



Supplier Code
of Conduct

Contents

01

A Word from our CEO 6

02

Message to our Suppliers 8

03

About this Supplier Code of Conduct 9

04

Our Purposes and Values 10

05

The Conduct We Expect from Our Suppliers..... 11

06

Our Commitment to People and Our Communities 12

6.1 Human Rights (Global Compact and UN Guiding Principles
on Business and Human Rights). 13

6.2 Diversity 14

6.3 Health & Safety 16

6.4 Environment & Sustainability 16

07

Commitment to Business Ethics	17
7.1 Business Relationships.....	19
7.2 Money Laundering and Terrorist Financing.....	19
7.3 Anti-corruption & Antitrust.....	20
7.4 Conflicts of Interests	21
7.5 Gifts, Entertainment & Hospitality	22
7.6 Data Protection - BR GDPR.....	23
7.7 Use of Information	23

08

Commitment to CBA	24
8.1 Image and Reputation	25
8.2 Press and Social Media	26
8.3 Communications & Supplier Development.....	26
8.4 Ethics Hotline.....	27
8.5 Violations of the Code and Consequence Management	28

09

Affirmation Statement	29
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This Supplier Code of conduct was reviewed and approved by Compliance on June 12, 2022.
If you have any questions about the Code, please contact Compliance at juridico.compliance@cba.com.br.

Quick Guide

Start here to learn about CBA's key messages to suppliers in each topic.



01

A Word from our CEO

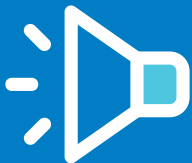
Our CEO, Ricardo Carvalho, talks about our value chain



02

Message to our Suppliers

A message to you, our supplier, about our partnership.



03

About this Supplier Code of Conduct

Here you will find everything you need to know about this Code.



04

Our Purposes and Values

Learn about #OurCBA



05

The Conduct We Expect from Our Suppliers

We list 10 key pointers to guide our suppliers in their business relationships.

Read about the commitments that enable us to achieve excellence



06

Our Commitment to People and Our Communities

Here you will find guidance on doing business in line with the Global Compact and the UN Guiding Principles on Business and Human Rights

07

Commitment to Business Ethics

We offer seven key pointers for our business relationships, providing best-practice guidance to our suppliers.



08

Commitment to CBA

It's important to communicate openly about our partnership. Learn how to make sure our communication is always positive.

09

Affirmation Statement

Let's shake hands!



Poços de Caldas, southern Minas Gerais

1.

A Word from
our CEO



CBA has built a legacy of ethics, best practice and corporate social responsibility that guides our actions and decisions.

We manage our business with integrity and transparency, and work to create a fair and respectful workplace environment. Our Supplier Code of Conduct is a guide that embodies our way of doing business and interacting with our suppliers. This is a key part of how we drive sustainability beyond our fence line. We believe a sustainable supply chain is one where all players address their own future needs while also expanding their focus across wider economic, social, ethical and environmental issues.

To ensure that we continue to improve and create aluminum solutions that transform people's lives, it is important that you read and understand this Code and at all times demonstrate conduct that supports our goal of embedding sustainability in our value chain.

Ricardo Carvalho

CEO

2.

Message to our Suppliers



Dear partner,

We are pleased to present the CBA Supplier Code of Conduct. This important document provides key guidance on how we do business with our suppliers. We recognize that transparent and respectful business relationships are core to sustainable business.

CBA has partners in a wide range of industries and locations, of all different sizes, and with different backgrounds and challenges. But we believe that, as diverse as they are, all our suppliers can incorporate CBA's purposes and values into their day-to-day business.

We are committed to upholding high standards of ethics and conduct, which we share with our suppliers so we can mutually safeguard our reputation and credibility. CBA strives to build wholesome, transparent and sustainable business relationships, and to do this it is up to each of us—we as a company and you as our supplier—to observe and uphold the highest standards of conduct.

We also work to disseminate best business practices—including transparency and sustainable initiatives—supporting our suppliers' development. And we seek partners that can help us create and share more value with our stakeholders. This Supplier Code of Conduct is a guide to help us continue to build win-win partnerships—together.

Roseli Maria de Souza Milagres

Chief Supply Chain & Procurement Officer

3.

About this Supplier Code of Conduct

This Supplier Code of Conduct is designed to provide clarity around the ethical and transparent conduct we expect in our business relationships with suppliers and contractors, in line with our corporate Code of Conduct. We expect all our suppliers and contractors to read and understand these guidelines, and to uphold high standards of business integrity, which includes ensuring safe working conditions, decent treatment of employees, and ethical conduct.

At CBA we are driven by a commitment to do the right thing always. As part of this commitment, we support the development of the communities where we operate and our end-to-end value chain. We know that improving performance is a continuous process and we recognize the role our suppliers have to play in this journey.

At CBA we encourage our suppliers to familiarize themselves and operate in accordance with international conventions, treaties and agreements applicable to their industries, including the:

- Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Global Compact
- ILO International Labor Standards

As well as the following environmental and social standards:

- ISO 14000
- SA 8000

This Code applies to all CBA suppliers and their subsidiaries, at all locations where we operate.



Caxias do Sul

4.

Our Purposes and Values

Purpose

Founded in 1955, CBA produces aluminum solutions that transform people's lives. We collaborate with a wide range of industries to build a better world. Our Purpose reflects our history, our identity and our vision for the future.

Today, CBA is an industry-leading producer of low-carbon aluminum, and the only fully vertically integrated aluminum company in Brazil. CBA is constantly evolving in response to the changing needs of our partners, the industry, society and our planet, as part of our aspiration to build a more harmonious future for all.

Principles and Values

The Votorantim Principles and Values express the Votorantim way of doing things, of being and of going beyond—and are common across all portfolio companies, including CBA.

Nosso jeito...

de ser

INTEGRIDADE

#Fazer o certo
#Respeito e Ética
#Valorizar as Diferenças

de ir além

CORAGEM

#Protagonismo
#Inovação
#Construir o Futuro

de fazer

COLABORAÇÃO

#Geração de Valor Compartilhado
#Redes e Conexões
#Valorizar as Pessoas

V3
VOTORANTIM

cba

5.

The Conduct We Expect from Our Suppliers

- Demonstrate integrity, a good reputation and transparency
- Meet their contractual obligations to CBA and ensure their practices are aligned with this Code throughout the term of the contract
- Comply with all laws and regulations applicable to their business
- Comply with all environmental standards and regulations applicable to the industry
- Pursue sustainability by advancing economic efficiency, environmental balance, social justice and corporate governance
- Treat every person fairly, with dignity and respect
- Avoid situations that could create conflicts of interest in their relationship with CBA
- Safeguard the parties' business relationship and reputation
- Report any violations or suspected violations of ethics standards, whether by their own or by CBA employees
- Like our own employees, our suppliers and their employees, and any subcontractors providing services to CBA, whether on site or off site, are required to uphold the values and principles outlined in the CBA Code of Conduct, which is available at <https://cba.com.br/cba/governanca-ecompliance/>

A full-page photograph of a worker at an industrial plant. The worker is wearing a red hard hat with a 'CBA' logo, a clear face shield, a black respirator mask, a blue long-sleeved work shirt with reflective yellow-green stripes and a 'CBA' logo, and orange gloves. They are standing in front of industrial equipment, including pipes and a yellow overhead crane. The background is slightly blurred, showing more of the plant's structure.

An employee at the Alumínio Plant

6.

Our commitment
to people and our
communities

6.1 Human Rights

CBA is committed to protecting internationally recognized human rights and ensuring that we do not engage in any way in human rights violations.

As signatories of the United Nations Global Compact, we support and observe the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

We also require our suppliers to comply with all applicable labor and social security laws and regulations, and to ensure their employees are provided with decent working conditions, compliant timekeeping, and all applicable employment rights.

CBA is committed to providing suitable working conditions to employees and to any contractors on our premises. We take a no-tolerance approach to violations of labor rights and collective bargaining agreements.

In supporting human rights, CBA is committed and works to:

- Eradicate forced or compulsory labor;
 - Eradicate child labor;
 - Combat sexual exploitation of children and adolescents;
 - Safeguard the rights of traditional communities, including quilombolas and indigenous and riverine communities;
 - Safeguard the rights of migrant workers;
 - Support freedom of association and collective bargaining;
 - Ensure private security personnel respect people's human rights.
-



Employees at the Itapissuma mill

6.2 Diversity

We respect people regardless of their gender, gender identity, color/race, age, physical or mental condition, sexual orientation, background, nationality, religion, belief system, or other aspects of human diversity. We are committed to providing a workplace environment that is equitable and free of discrimination, and it is everyone's duty to ensure no discriminatory practices are occurring within or outside the workplace or business environment, including inappropriate sexual, abusive, aggressive, humiliating or intimidating behavior.



We expect our suppliers to uphold the same standards of conduct in fostering an inclusive workplace environment that is free of discriminatory practices, abuse, harassment or prejudice.



An Environmental Laboratory in Zona da Mata, Minas Gerais

6.3 Occupational health and safety

At CBA we put life first in all our activities. We never compromise when it comes to the health and safety of all those in our value chain. We reiterate the requirement for all suppliers to familiarize themselves with, be aware of and strictly abide by our health and safety standards, policies and procedures.

Safety is non-negotiable for CBA

Our suppliers are required to have health and safety policies, procedures and practices that are communicated to and observed by all employees and subcontractors, creating a healthy and safe workplace environment.

Miraí



6.4 Environment and sustainability

We follow internationally recognized environmental standards in our operations, and are a signatory of the United Nations Global Compact.

CBA requires its suppliers to observe all applicable standards and regulations on environmental management. Suppliers are also required to obtain and comply with all environmental licenses required for production, transportation and other operations.

We expect our suppliers to:

- Comply with environmental regulations applicable to their products and services.
- Implement environmental management systems addressing: the impacts from their operations; initiatives to reduce and/or mitigate environmental impacts; and record keeping of such initiatives.
- Implement eco-efficient and cleaner production methods to reduce consumption of natural resources such as water, energy and other commodities; and minimize waste by closing process loops and reusing materials
- Implement measures to conserve and restore biodiversity.
- Monitor, manage and reduce greenhouse gas emissions.
- Report any spills or other incidents to CBA, follow emergency response procedures, and mitigate and remediate any resulting damage.

As part of CBA's corporate culture, we actively seek opportunities to protect the environment and provide enduring environmental benefits.



Legado Verdes do Cerrado

The Miraí Beneficiation Plant in
Zona da Mata, Minas Gerais

7.

Commitment to
Business Ethics

7.1 Business relationships

CBA is committed as an organization to ethics, and reserves the right to screen its suppliers based on their background with the company and publicly available data. CBA may also reject doing business with suppliers that are critically delinquent on their financial obligations, as determined by risk assessments.

All suppliers must process their business transactions via CBA's Procurement team, which is prepared to handle all procurement matters and provide needed information. The official channels for contacting CBA's Procurement department are:



Linkana: <https://applinkana.com/login>

The CBA website

7.2 Money laundering and terrorist financing

At CBA we follow best practices in relation to restrictions on doing business with parties included in any OFAC, UN, European Union or other sanctions lists. We also work to ensure through periodic due diligence that our business partners are not engaged in money laundering or terrorist financing practices.

We expect our suppliers to be equally diligent in monitoring for and detecting practices that could constitute money laundering or terrorist financing.

7.3 Anti-corruption and Antitrust

Preventing corruption and anticompetitive practices is among the pillars of our Compliance Program.

We require our suppliers to adopt best practices in compliance with anti-corruption and antitrust laws, as well as other laws, conventions and treaties dealing with corrupt practices, including the following:

- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions 1997 (OECD Convention);
- The United Nations Convention against Corruption 2003;
- The Foreign Corrupt Practices Act of 1977 of the United States of America (FCPA);
- The Bribery Act 2010 of the United Kingdom (UK Bribery Act).



Remember: as a supplier your activities may involve interaction with government officials. All such interaction should be handled with integrity, transparency, professionalism and in compliance with company standards.

CBA rejects any practices which could restrict free trade or competition, and any form of corruption.

7.4 Conflict of interests

Our suppliers are required to implement procedures to ensure that any conflicts of interest in their relationship with CBA are identified and addressed. A real or apparent conflict of interests is deemed to exist when a supplier's activities or their personal, family, social or political relationships interfere or have the potential to interfere with their responsibilities and duties to CBA, or if their judgment is or may appear to be affected by the possibility of personal gain.

We expect our suppliers to report to CBA any situation which could create or appear to create a conflict of interests.

Employees at the Alumínio Plant



7.5 Gifts, entertainment and hospitality

Offering and accepting gifts, hospitality or entertainment, even when for the purpose of facilitating business relationships, should be treated with extreme caution.

No gifts may be accepted if they are in excess of a token amount* or if they could influence or appear to influence the recipient's business decisions.

Invitations to attend courses or professional events in Brazil or internationally may only be accepted with formal internal approval and only after any potential conflict of interests has been ruled out.

No hospitality or entertainment of any kind may be requested or accepted.

As a rule of thumb, we refuse offers of paid travel and accommodation. If you believe there is a legitimate reason why CBA should participate in the event or course, this should be decided internally by the leadership team.



Remember: government authorities and their equivalents may only receive institutional gifts, and provided that this has been approved in advance by Compliance.

*Token gifts are defined as institutional gifts of minor material value such as pens, notebooks and other customary marketing gifts.

7.6 Data protection – BR GDPR

Protecting the personal data of CBA employees, candidates and business partners is very important to us. We expect our suppliers to exercise the same diligence in protecting the personal data of their own employees and business partners, ensuring compliance with the Brazilian General Data Protection Regulation (BR GDPR).



If you have any questions, refer to our Business Partner Privacy Policy, available on the CBA Website

7.7 Information security

CBA suppliers must have information security measures in place to ensure the confidentiality, integrity and availability of the information they receive from CBA during the course of providing their services or products.



Confidentiality: CBA information may not be accessed by unauthorized third parties; documents containing confidential information may not be disclosed to third parties without express prior permission from CBA.

Integrity: all information provided by or obtained from CBA must be kept up to date and never tampered with.

Availability: CBA information must be available for use when and as necessary, avoiding losses or waste due to the absence of timely information for its business processes.



8.

Commitment
to CBA

8.1 Image and reputation

Any inappropriate conduct by suppliers could harm CBA's image and reputation and may expose us and our employees, representatives and other business partners to liability. Our suppliers therefore have a duty to help safeguard CBA's reputation as well as their own.

We expect our suppliers to comply with all national and international laws and regulations applicable to CBA's intellectual property rights, copyrights, patents and industrial designs.

CBA's reputation for honesty and integrity is among our greatest assets.

Alumínio plant



8.2 The press and social media

Our suppliers and their employees are expected to uphold CBA's values. Any and all mentions of or references to CBA, our employees or third parties in press interviews or in social media posts must be communicated to and approved by CBA's Communications department.

CBA's official communications can be found in the following channels:

Instagram: @cbaoficial

Linkedin: CBA oficial

CBA – www.cba.com.br

CBA ESG – www.esg.cba.com.br

Home – www.ri.cba.com.br

Conecta CBA podcast hub: www.conectacba.com.br

Corporate Communications e-mail: comunicacaocorpcba@cba.com.br



The internet, social media and instant messaging apps offer new ways for us to interact and communicate. However, as a CBA supplier your posts may not contain any type of confidential or inappropriate information that could be harmful to CBA's reputation. Furthermore, any discrimination, harassment, slander, defamation and libel on social media or instant messaging apps also violate our principles.

8.3 Communications and supplier development

CBA has a supply chain management process through which we work to align our suppliers with our business model and with our principles of innovation and sustainability.

We communicate with our suppliers using multiple channels, including monthly newsletters (CBA News), social media (Linkedin and Instagram), the CBA website, informational emails (email marketing) and networking events.

In 2022 CBA began setting up a Supplier Development Program in which overall supplier assessments are compiled into a new performance dashboard featuring key indicators including ESG, performance and innovation.

CBA recognizes that our supply chain is a crucial component of our business strategy.

8.4 Ethics Hotline

CBA has an Ethics Hotline that transparently and impartially addresses any ethical concerns related to our Supplier Code of Conduct or violations of any laws, regulations, policies and other internal standards.

Our suppliers can also use the Ethics Hotline or contact Compliance directly if they have any questions related to the contents or practical application of our Supplier Code of Conduct or if they witness any misconduct.

Ethics Hotline:

By phone: 0800 0300 4535

At: <https://canaldeetica.com.br/companhiabrasileiradealuminio/>

Legal & Compliance:

juridico.compliance@cba.com.br



Remember: the Ethics Hotline handles all reports impartially, transparently and confidentially, and whistleblowers are kept anonymous and not retaliated against, helping to create a better environment throughout our value chain.



8.5 Code violations and consequence management

Our supply chain process will be actively monitored against this Code, including through assessments, due diligence and audits on our suppliers to ensure compliance. We may also request that suppliers conduct self-assessments, answer questionnaires or provide supporting documents related to the topics addressed in this Code, and implement agreed action plans.

Any violations under this Code may result in disciplinary action including debarment from future orders or even termination of existing contracts, in accordance with CBA's internal rules.

In doing business with CBA, we expect our suppliers to strictly comply with all agreed contractual requirements, including requirements on service levels, quality, schedule, documenting and reporting progress, materials delivered and/or used as part of the scope of supply, as applicable, and compliance with applicable laws and regulations and internal standards.

Strict compliance with this Code is a condition of continued business with CBA.



Aluminum profiles

9.

Affirmation
Statement

We know we can count on you to demonstrate conduct that is aligned with each of the requirements in this Supplier Code of Conduct.

All suppliers are required to carefully read this Code and complete and sign the Affirmation Statement below, acknowledging that they have been given access to a copy of the Code of Conduct and that they understand its contents.

By signing the Affirmation Statement, suppliers agree to ensure compliance with the standards and principles outlined in this Supplier Code of Conduct.

Employees at the Alumínio Plant



Affirmation Statement

I, [name of legal representative] _____
_____, in the capacity of _____
_____, of [name of supplier] _____
_____ a company duly incorporated and validly
existing in accordance with the laws of Brazil, hereby declare that:

- (1) I have read and accept the principles outlined in the CBA Supplier Code of Conduct, which has been delivered to me on this date;
- (2) I will hereafter comply with the requirements outlined in the Code;
- (3) I will ensure my business is compliant with the Code, and work to integrate it into my governance processes;
- (3) I will seek to incorporate the practices outlined in the Code to enhance the sustainability of my business.

I am aware that signing this Affirmation Statement does not create an obligation for CBA to enter into any business relationship with my company.

[City-state, date] _____, _____, 20____ .

(signature)



Supplier Code
of Conduct

