

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 1 of 8

INTERNAL CODE	BRN_POL_ISP-P&D_01
TITLE	Private Social Investment, Sponsorship and Donations Policy

VERSION CONTROLS

ACTION	NAME	POSITION	DATE
Created by:	Luciana Gutmann	Head of Communications and Engagement	09/Sep/2025
Approved by:	Laurie Kelly	Chief Sustainability Officer	03/Dec/2025

CONTENTS

- 1. INTRODUCTION.....2**
- 2. PURPOSE.....2**
- 3. SCOPE AND APPLICATION2**
- 4. ESSENTIAL CONCEPTS AND DEFINITIONS2**
- 5. GENERAL PRINCIPLES AND GUIDELINES3**
- 6. PROCESSES AND RESPONSIBILITIES3**
- 6.1 From the Requester3**
- 6.2 From the Communication and Engagement Department4**
- 6.3 From Other Actors5**
- 7. MODALITIES OF SUPPORT5**
- 7.1. Donations.....5**
- 7.2. Sponsorships5**
- 7.3. Private Social Investment (ISP)6**
- 8. PROHIBITIONS7**
- 9. PENALTIES7**
- 10. VALIDITY AND REVIEW8**

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------



**Private Social Investment, Sponsorship
and Donations Policy**

BRN_POL_ISP-P&D_01

Version: 01

Page 2 of 8

1. INTRODUCTION

This document establishes **Brazilian Nickel's (BRN) Private Social Investment (PISP), Donations and Sponsorship Policy**, reflecting the company's recognition that its operations must generate shared value for the communities in which it is present. It aims to promote social well-being, quality of life and local development, while fostering economic diversification beyond mining, by guiding initiatives for socioeconomic contributions using its own resources or through tax incentives.

2. PURPOSE

Expand BRN's positive social impact within its areas of operation by promoting sustainable local development and fostering economic diversification beyond mining. This policy aims to ensure equity, transparency, and accountability in the use of resources, while strengthening stakeholder trust in the company. It establishes clear criteria, procedures, and responsibilities for social investments, as well as parameters for partnerships that contribute to long-term community development and reinforce the acceptance and legitimacy of BRN's operations wherever it operates.

3. SCOPE AND APPLICATION

The guidelines of this Policy apply to all professionals associated with BRN's assets, regardless of hierarchical level, and guides relationships with communities, associations, social movements, and institutions (governmental and non-governmental) in this regard. It applies to any donation, sponsorship, or private social investment by BRN, its headquarters and subsidiaries, across all projects, and must be adapted to local specificities.

4. ESSENTIAL CONCEPTS AND DEFINITIONS

- **Private Social Investment (ISP):** Voluntary execution of private financial resources to social, environmental, cultural, and scientific projects of public interest, in a planned, monitored, and systematic manner, with a focus on generating a positive and lasting impact. This can be leveraged through tax incentives.
- **Sponsorship:** Voluntary transfer of financial or material resources to third parties, in exchange for institutional visibility or reputation enhancement consistent with BRN's brand and values. This includes support for events, projects, or activities that align with the company's strategic objectives.
- **Donation:** Voluntary and non-reimbursable transfer of financial, material, or service-based

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 3 of 8

resources, made without direct benefit or counterpart, to support social, philanthropic, or public-interest causes in alignment with BRN’s values and social responsibility principles.

- **Public Official:** An individual who holds, even if temporarily or without remuneration, a public office, position, or function, or who is a member of a political party or a candidate for public office. This definition also includes their immediate family members and first-degree relatives.
- **Government Authority:** Any public authority, agency, regulatory body, court, or judicial entity, whether in Brazil or abroad.
- **Requester:** Any individual or legal entity that submits a request for a donation or sponsorship to BRN, either directly or through its subsidiaries.

5. GENERAL PRINCIPLES AND GUIDELINES

All BRN social investment actions, donations, and sponsorships must comply with the following principles:

- **Strategic Alignment:** Prioritization of initiatives aligned with the Sustainable Development Goals (SDGs), especially numbers 8 and 11 (decent work and economic growth, and sustainable cities and communities, respectively).
- **Strategic Pillars:** Focus investments that promote Training, Entrepreneurship and Female Inclusion, contributing to lasting socioeconomic impact.
- **BRN Values:** Ensure alignment with BRN’s core values, material topics identified through its materiality assessment, and other internal policies and commitments.
- **Transparency and Governance:** Guarantee equity, transparency in the allocation of resources. All supported initiatives must include mechanisms for monitoring, evaluation, and reporting, with performance indicators disclosed in BRN’s sustainability reports.
- **No Favoritism or Personal Benefit:** Prohibition of those involved in the selection, execution, or management of social investments from receiving advantages or financial benefits from requesters. Small gestures of gratitude (less than R\$50.00) are permitted.
- **Local Prioritization:** Annual investment should prioritize actions located in the area of influence of projects developed by BRN.
- **BRN Sustainability Strategy:** The integration of initiatives with BRN's ESG goals will be considered a competitive advantage.

6. PROCESSES AND RESPONSIBILITIES

6.1 From the Requester

The requester, for any modality, must:

- Submit the request using a specific form, preferably 45 business days before the resource is

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 4 of 8

needed, for internal analysis and approval procedures.

- If requested by BRN, submit at least two reference quotes.
- Have the ability to implement, manage and develop actions or projects.
- Provide receipt of resources or materials.
- Present evidence of use in accordance with the commitment made, including performance reports, photos and data on beneficiaries when applicable.
- Authorize BRN to publicize the initiative on its communication channels.
- Adopt the BRN Brand Manual in publicizing, ensuring the correct application of the logo.

6.2 From the Communication and Engagement Department

The Communication and Engagement Department is responsible for:

- Receiving, evaluating and providing formal feedback on all requests (approved or not) within 10 business days.
- Requests will be handled according to their budget status:
 - Pre-approved budget items: requests for funds already anticipated and approved in the annual budget are automatically considered approved. The Communication and Engagement Department will proceed with formalizing the transfer and executing the planned activities.
 - Additional or unbudgeted funds: requests that require additional resources or exceed the approved annual budget will be submitted to the committee for evaluation. These will follow the specific process for requesting budget supplementation and/or reallocation, in line with BRN’s financial policy.
- Coordinating an evaluation and approval committee to evaluate and approve requests. This committee will be composed of representatives from the departments operating in the territory: Community Relations, Health and Safety, and Environment, and the legal department, aiming for a comprehensive and multidisciplinary analysis of the proposal.
- Contacting the purchasing department to handle approved requests.
- Monitoring and evaluating accountability, ensuring the correct allocation of resources).
- In the case of donations of physical items owned by BRN (such as materials available at the Central of Disposable Materials - CMD), it must be carried out upon the signing of a donation receipt.
- Ensuring proper filing and retention of all documents including signed delivery receipts for all donated physical items.
- Evaluating the maintenance of regular donations, approving them based on performance and accountability.
- Inspecting and ensuring the correct use of company brands in all materials and activities associated with sponsorships.

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 5 of 8

6.3 From Other Parties

Evaluation and Approval Committee:

- **Function:** The Evaluation and Approval Committee will be responsible for analyzing and deliberating on requests that exceed the annual budget or involve sensitive financial, legal, and strategic aspects. This committee will ensure a multidisciplinary and integrated evaluation.
- **Composition:** The committee will be led by the Communication and Engagement Department and will include representatives from the following areas:
 - Management departments operating in the territory: Community Relations and Health and Safety, Environment, and other relevant departments.
 - Legal Sector.
- **Evaluation:** The committee will receive a monthly report containing all requests for review and approval. In cases where the evaluation results are evenly split, the Communication and Community Relations Department will make the final decision. All deliberations and decisions must be properly documented to ensure registration and traceability.

7. MODALITIES OF SUPPORT

7.1. Donations

- **Public:** Can be carried out for individuals or legal entities.
- **Requirements:** The requester cannot be linked to situations that prevent the donation, such as: legal problems, lack of accountability for previous support, inappropriate purpose or any circumstance that goes against BRN's guidelines and values.
- **Form of Transfer:** BRN will be responsible for the acquisition and transfer of the object or asset to the beneficiary institution, and direct transfer of funds should be avoided whenever possible. In cases where alternate arrangements are considered, proper accountability procedures must be in place.
- **Prohibitions:** Donations are strictly prohibited in exchange for favoritism, undue advantage, or to influence the decision of a Public Official or Government Authority. Political donations to parties, campaigns, or candidates, or made by employees on behalf of BRN, are prohibited.

7.2. Sponsorships

- **Public:**
 - **Nonprofit organizations,** whose corporate purpose is compatible with the sponsorship proposal, and which promote activities aligned with BRN's values and strategic objectives.
 - **Individuals:** with relevant work in the following areas:
 - **Sports:** Athletes who promote education, health and teamwork.

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 6 of 8

- **Education:** Students or researchers with projects aligned with BRN's goals.
 - **Culture:** Artists and cultural creators who encourage inclusion, local identity, and social values.
 - **Innovation:** Professionals or entrepreneurs who develop impactful technological or social initiatives.
 - **Environment:** Activists or local leaders involved in promoting practices for environmental sustainability.
 - **Social or educational influencers:** People with significant reach or positive community impact on issues related to BRN's values.
- **Requirements:**
 - Not fall under any of the prohibitions set forth in this policy
 - Be up to date with the rendering of accounts for previous BRN support (when applicable)
 - Present a history of consistent performance aligned with BRN's values and strategic goals, preferably with social and community commitment.
 - Consideration for sponsorship must be clearly explained by the requester.
 - Proof:
 - **Nonprofit organizations:** Through the issuance of an invoice or other mandatory tax document and submission of reports and/or documentation proving the use of sponsored resources.
 - **Individuals:** Through specific contracts that guarantee accountability, delivery of reports, and/or supporting documentation of the use of sponsored resources.
- **Prohibitions:** Sponsorship is strictly prohibited for:
 - Influencing decisions of public officials or government authorities.
 - Granting political sponsorships (parties, campaigns or candidates).
 - Any purpose that involves personal favoritism or undue advantage.
 - Requests associated with individuals or institutions that violate current laws or compromise BRN's reputation.

7.3. Private Social Investment (ISP)

- **Nature:** Complements and supports local development, without replacing the responsibilities of the government. Applies to all BRN projects throughout their lifespan.
- **Public:** Only regularly constituted, non-profit entities with a corporate purpose compatible with the project.
- **Requirements:** Not fall under any of the prohibitions, be up to date with the rendering of accounts for previous BRN support and have a history of performance aligned with BRN's values and strategic goals, preferably with civic commitment to the community.

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 7 of 8

- **Exclusions:** Socio-environmental programs that comply with license conditions are not considered ISP. Direct investment in infrastructure improvements is not targeted by ISP, as it is covered by the Basic Environmental Plan (PBA).
- **Support for Public Entities:** BRN can support public institutions (e.g., city halls) in health, safety, training, and sanitation initiatives through agreements with partners.
- **Project Selection:** The selection of ISP projects will be carried out by the Communication and Engagement Department team, considering the guidelines, pillars, target audience, and proposed value.

8. PROHIBITIONS

BRN will not make donations, sponsorships or ISP to:

- Activities that cause negative socio-environmental impact encourage violence, child labor or slavery-like conditions, discrimination, or animal cruelty.
- Activities of a political-electoral or partisan nature.
- Activities that promote gambling, have speculative purposes, or encourage the consumption of alcohol, cigarettes, or other drugs.
- Activities that use names, symbols, or images for personal promotion of Government Authorities, public officials or BRN employees.
- Activities that pose risks to the physical integrity or health of participants/public/BRN employees, or to the preservation of public or BRN assets/structures.
- Projects from entities that are default, untrustworthy, or have registration restrictions with BRN or Government Authorities.
- Requests that aim to benefit oneself and not the collective good.
- Requests from entities with family ties (up to the 2nd degree by blood relation, such as parents, children and siblings, and up to the 3rd degree by affinity, such as sons-in-law, daughters-in-law, parents-in-law or spouses of close relatives) with BRN managers or approvers.
- Requests from entities that, having already benefited from BRN, did not render proper accounts or had their accounts rejected.
- Requests made by individuals (exclusive to ISP or Sponsorships).
- Requests with exclusively religious purposes, except when these are intended for projects of widely recognized public interest (e.g., social actions promoted by religious bodies with collective and non-partisan objectives).

9. PENALTIES

Failure to comply with this Policy by BRN's employees constitutes a violation of the company's Code of Ethics and Conduct, subjecting the offender to the sanctions provided for in the group's Consequence Management Policy.


Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------

	Private Social Investment, Sponsorship and Donations Policy	BRN_POL_ISP-P&D_01
		Version: 01
		Page 8 of 8

10. VALIDITY AND REVIEW

This Policy is effective from the date of its publication. The Communication and Engagement Department is responsible for issuing and reviewing this Policy, as well as monitoring compliance with it. Its review must be conducted every two years or at any time if there are significant changes in context or strategy.

Approval signatures

Assinado por:


2DCFC1B46506423...
Luciana Gutmann
 Head of Communication and Engagement

Signed by:


8D73BD19437A401...
Laurie Kelly
 Chief Sustainability Officer

Produced by: Communication and Engagement Department	Code: BRN_POL_ISP-P&D_01	Approved by: Laurie Kelly
--	------------------------------------	-------------------------------------