

# CBMM's CODE OF ETHICS AND CONDUCT



# CODE OF ETHICS AND CONDUCT

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## MESSAGE FROM THE PRESIDENT

The history of CBMM is related to the technological development of processes and applications of niobium end products. For over 60 years, sustainability, respect for customers, the environment, the community, employees and shareholders and a long-term vision have been the cornerstones of the CBMM program and form its main pillars of sustainability.

CBMM's legitimacy with customers, suppliers and the community has made it into the world's leading supplier of technological solutions using niobium products, and the company recognized as the market benchmark.

Achieving excellence and global recognition has involved a serious commitment on the part of CBMM and of all its employees and partners to comply with applicable laws and regulations, and to abide by essential values like honesty, integrity and respect.

In order to reassert our commitment to the essential principles and values that guide CBMM, as well as to reiterate our contribution to the construction of an environment in which ethics and compliance with laws are not negotiable conditions, in July 2015 we launched CBMM's Compliance Program, which contains a set of coordinated policies, procedures and initiatives whose main goal is to guide and prevent, but also identify and remedy, the occurrence of irregularities and violations of applicable laws and regulations.

It is in this context that CBMM's Code of Ethics and Conduct is inserted, describing the fundamental rules and principles that should always guide the professional conduct of the employees of CBMM and its subsidiaries, as well as of those acting on behalf of CBMM.

With this in mind, I strongly recommend that all of CBMM's employees and third parties, irrespective of hierarchical level, read and understand this Code of Ethics and Conduct and always consult it in the performance of their activities. The Code does not contain all the situations that may occur in our everyday activities, neither is that the goal, but it sets forth the behavior expected from all of us and describes the main rules and the fundamental principles that should be adopted.

In addition to abiding by the precepts of the Code, it is the responsibility of each of us to inform the Compliance Department about any violations of laws, the Code of Ethics and Conduct and other CBMM internal rules. To that end, CBMM employees and third parties may use the communication channels listed at the end of this Code. It is important to mention that CBMM will maintain the confidentiality of all the contacts made and will not allow any kind of retaliation or reprimand as a result of violations informed in good faith.

Thank you for your attention and I urge you to comply with the rules and principles of this Code of Ethics and Conduct, so that together we can continue CBMM's successful trajectory as a Brazilian company built on sustainable technology.

Eduardo Ribeiro

CBMM is proud to be a Brazilian company that is the world leader in the production of final niobium products. This leadership position is the result of the singular excellence of our operations, continuous investment in technology and processes, and respect for customers, suppliers, Employees, shareholders, the environment and the community in which we operate. Our aim is to make the world more efficient and sustainable through the responsible and effective use of niobium technologies, maximum customer satisfaction and low environmental impact.

To realize these values and ensure a workplace that operates with ethics, integrity and transparency towards our Employees, Third Parties, customers and shareholders, CBMM presents its Code of Ethics and Conduct ("Code"). Here, you will find the main rules and principles applicable to CBMM's activities.

The guidelines and principles contained in this Code shall be followed by all Employees of CBMM and its subsidiaries, as well as by Third Parties with whom CBMM interacts. This Code reflects our Company's values and must guide every activity related to CBMM, as well as the interaction between Employees and Third Parties acting on our behalf, customers, suppliers, other Employees, the community and government agencies and officials.

Conduct guided by ethics, integrity and honesty is of the utmost importance to CBMM. Acting within the rules and standards set forth in this Code is an obligation of all Employees and Third Parties, regardless of whether their activities are performed in Brazil or abroad.

Strict compliance with such rules and regulations does not exclude the need for constant reflection about the ethics of our behavior. For this reason, we encourage all Employees and Third Parties subject to this Code to consider if the impact of their actions is aligned with CBMM's principles and values, always acting in good faith.

Employees and Third Parties must follow and comply with the provisions of this Code in the conduct of their professional activities, disseminate its content and report any violations.

This Code can be accessed through the Ethics Channel, which is publicly available at [www.cbmmcompliance.com](http://www.cbmmcompliance.com), as well as the Compliance Portal, available to all CBMM Employees via the company's intranet site.



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## DEFINITIONS

For the purpose of the Code, the following definitions apply:

- ◆ "CBMM" or "Company" means CBMM and its subsidiaries.
- ◆ "Employees" includes all Employees, members of the Board of Directors and interns working at headquarters or any branch or subsidiary of CBMM.
- ◆ "Government Official" includes: (i) employee of the government of any level, agency or instrumentality, including, but not limited to, public companies or companies controlled by the government; (ii) occupant of or candidate to public office; (iii) political party or member thereof; (iv) employees or representatives of international public organizations, such as the World Bank and the United Nations Organization; (v) member of a royal family; or (vi) any other person performing activities or representing any of the foregoing. **This concept includes national and foreign Government Officials and may vary from country to country. If in doubt, always consult the Compliance Department.**

- ◆ “Public Power” means, collectively, the Public Administration and Government Officials.
- ◆ “Third Parties” includes all agents, consultants, distributors, contractors, service providers, outsourced workers acting in the name of or on behalf of or to the benefit of CBMM, and any other representative acting on behalf of CBMM.



## GENERAL RULES OF CONDUCT

All the acts performed on behalf of CBMM must comply with all applicable laws and with the values and internal rules described in this Code, as well as with all other applicable internal rules and policies.

All Employees, in particular Employees occupying leadership positions, must contribute to a work environment grounded in ethics and integrity, where adhering to the standards of conduct described in this Code is the rule.

Likewise, it is incumbent upon all to promote the values and standards of conduct that CBMM expects of its Employees and Third Parties towards coworkers, superiors and other Third Parties with whom they have contact while performing their activities.

In case of doubt about the lawfulness of an act performed or compliance thereof with this Code, Employees and Third Parties should seek support and clarification from the Compliance Department. If necessary, the opinion of CBMM's Legal Department will be requested.

**It is against the law and the policies of CBMM to pay or receive a bribe or to perform any act that is harmful to anyone, in particular one that is committed against the public administration, in any manner, for any reason, in any context, irrespective of who is involved.**

CBMM and all its Employees must follow the principles of all anticorruption laws in Brazil and abroad. The most well-known in Brazil are the Criminal Code (Decree-Law nº 2.848/1940), the Anticorruption Act (Law nº 12.846/2013, regulated by Decree nº 8.420/2015), the Improbity Act (Law nº 8.249/92) and the US Foreign Corrupt Practices Act.

Offering, delivering, promising or authorizing others to deliver, directly or indirectly, any undue advantage to a Government Official, whether Brazilian or foreign, or to any Third Party related thereto, is considered corruption and is expressly forbidden by the laws in force.

**CBMM does not tolerate, under any circumstances, the performance of actions against the public administration, especially corruption.**

## WHO IS A GOVERNMENT OFFICIAL?

The concept is defined in this Code of Ethics and includes councilors, representatives, senators and political candidates, employees of local, state or federal government, employees of notary offices, officials of the National Department of Mineral Production / National Mining Agency, officials of public companies or companies controlled by the government (such as CODEMIG, Petrobras, BNDES, Bank of Brazil), public universities, companies controlled by foreign governments, inspectors of IBAMA and of the Revenue Office, diplomats and others.

All negotiations with Government Officials, relatives or persons close to Government Officials, such as spouses, siblings, parents, uncles and aunts or close friends must be reported to the Compliance Department for specific guidance. Moreover, compliance with all applicable laws and official procedures must be followed when contracting with the Public Power.

CBMM's Employees and Third Parties must be respectful and act professionally in all procedures of inspection or investigation conducted by public agencies, such as city governments, IBAMA, Federal Revenue Office, DNPM/ANM, and others. CBMM's Employees and Third Parties must always ensure that their conduct will not interfere, impair, prevent or disturb the work of Government Officials and must always inform the Legal Department about such interactions.

If a Government Official asks an Employee or Third Party for any undue advantage in exchange for a favor or service to be provided, the Employee/Third Party must reject the request, inform that such conduct is not permitted by CBMM and report the fact immediately to the Compliance Department.

### How should I act?

**Question:** A consultant hired by CBMM has requested a commission above market value to provide services at a public agency. Can such a payment be made?

**Answer:** In this case, one must first understand the reason for the high value requested by the Third Party to verify the existence of contractual grounds or a real need. If the requested value is outside the usual contracting parameters, there is a risk that the Third Party will use the amount to commit an illegal act. If there are no lawful grounds for the requested value, the service provision must be immediately suspended and the Compliance Department must be consulted.

The concept of improper benefit must be understood broadly and includes more than cash payments. Undue advantage is anything that has some value for a Government Official, even if it does not have value for whoever grants it.

Accordingly, it is forbidden to promise, offer or receive any improper benefit, such as goods, gifts, job positions, meals, services or any other advantage to/from Government Officials with the intention of obtaining any improper benefit in return (financial return, beneficial treatment, preference in contracts, unlawful act or omission, others).

Situations in which the offer is made through Third Parties with the intention of concealing the actual recipient of the benefit and/or advantage are equally forbidden.

Transparency in the offer and receipt of freebies, gifts and hospitality is essential to ensure compliance with this Code. If in doubt, consult the Compliance Department.

#### 4.2.

#### **Conduct with customers, Third Parties, competitors and other suppliers.**

CBMM strives for the constant improvement of its processes, products and services through innovation, technology and qualification of Employees. The quality of products and services is a priority for CBMM and excellence is one of our values.

The conduct of Employees and Third Parties must follow the ethical rules and standards set forth in this Code regarding interactions with suppliers, customers, competitors, business partners and other persons required for the good development of CBMM's business.

CBMM shall prioritize relationships with Third Parties, suppliers and business partners who share CBMM's standards of ethics and conduct and that have compliance policies and procedures in place to prevent, detect and interrupt the occurrence of unlawful acts and irregularities.

CBMM values and cares for its business relationships with Third Parties, suppliers, customers and partners. All should be treated fairly, with honesty and transparency. The agreed contractual terms must be followed, and the offer of our products is based on quality and reliability.

***CBMM does not tolerate private corruption nor acts that are harmful to free competition.***

CBMM believes that fair and open competition is beneficial to CBMM, its customers and society as a whole, since it stimulates efficiency, technological advancements and quality improvements. In conducting CBMM's business, Employees and Third Parties are encouraged to act competitively, but loyally and in strict compliance with all competition laws. CBMM does not condone nor tolerate unfair competition, such as market division, price fixing or any conduct that prevents a free, fair and open market.

CBMM's Employees and Third Parties must refrain from obtaining or attempting to obtain improper benefits from agreements executed by CBMM. **It is expressly forbidden to offer, receive or demand any kind of payment, benefit, freebie, gift, present or favor with the sole purpose of guaranteeing an agreement with CBMM.** If in doubt, consult the Compliance Department.

All decisions to purchase or contract goods and services must be based on the best cost/benefit ratio for CBMM, and on objective technical, legal and/or economic criteria.

It is forbidden to contract with suppliers and Third Parties who refuse to follow anticorruption laws, the provisions of this Code or equivalent principles. When contracting, all Employees must ensure that the applicable anticorruption provisions are included in the agreement and that the contractor's conduct is monitored throughout its relationship with CBMM.

All CBMM operations must issue invoices and payment receipts that correspond to the actual transaction value.

A safe, welcoming and supportive work environment is essential to our professional activities. We are all responsible for ensuring that CBMM's work environment reflects these values.

***CBMM does not accept any form of discrimination or prejudice against anyone whatsoever.***

CBMM's Employees and Third Parties shall treat all others with respect and dignity, irrespective of race, gender, religion, age, social status, sexual orientation, biotype, political or ideological convictions or hierarchical position, including coworkers, subordinates, superiors, third parties, customers, government officials, suppliers and all other business partners.

Employees' professional reviews and promotions are based solely on competence, performance and personal merit.

***Any form of child, forced or degrading labor or conditions similar to slavery are expressly forbidden. The same shall be demanded from all Third Parties with whom CBMM engages.***

***All forms of harassment, including moral and sexual harassment, are repudiated by the Company and are strictly forbidden.***

### **WHAT IS MORAL HARASSMENT?**

Moral harassment includes any abusive conduct that repeatedly causes embarrassment, humiliation or that hurts the physical or emotional dignity of a person in the workplace and/or in the performance of their activities. Moral harassment includes direct accusations, insults, yelling and public humiliation, as well indirect means, such as spreading rumors, isolation, refusal of communication, gossip and social exclusion.

### **WHAT IS SEXUAL HARASSMENT?**

Sexual harassment is any form of constraint such as unwelcome advances, insinuations, requests for sexual favors, other verbal or physical harassment of a sexual nature or conducts that are offensive to the sexuality of any other individual and that are repealed by the victim.

## How should I act?

**Question:** My supervisor makes nasty comments and jokes and I realize that this creates an unpleasant environment not only among us, but also in relation to other colleagues at CBMM.

How should I act?

**Answer:** Talk to your supervisor and tell him/her that you feel uncomfortable with his/her behavior. If you prefer not to talk directly with your supervisor, look for someone from the Compliance Department, from Human Resources or use one of the communication channels indicated in this Code. It is the duty of everyone to create an environment free of hostility and hassle. It is against CBMM policy to threaten, intimidate or discriminate against anyone.

**Question:** I know someone who said he/she was not promoted because he/she does not share the same interests and political views of his/her supervisor. I also have disagreements with my supervisor. How should I act not to be harmed?

**Answer:** CBMM's policy is to assess its Employees only on the basis of their competence, merits and job performance. No political opinion, point of view, or any other personal belief or opinion shall be taken into account. If you suspect that any Employee is or that you are being harmed, get in touch with someone from the Compliance Department or Human Resources to tell them what is going on or, if you prefer, use one of the communication channels indicated in this Code.

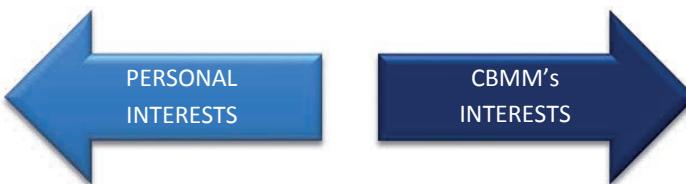
CBMM's Employees and Third Parties are guaranteed freedom of association to any lawfully constituted class entities and the right to collective bargaining agreements.

Any partisan or political activities of CBMM's Employees and Third Parties must be made in their own name, in each case pursuant to the provisions of this Code and other applicable policies. CBMM's name must never be associated with any partisan or political activity or donation made by its Employees and Third Parties.

#### 4.4

#### **Relationship with CBMM – Conflict of Interests**

Conflicts of interests may occur when an Employee's or Third Party's responsibilities afford opportunities of personal gain, to the detriment of CBMM.



CBMM's Employees and Third Parties must not use authority related to their office or privileged information obtained as a result of their activities with the intention of obtaining any advantage for themselves or others.

In order to avoid conflicts of interest, CBMM's Employees and Third Parties shall not:

- ◆ Work or provide any services for competitors, customers, distributors or other parties while working for CBMM without prior authorization from their immediate superior and the Compliance Department;
- ◆ Provide any service or assistance to other parties that could impair the performance of their duties;

- ◆ Hold any economic or financial interest in competitors, customers and other third parties or suppliers of CBMM without first obtaining written permission from the Compliance Department;
- ◆ Privilege relatives or friends in any contracts with CBMM, in performance assessments or in any other kind of review that may result in improper benefit;
- ◆ Solicit gifts or any other benefits while performing their activities and/or acting on behalf of CBMM.

Family ties, partnerships, friendships or close relationships between Employees and Third Parties are not forbidden. However, in the event that any of the foregoing results in undue favor and/or conflict of interests, they are forbidden by this Code. Any situation that generates a potential conflict of interests must be reported.

Likewise, all negotiations involving companies that belong to CBMM's Employees or Third Parties related to them must be informed in writing to their immediate supervisor and to the person responsible for the contract. If in doubt, consult the Compliance Department.

Transactions involving related parties must be in line with the interests of CBMM, pursuant to the laws and corporate charters in force and consistent with market conditions and impartial treatment.

All CBMM's Employees and Third Parties must pursue the Company's best interests. Conflict of interest situations must be avoided and reported to your supervisor and to the Compliance Department.

## How should I act?

**Question:** My brother has a company that could provide services to CBMM. Can I introduce his company to CBMM?

**Answer:** Yes, you can introduce your brother's company to the person responsible for the engagement of Third Parties. However, your supervisor and the person responsible shall be informed that he is your brother. Normal procedures for the selection of Third Parties shall be followed in relation to your brother's company so there is no favoritism.

### 4.5

## Conduct related to CBMM's resources

It is essential to preserve the confidentiality of all CBMM's information, including, but not limited to business, financial and strategic information. Our Employees and Third Parties are continually exposed to information that must not be forwarded to people outside CBMM, including family and friends. Also, many times information cannot be disclosed even to other CBMM Employees and Third Parties. Such information is not public and can only be disclosed to intended recipients.

CBMM's confidential and strategic information shall be kept confidential, even after termination of employment.

Accounting records, internal reports and external disclosures must be complete, accurate and reliable, and include updated, accurate, truthful and straightforward information. The Company's bookkeeping shall be maintained in permanent records, in compliance with generally accepted business, corporate and tax laws

and accounting principles in force. CBMM's Employees and Third Parties shall not use or authorize or consent to the use of illegal accounting practices or to the creation of "slush funds", secret accounts, unrecorded bank accounts, fake books or any other resources to manipulate the records or reports of the Company.

All Employees and Third Parties must care for CBMM's property and use it solely for professional purposes.

The privacy of Employees must be preserved. Notwithstanding, the physical and logical environments (IT and communications systems and resources) belong solely to CBMM and are subject to access, inspection and/or audit without prior notice. The use of electronic mail, internet and social media by CBMM's Employees and Third Parties while performing their activities in the Company must be in accordance with CBMM's policy.

It is strictly forbidden to send, receive or access any unlawful or improper content, including, but not limited to, messages promoting hate, violence, illegal drugs, explicit sexual content, and others.

CBMM's Employees and Third Parties shall not use or install files or software not licensed to CBMM, or not approved by the responsible department.

### How should I act?

**Question:** I received an interesting email "chain letter" from a friend from outside of CBMM. Can I use my corporate email to pass it along to other colleagues who certainly will like to receive it?

**Answer:** No. CBMM's email system shall not be used to begin or continue any "chain letter" or any other inappropriate form of information disclosure. In addition to including inappropriate content, these emails may have negative effects on the performance and availability of the computer network, essential to CBMM's activities.

#### 4.6

#### Relationship with the Community

CBMM cares for the well-being of the community in which it operates. Accordingly, investing in initiatives that contribute with priority aspects of the community's well-being, such as health and education, has always been essential for CBMM.

Additionally, CBMM prioritizes hiring local work force, which directly contributes to the region's economy, and invests in training that offers new opportunities for the generation of employment and income.

Aware of the particulars of each community, CBMM respects local customs and works in partnership with consolidated local institutions. It is committed to national causes and engages in campaigns for the promotion of human rights and corporate ethics.

All donations and sponsorships made by CBMM to support cultural, social, educational, environmental, sports and health initiatives have the sole purpose of contributing to the community in which it operates and for the construction of a better world. These donations and sponsorship must never be used to obtain undue advantage for CBMM or for anyone else.

#### 4.7

#### Conduct related to the environment, health and safety

It is an integral part of CBMM's business to ensure the occupational safety and health of its Employees and Third Parties. Accordingly, CBMM supplies safety equipment, training and all resources required for the performance of professional activities and maintains an Integrated Management System (IMS).

CBMM's internal environmental specifications are stricter than those imposed by law. CBMM has operated an environmental management system certified by ABS-QE since 1997. All Employees are responsible for the good performance of the IMS and for its continuous improvement.

With regard to worker safety and health, CBMM adopts the guidelines of OHSAS 18001, which sets forth that it is essential to have the participation of Employees and Third Parties in matters related to the system of occupational health and safety.

CBMM believes that there is no long-term program without ongoing care for the environment and the health and safety of its Employees and Third Parties. CBMM's Employees and Third Parties are responsible, jointly with CBMM, for faithful compliance with applicable environmental, health and safety procedures and laws, in its activities. Accordingly, everyone must:

- ◆ Comply with environmental laws and internal policies, as well as engage in the preservation of the environment and in the rational and conscious use of natural resources. CBMM has several programs in this respect that are encouraged and disseminated internally, such as monitoring the quality of water and air and waste management.
- ◆ Demand conditions and equipment required to provide a healthy and safe work environment. Employees and Third Parties shall be responsible for the proper use of such equipment.

## 5.

## DISCIPLINARY MEASURES

Additional to the penalties set forth in law, failure to comply with any of the provisions of this Code shall subject the Employee to disciplinary measures that will be applied according to the nature and severity of the offense:

- ◆ Verbal or written warning;
- ◆ Suspension; or
- ◆ Termination of employment with cause.

Beside the disciplinary measures mentioned before, CBMM may, according to the severity of the facts, decide to terminate the employment contract without cause.

Third Parties involved in the violation of any provision of this Code may be subject to the sanctions listed in the relevant agreements, termination thereof or extinction of the business relationship.

All Employees and Third Parties must know, promote and comply with this Code for the proper performance of their activities.

It is extremely important that CBMM knows what the problems faced are and the possible violations related to this Code. Only then can it take the necessary steps to remedy the undesired situations and prevent future violations.

CBMM's reputation and success depends on compliance with legal and ethical rules set forth in laws and in this Code. Thus, all Employees and Third Parties have the right and the duty to notify the Compliance Department about violations of this Code, as well as other internal standards and applicable legislation. For this, communication channels are available through which Employees and Third Parties can report violations and clarify doubts about the content and application of this Code in their daily activities.

**The following communication means are available:**

**Ethics and Reporting Channel, which can be accessed at  
[www.cbmmcompliance.com](http://www.cbmmcompliance.com) or by the following telephone numbers:**

**AVAILABLE 24 HOURS A DAY, 7 DAYS A WEEK.**

- 📞 BRAZIL – 0800 7210754**
- 📞 USA – 1-800-982-0934**
- 📞 SWITZERLAND – 0800-835-088**
- 📞 NETHERLANDS – 0-800-022-2352**
- 📞 SINGAPORE – 800-852-3836**
- 📞 OTHER COUNTRIES: +55 11 27394508**

**This number accepts collect calls.**

CBMM encourages Employees and Third Parties to identify themselves to facilitate the ascertainment of facts and the clarification of any query made. However, if an Employee or Third Party does not wish to be **identified**, the Compliance Department shall take all steps available to determine the facts. If a report is made anonymously, CBMM shall respect that **anonymity**. If a report is made confidentially (but not anonymously), CBMM shall maintain that **confidentiality** to the extent possible, consistent with the need to conduct an adequate investigation and, if necessary, to respond appropriately to any government investigation or inquiry.

All communications shall be reviewed by the Compliance Department, which shall ensure the application of this Code. It will be responsible for answering questions submitted and for coordinating investigations of complaints. Everything will be done confidentially so as not to expose the Employees or CBMM.

CBMM counts on the cooperation of its Employees to resolve irregularities within CBMM. Thus, queries about the understanding and application of this Code to specific situations are strongly encouraged.

This Code does not purport to address all situations that may arise within CBMM. Thus, it is extremely important that any question be directed to the communication channels indicated.

**Violations or potential violations reported in good faith by an Employee or Third Party shall not, under any circumstances, result in any form of retaliation.** CBMM values and encourages an open and transparent communication environment. On the other hand, any false or untrue accusation with the intent of harming others shall be deemed a violation of this Code. CBMM encourages only those communications made in good faith, in a responsible and ethical manner.

If any Employee or Third Party believes that his/her query/reported violation was not given proper attention, the Compliance Department is always available to provide any necessary clarification.

## REPRESENTATION AND UNDERTAKING

I, \_\_\_\_\_, [position] ,  
certify that I have read, reviewed and understood the Code of Ethics and Conduct  
of Companhia Brasileira de Metalurgia e Mineração (CBMM) and its subsidiaries;  
have had the opportunity to ask any questions about the Code; and will comply  
fully with the Code's principles and rules.

I have not directly or indirectly violated or performed any act that may have  
violated the Code. I am also not aware of – and have not received any communication  
or other information alleging or giving reason to believe there has been – any act  
by CBMM or any of its Employees (including all Employees, all members of the  
Board of Directors, and interns working at the headquarters or in any affiliates,  
subsidiaries, joint ventures and consortia in which CBMM participates) or Third  
Parties (the term "Third Party" includes all agents, distributors, advisors, contractors,  
service providers, outsourced workers that carry out any activities in the name of  
or on behalf of CBMM, and any other representatives acting on behalf of CBMM)  
that have violated or may have violated the Code. If I ever learn that such an act  
has occurred or may occur in the future, I will promptly report this information as  
required, using a communication channel specified in the Code.

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Name

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CPF / CNPJ / PASSAPORTE

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

DATE

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SIGNATURE



