

Internal Policy



Whistleblower Policy September 2020

**Prepared by:
Compliance**

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Approval and revision history

Approved by		
Version	Name / Title	Date
2.2	Jeff Kennedy	09-10-2020
2.1	Audit Committee	08-05-2018
2.0	Audit Committee	08-08-2017
1.2	Audit Committee	08-10-2015
1.1	Audit Committee	12-30-2011
1.0	Audit Committee	08-09-2007

Whistleblower Policy

1. Introduction

Jaguar Mining has a Whistleblower Hotline (Ethics Point), available to the internal and external public which allows the reporting of incidents, suspicions or questions about real or potential situations in non-conformance with the Code of Conduct, policies and procedures, anti-corruption laws, fraud or any other types of non-compliance issues.

2. Purpose

The purpose of Jaguar's Whistleblower Policy is to describe the procedures for the intake, receiving/dispatch, investigation and treatment of reports filed in the Whistleblower Hotline, as well as to demonstrate the company's commitment to preserving the confidentiality of the information obtained during the process and to establishing safeguards against retaliation for whistleblowers who file a complaint in good-faith.

3. Applicability

The Whistleblower Policy applies to all directors, employees, third parties, representatives of the company, as well as other stakeholders, such as clients, suppliers, among others.

4. Policy Requirements

4.1. Intake

Jaguar instructs employees, third parties and representatives to file a report through the Whistleblower Hotline, immediately after becoming aware of or suspecting any situation in non-conformance with Jaguar's Code of Conduct, policies, procedures or the law.

The objective is to ensure that the investigation is conducted by a specialized team and the deviation, if substantiated, is promptly interrupted. In this sense, it is recommended to avoid conducting an investigation on your own.

The Ethics Point is available 24/7 via the following channels:

- Jaguar's Hotline: 1-888-279-5268 (United States and Canada) or 0-800-891-1667 (Brazil);
- Jaguar's Website: www.jaguarmining.com; or
- Intranet.

The whistleblower may file an identified or anonymous report. Even in case of identified reports, Jaguar commits to restricting the information of the whistleblower's identity to only those responsible for the investigation.

When filing a complaint, whistleblowers are encouraged to provide all available information and evidences (if any) in order to increase the effectiveness of the investigation.

After the filing, the Whistleblower Hotline automatically generates a random key number, which allows the whistleblower to keep track of the progress of the investigation and reply to any questions or requests by the Compliance department to assist the investigation.

4.2. Receiving/dispatch

Ethics Point is a third party service provider that hosts Jaguar's Whistleblower hotline and website and is responsible for receiving the complaints with confidentiality and security. As an independent third party, Ethics Point analyzes the content of the report, including the employees and departments involved before forwarding it to the Compliance department responsible for its verification and treatment.

Reports that, eventually, mention employees from Audit, Compliance, and Risk department will be instead forwarded directly to Chairman of the Audit Committee and CEO, who will conduct the investigation, as an exception. This workflow aims to ensure the impartiality of the process, preventing a department or an employee from becoming aware of or carrying out an investigation of themselves (auto-investigation).

4.3. Investigation

Upon receiving the report, the Compliance department defines an investigation plan that may include communication with the whistleblower, request of additional information, and collection of evidence and, if necessary, hiring specialized third parties.

In addition to the Compliance department, which conducts the investigation, the plan may, eventually, require additional employee(s) from other department(s) to support the process, provided that their involvement is indispensable. However, these employees must be kept to a minimum and not be related to the reported incident, in order to avoid undue interference or influences.

The plan is submitted to the Chairman of the Audit Committee for approval, before the investigation begins.

4.4. Case closure

Due to a variety of complaints, it is not possible to determine an exact time frame to close an investigation. However, Jaguar reinforces the commitment to dealing with complaints as soon as possible without compromising the quality of the investigation.

At the end of each investigation, the Compliance department prepares a report, which may contain recommendations of disciplinary measures or opportunities for improvement. The document is sent to the Chairman of the Audit Committee for approval, before closing the investigation.

4.5. Disciplinary measure

If the investigation substantiates the complaint, Jaguar must ensure that deviations are promptly interrupted and the proper sanctions are applied, according to the Code of Conduct and Disciplinary Measures procedure.

The due date of a disciplinary measure must be agreed upon by the Compliance department and the area responsible for the employees involved.

4.6. Anti-retaliation

Jaguar will not retaliate and will not allow retaliation against a person who, in good faith:

- Reports what he or she believes to be a violation of our values, Jaguar's Code of Conduct, policies or the law;
- Raises a compliance question or seeks advice on a particular business practice, decision or action;
- Cooperates in the investigation of a potential violation.

Retaliation against a whistleblower or anyone who collaborates with an investigation is itself a violation of the Code of Conduct and the person responsible for the retaliation, regardless of his or her position in the company, will be subject to disciplinary action.

This safeguard also applies to any report that, even in good faith, is unsubstantiated by the investigation.

4.7. Reporting

The Compliance department is responsible for reporting the results of the Whistleblower Hotline periodically to the:

- **Audit Committee:** quarterly summary of reports/investigations and annual benchmark report.
- **Stakeholders:** disclosure of the annual number of incidents in the Social Responsibility Report and to other media.

4.8. Other channels

4.8.1. Fala aí

"Fala aí" is a tool used at the head office and mine sites for internal reporting of Almost Accidents, unsafe acts and inadequate conditions of labor, environmental impact, suggestions, complaints and compliments.

5. FUNCTIONS AND RESPONSIBILITIES

- **Compliance:** implementation of the Whistleblower policy.
- **Audit Committee:** review and approval of the Whistleblower policy.

6. EXCEPTIONS

There are no exceptions to this policy.

7. MAINTENANCE

The Whistleblower Policy must be reviewed every two years or whenever there are changes in the process.