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1. INTRODUCTION

This document establishes **Brazilian Nickel's (BRN) Community Relations Policy**, which guides the company's interactions with the communities surrounding its operations. It reflects BRN's commitment to respect local rights, cultures, and needs, while promoting sustainable development beyond legal compliance. The Policy is aligned with national and international references such as the Good Practice Handbook on Stakeholder Engagement (2007) and Performance Standard No. 1 (2007), both from the International Finance Corporation (IFC), the Equator Principles (2020), the Socio-Institutional Relationship Guide of the Brazilian Mining Institute (IBRAM) (2022), and BRN's Engagement Guidelines.

BRN recognizes that a transparent, ethical, collaborative, and mutually respectful relationship with host communities is fundamental to the operational success, viability, and sustainability of its business. It also recognizes that maintaining a good relationship with communities is part of the path to securing the **Social License to Operate (LSO)**.

2. SCOPE OF FORMAL APPLICATION

This Policy applies to employees across all areas of Brazilian Nickel, regardless of their area of activity or hierarchical level, as well as to employees of its subsidiaries and members of the supply chain. This Policy must be practiced throughout all phases of the business lifecycle, including potential expansions and/or new projects.

For suppliers, compliance with this Policy constitutes a requirement for validation, monitoring/measurement or contractual sanction, and must also be taken into consideration in cases of renewal of current contracts or participation in new bidding processes.

3. PURPOSE

This Community Relations Policy guides all **Brazilian Nickel (BRN)** plans, programs, and other actions regarding opportunities, limits, and restrictions for interactions with stakeholders. It applies to all of its projects, at all stages of their lifecycle.

The instruments (plans, programs, and actions) derived from this Policy seek to strengthen transparency, promote dialogue, and build relationships based on trust. Furthermore, they also seek to align the company's operations with the principles of business sustainability, contributing to the prevention and mitigation of socio-environmental risks, as well as reputational damage, social liabilities, conflicts, schedule delays, construction stoppages, and potential legal proceedings.

4. GUIDELINES AND PRINCIPLES

This Policy and all plans, programs, and actions guided by it will be based on ensuring transparent, fair, and sustainable relationships with communities and other stakeholders. To this end, they shall be guided by the following principles, contributing to:

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- A. Ethics and Integrity;
- B. Human Rights;
- C. Sustainability;
- D. Transparency;
- E. Dialogue and Social Promotion;
- F. Community Participation; and
- G. Respect for Local Culture.

The following principles are designed to guide their practical application in community relations and in the preparation and alignment of related documents.

A. Ethics and Integrity

Act with honesty, fairness and responsibility in all interactions while upholding high ethical and moral standards that demonstrate BRN's commitment to social responsibility and sustainable development. This involves combating corruption, having clear codes of conduct, ensuring secure reporting channels, honoring both formal and informal commitments to strengthen credibility and trust, and maintaining quality in interactions and information management.

B. Human Rights

Respect the rights of communities, including the right to land, access to water, cultural expression, freedom of expression, education, work and health. Strive to generate social and economic value through meaningful consultations, including traditional and indigenous communities, while supporting culture, promoting local work and income generation, and prioritizing the hiring and training of the region's workforce.

C. Sustainability

Promote actions that balance economic, social and environmental dimensions, ensuring that Sustainability principles guide all company practices. This means adopting robust environmental management standards, strategically investing in social initiatives, and maintaining sound governance structures. This integrated approach reinforces the company's commitment to development, promoting positive impacts on communities and the environment.

D. Transparency

Maintain clear and accessible language and communication channels to inform communities about relevant aspects (positive or negative), especially those aspects that impact social dynamics and lifestyle habits. Transparency is manifested in the anticipation of communication on critical issues (projects, impacts, crises), in the maintenance of permanent dialogue channels and in the regular presentation of results, allowing the community to monitor and contribute with suggestions, strengthening trust.

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E. Dialogue and Social Promotion

Foster communication with communities and stakeholders through structured, two-way dialogue, listening actively, understanding needs, reassessing positions when necessary, and communicating with clarity. Maintain a firm commitment to honoring agreements and decisions, demonstrating openness to different perspectives and reinforcing the legitimacy and trust built through shared processes.

F. Community Participation

Encourage communities to take part in planning and developing solutions for processes that directly affect them, recognizing their role as active contributors to local development. This includes engaging local representatives in consultations, conducting participatory assessments, and co-designing initiatives to ensure that decisions and investments are informed by local priorities and strengthen community leadership.

G. Respect for Local Culture

Relationship strategies must follow an approach that respects local culture, ways of life, and the specific characteristics of each territory. This includes valuing cultural diversity, observing customs, recognizing local leaders, using accessible language, and tailoring programs to each group's traditions. It also means acknowledging the importance of the territory as a space of identity, memory, and belonging — and promoting it as a source of pride and development. Such an approach fosters more respectful, inclusive, and effective relationships with the community.

5. INTERFACE WITH OTHER CORPORATE POLICIES

To strengthen relationships with communities and internal guidelines, the application of this Policy must take into account the following documents:

- Code of Ethics and Conduct;
- Good Practice Handbook on Socio-Institutional Relationships;
- Consequence Management Policy
- Private Social Investment, Donations and Sponsorship Policy;
- Purchasing Policy

6. NON-CONFORMITY CLAUSE

Failure to comply with the guidelines set forth in this Policy will result in the execution of the consequence management procedures provided for in the contract. The use of BRN's reporting channels is encouraged to report any suspected non-compliance, ensuring confidentiality and protection of whistleblowers.

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7. RESPONSIBILITY FOR CONTACT WITH COMMUNITIES

The Community Relations (CR) Department is responsible for managing all interactions with communities. Its role is to ensure that dialogue and engagement activities are conducted in an organized, consistent, and respectful manner, aligned with the company’s principles and procedures.

When matters related to technical areas arise, the CR Department will conduct the initial meeting with stakeholders and, when appropriate, coordinate the involvement of the relevant department to address specific topics.

All employees and contractors are prohibited from negotiating or resolving community issues directly. Any concerns, demands, or potential conflicts must be immediately referred to the CR Department, which is solely responsible for managing and formalizing interactions and agreements with community representatives.

The person responsible for follow-up must record all interactions in the stakeholder management system and may contact the CR Department for clarification or guidance whenever needed.

Further details on recording procedures and relationship practices are provided in the Good Practice Handbook on Socio-Institutional Relationships.

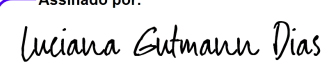
8. STATEMENT OF INSTITUTIONAL COMMITMENT

Brazilian Nickel (BRN) reaffirms its unwavering commitment to the principles and guidelines established in this Community Relations Policy. Our actions will reflect mutual respect, transparency, and the continuous pursuit of sustainable and collaborative development with the communities in which we operate. Adherence to this Policy is a strategic and ethical imperative for the entire organization.

It will be updated every two years, or whenever there are significant changes in context, such as a change in the project phase.

This Policy is effective and fully applicable from the date of its publication.

Approval signatures

Assinado por:

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Laurie Kelly
 Chief Sustainability Officer (CSO)

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