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## 1. OBJECTIVE

The objective of this Policy is to define behavior and conduct guidelines for the Employees, Officers and Contractors of Companhia Brasileira de Alumínio ("CBA") and its subsidiaries regarding domestic and international government agencies in the performance of their duties on behalf of CBA, thus ensuring the highest standards of integrity and transparency in all its procedures and compliance with best practices in Corporate Governance.

This policy complies with Law 12,846/2013 and Federal Decree 8,420/2015, as worded on the date this Policy was issued. Furthermore, this Policy takes into consideration best practices in governance regarding anti-corruption measures in Brazil and the world including, for example, as disclosed by the Brazilian Federal General Comptroller (Controladoria Geral da União - CGU) - Ministry of Transparency, Oversight and Control, and the United States Department of Justice (DOJ).

## 2. SCOPE

This policy applies to all CBA Employees, Officers and Contractors.

Under this Policy, all CBA Employees, Officers and Contractors are responsible for understanding and complying with this Policy at all times, regardless of where they live or work.

## 3. REFERENCES

VSA Corporate Compliance Handbook  
 Compliance Leaflet  
 CBA Corporate Code of Conduct  
 Federal General Comptroller (CGU) Integrity Program


## 4. DEFINITIONS

Officers: directors, board members, shareholders, and committee members.

Government Authorities: anyone who performs a public function on a temporary or permanent basis, with or without compensation, regardless of the position held or type of affiliation. This includes but is not limited to: (i) any individual in the Federal or State Executive, Legislative, Judiciary or Public Ministry (office of the prosecutor); (ii) any individual working for government companies, mixed-economy entities, autarchies or public foundations; (iii) any individual working for a public service utility such as power distributors or any public teaching or health care institution; (iv) any candidate to a government position or member of a political party; (v) any individual working for diplomatic representations or state-owned company in a foreign country; (vi) any individual working for international government organizations such as the UN or the WTC.

Employees: Employees who have been duly hired and registered according to applicable labor laws, as well as CBA executives.

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Government Authority Relatives: close individuals, friends, spouses or family members of a Government Authority up to the third-level, who might benefit from this condition.

Decree 8,420/15, applicable since March 19, 2015. This decree governs the objective administrative responsibility of legal entities for the practice of acts against any domestic or foreign government administration as per Law 12,846/2013.

Brazilian Anti-Corruption Law: The Brazilian Anti-Corruption Law, Law **12.846/2013**, applicable since January 29, 2014, states that legal entities headquartered or represented in Brazil have civil and administrative responsibility for any actions against any domestic or foreign public administration, regardless of whether or not they were directly involved in said action.

Contractors: any physical or legal entity retained by CBA that has or may come to have any type of contact with any Government Authority. Thus, for the purpose of this policy, commercial reps, facilitators, consultants, attorneys, distributors, resellers, brokers, freight forwarders, service providers, loaders and suppliers shall be considered contractors.

Nominal Amount: an amount considered small enough in either monetary terms or frequency not to be seen as something that could or may have improperly influenced the judgment or decisions of the recipient.

## 5. GUIDELINES

### 5.1. Overall Guidelines

CBA Employees, Officers and Contractors shall never offer or provide any monetary or other advantage to any Government Authority or person related to a Government Authority to influence any decisions that could impact the company's business, to gain any personal advantage that could have an impact on CBA's corporate interests, or to obtain confidential information about business opportunities, tenders or competitor activities.

Employees, Offices and Contractors shall avoid any and all contact that might be construed as impropriety.

CBA makes decisions based solely on legitimate commercial data such as prices, quality, and service, among other reasonable elements.


CBA shall require that any contractors interacting with Government Authorities and their relatives on its behalf comply in full with the guidelines in this Policy and the CBA Code of Conduct. CBA reserves the right to perform its own due diligence before or after retaining the contractor to verify compliance with this policy.

CBA shall ensure it investigates anti-corruption elements prior to any merger or acquisition.

### 5.2. Giving and Receiving Gifts

The CBA code of conduct governs the giving and receiving of gifts to and from people associated with private enterprise, affiliates and non-governmental agencies, and stipulates that Government Authorities

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and their relatives may only receive institutional gifts if this has been approved by Compliance ahead of time.

No gift shall be offered, promised, given, or received directly or indirectly to any Government Authority or relative thereof, with or without the goal of influencing the decisions made by the Government Authority as even the appearance of illegality must be avoided in all cases.

Any gifts given or received must comply with applicable legislation and in no case may cash or cash equivalents be exchanged.

When exchanging gifts is appropriate, CBA may only give or receive gifts of Nominal Value that are not intended to influence any business decisions.

CBA Employees, Officers and Contractors are strictly forbidden to promise, offer or give gifts other than institutional gifts to Government Authorities or their relatives, be it directly or indirectly. In all cases such gifts must be approved by the Compliance Area ahead of time.

All records (including expense accounts) related to gifts must be complete and accurate. Presenting false or misleading information, or willfully excluding information may result in disciplinary measures against the Employees and Contractors involved, and termination of employment or contract as per the Code of Conduct, without prejudice to reporting the case to the relevant authorities, if applicable.

Regardless of the amount, CBA discourages its Employees, Officers and Contractors from receiving gifts if they are in a position to influence or make decisions that impact the person giving the gift and/or this person's company or Government authority. If a gift is received, the Employee or Officer must abide by the relevant provisions of the CBA Code of Conduct

### **5.3. Gifts in the form of Hospitality and/or Entertainment**

Employees, Officers and Contractors may not directly or indirectly promise, offer or provide any type of hospitality or entertainment benefit to government authorities. Exceptions to this rule must be discussed and approved in writing by the Legal and Compliance Officer before the fact.

### **5.4. Payments to Facilitators/Urgency Fees**


Payments to facilitators and/or urgency fees are prohibited in countries where this practice is illegal. In countries or circumstances where the payment of facilitators and/or urgency fees is legal, we suggest avoiding such payments to the extent possible. If they are necessary, written authorization must be sought from the Compliance Director.

### **5.5. Political Contributions and Donations**

Political contributions or donations to a political party, candidate, or company on behalf of CBA are prohibited according to applicable legislation and the company's Code of Conduct.

Employees, Officers and Contractors shall avoid any conduct that might be construed as a political contribution or donation on behalf of CBA.

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In the event a political contribution or donation is made by a CBA employee or others acting on behalf of the Company, such amounts must come from personal funds, as per local legislation. In doing so however, Employees, Officers and Contractors may not give the impression they are speaking or acting on behalf of the Company, nor use CBA resources including its facilities, suppliers, brands, logos or working time.

## 5.6. Social Responsibility, Social Contributions and Sponsorships

CBA is serious about making a difference in the locations where it does business.

Social management is in line with CBA's ESG strategy. It works together with Instituto Votorantim, whose goal is to qualify social investment in those companies in which Votorantim invests and provide social planning methodologies and solutions. It is also in charge of capturing funds to expand the impact of its programs. CBA's social actions currently focus on the following priority areas: (i) Development of Education; (ii) Support for public management; (iii) Economic dynamism.

CBA Employees who wish to undertake initiatives within these topics must coordinate with CBA's Social Responsibility area, which, if applicable, will coordinate with Instituto Votorantim.

No Employee, Officer or Contractor may offer or commit to any contribution, donation, or social responsibility project on behalf of CBA in exchange for any benefit related to the company's business interests or those of any CBA Employee, Officer or Contractor.

To make sure these transactions are not used to facilitate money laundering or any other type of illegal activity, CBA and/or Instituto Votorantim shall perform suitable due diligence regarding the identity and reputation or the organization or person, identify the main participants, the nature of the activities performed and any links with other entities.

All records of social contributions and donations must be complete and accurate, and include proof and verification that the contributions and donations were used for the original purpose.


Sponsorships are limited to legitimate commercial events in line with CBA business and activities, or to situations where there is proven benefits to society, such as to support cultural, education, care, sports or other ventures. In such cases CBA must receive a clear counterpart. Sponsorships involving foundations or entities connected to people who are or have been, at any time in the past, Government Authorities or their relatives must be analyzed and approved by Business Legal - Compliance

All social contributions and donations must abide by this policy, the Company guidelines and the Management Standards for Donations and Sponsorships.

## 5.7. Participation in Tenders

Tenders are a procedure used by government agencies, special funds, autarchies, government foundations, state-owned businesses, mixed economy companies and other entities controlled directly or indirectly by the Federal, State, Federal District or Municipal Governments to retain services or purchase goods from third parties.

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The main objective of tenders is to ensure isonomy, impersonality, morality, fairness, and transparency when selecting the best proposal for the Government Administration. Tenders must necessarily follow applicable legislation.

Employees, Officers and Contractors must always act in a transparent and honest manner in all procedures and processes involving tenders or contracts with the government, be it locally or internationally. All measures that could be construed as fraud in a public tender or manipulation of tender documents are strictly prohibited.

All decisions made during tender procedures must abide exclusively by strict technical, economic, and legal standards, and may never make undue use of any influence on the Government Authority or its competitors.

Employees, Officers and Contractors may contact the Government Authority in charge of the tender solely to answer technical questions regarding the rules and documents for submission. Such contact must be formalized in writing in the form of a letter, e-mail, or other digital means.

#### **5.8. Other Types of Benefit, including hiring employees**

Granting favors (including ensuring internships or jobs to Government Authority relatives; making charity or other contributions involving CBA activities: lending goods or providing access to Company facilities) shall be considered as acts subject to anti-corruption laws. According to these laws, a "bribe" is "anything of value" or, in other words, favors, jobs, conveniences, social donations or favorable opportunities provided directly or indirectly to commercial contacts or others who may impact CBA's business.

Regarding the other benefits described above, CBA Employees, Officers and Contractors must recognize and address these situations with caution and contact their director or the Legal Business Department - Compliance before offering or providing this type of benefit to any Government Authority or relatives thereof.

Regarding hiring interns or employees who are related to government authorities (if a candidate is or has been a Government Authority or is related to a Government Authority), we expect that candidates will disclose their status at the start of the selection process so that CBA may analyze if any potential employment poses a conflict of interest, illegality, or appearance of illegality. New situations must be reported to Legal Business - Compliance, which will make the relevant recommendation. Failure to reveal this type of information will subject those involved to enforcement of the Consequent Management Policy.

#### **5.9. Merger & Acquisition Procedures**


CBA shall proceed with due diligence prior to purchasing assets or companies, and before entering into joint ventures or associating with other businesses in order to check if the other party has been involved in corruption and/or other violations, and has an Integrity Program to mitigate such events.

#### **5.10. Other Prohibited Conducts**

Other strictly prohibited conducts:

- Any type of corruption, extortion or fraud;

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- Offering or accepting bribes, kickbacks or other illegal incentives;
- Falsifying documents, expense reports, financial records, brands or products;
- Misappropriation, contraband, falsification, corporate espionage or other practices that are disloyal and harmful to competition.

The list above is merely a list of examples and is not exhaustive. All conduct that is illegal or violates Votorantim Values and the CBA Code of Conduct is prohibited.

### 5.11. ACCOUNT CONTROLS

CBA has an internal accounts control system that requires that all Employees produce detailed and accurate records that faithfully reflect the company's operations and how it disposes of its assets. False, misleading or incomplete entries in these or other documents are strictly prohibited. All funds and accounts must be recorded and disclosed, no matter their purpose.

CBA fixed assets must be regularly compared to its book assets.

CBA Employee, Officer and Contractor expenses must be proven in the form of a detailed description of the activities and original invoices or receipts reflecting the amounts spent.

Submitting and knowingly receiving false invoices and/or receipts are strictly prohibited and subject to sanctions, including termination of employment and legal measures against those involved.

### 5.12. Contractors

All Contractor purchase orders and agreements must include clauses to ensure compliance with this Policy to mitigate the risk of acts of corruption.

It must be made clear to Contractors that CBA


- undertakes its activities according to the highest standards of ethics and integrity, and does business only with upstanding, honest and qualified Contractors.
- It may, at its sole discretion, perform due diligence on the Contractor before retaining it, and also monitor Contractor activities as necessary.
- CBA shall not retain Contractors suggested or recommended by Government Authorities or their relatives. All questions must be submitted to Legal Business – Compliance

### 5.13. CBA COMPLIANCE PROGRAM

The CBA Compliance program is based on the guidelines of applicable legislation. Legal Business - Compliance is responsible for drafting, safekeeping and reviewing compliance-related documents (profile and compliance reports, integrity policies, related procedures and controls, as well as awareness and education campaigns, etc.).

All of the information on the CBA Compliance Program such as how the program is structured, concepts, pillars and guiding principles are contained in the Votorantim Compliance Manual available at: <https://www.votorantim.com.br/governanca> and <https://www.cba.com.br/cba/governanca-e-compliance/>

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## 5.14. VIOLATION OF THE LAW OR POLICY

### 5.14.1. Violations

Violations of this policy shall be investigated and analyzed by the CBA Conduct Committee on a case-by-case basis, without prejudice to the possibility of informing the relevant authorities, if applicable.

Sanctions against individuals may include disciplinary actions including but not limited to fair dismissal or contractual severance, irrespective of other sanctions in the Code of Conduct

Violations of the Brazilian Anti-Corruption Law shall subject CBA and its Employees involved in the violation to administrative, civil and/or criminal sanctions as per applicable legislation.

### 5.14.2. The Duty to Report

All CBA Employees, Officers and Contractors who become aware of or suspect any real or imminent violation of this policy shall contact their supervisor, Legal Business - Compliance or the Ethics Hotline via its website or telephone. CBA will not tolerate any form of retaliation against a person who, in good faith, reported suspected violation of the law, ethics or policies.

The Ethics Hotline is available 24x7 at 0800 892 0791 or at <http://www.cba.com.br/>.

The Ethics Hotline is a safe way to report policy violations to the Conduct Committee. The Ethics Hotline ensure the confidentiality of the reported information and the anonymity of the whistleblower.

## 5.15. General Provisions

CBA shall not tolerate any retaliation or penalty against those who refuse to practice acts of corruption, even if this implies in delays or loss of business.

Questions regarding interpretation, unforeseen situations, and reports of failure to comply with this Policy shall be submitted to the relevant supervisors, forwarded to Legal Business - Compliance or using the Ethics Hotline.


Should Contractors refuse to accept the clause requiring compliance with anti-corruption standards this should be immediately reported to Legal Business - Compliance if the counterparty cannot be replaced.

If an Employee is not comfortable talking to his/her immediate supervisor, he/she must immediately report the situation to Legal Business - Compliance or use the Ethics Hotline. Employees should use the Ethics Hotline if the topic goes beyond the span of authority of the Unit, involves management or could impact other Units.

Reports of fraud, misappropriation, bribery in commercial activities or negotiations involving employees, clients, suppliers, contractors and commercial partners shall include, whenever possible, concrete facts and data and as much detail as possible.

All such reports received by CBA shall be treated as confidential, to the extent permitted by law.

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## 6. RESPONSIBILITIES

The responsibilities of all CBA Employees, Officers and Third Parties are described in the guidelines (item 5) of this Policy.

## 7. ATTACHMENTS

Not applicable.

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