



HUMAN RIGHTS POLICY

COMPANHIA BRASILEIRA DE ALUMÍNIO

Approved by CBA's Executive Board

Date of approval: July 21, 2023

Effective from the date of approval until resolved otherwise by CBA's Executive Board

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HUMAN RIGHTS POLICY

INTRODUCTION

This "Human Rights Policy" aims to establish and assure the guidelines of Companhia Brasileira de Alumínio ("CBA") and its subsidiaries, jointly referred to as CBA, in respect of Human Rights.

REFERENCES

Internal

- CBA Code of Conduct
- Diversity, Equity & Inclusion Policy
- Anti-corruption Policy
- CBA Integrated Management Policy
- Sustainable Procurement Policy
- Stakeholder Engagement and Relations Policy
- Social Responsibility Policy
- Compliance Program Manual
- CBA Compliance Booklet
- Diversity, Equity & Inclusion Handbook and Management Standard - Social Investment.

External

- Principles of the United Nations (UN) Global Compact and Targets and indicators of the Sustainable Development Goals (SDGs)
- UN Framework on Business and Human Rights
- UN Universal Declaration of Human Rights
- UN International Bill of Human Rights
- ILO Convention 169 - Indigenous and Tribal Peoples
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- UN Declaration on the Rights of Indigenous Peoples
- Charter on Children and Adolescents - Federal law 8.609 of 07/13/1990
- 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, the communities where we operate, 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 on the date it is approved and may only be amended by decision of the CBA Board of Directors.

GENERAL PROVISIONS

Our Sustainability Committee, Executive Board and Executive Sustainability Committee shall track the application of this Policy, as applicable:

- Board of Directors: is responsible for a) approving this policy; b) demand that all the Company's strategies, programs, projects and actions respect and promote what is described in this Policy; and, c) periodically reassess the adequacy of the human rights strategy adopted by the 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 the implementation of this policy to the Board of Directors, if necessary.
- 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.

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.

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. 6.040, dated February 07, 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 issues such as: eradicating child, forced and slave labor; combating discrimination in all its forms; championing diversity, equity, and inclusion; 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, such as: sales representatives, agents, consultants, lawyers, distributors, resellers, real estate agents, customs agents, service providers, shippers, and other suppliers, etc.

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).

CHAPTER 1. GENERAL GUIDELINES

CBA's Human Rights Policy is aligned around the principles of protection, respect, promotion, awareness and if necessary remediating human rights in the activities taking place at the Company and in value chain, in accordance with the UN's Framework on Business and Human Rights. We express our commitment to uphold the fundamental rights of all individuals with whom we relate through the guidelines:

• Freedom of expression and association

- Guaranteeing freedom of association and collective bargaining in all fields, in accordance with the applicable local legislation.
- Respecting the freedom of expression and speech of all people, providing this takes place pacifically and respects the human rights of all involved.
- Including an open dialog agenda, regardless of collective bargaining and the dates specified by the government and/or employee representation entities.

• Fighting discrimination and abuse

- Combating discrimination and abuse in all their forms, regardless of race, color, religion, sex, nationality, age, disabilities, pregnancy, sexual orientation, identity or gender expression or any other motive.
- Combating so as to eradicate all forms of moral and sexual harassment.

• Workplace conditions

- Complying with existing labor legislation and internationally accepted standards and regulations around labor practices.
- Fair compensation and salary parity.
- Fighting sexual exploitation, especially that involving children and adolescents.
- Prohibiting and helping eradicate labor, forced and/or slave-like labor and child labor and upholding the rights of children and adolescents.
- Ensuring dignified working conditions, maintaining a healthy and safe workplace with suitable compensation.
- Prohibiting the exploitation of people in a vulnerable labor and social situation, such as migrants and refugees.
- Ensuring that all employees have the same working conditions, be they registered staff, contractors, native workers and/or migrants.

- Prohibit the abuse of power and inhumane treatment by private, registered and outsourced security agents.

- **Physical and mental safety and integrity**

- Continually strive for zero workplace accidents.
- Train all employees and contractors and require them to use suitable safety equipment at work.
- Guarantee the right of refusal for unsafe tasks.
- Nurture well-being through quality-of-life programs incentivizing physical exercise, nutritional guidance and support for emotional health - including for relatives.

- **Valuing diversity, equity and inclusion and equal rights**

- Valuing human and cultural diversity
- Building a welcoming workplace with respect, justice and equality.
- Seek to improve accessibility and provide suitable technologies and safe and healthy working conditions to allow people with disabilities to work for us.

- **Community and society**

- Preserving customary rights, access to water and other natural resources, livelihood activities and free prior and informed consent of indigenous peoples and peoples of traditional communities, where applicable.
- Invest in shares, projects and programs that help improve the social, economic and environmental conditions of the local community.
- Valuing the role played by local actors and communities, stimulating open dialog and participation in social investment decisions.
- Minimize, whenever possible, the need for and/or impacts related to physical or economic displacement resulting from CBA's operations, and when unavoidable, comply with legal, legitimate, and respectful processes, providing prior communication and fair compensation.

- **Ethics, Integrity & Compliance**

- Fighting corruption in all its forms and the receipt of bribes and other illicit acts.
- Adopting management procedures to guarantee ethics and integrity in all processes, striving to prevent conflicts of interest.

• Privacy & transparency

- Establishing accessible and transparent communications channels and ensuring that stakeholder complaints are answered and handled appropriately.
- Monitoring, assessing and reporting our operational results, indicators and goals.
- Guaranteeing the privacy and confidentiality of the information of our employees, suppliers, clients and service providers in accordance with Brazil's data protection act (LGPD), only using it for appropriate and consensual purposes.

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.

We do not tolerate prejudice or discrimination on the basis of gender, color/race, age, disability, sexual orientation, background, nationality, religion, belief or any other intrinsic aspect of human diversity.

CHAPTER 2. HUMAN RIGHTS DUE DILIGENCE

CBA carries out Human Rights Due Diligence to assess potential risks and impacts of our activities on Human Rights by identifying, preparing and implementing detective, preventive and mitigatory controls. The results obtained from the assessments should be included in the Company's processes, also reviewing policies, standards and procedures, amongst others.

Due Diligences take place every two years or whenever there are significant changes in the organization, such as new acquisitions, or new ASI (Aluminium Stewardship Initiative) guidelines, international certification that certifies excellent ESG standards, in order to address sustainability issues, including human rights, in the aluminum value chain. CBA conducts an annual internal audit to ascertain compliance of its plants with ASI guidelines.

CHAPTER 3. TRAINING

The Company undertakes to disseminate, educate and engage its employees at all levels, including its Executives, contractors and its value chain in relation to respecting human rights.

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.