

MODERN SLAVERY STATEMENT COMPANHIA BRASILEIRA DE ALUMÍNIO (CBA)

Companhia Brasileira de Alumínio (CBA) is reaffirming its commitment to human rights and to promoting decent work, including its responsibility to prevent and combat all forms of employee exploitation. The Company has zero tolerance across all its operations and supply chains for practices involving modern slavery, child labor exploitation and human trafficking. Aligned with Aluminium Stewardship Initiative (ASI) standards and the UN Guiding Principles on Business and Human Rights (UNGPs), CBA continues to strengthen its approach to sustainability and respect for human rights.

Drafted in accordance with Section 54 of the United Kingdom's Modern Slavery Act 2015, this statement outlines the measures the Company has taken to prevent and mitigate potential risks related to compulsory labor and human trafficking in its operations and supply chains.

1. ORGANIZATIONAL STRUCTURE AND SUPPLY CHAIN

Founded in 1955, CBA is a vertically integrated producer, with operations spanning from mining through recycling to end products. With renewable generation capacity for 100% of its energy requirement, CBA provides sustainable solutions for the packaging, transportation, automotive, building and construction, energy and consumer goods sectors.

Listed on B3 (CBAV3), the Company is part of the Corporate Sustainability Index (ISE) and remains committed to producing low-carbon aluminum, advancing the circular economy and fomenting sustainable and inclusive development in Brazil. The Company's supply chain includes sectors such as mining, transportation, manufacturing and logistics, with domestic and global suppliers, mainly in South America.

2. CORPORATE POLICIES AND GOVERNANCE FOR PREVENTING MODERN SLAVERY

CBA has policies, standards and governance tools that inform the prevention, identification, mitigation and remediation of risks related to forced or compulsory labor, human trafficking and practices similar to slavery in its operations and supply chain.

2.1. Human Rights Policy

The Human Rights Policy sets out guidelines, concepts, scope and responsibilities for respecting and promoting human rights, and provides for due diligence in human rights, training and communication channels. The document references international standards and frameworks (UNGPs, ILO, UN) and is included in other internal policies (Diversity, Equity and Inclusion, Social Responsibility, Sustainable Procurement and Integrated Management), thereby reinforcing CBA's commitment to fight modern slavery.

2.2. CBA Code of Conduct

The Code of Conduct sets out principles of integrity, expected behavior, respect for human rights and the prohibition of discrimination and harassment in the Company's operations and workplaces and in its relationships. It also provides guidance on appropriately engaging suppliers, third parties and other stakeholders. It clearly outlines whistleblowing mechanisms.

2.3. Supplier Code of Conduct

The Supplier Code of Conduct establishes mandatory requirements on human rights, decent working conditions, health and safety, diversity, environmental practices and business ethics, applicable to all suppliers and subcontractors.

2.4. Sustainable Sourcing Policy

This policy reinforces ESG criteria for supplier selection, evaluation and development, including human rights requirements and mechanisms to address non-compliance.

2.5. Sustainability Policy

This policy consolidates environmental, social and governance commitments, referencing human rights, ASI and the SDGs, and applies to employees, third parties and suppliers in Brazil and abroad.

2.6. Related (complementary) policies

- Anti-Corruption Policy: strengthens integrity systems, reducing risks that may conceal labor violations.
- Diversity, Equity and Inclusion Policy; Social Responsibility Policy; Integrated Management Policy; Health and Safety: establish standards that prevent vulnerabilities (discrimination, unsafe conditions, social impacts), often linked to risks of forced or compulsory labor.

3. COMPLIANCE AND DUE DILIGENCE

CBA runs a Compliance Program that reports to the Board of Directors, ensuring impartial oversight and continuous improvement. CBA's Program is designed to ensure that our daily operations display integrity and transparency, both internally and in our relationships with partners and communities. Since the program's creation, CBA has made continuous progress in best integrity practices.

The Company also has due diligence processes and management systems in place to identify, prevent and mitigate actual and potential human-rights risks and impacts, including promoting fair working conditions, preventing modern slavery and combating child labor. The Company regularly enhances its practices, tools and control mechanisms, ensuring alignment with corporate social responsibility standards.

3.1 Employees

The Company adopts practices and programs to ensure a safe, fair and inclusive workplace for all its employees, through robust management committed to ethics, transparency and respect for human rights. CBA's health and safety program is comprehensive and goes beyond legal requirements, covering employees and third parties, with the goal of ensuring safe and healthy working conditions, preventing risks and promoting well-being for all.

3.2 Suppliers

Since 2020, CBA's Sustainable Procurement Program has played a key role in promoting responsible practices throughout the supply chain, embedding sustainability, ethics and transparency practices that go beyond price, quality and delivery time. All suppliers must comply with the Sustainable Procurement Policy and the Supplier Code of Conduct, which outlines ethical and transparent standards of conduct in business relationships.

In addition, suppliers are pre-qualified before being approved to provide products or services. During this process, legal compliance is assessed, including Human Rights issues such as practices similar to slavery and child labor, plus suppliers' maturity in sustainability topics. Suppliers are also monitored through performance dashboards that consolidate ESG, financial, documentation, commercial and operational indicators, promoting transparency and dialog on results. The Company also conducts integrated audits to assess regulatory compliance and adherence to sustainability standards and practices.

4. TRAINING AND AWARENESS BUILDING

The Company offers a wide range of training and development programs aimed at professional growth and strengthening an ethical culture across the organization. To support the fight against modern slavery, training includes topics such as human rights, safe labor practices, ethics and transparency. These programs emphasize the Company's commitment to eradicating any form of exploitative labor in its operations and supply chain.

5. MANAGEMENT AND MONITORING

CBA uses continuous monitoring to perfect its approach to respecting human rights, including guaranteeing fair working conditions and preventing modern slavery and child labor. This monitoring includes the systematic tracking of reported and investigated cases, assessing the effectiveness of risk management measures, regularly reviewing policies and procedures, strengthening due diligence processes and establishing action plans for continuous improvement.

6. REPORTING CHANNELS

Our Ethics Hotline is CBA's official channel for receiving and addressing reports on violations of our Code of Conduct, applicable laws and regulations and internal policies and standards. The hotline is accessible to all Company stakeholders, including employees, community members, suppliers, customers and business partners. In addition, it is managed by an independent third party, ensuring complete confidentiality, secure handling of information, the option for anonymity and protection against reprisals for whistleblowers. Available 24 hours a day via telephone (0800 300 4535) and website, the Ethics Hotline serves both internal and external stakeholders, including suppliers and communities.

7. ONGOING COMMITMENT

CBA is committed to preventing and combating modern slavery, human trafficking and the eradication of child labor by continuously strengthening its policies, practices and management mechanisms. The Company believes that collaboration, engagement and transparency are essential to advancing this agenda and remains committed to working with its stakeholders to nurture an ethical, safe and responsible business environment.

APPROVAL

This Modern Slavery Statement was approved by the Executive Board of Companhia Brasileira de Alumínio (CBA) on [March, 25, 2026].

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Luciano Francisco Alves

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Luciano Alves, CEO