



## CORPORATE POLICY

PE 1050-00020-EN-GLOBAL COMPLIANCE SYSTEM POLICY

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## 1. PURPOSE

This Policy establishes the Compliance System of Braskem and all of its Controlled Entities in Brazil and abroad, providing guidelines, duties and responsibilities of Braskem Team Members as an extension of the Company's principles and concepts.

## 2. SCOPE

This Policy is applicable to Braskem S.A. and all of its Controlled Companies, both in Brazil and abroad.

## 3. REFERENCES

Company By-Laws;  
Braskem Global Code of Conduct; and  
(Global Anti-Corruption Policy).

## 4. DUTIES AND RESPONSIBILITIES

### 4.1. BOARD OF DIRECTORS

The agenda, minutes, and deliberations on compliance of the Board of Directors of Braskem S.A. ("**BD**" or "**Board**") must be formalized to provide evidence of the role of directors on the subject.

BD is responsible for:

- Establishing the Company's compliance-related principles and goals;
- Approving Policies related to Company's compliance; and
- Following the development and effective implementation of the Compliance System.

Further details regarding its duties, responsibilities, composition, mandate, operation, BD Chairman ("**C-BD**") attributions, and rules of operation are described in the BD internal regulation.

### 4.2. COMPLIANCE COMMITTEE

The Braskem S.A. Compliance Committee ("**CC**") supports BD regarding Braskem's ongoing commitment to acting ethically with integrity and transparency, in line with global best practices and applicable laws, rules and regulations.

Further details regarding its duties, responsibilities, composition, mandate, meetings, operation, attributions of the CC Coordinator, and rules of operation are described in the CC internal rules.

### 4.3. CHIEF COMPLIANCE OFFICER

The Chief Compliance Officer at Braskem S.A. ("**CCO**") is responsible for the day-to-day oversight of the Compliance System and serves as a primary resource on all related themes. The CCO reports directly to the CC Coordinator.

The responsibilities of the CCO include the following:

- Preparing (as detailed more fully below) and submitting on an annual basis his/her Action Program for the approval of the CC, with respective concentrations and budget, including external advisory services, information technology systems, and staff;
- Proposing the Compliance System to the CC, and periodically updating the CC on its status;
- Supporting Braskem's Chief Executive Officer ("**CEO**") and Team Members in the implementation of the Compliance System at the Company, and continuously monitoring its effectiveness;
- Recommending the creation, enhancement or review of the Company Guidance Materials, including Braskem's Global Code of Conduct, Policies, Directives, Procedures, training and communications, certifications, resources, assessments and monitoring, Risk assessment and other documents that guide Team Members to act ethically;
- Promoting the dissemination of the Code of Conduct, the Global Anti-Corruption Policy and other Company Guidance Materials, and creating and maintaining mechanisms to support Compliance actions;
- Assuring the implementation of the internal audit annual plan, including the planning, scope, definition, and methods, as well as performance of the audit and communication of the results;
- Promoting the monitoring of the identification, evaluation process and treatment of potential Risks, as well as the development and enhancement of the the related Internal Controls;
- Coordinating and supervising the effectiveness of the Ethics Line Channel and the Ethics Committee and related meetings, described in the Braskem Ethics Line and Investigations Procedure, to ensure that all allegations received are duly recorded, analyzed, and resolved;

- Performing necessary and timely investigation and remediation of compliance-related allegations with the support of General Counsel and other RAEs of the CEO's structure, as appropriate;
- Assuring periodic reporting and appropriate information flow to the Ethics Committee, CC, and full BD on the Compliance System, including Company Policies, Internal Controls, Internal Audit, Risk Assessment, and Investigations;
- Developing and implementing a communication plan to ensure the Code of Conduct, the Global Anti-Corruption Policy, and other Company Guidance Materials related to the Compliance System are communicated and accessible to all audiences;
- Coordinating and supervising training for Team Members regarding ethics, integrity, transparency, risk management, auditing and Company Guidance Materials;

Consistent with relevant Company Guidance Materials, facilitating and overseeing appropriate anti-corruption due diligence, monitoring and Internal Controls concerning the Company's activities presenting compliance Risk such as, among other topics:

- Third Parties;
- Business development transactions;
- Interactions and transactions with Public Agents; and
- Sponsorships and Donations.

In preparing his/her Action Program, the CCO must analyze the Company's objectives and activities for the respective year, and consider—as appropriate—the following:

- **Training & Messaging**, including consideration of (a) appropriate revisions of the training provided to Team Members as part of onboarding; (b) appropriate periodic training of eligible Team Members, including the format and materials for the training; (c) appropriate training of eligible Third Parties, including the format and materials for the training; and (d) communications and/or messaging appropriate to ensure penetration of the Compliance System, emphasizing the importance of integrity and compliance, and providing useful information and resources to Team Members and Third Parties in carrying out the operations of Braskem.
- **Third Party Monitoring**, including consideration of the Third Parties on which monitoring efforts are focused and the type of monitoring activities to be conducted.

- **System Testing & Enhancement**, including (a) assessment of Braskem's Risk profile; (b) assessment of the Compliance System to determine whether it is addressing and effectively mitigating current compliance Risks; (c) analysis of any specific operational processes or Risk areas relevant to Braskem to facilitate the implementation of appropriate Internal Controls and identify appropriate enhancements, if any; and (d) a plan to accomplish appropriate periodic testing of the Internal Controls as they relate to anti-corruption and other types of compliance.

The CCO has the autonomy and independence to coordinate the implementation of the necessary actions to support and maintain an effective Compliance System at Braskem. Hence, the CCO must have access to adequate and sufficient resources to develop and implement an effective Compliance System, including:

- A team dedicated to developing a Compliance System consistent with the size of Braskem and its compliance Risks;
- A sufficient budget allocated for the creation, implementation and maintenance of the Compliance System, including the hiring of independent and qualified advisory services; and
- Access to all Team Members, information, records, data, systems and facilities that may be necessary.

#### **4.4. LEADERS**

Braskem's Leaders, in carrying out the responsibilities inherent in their Action Programs, must, by conviction, act ethically with integrity and transparency, and guide their Team Members, including by example, to act likewise. Therefore, Leaders must be active and proactive by adopting the following behaviors:

- Influencing Team Members by example;
- Incorporating into their Action Programs and ensuring that, in the Action Programs of their Team Members, is the commitment to act in accordance with the provisions of this Policy;
- Implementing and guaranteeing the practice of the Compliance System within its scope of action;
- Developing actions under their responsibility, including derivative processes, ensuring that the compliance standards defined herein and the applicable legislation are followed;
- Encouraging debate on the commitment at Braskem to acting ethically with integrity and transparency, and clarifying the issues and concerns raised by the Team Members on the subject;

- Supporting Team Members when they report events that they believe are violating laws or the commitment at Braskem;
- Ensuring the Team Members attend the compliance training events promoted by the Company; and
- Directly and indirectly promoting (through class entities such as councils and associations, for example) actions aimed at fostering ethical, integrity and transparent business practices, contributing to the existence and consolidation of a healthy and competitive business environment.

#### **4.5. ALL TEAM MEMBERS (INCLUDING LEADERS)**

It is up to the Braskem's Team Members to:

- Know and act according to the Braskem commitment to acting ethically with integrity and transparency, described in this Policy;
- In the performance of the Action Program responsibilities, act in accordance with the provisions of this Policy;
- Attend compliance training activities promoted in their business that are related to their responsibilities.;
- Collaborate with the internal audit and map Risks related to their areas of work and/or their Action Program;
- Directly, openly and sincerely consult the Compliance area or their Leader concerning any doubts they have as to what conduct to take in the face of a potentially questionable action by themselves, by Team Members or by Third Parties, including but not limited to those that may be construed as a Conflict of Interest;
- Disclose to Compliance or to their Leader any potential or existing Conflict of Interest;
- Report any possible illegal or unethical conduct or wrongdoing of a Team Member or Third Party, including potential violations of Applicable Anti-Corruption Laws and/or Braskem guidelines, including this Policy, via one of the available reporting outlets, including the Compliance Officer and Ethics Line Channel; and
- In the event that a Team Member is not comfortable discussing an issue or concern with his/her Leader, or if a Team Member has any reason to remain anonymous in reporting a possible violation of this Policy, the Team Member may use the Ethics Line channel or contact his/her Compliance Officer. Ignoring, omitting or claiming ignorance is not an acceptable behavior.

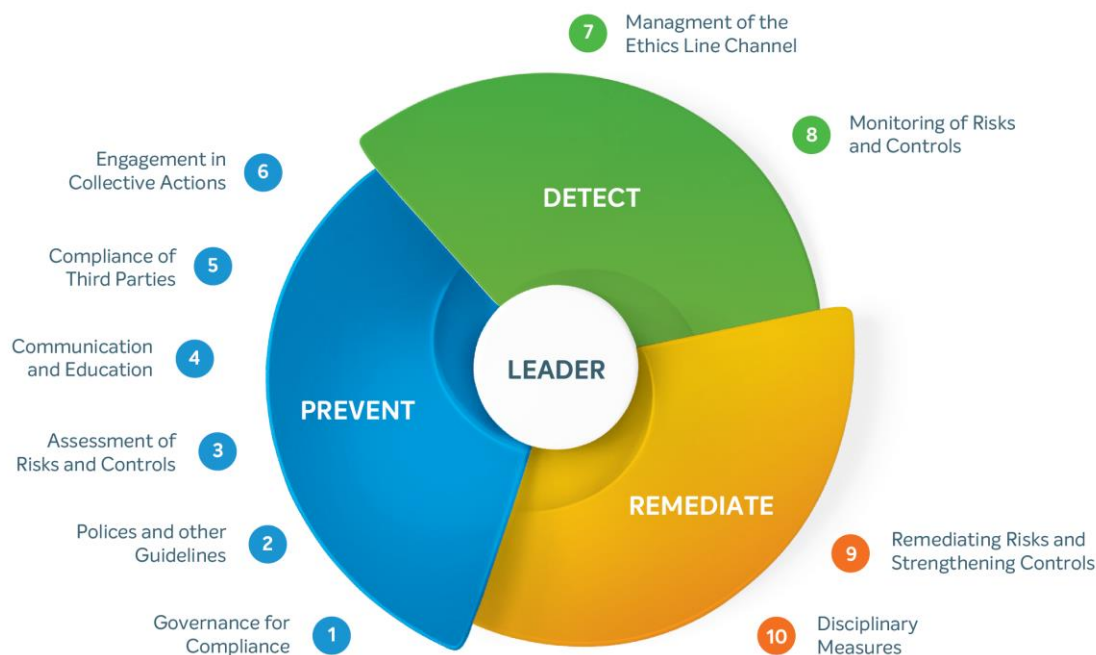
## 5. COMPLIANCE SYSTEM POLICY

The Compliance System supports Team Members striving to commit to acting ethically with integrity and transparency.

It therefore consists of a set of measures to prevent, detect and remedy Risks and issues that are not compatible with acting ethically with integrity and transparency. The Compliance System must be implemented by the Leader in all Company-related activities and operations, aligned with the respective Compliance Committee and CCO, and must be systematically monitored by the Board.

The implementation of the Compliance System is the responsibility of all, especially of Leaders, and must occur as part of the planning cycle and Action Program agreement and its follow-up, evaluation and judgment that permeates Braskem.

The Braskem Compliance System is composed of ten (10) integrated components for the prevention, detection and remediation of non-compliance Risks. The commitment of Braskem's Members, especially the Leaders, in the implementation and practice of these components is fundamental to the effectiveness and efficiency of the System.



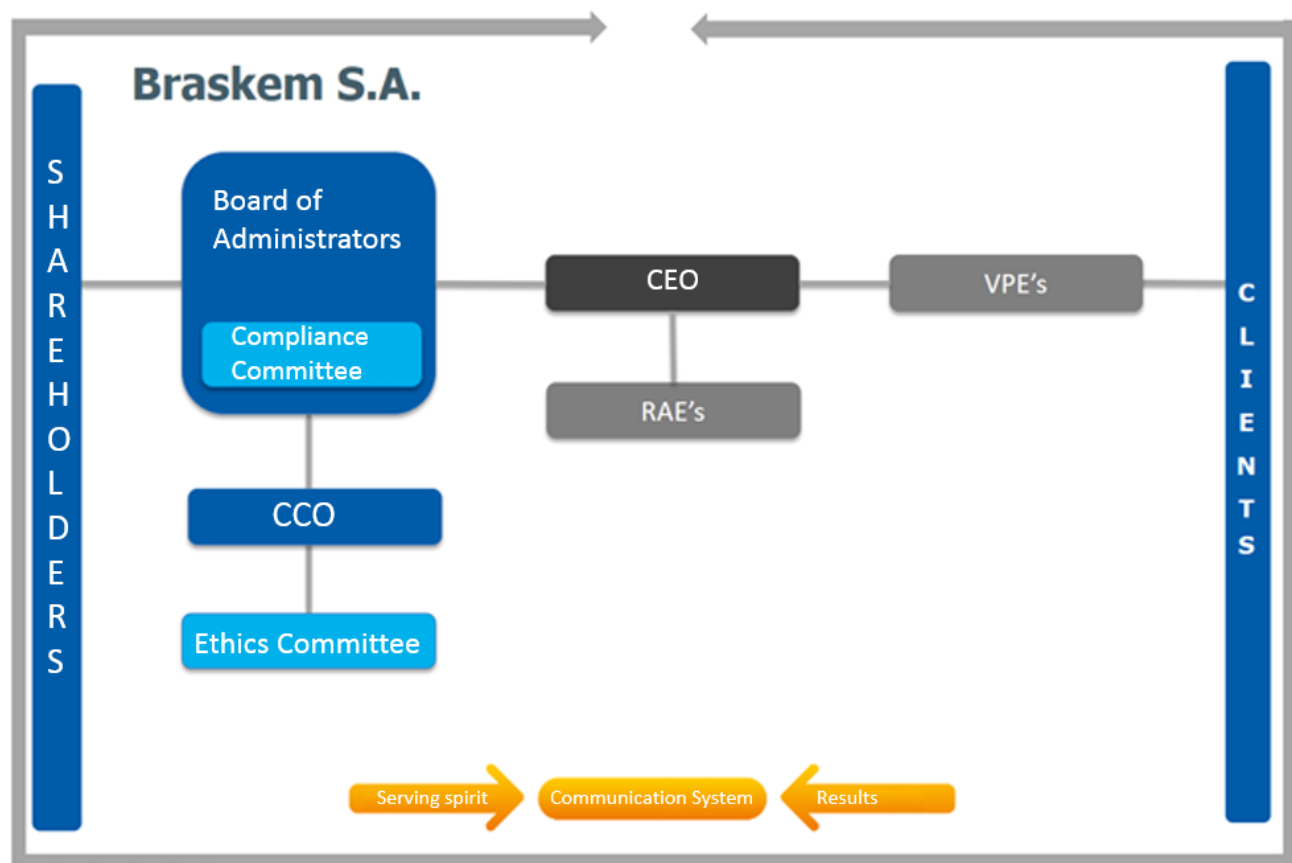
### 5.1. COMPLIANCE GOVERNANCE AT BRASKEM

The commitment to acting ethically with integrity and transparency begins with the BD, and extends to every Team Member. Continuous leadership support and a commitment to maintaining good conduct are indispensable conditions for the promotion of a culture of ethics, integrity, transparency and respect for the law, which must be reinforced and implemented at all levels



of the Company. By acting with ethics, integrity and transparency, leadership inspires other Team Members to act with the same principles, building the groundwork for an effective compliance system.

Braskem's compliance governance is structured as follows:



The independence, autonomy and impartiality of the compliance function are assured by its report to the BD, which is supported by CC, a permanent BD support committee to assure monitoring of Internal Controls and Risks to which the Company may be exposed. The CC is supported by the Ethics Committee in all matters related to Code of Conduct violations.

The CCO reports to the CC Coordinator and has the necessary skill to perform his or her functions, as well as adequate and sufficient resources for the development of his or her work. The CCO acts in constant partnership with other areas of the Company to ensure that the Compliance System is being followed by all Team Members.

This structure reinforces conditions for compliance at Braskem.

#### 5.1.1. BD Independent Directors

At least 20% of the BD must be considered “independent” according to definitions below. A Board Member will be considered independent if:

- He or she does not have any link with the Company, except capital stake;
- He or she is not a controlling shareholder, spouse or relative up to the second degree of the latter, and is not, or has not been, in the last three years, linked to the company or entity related to the controlling shareholder (persons linked to public educational and/or research institutions are excluded from this restriction);
- He or she is not a spouse or relative to the second degree of any of the Company's Administrators;
- He or she has not been, in the last three years, a Team Member or officer in the Company, controlling shareholder or at a Controlled Company;
- He or she is not a supplier or buyer, direct or indirect, of services and/or products from the company, in an economic magnitude that implies loss of independence;
- He or she is not an employee or Administrator of an entity that is offering or demanding services and/or products to the Company, in an economic magnitude that implies loss of independence; or
- He or she does not receive any remuneration from the other entity than the one related to the role of Board Member (cash proceeds from the stake in capital are excluded from this restriction).

## **5.2. POLICIES AND OTHER GUIDELINES**

Braskem's Company Policies establish general principles related to certain matters or business that must be observed and followed by all Company Team Members as applicable to their determined duties and responsibilities. To implement those principles and concepts, the Company has adopted and implemented additional Normative Documents that contain more detailed standards, appropriate to each business, according to its needs. The Company's Normative Documents, supporting documents, training programs, and other guidance adopted by Braskem are referred to collectively as Company Guidance Materials.

This Policy is supported by other Normative Documents that define guidelines based on the identification and evaluation of the Risks involved.

Company Guidance Materials concerning compliance topics should be easily accessible, understandable and applicable to the actions of relevant Team Members, regardless of their responsibilities.

Through the disciplined and systematic adherence to this Policy, the CCO or Leaders may identify the need to create new Policies or enhance other Braskem Policies. In this case, the need for new or revised policies must be discussed with the CEO or to the C-BD.

### **5.3. INTERNAL CONTROLS AND RISKS EVALUATION**

Braskem is subject to Risks from a wide range of sources, such as operational, financial, regulatory, and strategic, among others. These Risks must be properly evaluated and addressed by the Leaders periodically. The effectiveness of this process is fundamental to the improvement of the business performance and effectiveness of the Braskem Compliance System.

To a greater or lesser degree, there are Risks in the daily, routine activities of each Team Member, and the decisions taken by each business unit or corporate support areas. Thus each Leader must have responsibilities in managing the Risks identified in their environment. It is up to the Leaders to assess the Risk involved in their responsibilities, and to ensure that their team does so too, always adopting preventive, prospective and proactive attitudes in the anticipation and mitigation of Risks.

The Risk assessment process conducted by Leaders should be structured, systematic, and effective and should be supported by a corporate Risk management methodology and best practices.

Risk remediation details are provided for in the Company's Global Risk Management Policy.

### **5.4. COMMUNICATION AND TRAINING**

#### **5.4.1. COMMUNICATION**

Braskem's commitment to acting ethically with integrity and transparency as expressed in this Policy and elsewhere must be communicated in a way that is accessible and understandable by Team Members and external audiences.

Braskem's standards should be clearly and accurately transmitted, without ambiguous messages, and made available in the local language of operation.

Braskem's CCO, with the support of departments responsible for Personnel and Communication, must develop and implement a communication plan that continuously reinforces that the Code of Conduct, and any of its developments, are communicated and are accessible to all audiences.

#### **5.4.2. TRAINING**

Training Team Members to act ethically with integrity and transparency should occur mainly through work education, in the disciplined practice of the Action Program cycle (planning and agreement, monitoring, evaluation and judgment). The dialogue between Leader and Team Member, on operating ethically, with integrity and transparency, should result in a commitment by both in this sense, aiming at the best performance in the conduct of the Team Member's PA and the continuity of their self-development.

The commitment agreed upon between Leader and Team Member should be reinforced by work education programs with the objective of enhancing the Team Member's understanding of and ability to implement this Policy and related Normative Documents. These programs must be periodic and should contemplate new Team Members, as well as update the Team Members already

trained. Leaders should ensure that their Team Members and Third Parties are available to attend Braskem education programs for this purpose.

The records of the training programs should be kept at Braskem and its respective Controlled Companies, including identification of those who have been trained, when and in which subjects. Training programs should provide for practical situations, case studies and guidance on how to resolve dilemmas.

The CCO must implement mechanisms of monitoring and evaluation that ensure that the Team Members and Third Parties have been trained, and that they have demonstrated an understanding and commitment to acting ethically, and with integrity and transparency in their actions.

In addition to general capacity building for Team Members, Leaders and the CCO's team should identify groups of Team Members for targeted training and specific guidance, based on their PAs.

## **5.5. THIRD PARTY COMPLIANCE**

The actions of Third Parties on behalf of Braskem are the responsibility of the Company, as are the actions of its Team Members. Hence, the Leaders responsible for hiring and registering these Third Parties at Braskem must initiate and support the evaluation and due diligence of Third Parties, with the support of the CCO, following the principles below:

- The evaluation and due diligence should be based on the Risk presented by the Third Party and its relationship with Braskem. Third Parties must be classified according to pre-defined Risk criteria, as developed by Braskem.
- Evaluation and due diligence of Third Parties must be consistently applied. Once the evaluation and due diligence rules applicable to a particular Third Party Risk category have been defined, these rules should be applied to third parties with the same Risk classification. Exceptions to general rules may be appropriate in specific cases, but must be substantiated and previously approved by the CCO.
- The evaluation and due diligence must be formalized. Records of the steps taken and the information obtained during the evaluation and due diligence process should be kept. The records should be kept not only for the Third Parties with whom it has decided to partner, but also for those Third Parties that were not selected to be a partner with Braskem.

Due diligence Risk factors are provided in the Company Guidance Materials on Third Party due diligence.

Based on the Third Party Risk classification, it may be necessary to implement compliance recommendations, including but not limited to executing a contract, acknowledging the Third Party Code of Conduct, performing integrity trainings and defining a communication and awareness plan on the commitment to acting ethically with integrity and transparency.

## **5.6. ENGAGEMENT IN COLLECTIVE ACTIONS**

Engagement in collective actions through associations with other companies and/or entities in the sector is a way to express the commitment of the Team Members to act ethically with integrity and transparency, to share experiences, results and actions of the Company, to demonstrate the maturity of business practices and the compliance system of Braskem, and to learn and positively influence leaders of other companies.

In this sense, one must strive at Braskem to engage in associations that share Braskem's commitment to acting ethically with integrity and transparency, in the adoption of fundamental and internationally accepted values on human rights, labor and environmental relations, and to the fight against Corruption and unfair competition.

The performance of Team Members, as representatives of their respective companies, in collective or individual actions, should aim, as a priority, to improve the structuring conditions in the markets and in the environments in which they operate.

These initiatives, therefore, should aim, among other objectives, to support institutions, associations and universities in studies and proposals for the improvement of the institutional system, for the definition of public policies and for the improvement of public private relations, enhancing the experience of collective actions.

## 5.7. ETHICS LINE

At all times, Braskem offers to its Team Members, Customers, Third Parties and the external public a communication channel for reporting conduct by Team Members, Third Parties and Customers that does not comply with ethical, honest and transparent action ("**Ethics Line**").

The Ethics Line should be widely disclosed to all audiences, and especially to Team Members, Third Parties and Braskem's Customers.

The Ethics Line should be available on the external Braskem portal, on the internal portal and through toll-free phone numbers in countries where Braskem operates.

Complainants may choose to remain anonymous, and the Ethics Line is structured to receive anonymous reports. Braskem does not allow or tolerate any actual or perceived retaliation against or harassment of a Team Member who reports in good faith concerns about potential misconduct.

Reports submitted to the Ethics Line should be kept confidential in accordance with the rules outlined in the Ethics Line and Investigations Procedure.

Details regarding receipt and determination of allegations, and the Ethics Committee's role in treating allegations, are provided for in the Ethics Line and Investigations Procedure.

## 5.8. INTERNAL CONTROLS AND RISKS MONITORING

The monitoring of Risks and Internal Controls is the continuous evaluation of Internal Controls in order to verify whether they are adequate and effective to mitigate the Risks.

Risks and Internal Controls monitoring can be done through internal or external audits, or through the ongoing assessment of key business Risk indicators.

Risk monitoring should be part of the day-to-day actions of Team Members, who shall be trained to identify events that could generate Risks of a failure to act ethically, with integrity and transparency.

### **5.8.1. INTERNAL AUDIT**

Internal Audit is an independent and objective activity, designed to monitor, evaluate and make recommendations aimed at improving Internal Controls, policies and other Normative Documents in the Company. Conducting internal audits aims to assist Leaders in achieving their objectives through a systemic and disciplined approach to assessing and improving the effectiveness of Risk and Control management processes.

The annual audit plan should be consistent with Braskem's strategy and aligned with Braskem's CEO. The plan should be based on Braskem's Risk matrix, taking into account: the priority Risks, the financial and accounting materiality of the processes, the reports to the Ethics Line channel, as well as the results of previous audits. The plan should aim to prevent and identify potential deviations and threats and identify opportunities for improvement.

The results of the audit work/project must be evidenced in a report, which should describe any identified deficiencies related to the control environment along with the action plans, and deadlines for the responsible Leader.

All audits should be objectively and impartially conducted. The results of the internal audits should be aligned at least with Internal Controls, Compliance, and Risk Management areas and presented to Braskem Business Leaders and CC.

The Head of Internal Audit shall track and review the implementation of the agreed action plans, periodically reporting the matter to the CC.

If, under any circumstance, the conditions of independence or objectivity of Internal Audit is impaired, in fact or in appearance, Internal Audit shall notify, on a timely basis, the CC and, as appropriate, the Leaders responsible for the activities being audited.

To perform internal audits, the internal audit function must:

- Have access to all Team Members, information, records, data, systems and facilities as necessary; and
- Request information and confirmations from Third Parties through those responsible for the contacts with these Third Parties.

If the Head of Internal Audit decides to partially outsource Internal Audit work, such services should not be performed by the same firm that provides independent external audit services.

The global guidelines and rules for the Internal Audit function, as well the responsibility of the professionals involved, are described in the Internal Audit Directive.

### 5.8.2. EXTERNAL AUDIT

The independent external auditor's main assignment is to analyze, audit and express an opinion on whether the financial statements prepared by Braskem's directors adequately represent, in all material respects, the Company's financial position.

The independence of the external auditors is critical, so that they can evaluate the financial statements objectively and impartially.

Braskem's Fiscal Council ("FC") is responsible for monitoring and analyzing the process of hiring the independent external auditor and recommending to the Board of Directors its choice and compensation, as well as its possible substitution. The FC is also responsible for approving the additional services contracted by the external auditor, as well as ensuring that none of these services could jeopardize the auditor's objectivity and required independence. Independent external auditors should not audit the proceeds of their own work, should not promote or defend the interests of the audited company and should not perform managerial functions for the audited company.

Braskem's independent external auditors are responsible for:

- Reporting to FC;
- Expressing their conclusion about the financial statements by means of a report issued in accordance with applicable auditing standards;
- Evaluating whether the Internal Controls used are adequate and sufficient to allow the elaboration of financial statements that do not present any distortions, whether caused by error or fraud;
- Issuing a report with recommendations resulting from its evaluation of Internal Controls performed during the audit process; and
- Reporting to the FC any disagreements that arose in the dialogues with Fiscal Directors, or if there were difficulties in obtaining the necessary information.

### 5.8.3. RISK INDICATORS

The CCO must implement mechanisms for monitoring Risk indicators aiming at the:

- Detection and timely Internal Controls of potential fraud, diversion or financial losses;
- Identification of recurring failures and establishment of corrective actions;
- Demonstration of Risk evolution on an ongoing basis for Leaders and for the CC;

- Establishment of common performance indexes used as reference between localities and different businesses, when applicable; and
- Identification of trends related to errors or irregularities, considering time, business, locality, process and sub process.

## **5.9. REMEDYING RISKS AND STRENGTHENING INTERNAL CONTROLS**

After the identification, evaluation and measurement of the Risks, the response to any exposure to remaining Risks should be defined.

Risk response involves identifying one or more options to address the identified Risks. Risk response options are not necessarily mutually exclusive or appropriate in all circumstances and may include avoiding, reducing, sharing or accepting them depending on Braskem's tolerance and Risk appetite.

Selecting the most appropriate Risk response option involves balancing both the costs of implementation efforts and the resulting benefits related to legal, regulatory or other requirements, such as social responsibility and protection. Decisions taken by Team Members must also take into account Risks that require economically unjustifiable treatment, such as severe (often negative) Risks, but which are rare (with very low probability). Various treatment options can be considered and applied individually or in combination.

The Company typically benefits from the adoption of a combination of Risk response options. When Risk-response options can affect Risk in other enterprise environments, or with stakeholders, those involved should be part of the decision.

In the Risk response plan, the priority of implementing the Risk response, its deadlines and the definition of those responsible should be clearly identified.

Risk mitigations should be addressed by strengthening the control environment. In this sense, it is important that Braskem develops and implements strategies to mature and strengthen its control environment in a continuous manner and in line with its objectives, especially when new activities or achievements increase the level of exposure to Risk.

CCO must track and report on the implementation of Risk response and process improvements identified as necessary by the Compliance team, and which have been aligned with and agreed to by the Process Leaders.

Risk remediation details are provided for in the Company's Global Risk Management Policy.

## **5.10. DISCIPLINARY MEASURES**



Disciplinary measures will be imposed as appropriate, in the event of a violation of Braskem's Code of Conduct and other Normative Documents, in order to convey the seriousness of the Compliance System as provided for in the Disciplinary Measures Directive.

The C-BD and the CEO must ensure that, in the implementation of the Compliance System within his/her scope of responsibility, there are disciplinary measures for failures to act ethically with integrity and transparency. These disciplinary measures should be proportionate to the type of violation and the degree of responsibility of those involved. The prompt stoppage of irregularities and the timely remediation of Risk situations may include, but are not limited to, the following actions: the Team Member's dismissal, including for gross misconduct, verbal and formal warnings, contract cancellation, and suspension of payments, among others.

In these disciplinary measures, provision should also be made for the adoption of precautionary measures, such as the preventive removal of Team Members that may hinder or influence the proper course of the claim determination, and suspension of Third Party contracts, among others.

## **6. MISCELLANEOUS**

Team Members are responsible to know and understand all Normative Documents applicable to them. Similarly, Leaders are responsible to ensure that all of their Team Members understand and abide by the applicable Normative Documents of the Company.

Team Members who have questions or concerns about this Policy, including the scope, terms, or obligations of this document, should contact their respective Compliance Area or their Leader.

Violations of any of the Company's Normative Documentation can result in serious consequences to Braskem and the Team Members involved. Therefore, failure to follow this Policy or to report a known violation may result in disciplinary action for any Team Member(s) involved.

This Policy takes effect on the date of its approval and replaces PE 1050-00011 – Braskem Policy on Compliance in Acting Ethically with Integrity and Transparency, approved by the Board of Directors of Braskem on Nov. 11, 2016.

### **Braskem's Board of Directors**

## DEFINITIONS

Below are the definitions of the capitalized terms utilized in this Policy.

**"Action Program" or "PA":** Agreement between Leader and Team Member that defines the Team Member's responsibilities and the Leader's commitment with the follow-up, evaluation and judgment towards the Team Members based on his/her performance.

**"Administrator", "Administrators":** When in the singular, it stands for the statutory directors and members of the Board of Directors referred to individually. When in the plural, the statutory directors and members of the board of directors jointly referred to.

**"Applicable Anti-Corruption Laws":** All applicable domestic and international anti-corruption laws and regulations, including, but not limited to, Brazilian bribery and corruption laws, including Brazil's Anti-Corruption Law (Law No. 12.846), the Mexican Anticorruption National System ("SNA"), the Foreign Corrupt Practices Act ("FCPA") of the United States, and the Bribery Act of the United Kingdom, and similar laws that apply in the countries in which the Company operates.

**"BD" or "Board":** Board of Directors of Braskem S.A.

**"Braskem" or "Company":** Braskem S.A. and all of its Subsidiaries in Brazil and abroad.

**"C-BD":** The chairman of the Braskem S.A. BD.

**"Compliance Committee" or "CC":** Compliance Committee of the BD.

**"CC Coordinator":** A CC independent director which is responsible for coordinating the CC.

**"CCO":** The senior executive leading the Compliance function area of the Company; known in Brazil as R-Conformidade and abroad as Braskem's Chief Compliance Officer ("CCO").

**"CEO":** Braskem Business Leader; the global leader of Braskem, known in Brazil as LN Braskem and abroad as Braskem's the Chief Executive Officer ("CEO").

**"Company Guidance Materials":** The Normative Documents, supporting documents, training programs, and other guidance adopted by Braskem.

**"Compliance System":** Braskem's Core Values, Code of Conduct, the Global Anti-Corruption Policy, and all other Company Guidance Materials and other components of the Company's global compliance program.

**"Conflict(s) of Interest":** Occur when the interests of a Team Member, or the interests of an individual with whom the Team Member is associated, are at odds with the interests of Braskem, thereby interfering with (or appearing to interfere with) the Team Member's ability to render objective judgment in executing his or her responsibilities for the Company, or when a Team Member, or a relative or associate of the Team Member, receives improper personal benefits because of a Team Member's position at Braskem.

**“Controlled Company(ies)” or “Controlled Entity(ies)” or “Subsidiary(ies)”**: Companies in which Braskem, either directly or through other controlled companies, holds rights that assure it, on a permanent basis, prevalence in corporate deliberations and the power to elect the majority of managers or directors.

**“Internal Controls”**: The organization plan and the coordinated set of methods and measures adopted by the Company to protect its assets, verify the accuracy and reliability of accounting data, promote operational efficiency and encourage the adherence to policies outlined by Company Management.

**“Corruption”**: Abuse of power or procedure for personal or dishonest benefit. Corruption can be presented in a variety of ways, such as bribery, conflict of interest, collusion (manipulation of proposals, cartels and pricing), patronage, unlawful information, use of inside information, price arrangement, fiscal evasion, among others.

**“General Counsel” or “GC”**: The senior executive leading the Legal, Corporate Governance, and Institutional Relations functions of the Company, known in Brazil as RAE Jurídico and abroad as Braskem’s General Counsel (“GC”) of Braskem.

**“Leader(s)”**: Team Members leading a team.

**“Normative Document(s)”**: A formal Braskem document that provides content about corporate decisions, rules and orientations that are vital for directing the work of Braskem with legitimacy, trackability and applicability and must be observed and applied by a certain defined universe of Team Members.

**“Public Agent(s)”**: Any individual acting in an official capacity or exercising a public function for or on behalf of: (i) a national, regional, or local government (whether in a legislative, administrative, or judicial capacity or function); (ii) an agency, department, or instrumentality of a national, regional, or local government; (iii) a government-owned or government-controlled company or enterprise, or (iv) a public international organization, such as the United Nations, the World Bank, or the World Trade Organization. Also, any political party, party official, candidate for political office, or any individual acting in an official capacity on behalf of any of the foregoing.

**“Risks(s)”**: Possibility that an event will occur and adversely affect the Company causing a deviation from expectations (positive or negative) and generating uncertainty in the achievement of Braskem's objectives.

**“Team Member(s)”**: Braskem’s employees at all levels, including officers, board members, directors, interns and apprentices (as applicable by geographical location).

**“Third Party” or “Third Parties”**: Any person, whether a legal entity or individual, who acts in the name or interest of or for the benefit of Braskem, and provides services, supplies or other goods, as well as business partners who render services to Braskem directly related to obtaining, retaining or conducting Braskem’s affairs, including, without limitation, any distributors, agents, brokers,

forwarders, intermediaries, supply chain partners, consultants, dealers, resellers, representatives, joint venture parties, contractors, and other professional service providers.