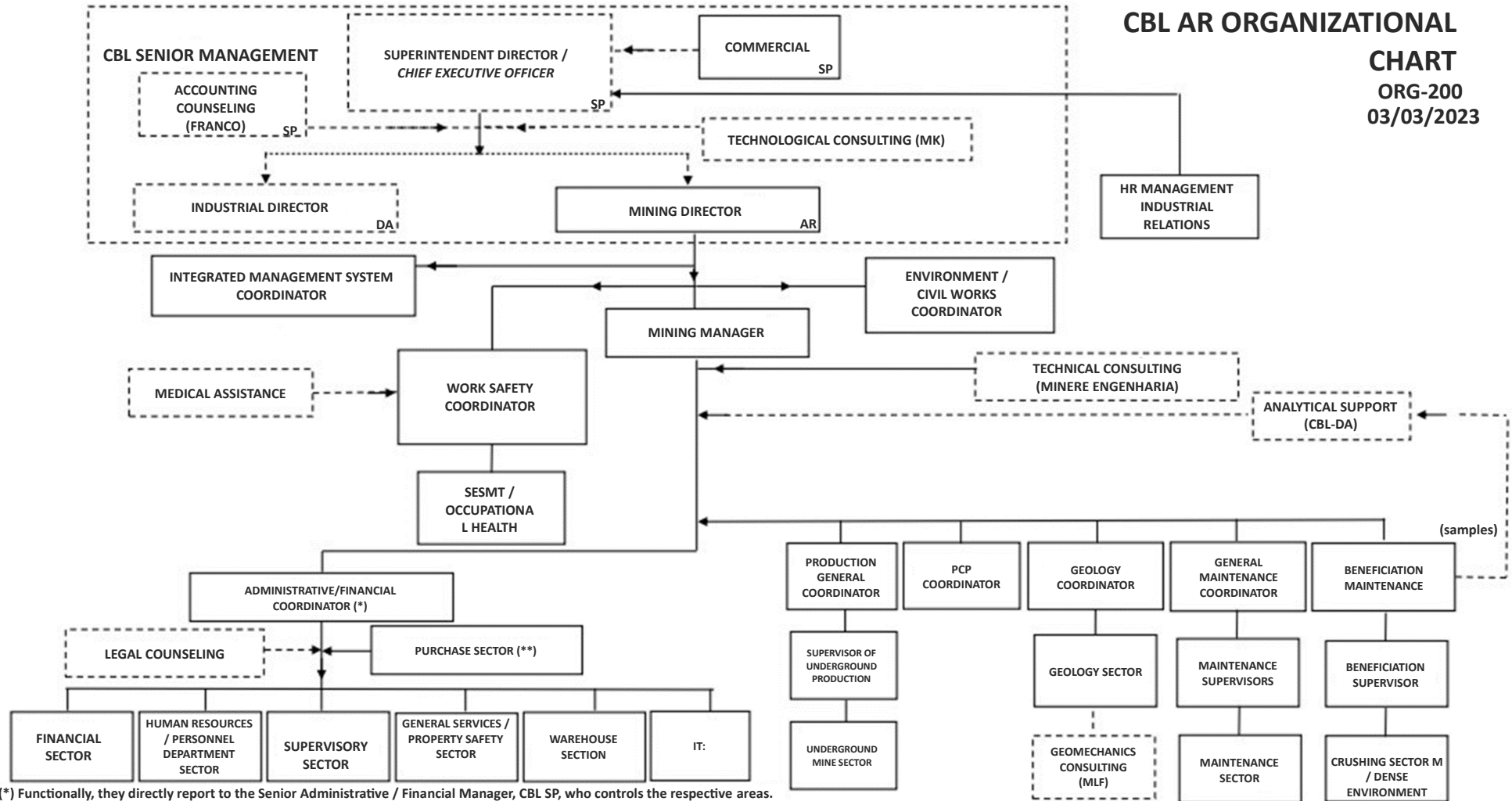
#### Organizational Chart



**Administrative Council:** Aguinaldo P. Couto, Daniel B. Leme, and Wilson Brummer  
**Supervisor Board:** José P. Comparini (Ana Paula Comparini), Flávio P. M. Hirschfeld (Juliano Vinha Venturini)

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**CBL AR ORGANIZATIONAL CHART**  
ORG-200  
03/03/2023



(\*) Functionally, they directly report to the Senior Administrative / Financial Manager, CBL SP, who controls the respective areas.

(\*\*) Functionally, they directly report to the Administrative / Financial Manager, CBL DA, who controls the respective areas.

(\*\*\*) Functionally, they directly report to the IT Coordinator, who controls the respective areas.

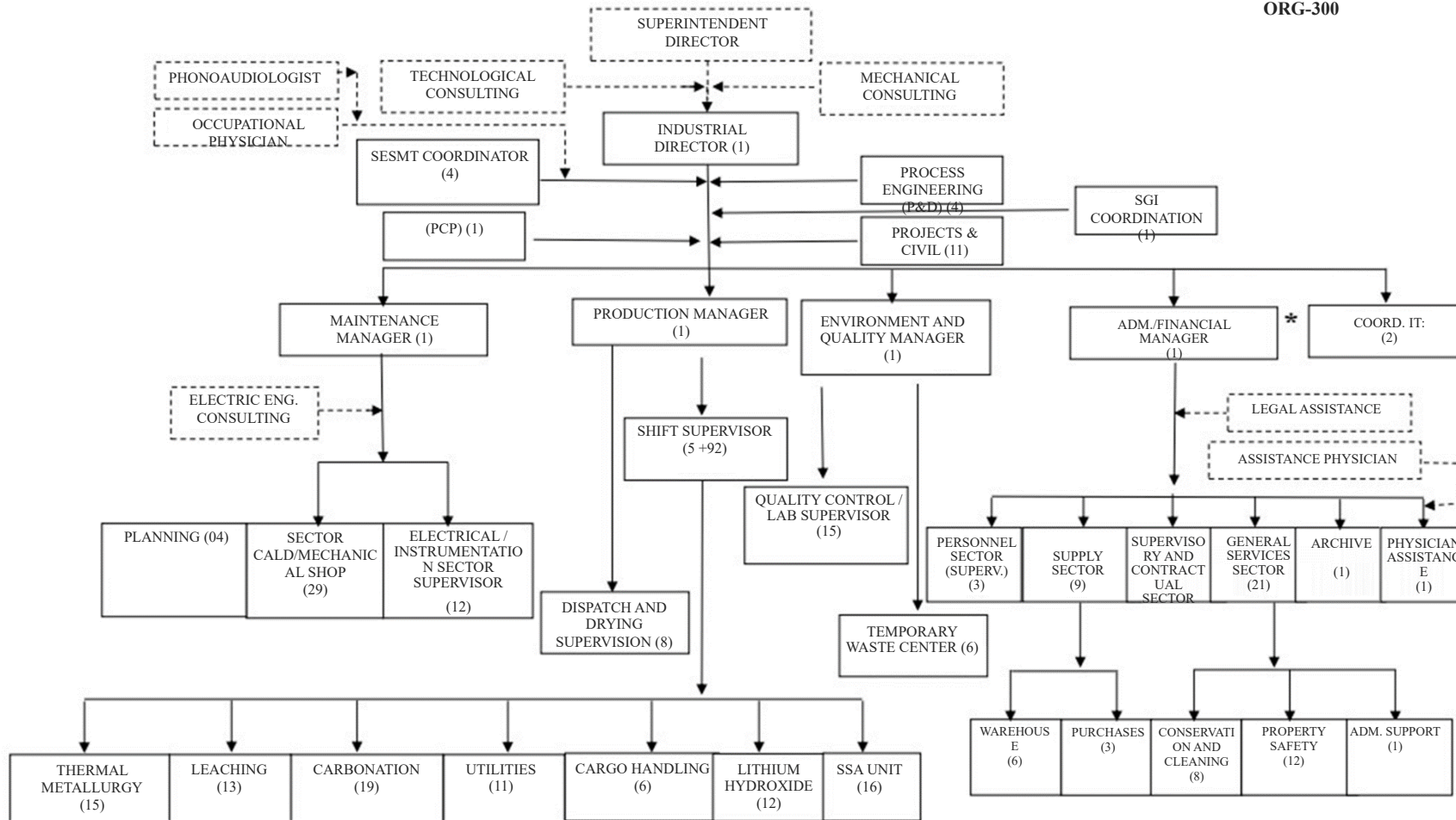
Legend: Continuous Lines Identify the parties of the organizational chart of CBL AR Unit / Dotted Lines Identify the parties of the organizational chart of CBL, SP, DA Units, and other external units which interact with CBL-AR.



CBL-DA

## CBL ORGANIZATIONAL CHART - Chemical Facility

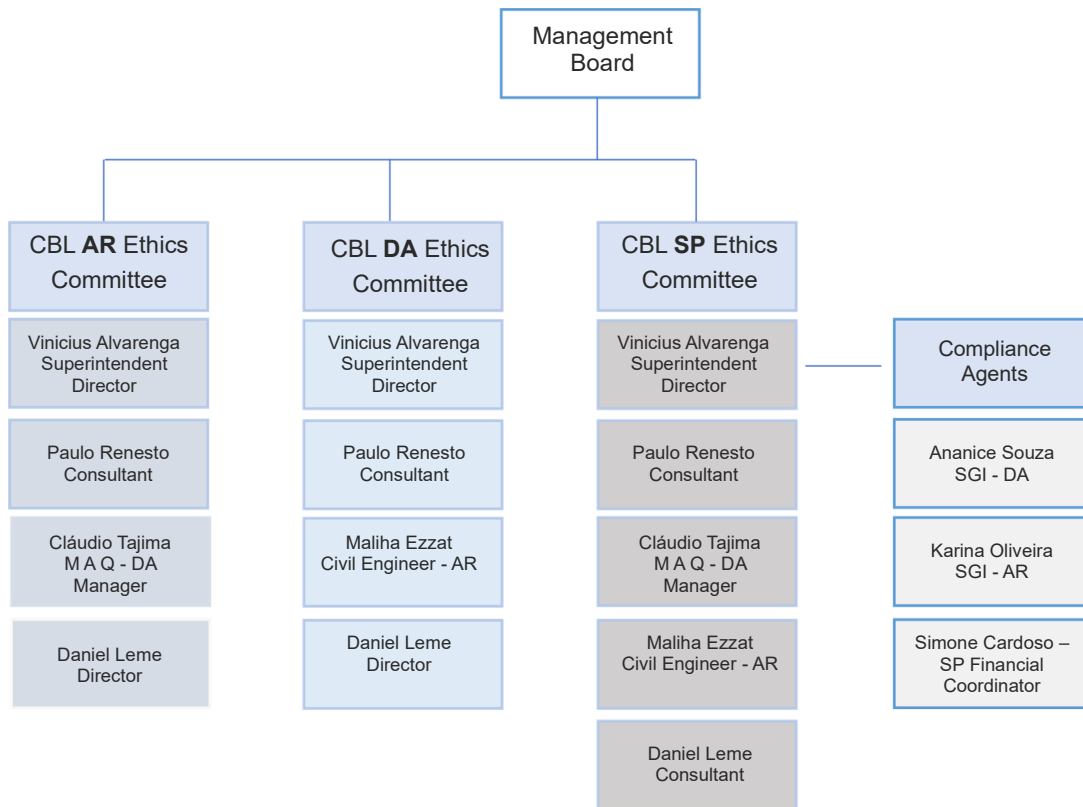
ORG-300



Note: \* Functionally, they directly report to the Corporate Adm. Manager and the Superintendent Director, who controls the respective areas.

03/30/2022

**Functional Organizational Chart of the Compliance Program - CBL**



All CBL managers, including directors, managers, coordinators, supervisors, and graduated professionals, have formal goals of compliance with the stages of Compliance actions, and these indicators are constantly assessed and discussed for assessment of individual performance. From then on, the Top Management monitors activities and actions performed and the planning of future actions.

The program improvement and the assertive communication of CBL governance model are constantly made through trainings and notices released in panels, informational charts, security and health discussion, information leaflets, e-mails, and other communication provisions in all units: central, mine, and chemical facility offices.

## **ETHICS COMMITTEE AND COMPLIANCE AGENTS**

The Ethics Committee is responsible for monitoring the application of ethics conduct rules, through the receiving, analysis, and investigation of reports.

The Ethics Committee is composed of the following collaborators:

| <b>AR</b>          | <b>DA</b>          | <b>SP</b>                    |
|--------------------|--------------------|------------------------------|
| Paulo Renesto      | Paulo Renesto      | Paulo Renesto                |
| Vinícius Alvarenga | Vinícius Alvarenga | Vinícius Alvarenga           |
| Cláudio Tajima     | Maliha Salha       | Cláudio Tajima/ Maliha Salha |
| Daniel Barco Leme* |                    |                              |

The Director Daniel Barco Leme will make the necessary replacement in the absence of any member of the Ethics Committee, in case of medical certificate, vacation, and others (\*).

Moreover, during the meeting of the Board of Directors together with the Management Board, the involved parties were asked to mention collaborators who fit the Compliance Agent profile, and the referred collaborators were submitted to a validation process considering communication, impartiality, and reputation skills among the collaborators chart.

The chosen Compliance Agents are:

- Simone Cardoso – Financial Coordinator – CBL SP;
- Karina Nikovschi – SGI Coordinator – CBL AR;
- Ananice Souza – SGI Coordinator – CBL DA;

Compliance Agents report directly to the Superintendent Director for matter related to the Compliance Program.

They both are responsible for developing the role of monitoring, reviewing and improving of internal rules and professional ethics, trainings and dissemination, as well as training and dissemination of information on the rules of ethical conduct. In addition, the multiplication of integrity and transparency measures, the importance of maintaining the culture and monitoring the application of the guidelines adopted by the Compliance Program, as well as the diligence, discretion and anonymity during the conduct of any investigations that may be necessary.

## **CORPORATE INTEGRITY**

Decree No. 8.420/2015 has established, in its art. 41, what is the Integrity Program:

*"Integrity program consists, within the scope of a legal entity, of a set of internal mechanisms and procedures for integrity, auditing, and encouraging the reporting of irregularities and the effective application of codes of ethics and conduct, policies, and guidelines aimed at detecting and solving deviations, frauds, irregularities, and illegal acts practiced against the public administration, whether national or foreign."*

In compliance with the concept above, CBL values corporate integrity, which is understood as an ethical attitude aligned with the Code of Conduct and a commitment to business in a socially responsible manner.

Above all, we understand that corporate integrity means compliance with all applicable laws and rules, as well as the high integrity standards established by the Top Management. Thus, complying with these standards constitutes a prerequisite for CBL sustainable success.

It is important to emphasize that the terms and conditions that establish the appropriate behavior must be precisely assessed, considering the relevance of each case. Therefore, CBL observes the principles imposed in national and worldwide legislation, the Universal Declaration of Human Rights, and ISO rules. We hereby highlight the following:

- Law No. 12.846, from August 1, 2013, known as the Brazilian Anti-Corruption Act or Clean Company Act, has instituted in Brazil the objective administrative and civil accountability of legal entities for the practice of damaging actions that are perpetrated for their interest or benefit, against the public administration, whether national or foreign;
- Law 8.420, from March 18, 2015, which provides for the administrative accountability of legal entities for acts against the public administration, whether national or foreign;
- Ordinance No. 909, from April 07, 2015, which provides for the assessment of integrity programs of legal entities; and
- Law No. 12.529/2011, from November 30, 2011, known as Competition Law, which provides for the prevention and repression to infractions against the economic order.
- ABNT NBR ISO 16001:2012 Social Responsibility – Management System – Requirements;
- ABNT NBR ISO 26000:2010 Guidelines on Social Responsibility;
- ABNT NBR ISO 37301:2021 Compliance Management Systems - Requirements
- Universal Declaration of Human Rights
- Regulating Rule No. 5 (NR-5) – Internal Commission for Prevention of Accidents and Harassment (CIPAA);
- LAW NO. 14.457, FROM SEPTEMBER 21, 2022, which establishes the Program “Emprega + Mulheres”, aimed at the inclusion and maintenance of women in the labor market through the implementation of several measures;

Additionally, we highlight other factors that orientate our Compliance Program:

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The factors were analyzed and added to CBL internal procedures and Code of Ethics and Conduct, released to all employees, partners, suppliers.

CBL has a structure of internal procedures and controls to mitigate misconduct risks and ensure compliance with the legislation applicable to the company's business, and adopts the factors below as an orientation to the internal policy of compliance with the requirements described in the internal procedures:

- Commercial business with municipal, state or federal public authorities, ensuring that the approval of the Ethics Committee is mandatory for the submission of a proposal for a commercial contract involving the public authorities, which must be properly reviewed from a legal perspective, as well as for responding to inquiries and investigations;
- Discrimination and harassment, ensuring the prohibition of acts based on race, color, religion, sex, sexual orientation, origin, age, disability or any other ground prohibited by applicable law, in accordance with the Convention on Discrimination in Employment and Occupation, which provides for discrimination in employment and occupation, as well as the Universal Declaration of Human Rights, which declares that all human beings are born free and equal in dignity and rights, and that everyone may invoke all the rights set forth in said Declaration, without any distinction of any kind, in particular regarding race, color or national origin;
- Conflicts of interest, focusing on identifying when an individual's personal interest is, or seems to be, hostile, adverse, or interferes with the adequate performance of the employee's actions, such as influencing contracts, using CBL resources or confidential information for personal achievements or diverting actions in business opportunities;
- Gifts, observing that the occurrences of receipt or offer of gifts are limited to those of a promotional nature, not more than 2 (two) times in a period of 12 (twelve) months, with items of no commercial value and not exceeding BRL 300.00 (three hundred reais), whereas this amount is adjusted annually according to the rate of inflation. During the receiving, the refusal must be made in a polite manner. In case of embarrassment, the gift must be sent to the Compliance Agents, who will be in charge of making donations to charity institutions supported by CBL;
- Gifts and Entertainment, preventing the acceptance of gifts, meals, or invitations to entertainment events by unauthorized companies or persons. During the receiving, the refusal must be made in a polite manner.
- Hospitality, observing that the occurrences of receipt or offer of hospitality are limited to the contractual compliance character, whereas it must be properly registered and handled in the planning and monitoring of the execution of the project at hand;
- Bribes and Gratuities, preventing the acceptance or offer of cash gifts under any circumstances, thus ensuring that an act that could be understood as an intention to affect the recipient's impartial discretion, in order to benefit a negotiation, is recognized as a bribe, becoming a criminal case, taking into account that CBL will cooperate with any investigation performed by an authority or related criminal

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procedures;

- Protection and appropriate use of assets, preventing thefts, waste, or inappropriate use of assets, such as, for instance, computers, tools, equipment, machinery, vehicles, among other assets. The inability of conducting personal business at CBL premises is also considered;
- Sponsorships and Donations will be submitted for approval by the Legal Representative and at least two Board Members, when:
  - a) they are NOT included in the annual Business Plan approved for the financial year at hand, and when the amounts exceed BRL 10,000 reais.
  - b) Amounts of less than BRL 10,000 will be approved by the Unit Director and the legal representative.
- Financial integrity, ensuring that the accounting books and records are kept following the rules and standards set forth by the law, so as to always show the entirety of transactions made throughout CBL's operations, as well as the valuation of its assets/liabilities, allowing the monitoring of income and expenses and possible identification of atypical transactions or changes in patterns, such as excessive increases or decreases in values agreed in contracts or any possible services provided;
- Information Security and Data Privacy, ascertaining that the collaborators with access to personal information of employees, suppliers, customers, partners, third parties, and other private individuals that are related to CBL, ensure that the information is collected, processed, stored, and transferred with the appropriate confidentiality precautions, and that said information can only be accessed by persons with legitimate business reasons. When appropriate, it is necessary to request authorization from the employees and customers for the collection and use of their personal information.
- Trade Unions and Employee Rights, we respect freedom of trade union association, the right to collective bargaining, collective bargaining agreements entered into with trade unions representing employees, employee rights, whether they are provided for in the Constitution, in infra-constitutional legislation, or even in regulations, and we absolutely forbid, whether in direct or indirect labor, informal work and the suppression of rights, especially the ones related to the employees' health and safety.
- Social Welfare Activities, the Collaborators may get personally engaged in these sorts of activities. CBL supports and encourages volunteer work, provided that:
  - It does not interfere with their duties and responsibilities in the Company;
  - The activities are performed out of the Company's working hours;
  - Employees clarify that they are acting on their own behalf and must refrain from involving the Company's name;
  - The personal contribution must not be made with the purpose or expectation of returning a favor.
- Prohibition of Slave, Forced, and Child Labor, CBL does not allow the exploitation of slave labor or labor analogous to slavery, forced labor, or child labor at any stage

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within its chain of production. For this reason, the hiring of any and all employees, as well as the signing of any and all contracts, must be based on the other party's commitment to never use child or slave labor and/or labor analogous to slavery.

- Environmental Responsibility, CBL strictly complies with the environmental legislation in force, and it will require compliance by all its employees and/or contractors, avoiding committing environmental crimes, or adopting any practice that could harm the environment is everyone's responsibility. However, in the unlikely hypothesis of an environmental accident, the appropriate agencies must be officially informed, and all appropriate measures must be adopted in order to mitigate possible damages and, as far as possible, restore the environment to its previous state.

## **PILLARS OF THE COMPLIANCE PROGRAM**

CBL realizes that the Compliance Program must be understood as a relevant importance factor for the mensuration and maximization of results, because of its complexity, as well as the steadfast need to adaptation to the internal procedures and process technology, through:

- Well-defined exercise of roles and responsibilities;
- Qualification of communication channels and operative interface;
- Proactive identification and assessment of new regulations, managing their respective obligations before themselves;
- Implementation of procedures and guidelines to assist CBL teams in the performance of their responsibilities, according to the defined Policies;
- Monitoring of conditions in which the Compliance risks are elevated and require attention and/or change;
- Use of tools and technologies integrated into the several business lines, therefore having a consistent view of the market challenges and trends.

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All in all, the assumptions that guide each pillar of the Compliance role at CBL are:

| <b>Pillars</b>             | <b>Description</b>   |
|----------------------------|--|
| Top management support     | The Top Management must regulate and disclose the necessary resources for the implementation of the Compliance program, establishing the culture of compliance with rules and regulations, prevention, detection, and response to conformity deviations. |
| Risk Assessment            | Continuous risk assessment facilitates the identification of the main vulnerabilities of the business processes and exposure indices of the Company to regulatory non-conformities.  |
| Internal controls          | The internal controls must set forth the rules of review and approval of activities, aiming at minimizing operational, financial, strategic, and Compliance risks.   |
| Training and Communication | Continuous training and communication for the dissemination of values, rules, policies, and procedures regarding ethical and sheer conduct in businesses.  |
| Code of Conduct and Ethics | The Code of Conduct must establish the rights and obligations of all levels of the organizational structure, demonstrating the commitment of each collaborator to the Compliance Program.  |
| Reporting Channels         | The reporting channels must provide mechanisms for confidential or anonymous reporting regarding the conduct or suspected inappropriate conduct.   |
| Internal Investigations    | The internal investigations must assess the reports of inappropriate behaviors, ensuring that the reported facts are verified and that disciplinary measures or corrective actions are duly applied.   |
| Partner monitoring         | Partner monitoring must provide for the classification of risk levels of third parties and service providers involved with the operation, refining their contractual clauses of the hiring procedure for verification of the susceptible exposure level. |
| Program monitoring         | Program monitoring must apply steadfast assessment procedures, through regular audits, aiming at the estimation of expected results focused on the continuous improvement of the entire Compliance program.  |

## 1. TOP MANAGEMENT SUPPORT

In order to structure an effective management, with sufficient autonomy to prevent, detect, and punish behaviors that are unsuitable to envisage the ethical principles, CBL envisions the leadership participation in the strengthening of the controlling environment, establishing the risk level, and disclosing internal rules that aim at mitigating the main conformity risks with the Compliance program.

Moreover, the Top Management

- Defines the Ethics Committee and Compliance Agents as responsible for assessing and deciding on the matters of the Compliance Program, including reporting cases, highlighting management autonomy and the availability of the necessary resources for its execution;
- Provides for leadership participation in training and communication strategies to keep the Compliance program active and effective – formalized through a training schedule and approval of formal and informal communication methods;
- Provides for the leadership participation regarding the monitoring of partners, centralizing decisions based on the risk level established;
- Emphasizes the importance of support for internal and external audits, the main element supporting timely decision-making and mobilization for the smooth progress of this Program.



**2. RISK ASSESSMENT****2.1 Process mapping and risk identification**

The mapping of CBL's processes aims at systematizing how administrative and operational activities are conducted, facilitating the identification of areas with the greatest and least exposure to the risks of Compliance matters.

The actions of process mapping verification are continuously made and formalized in CBL's Risk Matrices.

**2.2 Risk Classification**

To define the risk levels, CBL has decided to address the following categories:

- Strategic risks: events associated with the market, investments, and technological innovations;
- Financial risks: events associated with financial resources and cash flow management;
- Image and reputation risks: events associated with compliance with agreements through ethical principles, concepts, and values;
- Legal and regulatory risks or compliance risks: events associated with compliance with the application of laws, regulations, and CBL internal policies;
- Operational risks: events associated with failure in processes, people, resources, or systems;
- Social and environmental risks: events associated with the environment, society, or communities in CBL's influence areas.

**3. INTERNAL CONTROLS**

Risk Matrices addresses the main aspects of CBL's procedures, describing the controls adopted for the risk reduction.

The base for mapping of procedures to be assessed for the inclusion of matrices will be CBL's functional organizational and operational charts, which will analyze the risks of the Compliance Program.

The Compliance Agents are responsible for the structural maintenance of Internal Compliance Controls envisaged by Leadership and Management through the Risk Matrices and established in CBL's key procedures.

Therefore, in addition to the set of policies, procedures, and rules aiming at reducing the uncertainty levels of the occurrence or not of risks, compliance with the goals envisioned by the Management Board through the risk and control matrices ensures the existence of compliance with the laws and regulations, thus ensuring the reliability of the managerial reports.

It is important to emphasize that the policies, procedures, and rules do not ensure all alone that the intrinsic activities to CBL operations remain free of the inherent risks to their functionalities.

For this reason, based on the best practices defined and approved by the Management Board, the strengthening of processes and procedures related to the corporate governance model is paramount during the monitoring and updated of risks

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and controls matrices.

When the implementation of controls and the accomplishment of adjustments to avoid or reduce risks is necessary, actions will be established in the spreadsheet of the Action which contemplates the identified problem, proposed actions, responsible party, term, and status, being continuously reviewed for updates.

The process flows and systems involved are continually reviewed and updated, and they are submitted for assessment by the units' Boards and Top Management, with the involvement of the managers of the administrative and operational areas of CBL's units.

#### **4. TRAINING AND COMMUNICATION**

The applicability of awareness-raising and accountability of all collaborators (internal, third parties, and service providers) is reinforced by CBL through communication channels, including informational charts, safety and health discussions, information leaflets, emails, and other communication releases, which aim at the dissemination of ethical values and principles, rules, policies, and procedures for the integrity of actions of involved parties, being destined to all collaborators, third parties, service providers, commercial partners, members of the Top Management, and Advisors.

The individual responsibility of the collaborators is always highlighted in order to reinforce the guarantee need for compliance with all obligations associated with their activities, compliance with internal laws and rules, actions aligned to good practices, solid knowledge of the Code of Conduct and Ethics, as well as anonymity and assistance of the Top Management for the communication of any conformity violation.

The main purpose of communication is to provide all employees with knowledge and awareness of risk exposure, measure the effectiveness of the Compliance Program, evaluate the resources available to collaborators with guidance related to compliance with laws and internal rules, and provide advice to members of the Top Management and other administrators.

The trainings are structured in order to illustrate everyday situations that aim to break down self-judgment paradigms on ethics, avoid technical or legal terms, assimilate concepts in a practical and easily understandable manner, and turn communication dynamic. If there is an identification and/or survey of the need for guidance and widening study of issues related to CBL's strategy, they are presented for analysis and definition during managerial meetings of the Top Management and their advisors.

The training approach refers to contextualization for knowledge and awareness of the contents of the Compliance Program and Code of Ethics and Conduct.

Communications are made through physical or electronic means, reminding and clarifying some point of the Code of Ethics and Conduct, structured with programmatic content aimed at each target audience profile.

Moreover, operational leaders include some themes on cultural change in speeches or meetings with their teams.

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#### **5. CODE OF ETHICS AND CONDUCT**

The Code of Ethics and Conduct was created and approved to orientate the guidelines that must be followed by the employees and partners.

After the training, employees and third parties must certify that they are aware of the Code of Ethics and Conduct.

Copies of the document are made available in CBL areas and on its website for query and acknowledgment.

#### **6. REPORTING CHANNELS**

Reporting channels will be monitored by a third company to process the reports independently, protecting the anonymity of the complainant.

The communication methods are available through telephone (0800 740 4505), form filling ([canaldedenunciascbl@iaudit.com.br](mailto:canaldedenunciascbl@iaudit.com.br)), and URA (Audible Response Unit).

The use of reporting channels must be restricted to the communication of incidents or behaviors not compliant with the Compliance Program and/or the Code of Ethics and Conduct, as envisaged in the example below. We emphasize that the examples below are not limited to all the possibilities of non-compliant actions, but they are intended to facilitate the identification of certain actions.

Reports are assessed and handled by the Ethics Committee and they are monthly presented to CBL Board through a report sent by IAUDIT (the company that manages the complaints channel).

Actions regarding reports that require the approval of the Management Board are reported during Board meetings.

##### **A) Abuse of position or power for private interests**

- a) Support obtained by granting positions or advantages;
- b) Onlending of responsibilities or non-compliance with obligations;
- c) Data falsification for their own interest or the interest of others; and
- d) Other ways of personal benefit or benefit to third parties.

##### **B) Nepotism**

- a) Hiring family members for positions of trust;
- b) Hiring family members through a bidding process;
- c) Appointing family members who are not qualified for the job;
- d) Other ways of personal benefit or benefit to third parties.

CBL encourages local hiring as a way of continually developing the city and region, however, hiring relatives of employees must not be done in a way that creates a hierarchical or factual dependency or subordination between the people involved. Any hiring of first-degree relatives (spouse, children, grandchildren, parents, grandparents, siblings, and cousins) will be submitted to the Ethics Committee for approval regardless of hierarchical level.

##### **C) Conflicts of Interest**

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- a) Use of insider information;
- b) Activity incompatible with the position;
- c) Gifts from those with interests in decisions; and
- d) Other ways of advantage through the relationship with a private individual or legal entity with interests in decisions.

#### **D) Unethical Pressure**

- a) Retaliatory measures against potential reporting parties;
- b) Influence on subordinates to violate ethical conduct;
- c) Pressure related to influence peddling; and
- d) Other political or social pressures imposed on coworkers.

#### **E) Unjust Enrichment**

- a) Misappropriation;
- b) Receipt of money due to advantages;
- c) Other ways of resources used for one's own benefit (for instance, cars, working hours, office equipment, etc.).

#### **F) Electoral Donations**

Should the occasion arise, CBL may contribute money, services, or any valuable objects, directly or indirectly, to promote a specific candidate or political party in Brazil, observing the legislation in force. Unit Directors are compelled to inform the CBL Superintendent Director of their intention to donate and shall only do so after receiving approval from the Management Board.

#### **G) Relationship with public officers**

At least two CBL representatives must always attend meetings and hearings with public officers, whether for internal or external meetings. Reports of such Hearings must be presented to CBL's Board right after they take place.

## **7. INTERNAL INVESTIGATIONS**

### **7.1 Internal Investigations**

CBL understands the need for maintenance of disciplinary control, in a separate, autonomous, and impartial manner. Thus, reports of improper actions will be investigated in order to duly ascertain the accuracy of the facts, the severity of the occurrence, its circumstances, and the participation level of the involved parties.

Based on the findings, the Ethics Committee will determine sanctions to punish the behavior and maintain a culture of integrity among employees.

We reinforce the idea that the intelligence used during the investigative stage is impersonal and focuses on ascertaining the accuracy of the facts, while maintaining the secrecy of the reporting party and the reported party.

### **7.2 Accountability and penalties**

CBL will not condone any violations (felonious or unintentional) of the Code of Ethics in force and other rules that compose the Compliance Program.

Thus, without prejudice to the civil, criminal, and administrative responsibility applicable to each case, those who carry out, encourage, or participate in such

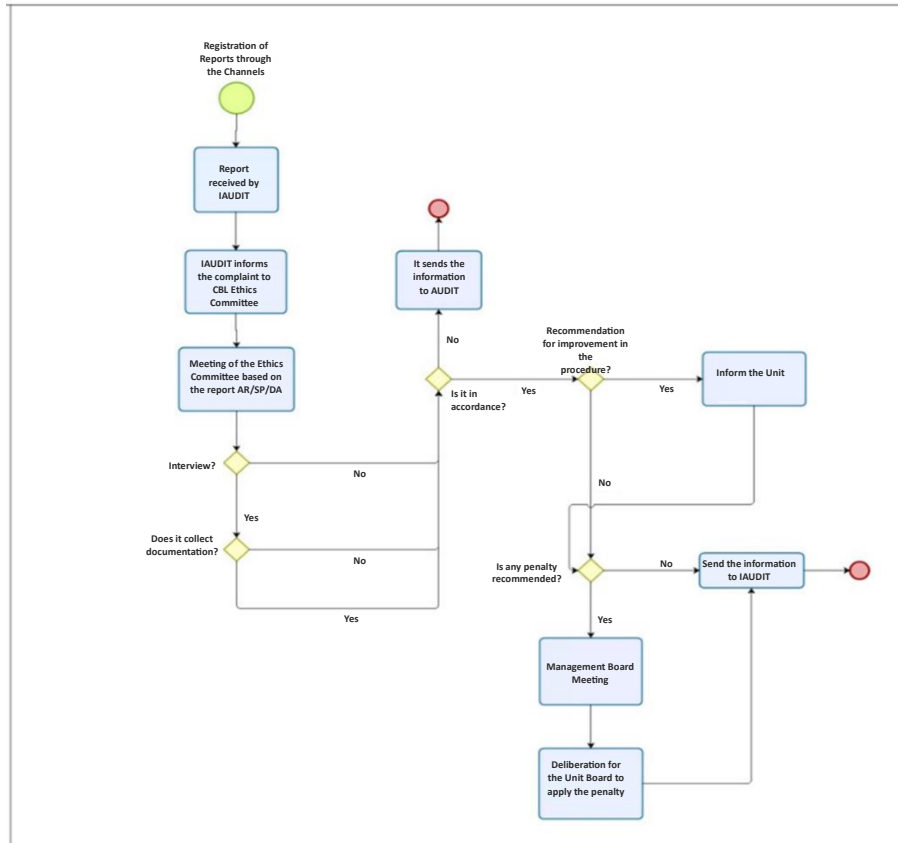
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violations, by action or omission, will be subject to the provisions of this topic.

**a) Reporting processes:**

Reports made to the reporting channel will be assessed according to the flow below:

**Reporting Flow**



**b) Possible Penalties**

The occurrence of acts that are not in accordance with the ethical rules defined in the CBL Compliance Program and other provisions of the Top Management may result in the application of the following penalties, whether cumulatively or otherwise:

1. Oral warning;
2. Written warning;
3. Temporary suspension of the offender's activities;
4. Dismissals without cause;
5. Resignation with cause;
6. Accountability under the terms envisaged in the Law.

It is important to emphasize that the penalty definition focus on the character and extent of the infraction as determined in the Internal Investigation process.

The analysis of the incident by the Ethics Committee will take into account the actual and possible damage caused, starting with the application of penalties on a pedagogical basis in order to prevent new occurrences, and the application of penalties of greater severity depending on the recurrence or seriousness of the act.

The Unit Management is responsible for the application of penalties.

## **8. PARTNER MONITORING**

CBL's commitment to the social responsibility, usually accepted by the Brazilian society, is also extended to its business Partners, in order to ensure compliance with laws, regulations, industry codes, and contractual terms with integrity, from clearance of the Partners' registration data to evaluation of the company and its executives' reputation.

The behavioral principles consistent with universally accepted standards are applied in all of CBL's business relationships in order to phase out liability by omission towards its consultants, advisors, suppliers, Partners, representatives, and resellers, as, for instance: human rights protection, safety and environment, prohibition of child or forced labor, money laundering, and bribery.

CBL has specific internal rules to regulate any and all contracts with suppliers of materials and services, employing guidelines, competencies, and controls applicable to the provisioning procedure.

An assessment is carried out before the contract, in accordance with **PA-DA-002** Supplies and **PA-DA016** Third Party Management (contracts) considering a general rule according to risk classification upon the character of the relationship, where CBL has the right to narrow its analysis as necessary. The assessment aims at understanding the financial status, corporate structure, consultation to the Portal of Labor and Social Security Ministry (struggle against slave labor), and history of unethical activities of possible Partners, and it is filed for future query, both of concluded and not contracted partnerships.

The relationships are formalized through contracts or buying orders that both parties are aware of, with accountability clauses and possible partnership cancellation when non-compliance with the above-mentioned assumptions is identified. Once an agreement has been entered into between the parties, the analysis takes the form of monitoring the guarantee of compliance with the established rules, in addition to the monitoring of legal qualification, verification of tax and labor regularity, technical/operational qualification and quality of services and products of the partners, according to the criteria described in the procedure PA-DA-002 Supplies.

We emphasize that CBL is available for business Partners to achieve help and counseling about actions related to CBL's Code of Ethics and Conduct, as well as to report situations involving presumed compliance breaches.

CBL considers the following as examples of non-conforming actions:

- Reputation or allegation of corruption or fraud;
- Agreements with significant or unusual payments;
- Relationships with PEPs (Politically Exposed Persons);
- Lack of transparency in the company's corporate structure that hinder the visualization of actual partners;
- Lack of commercial history, in other words, newly created companies without past commercial history;

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- Agreements or arrangements for payments in questionable or odd ways;
- Disclosure of confidential information, for all information generated or acquired by CBL is owned by it.

## 9. STRUCTURED MONITORING

CBL has the formalization, review, and release of the operational procedures and flows that encompass the proper actions by all the collaborators during the execution of their duties.

In view of that, CBL Compliance Program envisages the principle of structured monitoring and continuous improvement of the program pillars.

The Compliance Program structured monitoring applies steadfast assessment procedures, through regular audits, which aim at the estimation of expected results focused on the continuous improvement of the entire program. For such a purpose, find below the annual planning of the program monitoring:

| Annual Planning                       |             |   |
|---------------------------------------|-------------|---|
| Activity                              | Periodicity | Responsible People  |
| Ethics Committee Meeting              | Biannual    | Ethics Committee  |
| Compliance Agents Meeting             | Biannual    | Compliance Agent  |
| Report Channel Monitoring             | Monthly     | Ethics Committee / Compliance Agent                       |
| Release of the Managerial Report      | Biannual    | Superintendent Director                                   |
| External Audit                        | Annual      | External Consultant                                       |
| Review of Risks and Controls Matrices | Annual      | Compliance Agents / Responsible People for the Procedures |
| Monitoring of the Action Plan         | Annual      | Compliance Agents / Responsible People for the Procedures |

### 9.1 Release and Awareness

The release of the rules of the Compliance Program is extremely important and mandatory for the leaders, managers, and operational teams at CBL.

It is important to emphasize that the release of the program rules, the transparency in the management of Compliance procedures, is extremely important and mandatory for the leaders, managers, and operational teams at CBL.

| Activity  | Periodicity | Responsible People  |
|---|-------------|---|
| Awareness regarding the reporting channel                     | Annual      | CBL Team  |
| Training and release of the Code of Conduct and Ethics        | Continuous  | CBL Team  |
| Release of the reports and indicators to the Management Board | Annual      | Ethics Committee - Represented by the Superintendent Director |
| Campaign Against Moral and Sexual                             | Annual      | CIPAA   |

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|  |            |   |
|--|------------|---|
| Harassment   |            |   |
| Report to the Management Board - actions / status Compliance Program | Continuous | Ethics Committee - Represented by the Superintendent Director |

The activities envisaged above must be systematically complied in order to ensure the continuity and longevity of CBL Compliance program.



Term of Awareness - Compliance Program

I, \_\_\_\_\_,  
holder of the CPF [Private Individual Taxpayer Registration] No. \_\_\_\_\_, enrollment \_\_\_\_\_, hereby declare that I have received the training on the Compliance Program and that I have read and understood the contents that establish the rules of conduct adopted by CBL - Companhia Brasileira de Lítio, as well as the understanding of my rights and obligations as an Integral member of the Ethics Committee or Compliance Agent.

In accordance with the legal requirements envisaged, and the regulations and legislation in force, I have read and understood, in a clear, precise, and objective manner, all activities with which I am related, and I fully assume the responsibility for my acts associated with the set of rules envisaged herein.

I hereby declare my commitment to ensuring a transparent environment, spreading the culture of controls, and unquestionably keeping the adherence and compliance with the assumptions described herein, as well as in all the appropriate legislation.

Furthermore, I am fully aware that the structured reporting channels are destined to true and reliable reports, avoiding false accusations or false information.

I am also aware of the access to the Compliance Program on CBL website – [www.cblitio.com.br](http://www.cblitio.com.br) and the internal system of documents.

All information provided above is true, and I assume full responsibility for it.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
DATE