

SOCIAL RESPONSIBILITY POLICY

COMPANHIA BRASILEIRA DE ALUMÍNIO

Approved by the CBA Board of Directors

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Applicable from the date of approval until a new decision by the Board of Directors

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SOCIAL RESPONSIBILITY POLICY

INTRODUCTION

This "Social Responsibility Policy" aims to establish and assure the guidelines governing the conduct of the Company and its subsidiaries in respect of the commitments of Companhia Brasileira de Alumínio (CBA) to social investment and community relations guidelines.

REFERENCES

Internal

- Management Standard for Social Investment
- Donations and Sponsorship Policy
- Code of Conduct
- Human Rights Policy
- Stakeholder Engagement Policy
- External Communications Policy
- Managerial compliance standard
- Managerial External Crisis

Management Standard

- Instituto Votorantim Social investment guide
- ABNT NBR ISO 26.000
- ASI Aluminum Stewardship Initiative
- · Principles of the United Nations (UN) Global Compact
- UN Framework on Business and Human Rights
- UN Universal Declaration of Human Rights
- UN International Bill of Human Rights
- Guidelines, targets and indicators of the Sustainable Development Goals (SDGs)
- Brazilian General Data Protection Regulation Federal law 13.709 of 08/14/2018

SCOPE

This Policy applies to CBA and its subsidiaries, covering all employees of the Company and its units, Executives, communities where we operate and other stakeholders, as well as greenfield and brownfield projects. All clients, service providers and suppliers and other partners of CBA and its subsidiaries should read this Policy and abide by it, avoiding conflicts and violations.

EFFECTIVENESS

This Policy is effective from the date it is approved and may be amended by decision of the CBA Board of Directors.

GENERAL PROVISIONS

This Policy shall be monitored by the CBA Board of Directors, Sustainability Committee, Executive Board and Executive Sustainability Committee, as applicable:

- The Board of Directors is tasked with a) approving this policy; b) demanding that all the Company's strategies, programs, projects and actions comply with and promote this Policy; c) systematically (at least twice a year) monitor the initiatives involving the topics of community engagement and social investment; d) periodically reassess the suitability of the social investment and community relations strategy adopted by CBA.
- The Sustainability Committee is tasked with: a) evaluating updates and/or changes to this policy; b) updating and implementing the policy; and c) recommending and approving the policy to the Board of Directors.
- The Executive Board is tasked with: a) assuring that all programs, projects and initiatives carried out in the respective boards comply with the provisions of this Policy; b) working on the management and monitoring of initiatives within its board.
- The Executive Sustainability Committee is tasked with: a) updating this policy as and when necessary; b) assuring that all the programs, projects and initiatives carried out at the Company comply with the provisions of this Policy.

Non-compliance with the guidelines set out herein and the related laws to which CBA is subject, including due to omission, shall result in the imposition of disciplinary measures and penalties established by law, in the CBA Code of Conduct and Consequences Management policy of CBA.

DEFINITIONS

Executives: officers, board members and committee members.

<u>CBA Code of Conduct</u>: internal document called Code of Conduct approved by the CBA Board of Directors' meeting.

<u>Local communities:</u> 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).

<u>Traditional communities:</u> 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.

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

<u>Suppliers and Contractors</u>: any person or entity hired or engaged by CBA, such as: sales representatives, agents, consultants, lawyers, distributors, resellers, real estate agents, customs agents, service providers, shippers, and other suppliers etc.

<u>Stakeholders</u>: All material stakeholders with interests in the company or individuals or entities that undertake some type of direct or indirect risk against the Company.

Policy: this "Social Responsibility Policy".

<u>Geographies</u> - locations where CBA has operations or is located in a zone of influence and impacted by production activities.

<u>Social investment</u>: social investment is voluntarily passing through private funds in a planned, monitored and systemic way to social and cultural projects. This investment should support the business strategy, always pursuing the socioeconomic and cultural transformation of CBA's geographies.

<u>Characterization</u>: territorial diagnosis ascertaining secondary and primary socio-economic and environmental data, analyzing the operation's profile, identifying key stakeholders and their historic relations to map challenges and opportunities in order to build a win-win relationship between the company and the community.

<u>Social planning</u>: defining goals, triggers and macro actions to be implemented every year, to achieve the intended results.

<u>Social investment plan</u>: in this plan the company defines the most suitable solutions for demands prioritized in Social Planning and builds its portfolio of initiatives, based on the social strategy. The initiatives or solutions could be proprietary or acquired technology. It is a long-term plan.

CHAPTER 1. GENERAL GUIDELINES

This policy aims to advise on how CBA is proposing to relate with communities and drive local development. CBA undertakes to:

- Participate and contribute to government policy and/or collective sustainable development agendas whenever possible.
- Dialog and maintain open channels with the community transparently, in accordance with the External Communications policy and Stakeholder Engagement Policy.
- Valuing the role played by local actors and empowering civil society.
- Whenever possible participating in councils, committees (or similar bodies) to discuss local development.
- Allocate priority to structuring social investments conducive with government policy and local vocations.
- Establishing indicators for monitoring set targets and monitoring, evaluating and reporting results.
- Basing the relationship with stakeholders on the Company's proactiveness in dialog with communities and through respect and transparency.
- Characterizing the municipality and knowing its geographies, as well as using social investment to engage stakeholders in development of their territories.
- Conducting Due Diligence on Human Rights and periodically updating it in accordance with the criteria of the Aluminium Stewardship Initiative ASI.
- Respecting local legislation in force in respect of engaging local, traditional and indigenous communities, conducting preliminary, free and informed consultations, where applicable.
- Monitoring relations with communities and possible mitigating impacts, informed by the crisis management policy.

• Wherever possible participating in and fostering local initiatives - promoted by stakeholders - aiming to address topics related to gender, race/color and sex diversity.

CHAPTER 2. COMMUNICATION CHANNELS

Regardless of their relationship with CBA, any stakeholder can contact the company through the available channels:

• Corporate Website: https://cba.com.br/en/

• Investor Relations website: https://ri.cba.com.br/en/

• ESG Website: http://esg.cba.com.br/en/home-en/

• LinkedIn: https://www.linkedin.com/company/cbaoficial/

• Instagram: https://www.instagram.com/cbaoficial/

• Ethics Line: a confidential whistleblower channel for internal and external stakeholders, available 24 hours a day on the telephone number (0800 89 8920791) and through the site (https://cba.com.br/en/contato/linha-etica/). All Employees, Executives, Contractors, Suppliers and other stakeholders who become aware of or suspect any real or imminent violation of this and/or other policies or applicable legislation shall reach out to our Ethics Line. Allegations shall be impartially and independently investigated and assessed by CBA's Conduct Committee. CBA reserves the right to take appropriate action to address any violations of the requirements established herein.