



Code of
Conduct
 **cba**

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Code map

1. #OurCBA

Start here by checking our purpose and values and what our leaders say.



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2. About our Code of Conduct

Now you have in your hands an informative guide to help you in your daily professional activities.

3. Commitment to our people

Keep following to get to know how we care about our relationship with our people, building a healthy work environment and good commercial relationships.



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4. Commitment to the community

We take sustainability very seriously. We are all one community.



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5. Commitment to our CBA

We are always looking after CBA's good image, in any environment.

6. Commitment to ethics in business

For us, ethics are unnegotiable. Therefore, be always aware of the rules and good practices.



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7. Relationships with clients and other business partners

By now, you already know that our Code of Conduct is not limited to our facilities.

8. Queries



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9. Term of Commitment



1.

#Our**CBA**

1.1 Message from the Chair of the Board of Directors

Compliance is everyone's duty and essential for the continuity of sustainable business. We believe that long-term partnerships that contribute to a more equitable society are only possible if the relationship is ethical and transparent.

The Board of Directors is pleased with the conduct it has observed at CBA, which stands out as an example of an ethical company that fosters compliance along the entire value chain.

CBA's compliance program supports the governance of such practices, engaging employees to display appropriate conduct, offering a whistle-blowing channel – the Ethics Hotline – and management policies.

We are confident our employees, suppliers, clients, communities, and business partners are continuously committed to the expected ethics and conduct, further strengthening integrity as part of CBA's DNA.



Luis Ermírio de Moraes

Chair of the CBA Board
of Directors

1.2 Message from the CEO

CBA has a legacy of ethics, best practices and responsibilities that guide our actions and decisions.

We manage our business with integrity and transparency, striving for a fair and respectful working environment.

Our Compliance Program provides the governance that ensures our employees continuously practice compliance.

The Code of Conduct is an essential pillar of the Compliance Program; it is the guiding light of our way of doing things and our way of relating to employees, suppliers, clients, communities, and other business partners: the right way!

To continue on our journey and deliver aluminum solutions that transform lives it is essential to read and understand our Code, and continuously display the conduct expected of each employee, creating sustainability in our value chain.

Together we will keep Our CBA Compliant!

#Somostodoscompliance! (#Weareallcompliance!)



Ricardo Carvalho
CEO of CBA

1.3 Purpose and Values

Purpose

Our Purpose reflects our history, our identity, and our look towards the future.

Aluminum solutions that transform lives.

Values

Votorantim Principles and Values permeate all Votorantim subsidiaries and represent our way of being, of doing, and going beyond. They are also the values of Companhia Brasileira de Alumínio (“CBA”)

Clarity about our
essence. Past,
present and future
balanced. For us, **HOW**
we do it matters.
Our way...

INTEGRITY

Being ethical, honoring our history and building the future with respect.

Act with honesty and ethics anywhere in the world. Votorantim way of behaving include respect individualities and approach differences. Integrity rewards, drives and sustains the success of our business.



COLLABORATION

Believing in a constant and constructive dialogue between people, business and society.

Our continuity only makes sense because we create shared value in a sustainable way. An ecosystem of collaboration and growth, which values people, allows the divergence of ideas and brings us closer to our customers.

COURAGE

Taking responsibility and driving results to build the future.

The prosperity of our businesses comes from our noblest intentions and the achieved results. Therefore, we seek to be an example and work with dedication, continuously seeking to go further. We carry out, innovate and are brave to think and do things differently whenever necessary.





2.

About our Code of Conduct

2.1 Do you have questions regarding which decision to make?

Ethical dilemmas come up when we must make a decision that involves our moral values and have consequences that could impact other people's lives, such as benefiting from confidential information or observing anti-ethical attitudes by others. For this reason, any time you are faced with an ethical dilemma or controversy, or have questions about the best decision to make, ask yourself the following:



If in fact the decision complies with:

- ▶ Applicable laws and regulations
- ▶ CBA internal policies and standards
- ▶ Votorantim Values

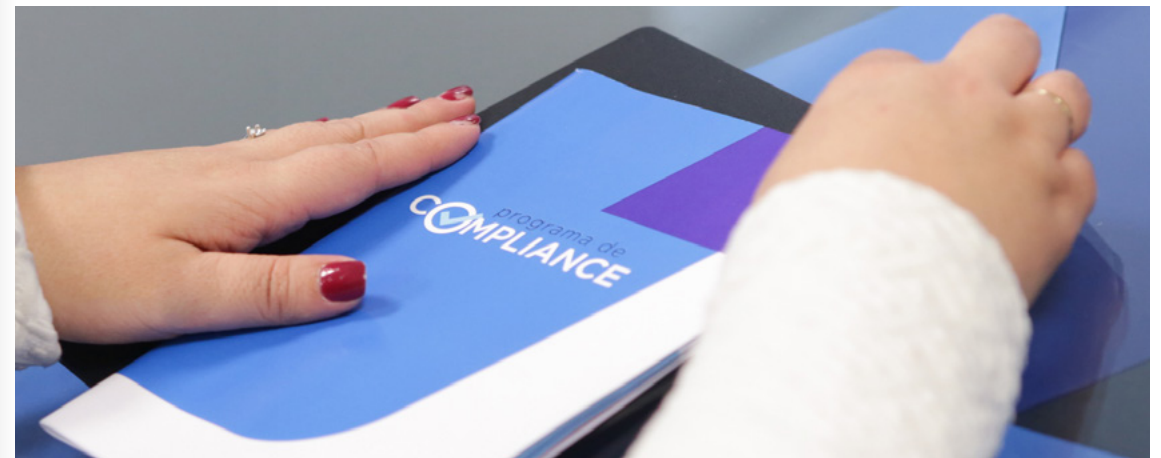


How would I feel if my decision:

- ▶ Were published in the media
- ▶ Were exposed to my family
- ▶ Harmed someone or put someone at risk

#remember:

Remember: Whenever you have a question or need help to resolve these dilemmas remember to talk to your manager, to the local department of Human and Organizational Development ("HOD") or Compliance area or call the Ethics Hotline.



2.2 Application, Management and Amendments

The CBA Code of Conduct applies to all our employees, shareholders, board and committee members (together the “Employees”), and shall be a **reference of good** practices for our business partners, clients, suppliers, service providers and other third parties with whom we relate and that act on our behalf or in our interests or benefit (together the “Business Partners”). It should guide our understanding of the daily conduct we expect in the course of our activities.

The members of the Board of Directors, committees, officers, directors, and managers are responsible for fostering the CBA Code of Conduct and apply it to their routines, promoting the dissemination of its principles and rules!

This Code of Conduct was approved by the Board of Directors on May 14, 2021, effective immediately.

Compliance is responsible for enforcing this Code of Conduct, with the support of CBA senior management and the Conduct Committee.



2.3 Whistle-blowing channels and consequence management

CBA has an Ethics Hotline to analyze and resolve ethical issues involving our Code of Conduct, or violation of laws, regulations, policies and other internal standards. This channel can be accessed by our employees or third parties by phone or via our website. It is available in both English and Portuguese.

To reach the Ethics Hotline call:
0800 892 0791
or go to:
<https://www.cba.com.br/contato/linha-etica>

The Ethics Hotline guarantees that your identity and the information provided will be kept confidential and not revealed to those involved. All questions and reports will be handled by the Hotline in a transparent and impartial way. For handling reports, CBA uses an autonomous channel provided by an independent third party, where we guarantee the right to report anonymously.

We vehemently reject any type of retaliation against those who report potential violations of our Code of Conduct, laws, regulations, and other internal standards, even if the report turns out to be unfounded. Retaliation against any reports are considered a violation of this Code of Conduct, and may be punished with the application of disciplinary measures, without prejudice to applying said disciplinary measures to those who report in bad faith.



The Conduct Committee, whose members are appointed by the Board of Directors, previously analyzes all reports received through the Ethics Hotline. Our statutory Audit Committee will be periodically informed about report-verification activities.

Disciplinary measures

- 1 Verbal or written warnings;
- 2 Suspension;
- 3 Termination, including fair termination;
- 4 Other specific measures depending on the actual situation.

2.4 Conduct Committee

CBA has a Conduct Committee made up of employees prepared to handle issues involving possible deviations of conduct and integrity in general.

All reports submitted via the Ethics Hotline are received by the Conduct Committee, which is responsible for follow-up, among other responsibilities described in its Bylaws:

- Determine the enforcement of applicable measures in each case, including disciplinary measures;
- From time to time, have the Code of Conduct updated and reviewed;
- Make administrative decisions for the more serious violations of the Code of Conduct, laws and other regulations that apply to CBA;
- Issue recommendations of potential conflicts of interest between related parties;
- Ensure the existence and continuity of the Ethics Hotline as a permanent and direct communication channel with the Conduct Committee.

#remember:

If you learn of any breach of our Code of Conduct, internal standards, laws or regulations, we expect you to report this. You can do this directly to your manager, your local department of Human and Organizational Development (HOD), Compliance or, if you would rather, use the Ethics Hotline via phone or website.

The Conduct Committee has full autonomy to ensure it fulfills its obligations. Periodically it informs the Audit Committee of its activities related to following up reports and application of disciplinary measures.

2.5 Training

CBA provides training to all employees at least once a year to ensure they are qualified and aware of the conduct, principles, concepts, and procedures of this Code of Conduct. It also constantly sends out internal memos on related themes. Employees are required to attend these trainings and attendance is suitably registered by Compliance.



3.

Commitment
to our people

CBA VALUES A GOOD WORK ENVIRONMENT AND THE QUALITY OF ITS PERSONAL RELATIONSHIPS. THE FOLLOWING TOPICS DESCRIBE OUR COMMITMENT TO OUR EMPLOYEES AND THE VALUES WE EXPECT WILL GUIDE OUR INTERACTIONS WITH BUSINESS PARTNERS.

3.1 Human Rights

CBA is **committed to protecting internationally recognized human rights**, and ensures it is not involved in the violation of such rights. As a signatory to the United Nations Global Compact, we support and respect the Universal Declaration of Human Rights and the International Labor Organization Declaration on the Fundamental Principles and Rights at Work, among other good governance practices related to Human Rights.

We believe that respect for human rights and valuing human diversity must be ensured to our employees, the communities where we work and all our Business Partners, contributing to a work environment and a society that is increasingly fair, healthy, and plural.



- Therefore, CBA states that:
- ▶ We have zero-tolerance for child labor and any slave-like labor in our operations and those of our business partners;
 - ▶ We promote diversity and inclusion and offer equal and fair opportunities for professional growth to all;
 - ▶ We ensure a working environment free of harassment, prejudice, and discrimination;
 - ▶ We support everyone’s right to join unions or other organizations of their choice;
 - ▶ We safeguard the physical and mental integrity of our Employees by providing a whole-some and safe working environment.

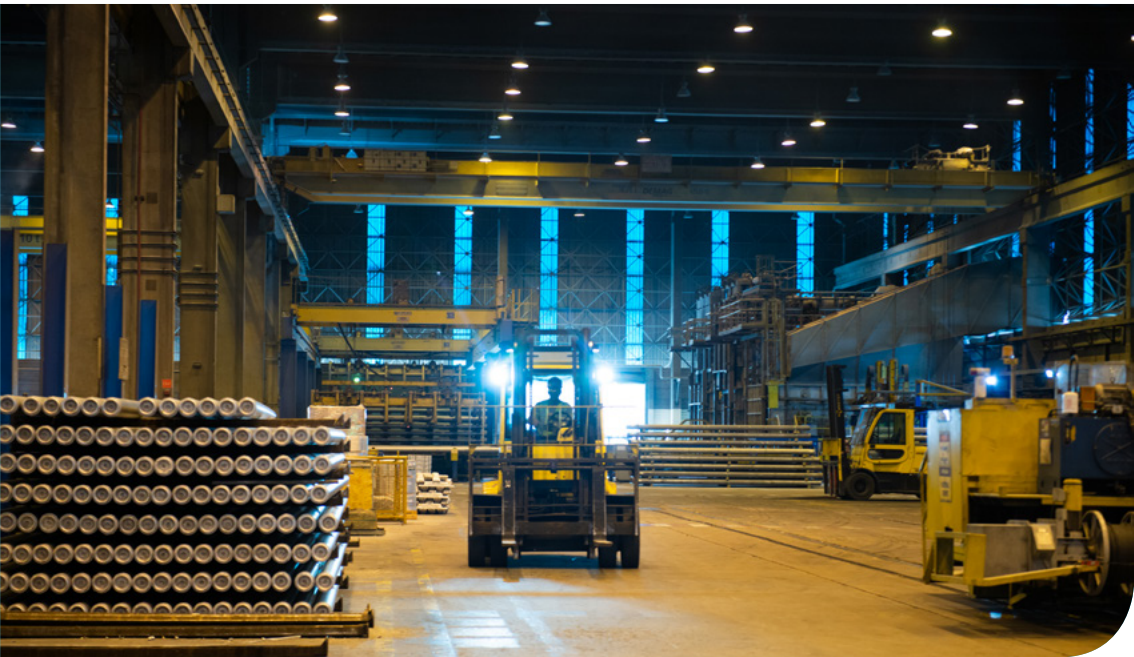
Our Business Partners, such as suppliers and clients, shall practice this same conduct and respect the rights of their employees and the communities they do business in.

3.2 Discrimination, harassment, and intimidation

We fully respect all people, regardless of gender, gender identity, race/ethnicity, age, physical and intellectual condition, sexual-affective orientation, origin, nationality, religion, belief and other attributes inherent to human plurality. Thus, **we are committed to promoting a non-discriminatory and equitable work environment**, treating all Employees, Candidates in the hiring process and any Business Partners in a fair and dignified manner.

We expect you to treat all people with respect, encouraging this behavior at all times so that we may have a work environment free of abuse, harassment, and prejudice. Thus, never behave in a manner that may be offensive, insulting, intimidating, malicious or humiliating, and never distribute or display offensive material, including inappropriate photos, videos, or drawings.

CBA does not tolerate any type of abuse, harassment, or intimidation. It is the duty of all of us to prevent such behavior from happening within and outside the work and business environment, including improper behaviors of a sexual, abusive, aggressive, humiliating, discriminatory or intimidating nature.



3.3 Health and Safety

CBA believes that people’s health and physical integrity are non-negotiable and are above economic and productivity issues. It is the responsibility of each and every one of us to be familiar with health and safety policies, and internal procedures and practices, and rigorously comply with them.

CBA also encourages its employees to care for their own physical and mental health, with programs that are also extended to family members.

We must all perform our functions in a safe manner, properly using all personal protective equipment and operating machinery and equipment according to the safety instructions. **Always remember the Right to Refuse!**

SAFETY IS NON-NEGOTIABLE!



4.

Commitment to the community

SUSTAINABILITY IS THE STARTING POINT THAT GUIDES OUR ACTIVITIES, DECISIONS, AND BUSINESS STRATEGY, AS WE FOCUS ON BECOMING MORE COMPETITIVE AND ON CREATING MORE VALUE FOR OUR CLIENTS, SUPPLIERS, EMPLOYEES, COMMUNITIES, THE

ENVIRONMENT AND SOCIETY AS A WHOLE. WE STRONGLY CHERISH SOCIAL DIALOGUE AND TRANSPARENT RELATIONSHIPS WITH THE COMMUNITY WE ACT IN, AIMING THE BUILDING OF A SOCIAL LEGACY.

4.1 Environment

Regarding the Environment, in all our operations we abide by standards of environmental management that are international references; CBA is a signatory of the United Nations Global compact.

We support a preventive approach to environmental challenges and develop initiatives to foster increased environmental responsibility. We also encourage the development and use of technologies that do not harm the environment, not only in production but along our entire supply chain.



It is part of our **culture** to be attuned to opportunities to preserve the environment and provide long-lasting environmental benefits.

4.2 Sponsorships and Donations

Our vision is that our activities must promote positive transformations in the communities where we do business. For this reason, we sponsor and donate for the social, economic, educational, cultural, and environmental development of the communities in which we do business.

All sponsorships and donations must be in line with the Company's strategy, its Social Responsibility guidelines, the recommendations of the Compliance Program, and applicable legislation.

They are also subject to **prior approval**, as determined by CBA internal standards.



5.

Commitment to CBA

BUILDING AND STRENGTHENING CBA ALSO DEPENDS ON DIALOG AND BEHAVIOR TOWARDS OURS STAKEHOLDERS THUS, OUR BEHAVIOR INSIDE AND OUTSIDE CBA MUST ALWAYS BE CONSISTENT WITH OUR PURPOSE AND VOTORANTIM VALUES.

5.1 Image and Reputation

CBA's reputation for **honesty and integrity** is one of our most valued assets. Furthermore, our Business Partners recognize us as a reliable company that creates valuable partnerships based on industry best practices, ethics, and reliability. It is important to reiterate that CBA's image and reputation are built by all of us, day by day. Thus, we must abide by the following recommendations:

- ▶ The confidentiality of information about CBA and its business shall be rigorously safeguarded in lectures, seminars, and other public venues.
- ▶ If you are invited to participate in an event as a speaker/mediator – either face-to-face or online, your participation and the content must be previously approved by your Director and the Corporate Communications area.
- ▶ Contact with the press is limited to appointed CBA spokespersons, with the support of Corporate Communications.

THE INTERNET, SOCIAL MEDIA AND INSTANT MESSAGING APPS OFFER NEW WAYS FOR US TO RELATE AND COMMUNICATE. HOWEVER, AS A CBA EMPLOYEE YOUR POSTINGS MAY NOT CONTAIN ANY TYPE OF CONFIDENTIAL OR INAPPROPRIATE INFORMATION THAT COULD BE HARMFUL TO CBA'S REPUTATION. FURTHERMORE, CASES OF DISCRIMINATION, HARASSMENT, SLANDER, DEFAMATION AND LIBEL ON SOCIAL MEDIA OR INSTANT MESSAGE APPS ALSO VIOLATE OUR PRINCIPLES.

#remember:

Wherever you are identified as a CBA employee your conduct must be compatible with Votorantim Values, thus safeguarding the company's good corporate image.

5.2 Company Assets and Intellectual Property

CBA assets and equipment may only be used for professional purposes. Personal use is allowed only in specific cases defined by CBA. Such assets and equipment include, for instance, machinery and tools, vehicles, corporate cell phones, computer and notebooks, documents, software and physical and digital facilities. Access to, and dissemination of inappropriate content, such as encouraging illegal practices, forwarding pornographic or pedophilic content, or content that encourages violence, racism, etc. is not allowed.

Furthermore, **all of your output as a CBA employee is the intellectual property of the company.** This includes data, spreadsheets, reports, technologies, innovations, presentations, and engineering works.

#remember:

That we all have a duty to use company assets and equipment correctly and responsibly, taking measures to avoid improper use or destruction.

5.3 Sale of goods, merchandise, and services

No goods, merchandise or services may be marketed (sold, bartered, delivered or the like) on CBA premises during working hours. This applies also to meal and other breaks.



5.4 Use of alcohol and drugs, carrying weapons

Providing any services or entering into any type of business with CBA **while under the effect of alcohol or illegal drugs** is prohibited, as is the use of such drugs on CBA premises.



Alcoholic beverages may be consumed during celebrations if previously approved by management.

Employees using legal drugs that could cause impaired attention, drowsiness or any other symptom that could put a life at risk must seek the CBA medical area to assess the situation, so the employee may be assigned to a position where there is no exposure to risk or some other measure at the physician's discretion.

Weapons of any nature are only allowed on CBA premises by duly authorized professionals.

5.5 Information Security

CBA values information security. All information shall be handled with the utmost attention and responsibility, be it oral, written, in audio or video format, on papers, documents and IT systems. The **confidentiality, integrity** and **availability** of the information must be safeguarded to provide a safe environment for all.

You must use CBA information responsibly, avoiding, for example, opening suspicious e-mails or files, and always check data in documents (in particular financial documents). It is important to adopt good habits such as always blocking your computer when leaving the workplace, using strong passwords, and changing them from time to time, storing documents in suitable places and always report any situation that might compromise information security.

Confidentiality: CBA information shall not be accessed by unauthorized third parties; documents containing confidential information may not be sent to third parties. This includes public conversations about internal company information, which should be avoided at all times, as well as carelessness or failure to take suitable measures to secure documents in physical and digital files.

Integrity: All CBA information shall be kept up-to-date, no information may be adulterated. Amending or removing entries, reports and information in general requires suitable authorization. Information about CBA may only be disclosed by suitably authorized employees. It is essential that any information be accurate and correctly disclosed. Unauthorized persons are strictly prohibited from speaking on behalf of the company.

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

CBA uses security measures to safeguard the security of its information. this includes physical, logical, and organizational measures to protect its assets.

ALL INFORMATION THAT PASSES THROUGH CBA INFORMATION SYSTEMS, INCLUDING COMPUTERS, NOTEBOOKS AND CELL PHONES, IS MONITORED.

#remember:

That your passwords are personal and nontransferable.





6.

Commitment to **ethics** in **business**

AS A CBA REPRESENTATIVE YOUR CONDUCT MUST ALWAYS BE BASED ON TRANSPARENCY AND INTEGRITY, AS WELL AS HONORING OUR COMMITMENT TO THE HIGHEST STANDARDS OF ETHICS. AFTER ALL, FOR US, INTEGRITY IS NON-NEGOTIABLE.

6.1 Corruption Prevention and government relations

CBA repudiates any type of corruption. One of the pillars of our Compliance Program is corruption prevention. For this, CBA developed a number of internal standards that provide in-depth details of our actions and procedures to help our employees understand the types of corruption that exist, avoiding losses for CBA and any negative impact on our image and reputation. It's important to remember that corruption is a crime!



It's the responsibility of all of us to recognize and enforce the rules and safeguards described in the Corruption Prevention pillar of our Compliance Program and in our internal standards. You are also responsible for **reporting any questionable conduct** you are aware of using the channels provided.

We remind you that sometimes, in the performance of our jobs, we will have to interact with Public Administration. Ethics, transparency, and professionalism, as well as compliance with internal standards must always be present in such interactions!

PLEASE CHECK THE ANTI-CORRUPTION POLICY AVAILABLE ON THE CBA WEBSITE IF YOU HAVE ANY QUESTIONS.



6.2 Involvement in Politics

CBA respects the rights of its employees to involve themselves in civic matters and participate in the political process. However, this should take place in their free time and at their own cost. Furthermore, employees must make it clear that any opinions are their own and are not the views of CBA. CBA resources, premises and images may not be used to pursue the personal political or party interests of its employees.

The use of t-shirts, caps, cars with stickers or any other material that constitutes advertising for candidates or political parties may not be used on CBA premises.

#remember:

That CBA does not make any type of donation to electoral campaigns, candidates or political parties.

6.3 Money laundering and terrorism financing

Money laundering consists of using legitimate transactions to hide illegal operations, in particular the financial gains from such operations. **This is a crime; therefore, we do not accept any practice that might facilitate or foster money laundering involving CBA business.**

To this end, it is important that all our business are conducted with upstanding partners whose activities and resources are fully legitimate. CBA has well-established due diligence processes for its Business Partners, in addition to specific control tools for loss and fraud prevention and to analyze financial transactions. We are also seriously committed to our accounting and fiscal integrity, ensuring the reputability of our transactions and books, as well as suitable systems.

The opposite may also take place, with legal businesses used to sponsor illegal activities, such as the misappropriation or transfer of materials and/or funds to foster activities linked to terrorism, drug and people trafficking, among others that harm human rights.

To avoid this, we adopt best practices regarding limitations on conducting business with parties on the OFAC, UN, EU and other sanctions and embargoes lists. From time to time, we assess our Business to make sure we are not doing business with parties on these lists and that might be involved in illegal activities.

6.4 Fair Competition

CBA rejects any practice that might limit free trade or competition, in particular the illegal exchange of sensitive information, formation of cartels, fraud in public tenders or abuse of power. We are fully committed to complying with the laws of competition.

It is the responsibility of all CBA's employees to recognize and enforce the rules and safeguards described in the Competition pillar of our Compliance Program and in our internal standards. Everyone is also responsible for reporting any questionable conduct you are aware of using the channels provided.

#remember:

- Under no circumstance should sensitive data such as current and future prices, profit margins, discount policies, capacity, processes, manufacturing methods and costs, sales territories, marketing plans, growth plans, measures to impede or hamper the entry of new competitors, among others, be discussed with the competition;
- Always check with Compliance before registering CBA in any association.



6.5 Conflicts of Interest

In your day-to-day activities you will face many decisions that could constitute a conflict of interest.



Conflicts of Interest are real or apparent conflicts that may emerge when your activities and personal, family, social or political relationships interfere or could interfere in your duties and responsibilities towards CBA, or whenever your assessment of a situation is or may appear to be impacted by the possibility of personal gain.

CBA does not allow relatives to be hired or kept in positions where there is a direct hierarchical relationship or that report to the same immediate superior. This is also true for employees who are in a romantic relationship with each other. Specific cases shall be handled by the HOD and analyzed by the Conduct Committee.

Performing paid or unpaid activities while employed by CBA is allowed if such activities take place at different times and do not represent any conflict of interest with CBA activities.

#remember:

The existence of an apparent Conflict of Interest is not, in itself, a problem but failure to report it **is!**

6.6 Personal Data Protection

Protecting the personal data of CBA employees, candidates and Business Partners is very important to us. We strive to ensure our activities take place in an environment that is safe for all. This is one of our priorities.

We use all necessary measures to protect personal data, focusing on continuously improving our actions and ensuring the security and reliability of our relationships.

Whenever you are accessing, sharing, producing, storing, transferring or otherwise handling personal data in the context of any relationship with CBA it is important to ask yourself:

- ▶ Am I allowed to access the data? Do I have a contract (working or service agreement), commercial relationship (client or supplier) or any other type of relationship that would justify this access?
- ▶ Do I really need to access the data? Is it related to something I really must know to perform my duties? Do I have access to more data than I need?
- ▶ Am I accessing data in a secure environment? Is the data, in particular the more sensitive ones, protected by password or encryption? Am I using a secure and stable Internet connection? Is the data protected against unauthorized third parties?

Check the Business Partner Privacy Policy available on CBA website, and the Employee Policy available on our internal channels if you have any questions.

6.7 Investor relations

In compliance with the principles of corporate governance, CBA only communicates with all its capital providers transparently and within industry best practices and applicable laws and regulations.

CBA's financial situation and information about its performance are **shared with the market in a transparent and reliable way**. The same principles of transparency apply to related parties commercial transactions, which are allowed pursuant to our governance standards and applicable regulations.

6.8 Insider Information

Insider information is relevant information about the company's business and situation. In other words, this information could impact CBA share prices and thus investor decisions to sell, buy or hold these securities.

CBA prohibits its employees from **using CBA insider information for their own or third-party benefit, or to obtain any advantage when trading securities**. In order to maintain market transparency and isonomy, CBA is required to report to the relevant agencies any material fact related to its business.



7.

Relationships with **Clients,** **Suppliers** and Other **Business** **Partners**

THE CONTENT OF CBA'S CODE OF CONDUCT IS NOT LIMITED TO OUR PEOPLE OR OUR PREMISES. WE BELIEVE THAT THE POSTURE WE EXPECT OF OUR EMPLOYEES IS THE SAME WE EXPECT OF OUR CLIENTS, SUPPLIERS AND ALL OUR OTHER BUSINESS PARTNERS.

7.1 Gifts, Entertainment and Hospitality

Receiving gifts, hospitality, or entertainment may be a legitimate way to develop trade relationships but **requires caution**.

Gifts other than of symbolic value* **may not be accepted**, nor may more than one gift be accepted from the same person or company within the same year. **Gifts intended to influence or that appear to influence the recipient in making his/her business decisions must always be refused.**

Invitations to participate in domestic and international professional courses and events may only be accepted if formally approved by the manager/director, who is responsible for analyzing the possible existence of a conflict of interest. Compliance shall be informed to check the fairness of the entire process.

Hospitality and entertainment of any type may not be solicited or accepted by anyone connected to CBA, including employees, suppliers, clients and Business Partners in general. As a rule of thumb, you should refuse offers of paid travel and lodging. If you believe there is a legitimate reason why CBA should participate in the event or course, take this up with the Conduct Committee for a decision.

REMEMBER THAT GOVERNMENT AUTHORITIES AND THEIR RELATIVES MAY ONLY RECEIVE INSTITUTIONAL GIFTS AND PROVIDED THAT THIS HAVE BEEN APPROVED BY COMPLIANCE AHEAD OF TIME.

*Symbolic gifts are institutional gifts of low material value such as pens, notebooks and other typical marketing gifts

7.2 Supplier Contracting and relationships

Our suppliers are considered one of the most important and strategic resources for CBA business. For this reason, we seek to establish **valuable partnerships** based on **ethics, compliance, sustainability** and **respect to human rights**. Any unsuitable conduct on the part of our suppliers could have a negative impact on our image and reputation and expose CBA, its employees, representatives and other Business Partners to legal liabilities. Thus, we must adopt the highest standards of transparency and integrity, creating objective and impartial criteria to select and keep suppliers.

To protect our reputation and strengthen our supply chain, CBA suppliers must meet at least the following criteria:

- ▶ Good-standing tax situation
- ▶ Economic-financial capacity
- ▶ Technical capabilities
- ▶ Reliability
- ▶ Compliance with legal, health, safety, sustainability, human rights and compliance obligations



8.

Queries

SHOULD YOU HAVE ANY QUERIES REGARDING THE CONTENT AND/OR APPLICATION OF THE CODE OF CONDUCT PLEASE CONSULT YOUR MANAGER, YOUR LOCAL HOD OR COMPLIANCE. YOU MAY ALSO SUBMIT YOUR QUERIES TO ANY OF THE ETHICS HOTLINE CHANNELS LISTED BELOW:

By phone: 0800 892 0791

Online: <https://www.cba.com.br/contato/linha-etica>



9.

Term of **Commitment**

CBA counts on you to display Conduct that is aligned with the content of the CBA Code of Conduct. All employees must carefully read this Code of Conduct, complete and electronically sign the Term of Awareness and Compliance, stating that they have had access to a copy of the Code of Conduct and are aware of its entire content. By signing this commitment employees agree to safeguard the application of the standards and principles of this Code of Conduct.

Code of **Conduct**

The logo consists of a stylized blue 'b' inside a circle, followed by the lowercase letters 'cba' in a bold, white, sans-serif font.

cba

Companhia Brasileira de Alumínio
cba.com.br