



STAKEHOLDER ENGAGEMENT AND RELATIONS 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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STAKEHOLDER ENGAGEMENT AND RELATIONS POLICY

INTRODUCTION

This “Stakeholder Engagement and Relations Policy” aims to establish and assure the guidelines for managing stakeholder engagement and relations, seeking to create bonds and relationships based on transparency, ethics, inclusion, equity and respect across all business operations of Companhia Brasileira de Alumínio (“CBA”) and its subsidiaries, hereinafter referred to as jointly as “CBA”.

REFERENCES

Internal

- CBA Code of Conduct
- Human Rights Policy
- Diversity, Equity & Inclusion Policy
- Policy for Community Relations and Social Investment
- Anti-corruption Policy
- CBA Integrated Management Policy
- Sustainable Procurement Policy
- Compliance Program Manual
- CBA Compliance Booklet
- Diversity, Equity & Inclusion Handbook
- Management Standard - Social Investment
- Management Standard - Annual and Materiality Report

External

- ISO 26000
- Principles of the United Nations (UN) Global Compact
- Guidelines, targets and indicators of the Sustainable Development Goals (SDGs)
- UN Universal Declaration of Human Rights
- UN Framework on Business and Human Rights
- AccountAbility Framework 1000 – AA1000
- Brazilian General Data Protection Regulation - Federal law 13.709 of 08/14/2018
- ASI – Aluminum Stewardship Initiative

SCOPE

This Policy applies to CBA and its subsidiaries, covering all employees of the Company and its units, Executives, contractors, suppliers and other stakeholders.

All clients, service providers, 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 monitor actions involving stakeholders; d) periodically reassess the suitability of the Stakeholder Engagement 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 Code of Conduct and Consequences Management Policy of CBA

DEFINITIONS

Executives: officers, board members and committee members.

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

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

Stakeholder Engagement: Systematic process established by the company of identifying and talking with groups of individuals whose legitimate interests are affected or which could affect the company's decisions and activities, beginning to include them in its decision-making processes. This requires including these interests and opinions in the management process, and is a factor of respecting society at large and presenting a series of opportunities, such as risk reduction, conflict negotiation, expanding dialog, enhancing confidence levels and relations between the parties involved.

Stakeholders: 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 "Stakeholder Engagement Policy".

Material topics: topics of more importance to the Company and its stakeholders and that create long-term value. They can include economic, environmental, social and corporate governance topics, most of this, and are plotted in the Materiality Study conducted periodically with the participation of key stakeholders.

CHAPTER 1. GENERAL GUIDELINES

ESG matters are the starting point that underpins our operations, decisions and business strategy, in order to make us more competitive, protect the environment and create value for all the stakeholders we engage with.

We believe stakeholder engagement and relations should be a part of our operating model and be underpinned by our motto - "Aluminum solutions that transform people's lives", and the ethical and guiding principle set out in our Code of Conduct and in the guidelines below:

- Building enduring bonds and relationships based on dialog, transparency, clarity and reliability, fostering the construction of collective innovative solutions that create value for all parties.
- Respecting the rights and specificities of stakeholders, guaranteeing fair and equal treatment, not permitting discriminatory behavior in any situation.
- Understanding the risks and opportunities posed by the company's activities, evaluating the potential impacts on stakeholders in the short-, medium- and long-term.
- Considering stakeholder interests in the company's decision-making processes, identifying their aspirations, needs and demands for creating and enhancing products, services, processes and management models;

- Evaluating potential impacts on stakeholders during the planning of new initiatives, new services and new products, in order to understand the risks and opportunities posed by the activities.
- Carrying out periodical consultations within core stakeholders to determine material topics to guide the company's management and consequently establish goals, targets, actions and indicators.
- Transparently disclosing the company's information about its economic, environmental, social and corporate governance performance as well as its policies, principles and regulations.
- Using suitable language when engaging stakeholders, prioritizing so it is clear, concise and easy to understand and using accessibility tools, where necessary.
- Developing specific means of engagement for each priority stakeholder, in order to fully satisfy their specific requirements and interests, pursuing areas of collaboration and dissemination mechanisms for the practices adopted.
- Encourage the company's key stakeholders to conduct participatory communication and engagement processes, disseminating these practices in their spheres of influence.
- Promoting proactive engagement in order to identify potential conflicts and manage crises adequately, preventing risks and protecting value.
- Providing channels for communication and receiving feedback, complaints and allegations nurturing the exchanging of information and opinions and which measures the degree of satisfaction with relationships and compliance with processes and practices.
- Guaranteeing the privacy and confidentiality of the information of all the Company's stakeholders, pursuant to the LGPD Legislation.

CHAPTER 2. GUIDELINES FOR IDENTIFYING, PRIORITIZING AND ENGAGING STAKEHOLDERS

In light of the above guidelines and particularities of each stakeholder, every stakeholder engagement and relations initiative should be planned in accordance with the guidelines set out below.

A) IDENTIFYING AND PRIORITIZING STAKEHOLDERS

Internal or external stakeholders are defined by individuals, groups of individuals, organizations, associations and others who relate with and impact operations and/or could be impacted by the Company's actions, decisions and performance. Identifying these stakeholders should take into account the following matters:

- The Company's (direct or indirect) dependence on the stakeholders
- The Company's impact and responsibility in dealing with stakeholders
- Influence of stakeholders in the Company's operations and activities
- Proximity of the relationship and interest in maintaining a long-term relationship
- Urgency or tension in the relations between the parties
- Risk analysis and the organization's capacity to respond to stakeholder demands.

After identifying the stakeholders, it is necessary to prioritize them, which will then be added to the Stakeholders Map, which can be comprised of various groups, with varying levels of impact, influence and dependence on CBA. The key stakeholders identified are therefore:

- Academia and universities
- Shareholders, investors and financial institutions
- Multilateral associations, sector institutions and non-governmental organizations
- Clients,
- suppliers, service providers and other business partners
- Local communities and players engaged in the respective locations
- Employees
- Governments and regulatory agencies
- Press, media, influencers and social networks
- Trade unions

B) DETERMINING THE RELATIONSHIP LEVEL AND ENGAGEMENT METHOD FOR STAKEHOLDERS

There are different levels of engagement that vary according to the Stakeholder and activity to be carried out. They are: Informing, Consulting, Participating/Talking, Collaborating and Empowering (Reference: AA1000).

Once the relationship level has been determined, the following step consists of defining the specific strategies and engagement method for the successful management and enhancement of the relationship between the company and its stakeholders.

CBA's engagement method could include: communications channels, such as sites, social networks, newsletters, service centers, email, events, periodical in-person meetings, workshops, training, workgroups, materiality studies, focal groups, opinion surveys and others.

CHAPTER 3. DEFINING MATERIALITY

CBA understands it is crucial to understand the expectations of its stakeholders when defining its business strategies. Every two years or whenever there are significant changes to the company's operations, a consultation and dialog process should therefore take place with its core stakeholders.

The engagement method should be defined in accordance with CBA's objectives and the current situation it will operate in. The materiality process should involve a broad sample of core prioritized stakeholders and represent all the organization's significant operations.

CHAPTER 4. 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.