CBL – Companhia Brasileira de Lítio
CBL Refinaria SA

Compliance Program

Dear Colleagues,

The corporate values and principles of Companhia Brasileira de Lítio (CBL) guide how we conduct ourselves and how we build relationships in business.

That is why CBL's Board of Directors has formally approved, and fully supports, every initiative aimed at implementing this Compliance Program.

A culture of mutual trust, one that encourages the open exchange of ideas at every level of the organization, creates the kind of workplace in which this Program can succeed. We count on every employee to speak openly and to take an active part in making decisions that reflect CBL's values.

Protecting and promoting CBL's reputation is everyone's responsibility, so we ask that you take the time to read and fully understand our Code of Ethics and Conduct.

Whenever you are unsure about the right way to act in business or about any compliance matter, ask for help and guidance.

As citizens, we believe it is our duty to uphold principles that strengthen transparency and ethics and help build an increasingly fair society.

Rua Tripoli, 92 – Suites 131/134 – 13th floor
Vila Leopoldina – São Paulo – SP
ZIP 05318-010
São Paulo – Brazil
T: +55 11 3837-0075 / +55 11 3649-0775
www.cblitio.com.br

Rodovia BR-367 – Km 276
P.O. Box 047 – Araçuaí – MG
ZIP 39600-000
Minas Gerais – Brazil
T: +55 33 3731-3351

Rodovia BR-116 – Km 3.5
Divisa Alegre – MG
ZIP 39995-000
Minas Gerais – Brazil
T: +55 11 3755-8000

TABLE OF CONTENTS

REVISION HISTORY **4**

PURPOSE **4**

SCOPE **5**

GLOSSARY **6**

COMPLIANCE STRUCTURE **8**

ETHICS COMMITTEE AND COMPLIANCE OFFICERS **10**

CORPORATE INTEGRITY **11**

PILLARS OF THE COMPLIANCE PROGRAM **14**

2. RISK ASSESSMENT **15**

3. INTERNAL CONTROLS **15**

4. TRAINING AND COMMUNICATION **16**

5. CODE OF ETHICS AND CONDUCT **17**

6. WHISTLEBLOWER CHANNELS **17**

7. INTERNAL INVESTIGATIONS **19**

8. THIRD-PARTY MONITORING **21**

9. STRUCTURED MONITORING **22**

REVISION HISTORY

Version	Date	Description	Owner
1.0	12/16/2019	Initial release	Ethics Committee
2.0	02/06/2020	Organizational chart update	Ethics Committee
3.0	03/30/2021	General revision	Compliance Officers
4.0	10/11/2023	General revision – ESG / ABNT NBR 16001 alignment	Compliance Officers
5.0	01/31/2025	Organizational chart update; Section 3 – Risk Assessment; Update to Section 9 – Structured Monitoring	Compliance Officers
6.0	09/21/2026	Purpose – inclusion of CBL Refinaria S/A; General revision	Compliance Officers

PURPOSE

Committed to responsible corporate conduct, CBL – Companhia Brasileira de Lítio / CBL Refinaria SA uses this document to set out the core principles and tools required to run and sustain its Compliance Program, with the aim of continuously improving its relationships with employees, partners, investors, suppliers, customers, government agencies and the general public.

By developing, communicating and applying the concepts in this document, CBL seeks to show its employees how much importance it places on business ethics and on transparent conduct toward its stakeholders, guided by our culture, our mission and our core values of integrity, sustainability, honesty, transparency and sound conduct.

The measures described here make up a set of practices and behaviors that comply with laws, regulations and procedures in every area in which we operate, strengthening our corporate governance framework with integrity, competence, efficiency and competitiveness.

Key measures include the Code of Ethics and Conduct, a standing Ethics Committee, an independent whistleblower channel open to internal and external audiences, a policy governing interactions with public authorities, a defined supplier evaluation process, and training designed to embed and strengthen CBL's culture.

The Ethics Committee's work is grounded in leading national and international practices in governance, risk management and ethics, and is fully aligned with applicable law.

Everyone within the organizational structure will confirm that they have read and understood this document by signing the acknowledgment form at the end.

SCOPE

Recognizing the importance of setting ethical standards for both internal and external relationships, CBL has adopted this document for use across all of its units and by all of its employees, including leaders and members of the Board of Directors, as well as anyone else who may represent CBL's interests, such as investors, third parties and partners.

These principles are fully aligned with CBL's current policies and standards, which are kept up to date, written in clear and accessible language, and made available to all employees. Compliance with them is essential to preventing, detecting and responding to misconduct by people, processes or systems within CBL's operations.

The Board of Directors is responsible for ensuring that, in proportion to the company's risk exposure, processes are fit to support the Compliance Program across the entire organization. This includes defining the criteria and methods needed to manage, operate and monitor those processes effectively, taking into account the resources and information required to support them, and raising employee awareness of why a compliance system matters and why it must be applied in practice.

Senior Management is responsible for ensuring that the risks within our professional responsibilities are consistently and properly assessed and managed.

Managers are responsible for selecting, guiding and monitoring the employees who report to them, and for including compliance criteria in those employees' performance reviews.

Every employee is responsible for ensuring that their business conduct complies with applicable policies and standards and with CBL's integrity standards, and for understanding their own role in maintaining compliance.

GLOSSARY

To ensure consistent terminology, the following capitalized terms used in this document have the meanings below:

“Senior Management” (Top Management): the person or group of people who direct and control an organization at the highest level.
Note 1: Senior Management has the authority to delegate responsibilities and allocate resources within the organization.
Note 2: If the scope of the management system covers only part of an organization, Senior Management refers to those who direct and control that part of the organization.
Note 3: For the purposes of this document, “Senior Management” refers to the highest level of executive management.

“Compliance”: from the verb *to comply*. In this document, the term refers both to acting in accordance with internal and external laws and regulations and to the function performed by the company, its departments and its employees to meet the key requirements, or “pillars,” described herein.

“Control” or “Internal Control”: a mechanism or activity designed to mitigate risk, promoting the effective and efficient use of resources, the reliability of financial information, and compliance with applicable laws and standards. Controls may be preventive or detective and are performed more or less frequently depending on the risk level defined by CBL.

“Board of Directors”: the body of professionals elected by the shareholders and appointed to make strategic decisions at CBL.

“Risk”: the effect of uncertainty on objectives.
Note 1: An effect is a deviation from what is expected, whether positive or negative.
Note 2: Uncertainty is the state, even partial, of lacking information about, understanding of, or knowledge of an event, its consequences or its likelihood.

“Risk Level”: the level of risk that CBL considers acceptable or is willing to take on in pursuit of its objectives.

“Internal Standard”: documentation prepared and issued by leadership to provide the instructions and information needed to achieve CBL’s objectives. Internal standards are divided into policies, procedures and work instructions.

“Process”: a sequence of activities carried out by the company, involving one or more departments, people and systems, to achieve defined objectives.

“Risk” (business context): in a corporate setting, risk is the combination of the likelihood that an event will occur and its negative impact on business objectives. Negative impacts may be financial, operational, strategic or compliance-related.

“System”: software used to centralize and integrate CBL’s data and processes.

“Third Party” or “Partner”: any individual or legal entity that acts on behalf of, in the interest of, or for the benefit of CBL, or that provides services or supplies other goods to CBL, as well as business partners that provide services directly related to obtaining, retaining or facilitating business, or to conducting CBL’s affairs. This includes, without limitation, distributors, agents, brokers, customs brokers, intermediaries, supply chain partners, consultants, resellers, contractors and other professional service providers.

“Stakeholder” (also “interested party”): a person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.

“Compliance Culture”: the values, ethics, beliefs and conduct that exist throughout an organization and interact with its structures and control systems to produce behavioral norms that support compliance.

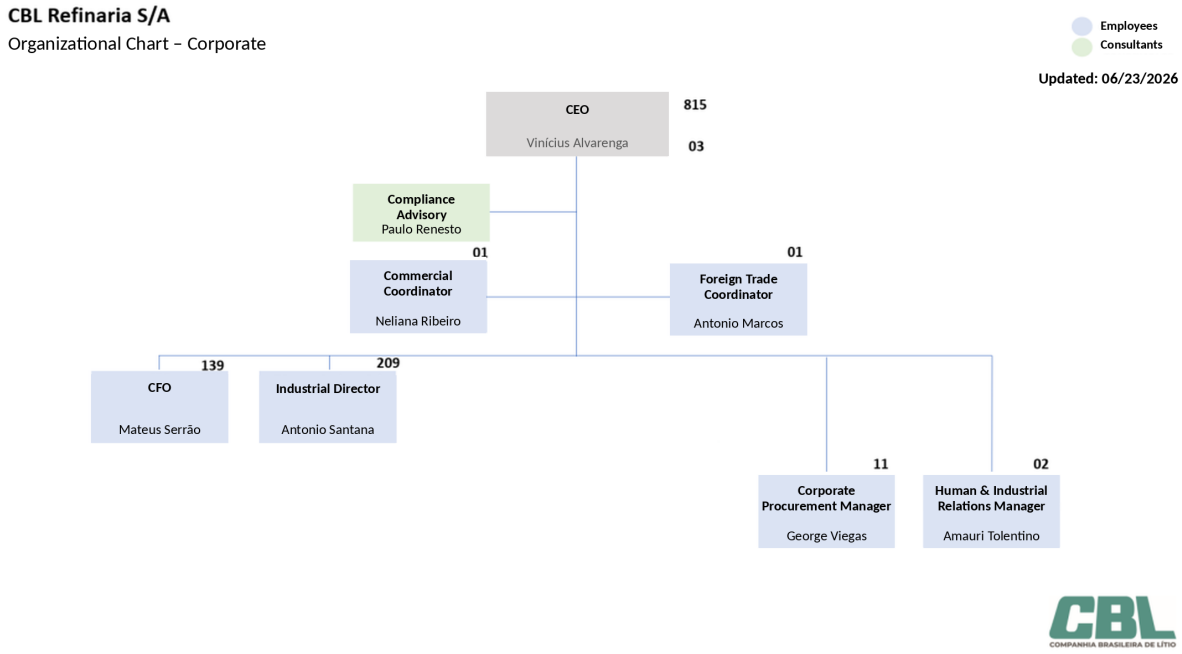
“Third Party” (independent): a person or body that is independent of the organization.
Note 1: All business partners are third parties, but not all third parties are business partners.

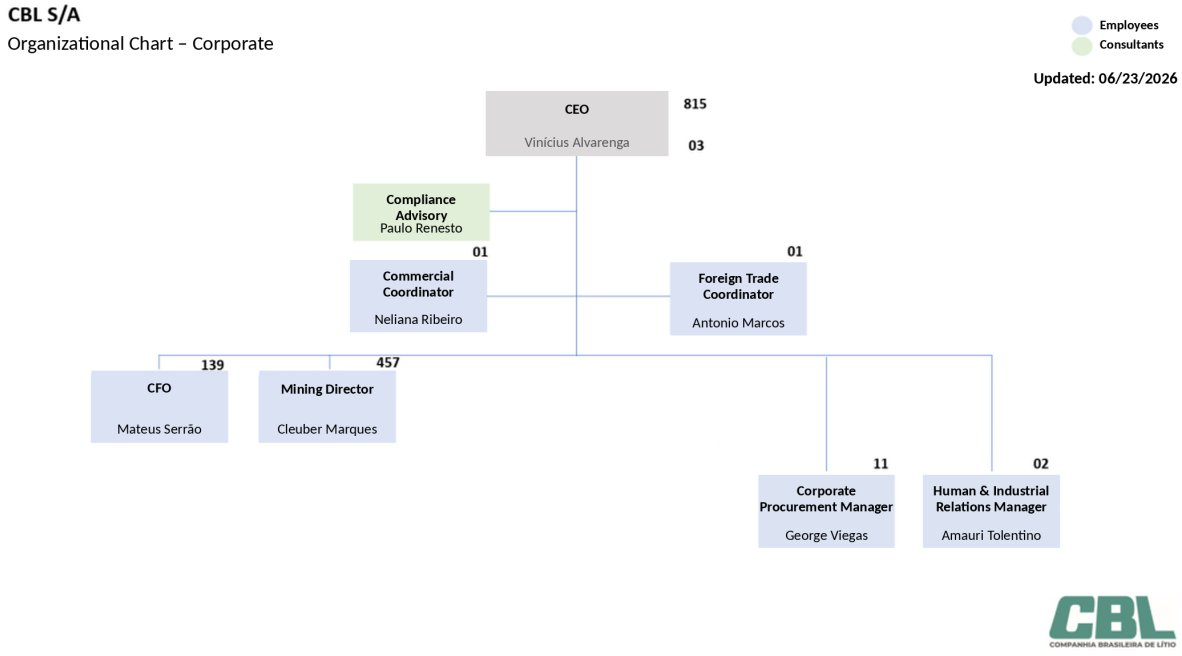
COMPLIANCE STRUCTURE

CBL's strategic plan has adopted compliance and ethics guidelines as fundamental drivers of the organization.

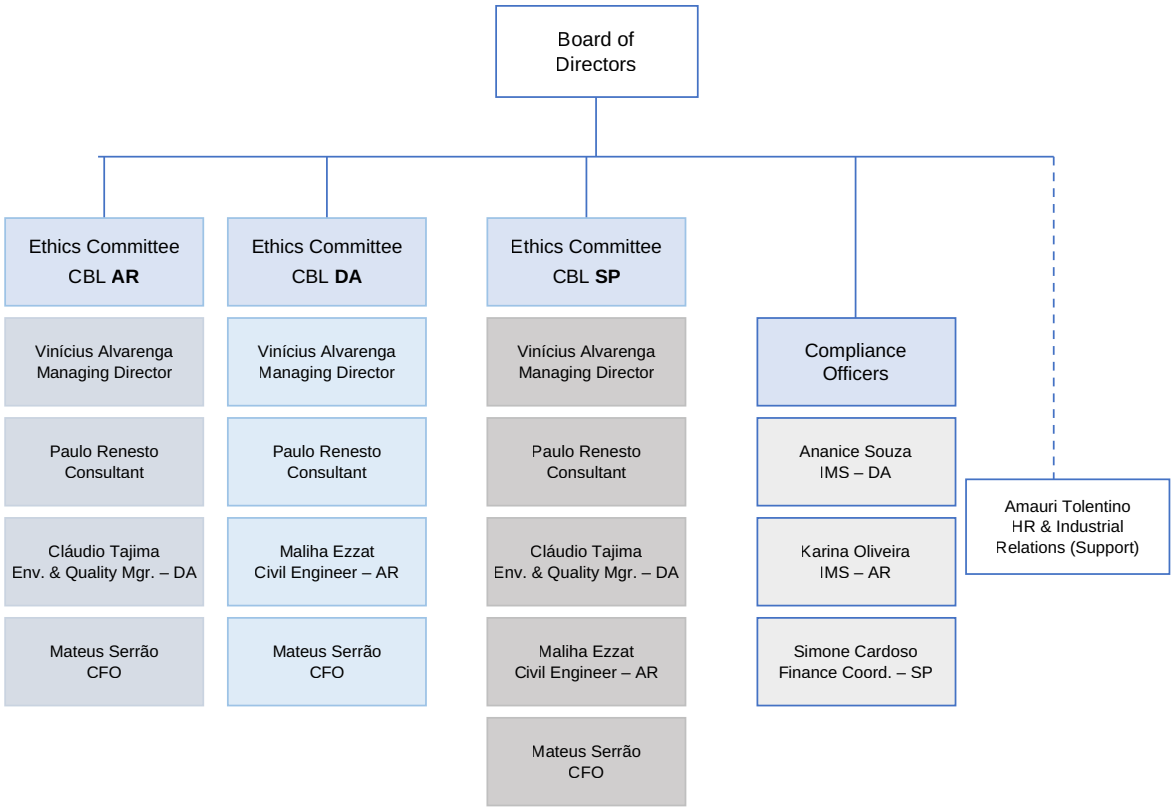
CBL's compliance structure is currently led by the Managing Director, reports directly to Senior Management, and is supported by several departments, as shown in the organizational charts below:

CBL General Organizational Chart – AR / SP / DA Units





CBL Compliance Program – Functional Organizational Chart



All CBL managers, including directors, managers, coordinators, supervisors and senior professionals, must show active, visible, consistent and lasting commitment through the standard of conduct and behavior expected across the organization.

Senior Management must encourage behavior that builds and supports compliance, and must prevent and refuse to tolerate any conduct that undermines the Compliance Program.

Senior Management's commitment can be demonstrated through simple actions, such as taking part in and supporting the upkeep of the program, promoting and requiring training, and participating actively and impartially in identifying potentially harmful conduct. These and similar actions show not just formal adherence to the Compliance Program, but a genuine, visible commitment to integrity and ethics.

The program is continuously improved, and CBL's governance model is clearly communicated, through training and through notices shared on bulletin boards, information displays, safety and health talks, newsletters, emails and other communication channels at every site: headquarters, the mine and the chemical plant/refinery.

ETHICS COMMITTEE AND COMPLIANCE OFFICERS

The Ethics Committee is responsible for monitoring how the rules of ethical conduct are applied, by receiving, reviewing and investigating reports.

The Ethics Committee is made up of the following employees:

AR	DA	SP
Paulo Renesto	Paulo Renesto	Paulo Renesto
Vinícius Alvarenga	Vinícius Alvarenga	Vinícius Alvarenga
Cláudio Tajima	Maliha Salha	Cláudio Tajima / Maliha Salha
Mateus Serrão*		
People management support – Amauri Tolentino**		

(*) CFO Mateus Serrão will stand in for any Ethics Committee member who is absent due to medical leave, vacation or other reasons.

The Board of Directors and the Executive Board reviewed which employees fit the Compliance Officer profile, and the nominees went through a validation process that considered their communication skills, impartiality and reputation among their colleagues.

The appointed Compliance Officers are:

- Simone Cardoso – Finance Coordinator – CBL SP;
- Karina Nikovschi – IMS Coordinator – CBL AR;
- Ananice Souza – IMS/ESG Coordinator – CBL DA.

Compliance Officers report directly to the Managing Director on all matters related to the Compliance Program.

Their role is to monitor, review and improve internal standards and professional ethics, and to provide training and raise awareness of the rules of ethical conduct, helping to spread a culture of compliance throughout the company.

They are also responsible for championing integrity and transparency, preserving the company's culture and overseeing how the Compliance Program's guidelines are applied, as well as ensuring discretion and anonymity in any investigation that may be required.

The HR & Industrial Relations Department supports Ethics Committee members in investigating reports. It acts impartially, provides relevant information about the employees involved in a report, and proposes actions such as training and awareness initiatives that contribute to employee development.

CORPORATE INTEGRITY

Article 41 of Decree No. 8,420/2015 defines an integrity program as follows:

> *"Within a legal entity, an integrity program consists of the set of internal integrity, audit and whistleblowing mechanisms and procedures, together with the effective application of codes of ethics and conduct, policies and guidelines, aimed at detecting and remedying misconduct, fraud, irregularities and unlawful acts committed against domestic or foreign public administration."*

In line with this definition, CBL is committed to corporate integrity, which it understands as ethical behavior consistent with the Code of Conduct and a commitment to doing business in a socially responsible way.

Above all, we believe corporate integrity means complying with all applicable laws and regulations, as well as with the high integrity standards set by Senior Management. Meeting these standards is therefore a prerequisite for CBL's long-term success.

Keep in mind that what constitutes appropriate behavior must be assessed case by case, based on the relevance of each situation. CBL therefore observes the principles set out in national and international legislation, the Universal Declaration of Human Rights and ISO standards, including in particular:

- Law No. 12,846 of August 1, 2013, known as the Brazilian Anti-Corruption Law or Clean Company Act, which established strict administrative and civil liability for legal entities for wrongful acts committed in their interest or for their benefit against domestic or foreign public administration;
- Decree No. 8,420 of March 18, 2015, which regulates the administrative liability of legal entities for acts committed against domestic or foreign public administration;
- CGU Ordinance No. 909 of April 7, 2015, which sets out how legal entities' integrity programs are evaluated;
- Law No. 12,529 of November 30, 2011, known as the Brazilian Competition Law, which addresses the prevention and punishment of violations against the economic order;
- ABNT NBR 16001:2012 Social Responsibility – Management System – Requirements;
- ABNT NBR ISO 26000:2010 Guidance on Social Responsibility;
- ABNT NBR ISO 37001:2017 Anti-Bribery Management Systems – Requirements;
- ABNT NBR ISO 37301:2021 Compliance Management Systems – Requirements;
- Universal Declaration of Human Rights;
- Regulatory Standard No. 1 (NR-1) – General Provisions on Occupational Safety and Health;
- Regulatory Standard No. 5 (NR-5) – Internal Commission for Accident and Harassment Prevention (CIPAA);
- Law No. 13,709 of August 14, 2018, the Brazilian General Data Protection Law (LGPD), which governs the use and protection of personal data;
- Law No. 14,457 of September 21, 2022, which established the *Emprega + Mulheres* Program to promote the hiring and retention of women in the workforce through a range of measures.

Other factors that guide our Compliance Program are outlined below.

These factors have been reviewed and built into CBL's internal procedures and its Code of Ethics and Conduct, which have been shared with all employees, partners and suppliers.

CBL maintains a framework of procedures and internal controls designed to mitigate the risk of misconduct and ensure compliance with the laws that apply to its business, using the following factors as a guide for the internal requirements set out in its procedures:

- **Business with government entities:** any business dealings with municipal, state or federal government entities require Ethics Committee approval before a proposal for a commercial contract involving the public sector is submitted. Such proposals must also be reviewed by Legal, as must any responses to inquiries and investigations.
- **Discrimination and harassment:** any act based on race, color, religion, sex, sexual orientation, origin, age, disability or any other ground prohibited by applicable law is forbidden. This is consistent with the ILO Discrimination (Employment and Occupation) Convention and with the Universal Declaration of Human Rights, which proclaims that all human beings are born free and equal in dignity and rights and that everyone is entitled to all the rights set forth in the Declaration without distinction of any kind, in particular as to race, color or national origin.
- **Conflicts of interest:** we focus on identifying situations in which an individual's personal interest is, or appears to be, contrary to or interferes with the proper performance of their duties, such as influencing contracts, using CBL resources or confidential information for personal gain, or diverting business opportunities.
- **Promotional gifts:** promotional gifts may be given or received no more than twice in any 12-month period, must have no commercial value, and may not exceed R$ 401.00, an amount adjusted annually for inflation. When a gift must be declined, do so politely. If declining would cause embarrassment, hand the gift over to the Compliance Officers, who will donate it to one of the charities CBL supports.
- **Gifts and entertainment:** gifts, meals and invitations to entertainment events from unauthorized companies or individuals may not be accepted. When declining, do so politely.
- **Hospitality:** hospitality may be offered or accepted only where required to fulfill a contract, and must be properly recorded and addressed in the planning and execution tracking of the relevant project.
- **Bribes and kickbacks:** cash gifts may never be offered or accepted under any circumstances. Any act that could be seen as an attempt to influence the recipient's impartial judgment in order to win favorable terms in a negotiation will be treated as bribery and may result in criminal prosecution. CBL will cooperate fully with any related investigation or criminal proceeding.
- **Protection and proper use of assets:** theft, waste and misuse of company assets, such as computers, tools, equipment, machinery and vehicles, are prohibited. Conducting personal business on CBL premises is also not permitted.
- **Sponsorships and donations:** sponsorships and donations require approval from the Legal Representative and at least two Board members when:

    a) they are NOT included in the annual Business Plan approved for that fiscal year and exceed R$ 10,000;

b) amounts below R$ 10,000 must be approved by the Unit Director and the Legal Representative.

- **Financial integrity:** accounting books and records must be kept in accordance with legal standards and requirements, so that they always reflect every transaction carried out during CBL's operations, as well as the valuation of its assets and liabilities. This allows revenue and expenses to be monitored and any unusual transactions or changes in patterns to be identified, such as a sharp increase or decrease in amounts agreed in contracts or service agreements.
- **Information security and data privacy:** employees with access to personal information about employees, suppliers, customers, partners, third parties and any other individuals connected with CBL must ensure that such information is collected, processed, stored and transferred with appropriate confidentiality safeguards, and that it is accessible only to people with a legitimate business need. Where appropriate, employees and customers must be asked to authorize the collection and use of their personal information.
- **Unions and workers' rights:** we respect freedom of association, the right to collective bargaining, the collective agreements signed with the unions that represent our workers, and workers' rights, whether provided for in the Constitution, in other legislation or in regulations. Informal (off-the-books) employment and the denial of any rights, especially those related to workers' health and safety, are strictly prohibited, whether in our direct or indirect workforce.
- **Community and volunteer activities:** CBL encourages and supports volunteer work, and employees may take part in such activities personally, provided that:
  - ✓ it does not interfere with their duties and responsibilities at the Company;
  - ✓ the activities take place outside working hours;
  - ✓ the employee makes it clear that they are acting in a personal capacity and does not involve the Company's name;
  - ✓ the personal contribution is not made with the aim or expectation of receiving a favor in return.
- **Prohibition of slave, forced and child labor:** CBL does not tolerate slave labor or conditions analogous to slavery, forced labor or child labor at any stage of its production chain. Accordingly, every hire and every contract must be based on the other party's commitment never to use child labor, slave labor or labor in conditions analogous to slavery.
- **Environmental responsibility:** CBL strictly complies with applicable environmental legislation and requires all its employees and contractors to do the same. Everyone must avoid committing environmental crimes or engaging in any practice that could harm the environment. In the unlikely event of an environmental incident, the competent authorities must be formally notified, and all appropriate measures must be taken to mitigate the damage and, as far as possible, restore the environment to its previous condition.
- **Fair competition:** CBL is committed to full compliance with Law No. 12,529/2011 and all other competition laws, maintaining fair and transparent business relationships with customers and suppliers and prohibiting abusive practices, unjustified discrimination and the imposition of unfair terms.

PILLARS OF THE COMPLIANCE PROGRAM

CBL views its Compliance Program as a key factor in measuring and maximizing results, given its complexity and the ongoing need to adapt internal procedures and process technology. This is achieved through:

- clearly defined roles and responsibilities;
- active, effective communication and coordination channels;
- proactive identification and assessment of new regulations and management of the obligations they create;
- procedures and guidelines that help CBL's teams carry out their responsibilities in line with established policies;
- spreading a culture of compliance throughout the organization;
- monitoring situations in which compliance risks are high and require attention or change;
- tools and technologies integrated across the business, providing a consistent view of market challenges and trends.

In short, the principles behind each pillar of CBL's compliance function are:

Pillar	Description
Senior Management support	Senior Management must govern and provide the resources needed to implement and maintain the Compliance Program, establishing a culture of adherence to rules and regulations and of prevention, detection and response to compliance failures.
Risk assessment	Ongoing risk assessment identifies the main vulnerabilities in business processes and any signs that the Company is exposed to regulatory non-compliance.
Internal controls	Internal controls must set the rules for reviewing and approving activities in order to minimize operational, financial, strategic and compliance risks.
Training and communication	Ongoing training and communication to promote the values, standards, policies and procedures for ethical business conduct and integrity.
Code of Ethics and Conduct	The Code of Conduct must set out the rights and obligations of every level of the organization, reflecting each employee's commitment to the Compliance Program.
Whistleblower channels	Whistleblower channels must provide confidential and anonymous ways to report misconduct or suspected misconduct.
Internal investigations	Internal investigations must be conducted impartially, assessing reports of misconduct, ensuring that the facts reported are verified and that disciplinary or corrective measures are properly applied.
Third-party monitoring	Third-party monitoring must classify the risk level of third parties and service providers involved in operations, refining contract clauses or the hiring process to determine the level of exposure.
Program monitoring	Program monitoring must involve ongoing evaluation through regular audits to measure expected results, with a focus on continuous improvement of the entire Compliance Program.

1. SENIOR MANAGEMENT SUPPORT

To ensure effective oversight, with enough autonomy to prevent, detect and penalize conduct that is inconsistent with its ethical principles, CBL involves its leadership in strengthening the control environment by defining the risk level and issuing internal standards designed to mitigate the main compliance risks under the Compliance Program.

In addition, Senior Management:

- appoints the Ethics Committee and the Compliance Officers to assess and decide on Compliance Program matters, including reports received, with management autonomy and the resources needed to carry out this work;

- requires leadership to take part in training and communication strategies to keep the Compliance Program active and effective, formalized through training and approval of formal communication methods;
- requires leadership to take part in third-party monitoring, centralizing decisions based on the established risk level;
- emphasizes the importance of supporting internal and external audits, which are the main basis for decision-making and for timely action to keep this Program on track.

2. RISK ASSESSMENT

2.1 Process mapping and risk identification

Mapping CBL's processes provides a systematic view of how administrative and operational activities are carried out, making it possible to identify the areas with greater and lesser exposure to compliance risk.

2.2 Risk classification

To define risk levels, CBL has adopted the following categories:

- **Strategic risks:** events related to the market, investments and technological innovation;
- **Financial risks:** events related to financial resources and cash flow management;
- **Image and reputational risks:** events related to honoring commitments in line with ethical principles, concepts and values;
- **Legal, regulatory and compliance risks:** events related to compliance with laws, regulations and CBL's internal policies;
- **Operational risks:** events related to deficiencies in processes, people, resources or systems;
- **Social and environmental risks:** events related to the environment, society or communities in CBL's areas of influence;
- **Supply chain risks:** events related to suppliers and service providers, including their subcontractors, that could affect the company's operations, reputation and financial performance;
- **Stakeholder risks:** risks arising from direct or indirect relationships with stakeholders that could affect CBL's image.

3. INTERNAL CONTROLS

The Risk Matrices – Strategic Planning cover the key aspects of CBL's processes and describe the controls in place to reduce risk.

Risk management is an ongoing process made up of a set of actions to identify, analyze, assess, prioritize, treat and monitor risks.

Risks and opportunities are managed through the procedures of CBL's Integrated Management System (IMS), which ensures a prompt response based on the identification of threats and opportunities, helps improve the business and reduces impacts on stakeholders. This includes assessments of the organizational context covering CBL's internal and external conditions, the Business Plan, management of legal requirements, and stakeholder assessment.

Risk assessments are carried out through internal and external audits of the Social Responsibility Management System and the IMS, independent audits of the financial statements, legal compliance audits (VCL – CAL System) and whistleblower reports, through which Compliance Program risks are analyzed and addressed.

The Compliance Officers are responsible for maintaining the Internal Controls framework set by leadership and the Executive Board, using the Risk Matrices (Risk and Opportunity Management Spreadsheet) and periodic assessments of CBL's key processes.

In addition to the set of policies, procedures and standards designed to reduce uncertainty about whether a risk will occur, meeting the objectives set by the Board of Directors through the risk matrices, the Risk and Opportunity Management Spreadsheet and related controls ensures compliance with laws and regulations and the reliability of management reports.

It is important to note that policies, procedures and standards alone cannot guarantee that CBL's operations will remain free of the risks inherent in them.

For this reason, and based on best practices defined and approved by the Board of Directors, strengthening the processes and procedures tied to the corporate governance model is essential when monitoring and updating the risk and control matrices and the Risk and Opportunity Management Spreadsheet.

Whenever new controls or adjustments are needed to avoid or minimize risks, actions are recorded in the Risk and Opportunity Management Spreadsheet, specifying the issue identified, the proposed action, the owner, the deadline and the status. The spreadsheet is reviewed and updated on an ongoing basis.

Process flows and the systems involved are continuously reviewed and updated, and are submitted for evaluation by the Unit Directors and Senior Management, with the participation of the managers of administrative and operational areas across CBL's units.

4. TRAINING AND COMMUNICATION

CBL reinforces awareness of the Program and the accountability of everyone involved (employees, third parties and service providers) through a range of communication channels, including bulletin boards, information displays, safety and health talks, newsletters and emails. These channels promote ethical values and principles, standards, policies and procedures, and are aimed at all employees, third parties, service providers, business partners, members of Senior Management and Board members.

We consistently emphasize each employee's individual responsibility to ensure compliance with all obligations related to their work, follow laws and internal standards, act in line with best practices, know the Code of Ethics and Conduct well, and report any compliance violation, with anonymity guaranteed and Senior Management's full support.

The main goal of our communication is to give all employees the knowledge and awareness they need regarding risk exposure, how the Compliance Program's effectiveness is measured, the resources available to them for guidance on complying with laws and internal standards, and the advice available from Senior Management and other leaders.

Training is designed around everyday situations that challenge assumptions people tend to make about their own ethics. It avoids technical and legal jargon so that concepts are practical, easy to understand and engaging. Whenever a need for further guidance or deeper discussion of topics related to CBL's strategy is identified, it is brought to Senior Management and the Board for review and decision during management meetings.

Training focuses on building knowledge and awareness of the Compliance Program and the Code of Ethics and Conduct.

Notices are shared in print or electronically to remind employees of, or clarify, specific points of the Code of Ethics and Conduct, with content tailored to each target audience.

Operations leaders also bring up cultural change topics in their talks and meetings with their teams.

5. CODE OF ETHICS AND CONDUCT

The Code of Ethics and Conduct was created and approved to set out the guidelines that employees and partners must follow.

Workplace ethics training equips employees and third parties to apply principles of integrity, respect and compliance in their day-to-day work. The training is delivered as part of the onboarding program, and participants must confirm that they have read and understood the Code of Ethics and Conduct.

Copies of the Compliance Program and the Code of Ethics and Conduct are available on CBL's website and intranet, and in print in the IMS office, for reference.

6. WHISTLEBLOWER CHANNELS

The whistleblower channels are managed by an independent third-party company so that reports are handled impartially and the whistleblower's anonymity is preserved.

Reports can be made by phone (0800 740 4505), by email (canaldedenunciascbl@iaudit.com.br) or through the interactive voice response (IVR) system.

The whistleblower channels should be used only to report incidents or conduct that does not comply with the Compliance Program and/or the Code of Ethics and Conduct, as illustrated below. These examples are not exhaustive; they are intended simply to help identify certain types of misconduct.

Reports are assessed and addressed by the Ethics Committee and presented to CBL's Executive Board each month in a report issued by IAUDIT, the company that manages the whistleblower channel.

Actions arising from reports that require Board of Directors approval are presented at Board meetings.

A) Abuse of position or power for private interests

a) Gaining support by granting positions or benefits;

b) Shifting responsibilities onto others or failing to meet obligations;

c) Falsifying data for one's own benefit or the benefit of others;

d) Any other form of personal or third-party benefit.

B) Nepotism

a) Hiring family members for positions of trust;

b) Hiring family members through competitive bidding;

c) Appointing unqualified family members to a role;

d) Any other form of benefit to family members.

CBL encourages local hiring as a way to support the ongoing development of the city and region. However, relatives of employees must not be hired in a way that creates a hierarchical or de facto dependency or a reporting relationship between the people involved. Any hiring of close relatives (spouses, children, grandchildren, parents, grandparents, siblings and cousins), regardless of position level, must be submitted to the Ethics Committee for approval, and HR is responsible for keeping a record of the process.

C) Conflicts of interest

a) Use of inside information;

b) Activities incompatible with one's position;

c) Accepting gifts from anyone with an interest in a decision;

d) Any other form of favoritism arising from a relationship with an individual or entity that has an interest in a decision.

D) Unethical pressure

a) Retaliation against potential whistleblowers;

b) Pressuring subordinates to violate ethical conduct;

c) Pressure related to influence peddling;

d) Any other political or social pressure placed on coworkers.

E) Illicit enrichment

a) Misappropriation;

b) Receiving money in exchange for favors;

c) Any other use of company resources for personal purposes (e.g., vehicles, working hours, office equipment).

F) Political contributions

CBL may occasionally contribute money, services or other items of value, directly or indirectly, to support a specific candidate or political party in Brazil, in accordance with applicable law. Unit Directors must notify CBL's Managing Director of any intended contribution and may proceed only after approval by the Board of Directors.

G) Interactions with public officials

At least two CBL representatives must be present at all meetings and hearings with public officials, whether held internally or externally. A report on each such meeting must be submitted to CBL's Executive Board immediately afterward.

7. INTERNAL INVESTIGATIONS

7.1 Internal investigations

CBL recognizes the need to maintain disciplinary control in a segregated, autonomous and impartial manner. Reports of misconduct will therefore be investigated to properly establish the facts, the seriousness of the incident, the circumstances involved and the extent of each party's involvement.

Once misconduct is confirmed, the Ethics Committee will determine the appropriate sanctions, reinforcing a culture of integrity among employees.

The investigative phase is impersonal and focused on establishing the facts, while preserving the confidentiality of both the whistleblower and the person reported.

The Ethics Committee is responsible for investigating reports, with guidance from IAUDIT, the company that receives them, ensuring an independent process free of conflicts of interest. Cases of workplace bullying and sexual harassment are referred to the Legal Department for a technical opinion.

The investigation must be impartial, focused on establishing the truth and gathering evidence that either confirms or rules out the allegations. The organization must also pay close attention to how documents and information are managed, which is essential to an efficient and effective investigation.

To gather information about the matter under investigation, the Ethics Committee will interview employees, collect information and data from company computers and mobile phones, and observe procedures and conduct.

Those conducting the investigation must declare that they have no conflict of interest regarding its subject matter.

Interviewees must be selected carefully, so that only employees likely to provide the information the Ethics Committee needs to establish the facts are included. Potential interviewees are reviewed and their selection must be approved by the Ethics Committee members.

Interviews must be conducted by at least two members of the Ethics Committee, with support from the HR & Industrial Relations Manager when needed.

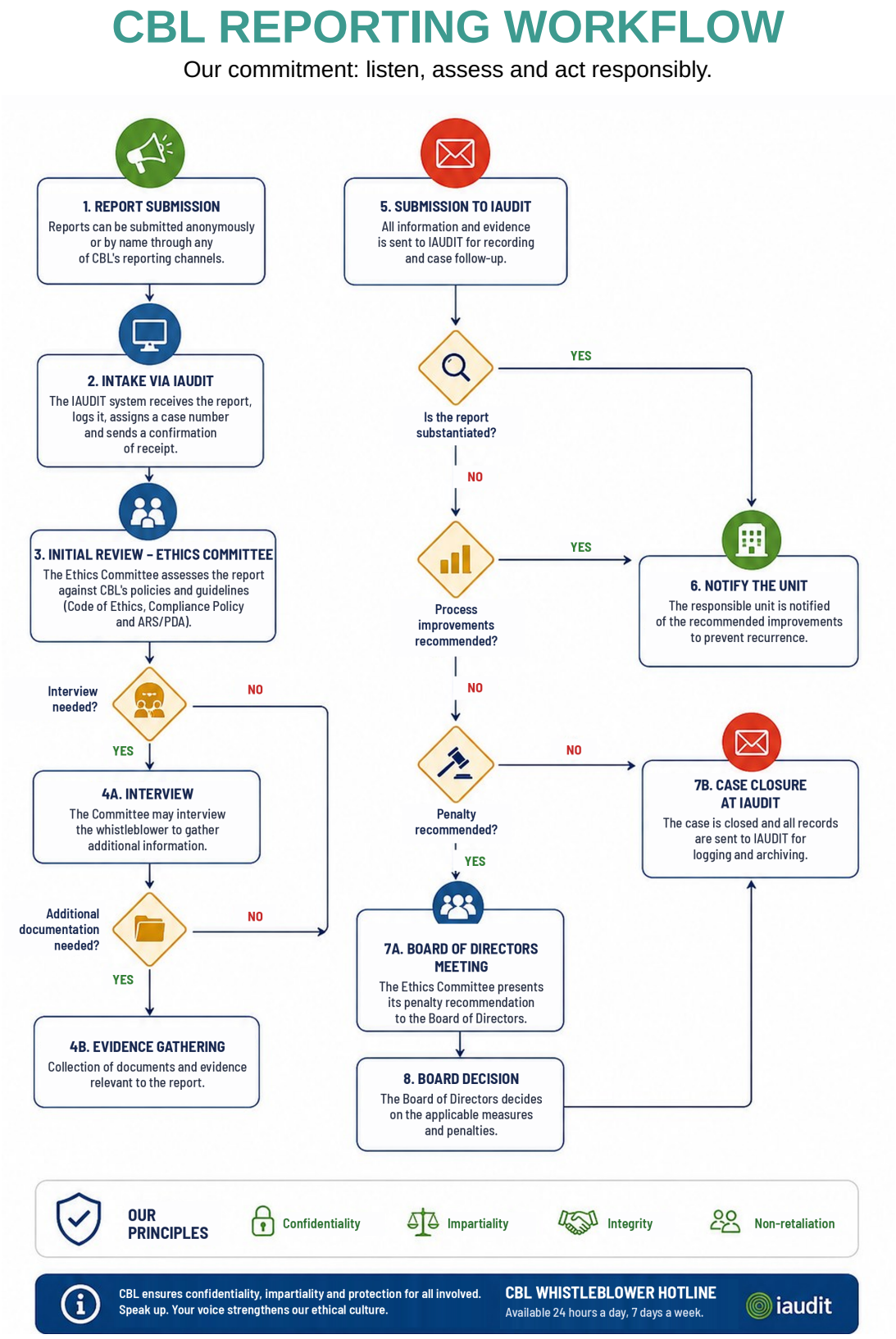
Any investigation of an employee must respect, as applicable, the rights to be heard and to a full defense, in accordance with Article 5 of the Brazilian Federal Constitution and with labor law.

7.2 Accountability and penalties

CBL will not tolerate any violation, whether intentional or negligent, of the current Code of Ethics or of the other instructions that make up the Compliance Program. Accordingly, without prejudice to any civil, criminal or administrative liability that may apply in each case, anyone who commits, encourages or takes part in such violations, by action or omission, will be subject to the provisions of this section.

a) Report handling process:

Reports submitted through the whistleblower channel are assessed according to the following workflow:



b) Possible penalties

Any conduct inconsistent with the ethical standards set out in CBL's Compliance Program and other directives from Senior Management may result in the following penalties, applied individually or cumulatively and depending on the nature of the sanctioned party's relationship with the organization:

1. Verbal warning;
2. Written warning;
3. Temporary suspension;
4. Termination without cause;
5. Termination for cause;
6. Legal action as provided by law.

The penalty will reflect the nature and extent of the violation, as determined through the Internal Investigation process.

In reviewing each case, the Ethics Committee will consider the actual and potential harm caused. Penalties will initially be educational in nature, to prevent recurrence, and will become more severe depending on recurrence or the seriousness of the conduct.

The Unit's Executive Board is responsible for applying penalties.

8. THIRD-PARTY MONITORING

CBL's commitment to the standards of social responsibility generally accepted in Brazilian society extends to its business partners, who are expected to comply with laws, regulations, industry codes and contract terms with integrity. This applies from the validation of partners' registration data to the assessment of the reputation of the company and its executives.

Universally accepted standards of conduct are applied to all of CBL's business relationships to eliminate liability by omission in relation to its consultants, advisors, suppliers, partners, representatives and resellers, covering areas such as protection of human rights, safety and the environment, the prohibition of child or forced labor, money laundering and bribery.

CBL has a specific internal standard governing the hiring of all suppliers of goods and services, setting out the guidelines, responsibilities and controls that apply to the procurement process.

A pre-contract assessment is carried out in accordance with procedures PA-DA-002 Procurement and PA-DA-016 Third-Party (Contract) Management, following a general rule based on risk classification according to the nature of the relationship. CBL reserves the right to expand its review as needed. The assessment covers the potential partner's financial position, ownership structure, a check of the Ministry of Labor and Social Security portal (for slave labor violations) and any history of unethical activity, and is retained for future reference for both completed and declined partnerships.

Relationships are formalized through contracts or purchase orders acknowledged by both parties, which include liability clauses and allow the partnership to be terminated if any breach of the principles above is identified. Once an agreement is signed, the review be-

comes ongoing monitoring to ensure compliance with the established rules, along with monitoring of the partner's legal standing, tax and labor compliance, technical and operational qualifications, and the quality of its services and products, according to the criteria set out in procedure PA-DA-002 Procurement.

CBL makes itself available to business partners for help and advice on conduct consistent with CBL's Code of Ethics and Conduct, and to receive reports of suspected compliance violations.

CBL considers the following to be red flags:

- a reputation for, or allegations of, corruption or fraud;
- agreements involving unusually large or irregular payments;
- ties to politically exposed persons (PEPs);
- a lack of transparency in the company's ownership structure that makes it difficult to identify the ultimate owners;
- no business track record, such as newly formed companies with no prior commercial activity;
- agreements or arrangements involving suspicious or unusual payment methods;
- disclosure of confidential information, since all information generated or acquired by CBL is company property.

9. STRUCTURED MONITORING

CBL formally documents, reviews and communicates the operating procedures and workflows that set out what all employees are expected to do when carrying out their work.

CBL's Compliance Program is therefore built on structured monitoring and continuous improvement of the program's pillars.

Structured monitoring of the program involves ongoing evaluation through regular audits that measure expected results, with a focus on continuous improvement of the entire program. To this end, the following annual monitoring plan applies:

Annual Plan

Activity	Frequency	Responsible
Whistleblower channel monitoring	Monthly	Ethics Committee / Compliance Officers
Management report distribution	Monthly	Managing Director

9.1 Communication and acknowledgment

Communicating the Compliance Program's standards is essential and mandatory for CBL's leaders, managers and operating teams.

Likewise, transparency in managing compliance processes is essential and mandatory for CBL's leaders, managers and operating teams.

Activity	Frequency	Responsible
Whistleblower channel awareness	Annual	CBL team

Training on and communication of the Code of Ethics and Conduct (onboarding / refresher / review of the Compliance Program and Code of Ethics and Conduct)	Ongoing	CBL team
Distribution of reports and KPIs	Monthly	CBL team
Workplace bullying and sexual harassment campaign	Annual	CIPAA
Reporting to the Board of Directors – Compliance Program actions and status	Ongoing	Ethics Committee, represented by the Managing Director

The activities above must be carried out systematically to ensure the continuity and long-term sustainability of CBL's Compliance Program.

Acknowledgment Form – Compliance Program

I, _____, CPF (Brazilian Taxpayer ID) No. _____, Employee ID _____, hereby confirm that I have completed the Compliance Program training and have read and understood the rules of conduct adopted by CBL – Companhia Brasileira de Lítio, as well as my rights and responsibilities as a member of the Ethics Committee or as a Compliance Officer.

In accordance with applicable legal requirements, regulations and legislation, I confirm that I have read and clearly understood all the activities for which I am responsible, and I take full responsibility for my actions under the rules set out in this document.

I am committed to ensuring a transparent environment, promoting a culture of controls, and fully upholding and complying with the principles described in this document and with all applicable legislation.

I also understand that the whistleblower channels are intended for truthful and reliable reports, and must not be used for false or malicious accusations.

I am aware that the Compliance Program is available on CBL's website, www.cblitio.com.br, and in the internal document management system.

I declare that all information provided above is true and accept full responsibility for it.

_____
SIGNATURE

_____
DATE