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Approval Agenda Policy for Diversity, Equity and Inclusion

I agree:

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POLICY FOR DIVERSITY, EQUITY AND INCLUSION		

FCC S.A. Policy for Diversity, Equity and Inclusion

POLICIY GOAL

The FCC S.A. Policy for Diversity, Equity and Inclusion sets guidelines to rule its action on respect, inclusion, equity and valuation of human and cultural diversity in the development of activities, projects, partnerships throughout the whole production chain and in the relationship with society. In the same way, it evidences its rejection of all kind of behavior and conduct opposed to this policy, aiming at a discrimination-free environment, able to foster and value respect and equal opportunities.

TO WHOM THIS POLICY IS APPLIED

This policy applies to all the FCC S.A. workforce, trainee(s), young apprentices, advisor(s), besides supplier(s), service provider(s), partner organization(s) and customers.

TERMS AND ABBREVIATIONS

For the purposes of interpretation of this Policy, the meaning of terms and expressions are set forth below:

Human Rights: Human rights are rules that acknowledge and protect the dignity of all persons. They rule the way people individually live in society and among themselves, as well as their relation with the State and the obligations of the State towards them. They should serve as legal warranties to individuals and groups, against actions that could jeopardize fundamental freedoms and human dignity.

UNO: United Nations Organization

Diversity: It is the presence of differences in an environment, where people with different identities interact in the same place. It involves the understanding of differences, either under the physical, cultural, biological, social, economic, ideological aspect, or other ones. There are many profiles, among them: gender identity, LGBTQIAPN+; persons with disabilities, black persons, elderly people, refugees, socially vulnerable people, of different generations, among others.

Equity: It means to acknowledge that each person is unique and for this he or she has different needs, experiences and opportunities.

Equality: Absence of difference of rights and duties among persons of a society.

Inclusion: Refers to the quality of the human experience to feel pertaining, respected, acknowledged, valued and having opportunities under conditions of equity and equality.

Minority groups or minorities: an umbrella term including the amount of people belonging to the group, representation in power spaces, discrimination, violence and lack of rights. There are several minority groups and some of them are as follows: women, black people*, indigenous people, Persons with Disabilities (PWD), the LGBTQIAPN+ community, economically vulnerable people, among others.

*According to IBGE, black and brown-skinned people compose the group of black people.

Gender Equity: Gender equity seeks to eliminate any discrimination, oppression, injustice and inequality (social, economical or political), in this case, against women.

Race and ethnicity: While race encompasses phenotype features, such as skin color, ethnicity also comprises cultural factors such as nationality, tribal affiliation, religion, language and traditions of a certain group.

Persons with Disabilities (PWD) – A person with disability is someone who has long term (at least two (2)years) impairments of physical, mental, intellectual or sensorial nature. Impairments can block his or her effective participation in society, on an equal basis with all others.

Unconscious bias: these are prejudices or biased thoughts about an idea, group or individual, based on one's own judgement, caused by past experiences which keep stored in the subconscious, influencing attitudes which are not perceived.

Stereotypes: A stereotype is a kind of standard developed by society. It is a preconceived idea which in the end places persons or social groups into "small boxes", creating labels, dictating their behavior and standardizing their image in a deeply biased way.

LGBTQIAPN+ Person: This is an abbreviation encompassing persons who are Lesbian, Gay, Bisexuals, Transgender, Queer/Questioning, Intersex, Asexual/Aromantic/Agender, Pan/Poly, Nonbinary and more, encompassing all gender and sexual orientation expressions.

Social Class: This is a society group that differs from others consequent to economic, educational, political or cultural features.

Ageism: this is a kind of discrimination against persons and groups based on their age.

Representativity: this is the expression of a group interests (either a party, a class, a movement or a nation) in the figure of whoever represents it. As such, representativity within an organization has an inspirational role, that is, being a model for a group of persons who share among themselves a same social marker. It can be related to the quantitative issue – for example, the number of persons of a certain group in the company staff— or to the legitimacy issue – a representative person is like the voice and image of a social group.

DE&I: Abbreviation utilized for Diversity, Equity and Inclusion.

Harassment: characterized by abusive conducts by words, behaviors, actions, gestures or writings that can cause damage to a person's personality, dignity or physical or psychic integrity.

Contextualization

This policy is governed by Human Rights international principles, encompassed by the UNO Human Rights Declaration, which secure the rights of all persons, independently from age, race, ethnicity, color, gender, language, religion, political opinion or of other nature, national or social origin, economic condition or social class, birth or any other condition.

Respect and Human Rights promotion are crucial for securing an egalitarian and fair society.

We believe that Diversity is to consider and respect the various features of each individual. As regards Inclusion, besides acknowledging it, these various features should also be valued and fostered, being purposeful in the effort towards representativity. We understand as responsibility of all the publics encompassed by this Policy to be agents of this behavior change.

That is why we promote Diversity and Inclusion. We combat and do not tolerate any kind of discrimination, either by age, gender, sexual orientation, identity or expression of gender, race, color, disability, religion, civil status, nationality or any other identitarian marker.

Diversity and inclusion are values, commitments and leverages for performance and social economical innovation, and crucial in a customer-focused business.

FCC S.A. COMMITMENTS

FCC S.A. is committed to providing fair and respectful treatment to all persons, as well as to attending to the laws in force. Considering as fundamental, the nine (9) commitments below, with which we are committed and which should be followed by all the FCC team and further parties concerned:

COMMITMENT 1

Persons development and offer of opportunities for:

- · Persons with disabilities;
- Promotion of age Diversity;
- Gender Equity;
- Race Equity;
- Salary Equity;
- Promotion of women and LGBTQIAPN+ persons rights.

COMMITMENT 2

Reaffirm institutionally the organizational commitments with the diversity, equity and inclusion agenda

By this Policy establishing the guidelines and governance for rendering the company more inclusive and diverse. Defining and following up indicators and strategies for attraction and selection of persons focusing on diversity, considering gender, race, ethnicity and persons with disabilities, to secure that the objectives of this Policy are reached.

COMMITMENT 3

Promoting Diversity, Equity and Inclusion (DE&I)

Stimulating dialogue and debate to widen awareness of employees, service providers, supplier (s), customers and communities on diversity respect and valuation and combat discrimination by means of internal and external campaigns, training sessions, educational activities and express commitments.

Establishing inclusive processes for attraction, selection and permanence, among others, so as to represent Brazilian population diversity in all hierarchical levels of the company.

Seeking diversity integration in purchases and acquisitions processes for inputs, goods and services through inclusion of companies and professionals that compose minority groups in the supplier (s) register.

Strengthening the local territory by means of prioritization of professionals who reside and companies with headquarters in the same area as FCC S.A.

Prioritizing the companies having established DE&I practices and/or that try to reduce their social impact.

Defining and following-up indicators and strategies for attraction and selection of persons with focus on diversity, considering gender, race, ethnicity and persons with disabilities, for securing that the goals proposed by this Policy are attained.

COMMITMENT 4

Developing inclusive leadership

FCC S.A. is committed to develop an engaged leadership and with leading behavior in the promotion of Diversity, Equity and Inclusion, being a reference by personal example. It is paramount for the leadership to have a thorough knowledge of and be a multiplier of this Policy.

COMMITMENT 5

Promoting an atmosphere of respect for all persons

Acknowledging and valuating the individuality of employees and concerned parties, securing a fair and cozy work ambience, where everyone has equal opportunities to develop their potential.

COMMITMENT 6

Building a secure and trustful environment

Securing an environment of psychological safety where all are free to be themselves, being able to share their ideas and expose their points of view, even diverging, in a respectful way with other people, by means of an open, transparent dialogue

COMMITMENT 7

Establishing prejudice-free processes

All people deserve to be treated in a fair and egalitarian way, without discrimination for reasons of race, ethnicity, gender, gender identity, sexual orientation, age, social class, disability, religiosity, nationality and political beliefs, chiefly in the recruiting, dismissal, promotions, rewards and benefits, participation in work groups, training or retirement norms and internal processes which should be based on performance assessment, utilized by the company for employees evaluation.

COMMITMENT 8

No tolerance and rejection to prejudice, discrimination and harassment:

Violations to this Policy are considered violations to the FCC S.A. Code of Conduct, and are subject to the penalties cited in said document.

COMMITMENT 9

Attendance to Human Rights principles:

Also encompassing the work relationships kept by FCC S.A. with employees and all links of the chain where it is inserted, the following matters will also be considered as commitments:

- Prohibition of child work and children and adolescents rights protection;
- Prohibition of forced/analogous to slavery labor;
- Adoption of disciplinary measures in case of harassment and abuse;
- Free syndicate association, collective negotiation and complaint mechanisms;
- Worked hours legal limits observance, and fair, balanced salaries and benefits;
- Safe and sound work place guarantee;
- Safety at the work place.

SHARED RESPONSIBILITY

All persons having activities at FCC S.A. are responsible for developing their activities while respecting and following the guidelines provided by this Policy. It is the responsibility of all to collaborate for a work environment and relationship with the different publics that value diversity, being inclusive, respectful and accessible. It is expected that each one supports, participates and presents his or her collaboration for the improvement of the company's activities in this regard.

EXPECTED CONDUCT

Leadership:

- Take position, warn and advise when witnessing excluding and/or discriminatory attitudes and indicate the utilization of the competent channels;
- Know your own biases and try to minimize them in your daily decisions;
- Create an ambience of psychological safety for your team;
- Communicate in an inclusive, assertive way;
- Contract and develop diverse teams;
- Follow-up indicators related to Diversity and Inclusion;
- Activate the Reporting Channel for situations involving breaking of this Policy or of the Ethics Code.

Employees, outsourced persons and suppliers:

All people should avoid incidents of disrespect, harassment and/or discrimination. All people (advisors, leaderships, employee(s), service providers, suppliers, partner organizations) should have the duty and commitment to formally communicate to the Reporting Channel any discriminatory conduct and/or any conduct in disagreement with this Policy occurring in the premises, remote routines or activities in which FCC S.A is directly involved, and/or through its counterparts.

Important recommendations

- It is important not to stereotype, that is, not to assume truths based solely on your point of view;
- Do not presume people sexual orientation or gender identity based on your observation. All should be treated with equal respect.
- Do not make jokes with people's features, either physical or of other nature;
- Position yourself whenever facing a discriminatory situation;
- Be inclusive in your communication.

Gender Identity Issues:

Respect and consider documents and talks (formal and informal), specifically on the gender identity issue of employees and all other publics with whom we have relationships, as follows:

- Utilization of the social name and pronoun (he/she) in documents, internal systems and talks;
- Recommendation to use the social name in all benefit documents (e.g. health care system card and dental plan).

Diversity and Inclusion Indices

The subject matters Diversity and Inclusion are among the strategic subjects validated by the High Administration. The item "Strengthen the ESG agenda" means being a reference company that promotes the subject and aims, by developing programs, initiatives and indicators, the promotion of Diversity, Inclusion and Sustainability before the employees. FCC S.A. High Administration should define indicators and concrete strategies related to the commitment with Diversity & Inclusion, follow up and communicate the results and set sustaining plans with continuous improvement of these plans.

Relationship with Customers

Relationship with customers is a crucial dimension in an inclusive culture consolidation at FCC S.A., since through such communication it is possible to strengthen and demonstrate in practice our positioning on Diversity and Inclusion. This subject matter is a follow-up target and society demand, particularly when companies incur in discriminatory activities. Undesired repercussion of an occurrence involving discriminatory acts can be extremely negative for FCC S.A., affecting its reputation before the various publics. On the other hand, communication ruled by Diversity and Inclusion strengthens the bond, dialog and validation before the various publics which interact with

the trademark. Our way of engaging, our teams and communication pieces should reflect our customers and collaborators Diversity.

Relationship collaborator - customer

Our customer(s) are a sample of society, that is why it is very important to always remember that they are diverse. The collaborator-customer relationship should be based on mutual respect, without stereotypes and any kind of discrimination.

Relationship with supplier(s)

All the supplier(s) should abide by the laws and regulations, know the values and respect ethical principles set forth in the Code of Ethics and in this policy, under any circumstances, within the FCC S.A. supply chain.

Preventive Actions

Preventively, FCC S.A. executes campaigns and educative activities, such as training and sensitizations, aiming at eradicating non-acceptable behaviors related to gender, racial discrimination issues and other relevant subjects.

Inclusive language and comunication

It is the responsibility of everyone involved in communication activities (internal and external), to care for production, validation and disclosure of contents free from discrimination, without stereotypes and which comply with the principles below:

- Accessibility: communication should be accessible to people with disabilities;
- Representativity: layout and chosen pictures should represent the plurality of society and should not reproduce stereotypes in representing black people, women and other publics;
- Clear, no-barrier language: language should be assertive and understandable to all hierarchical levels, besides low-literacy people.

Disclosure

This policy will be disclosed to all people working at the company by means of the usual communication channels and will be available at the FCC S.A. site to all interested parties including suppliers and other business partners. Besides, as a must-know item by the company's suppliers, it is being mailed to be signed by the management of the contracted company.

YOU CAN FILE A COMPLAINT USING THE FOLLOWING CHANNELS:

E-mail: canaldedenuncias@fccsa.com.br

Telephone: 0800-9400158 (toll-free call from all over Brazil, from Monday to Friday, from 8 a.m. to 6 p.m.).

Personally: schedule a meeting with the Ethics Committee or with the FCC S.A. Board on number (21) 2195-9009.

For further information please access the site: https://www.fccsa.com.br/pt/quem-somos/canalde- denuncias/

This policy was approved by the FCC S.A. Board in September, 2024

FÁBRICA CARIOCA DE CATALISADORES S.A.

Luiz Eduardo Valente Luiz Eduardo Valente Moreira

DocuSigned by:

Director Superintendent

Rodrigo C Pin

Rodrigo Coelho Pinto Director