



Sustainable Procurement Policy

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1. PURPOSE

The purpose of this Policy is to establish guidelines on Supply Chain processes and the environmental, social and governance (ESG) criteria that are embedded in the procurement process.

2. SCOPE

This Policy applies to all employees, managers, contractors, suppliers and customers of Companhia Brasileira de Alumínio ("CBA") and its subsidiaries, all of whom are responsible for ensuring they understand and comply with this Policy at all times.

3. REFERENCE DOCUMENTS

CBA Compliance Booklet

CBA Code of Conduct

Integrated Management Policy

Diversity and Inclusion Policy

CBA Anti-corruption Policy

PG_VM_AL_SUP_001 – Capex Project Procurement

PG_VM_AL_SUP_002 – Procurement Procedure – MRO and External Repairs

PG_VM_AL_SUP_003 – Raw Material Procurement

PG_VM_AL_SUP_007 – Services Procurement

PG_VM_AL_SUP-006 – Supplier Management

PC-VM-SUP-001 – Procurement Standard

4. DEFINITIONS

Management: officers, directors, shareholders, and committee members.

Supply Chain: the sequence of steps in the production process, from extraction of raw materials to production of the end product for marketing.

Value Chain: the set of activities that add or subtract value for a company and its stakeholders, from designing products and/or services and obtaining inputs and raw materials, through interacting with suppliers and contractors and producing, selling and delivering the product and/or service to consumers and customers, to aftersales or post-use service (Porter, 1985).

Code of Conduct: the Code of Conduct approved in a meeting of CBA's Board of Directors. The Code is a guide that embodies our way of doing business and interacting with our employees, suppliers, customers, communities, and other business partners.

Local communities: persons or groups of persons living and/or working in any areas that are economically, socially, or environmentally impacted (positively or negatively) by an organization's operations (Global Reporting Initiative).

Traditional communities: people or groups who are culturally distinctive and recognize themselves as such, who have their own forms of social organization, and who depend on land and natural resources for their cultural, social, religious, ancestral, and economic reproduction, using knowledge, innovation and practices generated and transmitted by tradition (Federal Decree no. 6040, dated February 7, 2000). Traditional communities include indigenous populations, quilombolas, riverine and other communities.

Human Rights: human rights are rights inherent to all human beings, regardless of their race, sex, national or ethnic origin, language, religion, or any other status. Human rights include aspects such as: eradicating child, forced and slave labor; combating discrimination in all its forms; valuing diversity; preventing workplace and sexual harassment; combating sexual exploitation of children and adolescents; and providing decent working conditions.

Labor Rights: the set of laws and regulations governing employer-employee relationships and the rights inherent to a person's status as a worker. In Brazil, labor rights are governed by the Consolidated Labor Regulations (CLT), the Federal Constitution and other related laws, as well as by the conventions of the International Labor Organization (ILO). Other sources of labor rights include collective bargaining agreements made through labor and employer unions, and the regulatory framework governing labor unions.

Employees: employees hired and registered in accordance with applicable labor regulations.

Suppliers and contractors: any person or entity hired or engaged by CBA. For the purposes of this policy, suppliers and contractors include, but are not limited to sales representatives, agents, consultants, lawyers, distributors, resellers, real estate agents, customs agents, service providers, shippers, and other suppliers.

Significant suppliers: suppliers whose scope of supply can have significant economic, environmental, social and reputational impacts; whose raw materials or services are essential for the company's core business and, if unavailable, will adversely affect a plant's production performance; single-source suppliers that are difficult to replace; high spend suppliers; and suppliers whose materials/services are related to the company's quality management system certifications (IATF, ASI, etc). From a sustainability perspective, critical suppliers also include those suppliers that, while not the most significant economically, may be a weak link in the supply chain and pose a risk in terms of social, environmental and reputational impacts.

Small and medium-sized suppliers: suppliers classified as small and medium-sized enterprises by federal agencies and/or credit rating agencies.

Policy: this "Sustainable Procurement Policy".

Migrant worker: a person who migrates from one country to another with a view to being employed otherwise than on his own account, including any person regularly admitted as a migrant for employment (C097 – Migration for Employment Convention).

5. GUIDELINES

At CBA we are guided by our commitment to always do the right thing for all stakeholders. We are committed to making a positive contribution to society and the environment also making an effort to be increasingly sustainable in everything we do, with a particular focus on our value chain. We know that improving performance is a continuous process and we recognize the role our suppliers must play in this journey.

Through this "Sustainable Supply Policy", which guides our procurement processes, we intend to make our operations more sustainable by:

- Comply with the laws and regulations of the countries where we operate.
- Adhere to the highest standards of economic, social, ethical, and environmental practices.
- Minimize social, environmental, and economic risks and impacts in our supply chain.
- Drive efficiency and productivity with sustainability.
- Capture competitive advantage by creating shared value.

- Communicate this policy to and raise awareness among internal and external stakeholders.

The commitments we assume and share with our suppliers are reflected in the aspects mentioned below:

Environmental

- Implement environmental management and related systems.
- Contribute to minimizing or neutralizing emissions that are causing climate change.
- Strive for energy efficiency and the use of clean energy.
- Promote the management of water resources, emphasizing the rational use of this asset.
- Support, promote and foster a circular economy.
- Implement waste management, minimizing generation throughout the supply chain and ensuring waste materials are optimally disposed.
- Take action to protect biodiversity.

Social

- Ensure decent working conditions and compliance with Labor Principles and Rights applicable to activities and throughout the entire supply chain.
- Ensure and protect the health and safety of our employees and communities across the supply chain.
- Promote and support diversity and inclusion.
- Respect and promote human rights in any circumstances by our employees, suppliers, customers, other business partners, such as transport and food service providers, private security agents, and other suppliers.
- Value, involve and support surrounding communities and guarantee the rights of traditional communities and migrant workers.
- Mitigate supplier dependence on business with CBA.
- Build business relationships with small and local suppliers.

Governance and ethics

- Build fair and transparent relationships with suppliers.
- Act always with ethics and integrity and in accordance with established compliance principles.
- Care for reputation.
- Assess, identify, and control risks associated with business and ethics.
- Promote the development and use of innovative solutions.
- Promote, value, and share sustainable practices throughout the entire supply chain.

As a company, we recognize our responsibility to influence our value chain to promote sustainability and we want our suppliers to engage in this continuous development with us. In our view, supply chain sustainability foresees that all companies continue to meet their needs in

the future, but broaden their vision to economic, social, ethical, and environmental aspects.

Based on this Policy, the Supply Chain process will be actively monitored, and there may be assessments, due diligence, and audits of our suppliers. We may also ask them to carry out self-assessments, answer questionnaires or send documents related to the topics set out here.

If behaviors or practices are identified that violate the provisions of this Policy and other internal CBA rules, we expect our employees, whether internal or outsourced, and suppliers to immediately report the problem to CBA through their contact at the Company, or our website cba.com.br/contato, or through our Ethics Line (0800 89 8920791).

Impartial and transparent, the Ethics Line guarantees the confidentiality of all information, preserving the identity of those involved and helping to promote a better environment for our entire value chain.

In the event of non-compliance with the practices established here, CBA reserves the right to take the appropriate measures.