



## CORPORATE POLICY

PE 1050-00021-EN-GLOBAL ANTI-CORRUPTION POLICY



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## 1. PURPOSE

This Global Anti-Corruption Policy (the "Anti-Corruption Policy" or the "Policy") is the Company's global policy prohibiting bribery and corruption.

## 2. SCOPE

This Policy is applicable to Braskem S.A. and all of its Controlled Companies, both in Brazil and abroad. As such, this Policy applies to all Team Members of Braskem, as well as Third Parties working on Braskem's behalf around the world.

## 3. REFERENCES

- Braskem Code of Conduct

## 4. DUTIES AND RESPONSIBILITIES

### 4.1 BOARD OF DIRECTORS

- Responsible for guaranteeing the existence of a Compliance System that attends to the applicable laws and regulations, including Applicable Anti-Corruption laws and maintaining this Anti-Corruption Policy; and
- Responsible for approving any amendments to this Anti-Corruption Policy.

### 4.2 COMPLIANCE COMMITTEE

- Responsible for serving as a permanent oversight body for Braskem's compliance efforts, including the Compliance System and the maintenance of this Anti-Corruption Policy.

### 4.3 COMPLIANCE AREA

- Responsible for implementing, disseminating, and advising on issues related to this Anti-Corruption Policy;
- In coordination with other areas, responsible for developing, implementing, and maintaining the Company's Compliance System, including Company Guidance Materials and controls needed to conduct the Company's business in compliance with all Applicable Anti-Corruption Laws and this Policy;
- In coordination with other areas, responsible for developing, implementing, and monitoring the Company's training program and other resources and guidance as appropriate to ensure Team Members and Third Parties know and understand Applicable Anti-Corruption Laws, and this Policy;
- Responsible for serving as a trusted advisor to all Team Members and Third Parties on the execution of the Company's business in compliance with all Applicable Anti-Corruption Laws and the Compliance System, including this Policy; and
- Responsible for maintaining the mechanisms for Team Members and Third Parties to report potential violations of law and the Company Guidance Materials, including the Code of Conduct and this Policy, and responsible, in coordination with other areas as appropriate, to ensure the review and remediation of reported concerns. At a minimum, the Company will maintain permanently a fully operational channel (available 24 hours a day, 7 days a week to receive reports), in accordance with item 6.2 below.

### 4.4 PEOPLE AND ORGANIZATION ("P&O") AREA

- Responsible for supporting the Compliance area in training and communicating topics related to this Anti-Corruption Policy; and
- Responsible, in coordination with the Compliance area, for reviewing, defining, and facilitating the remediation of reports of potential violations of Company Guidance Documents, including the Code of Conduct and this Anti-Corruption Policy.

### 4.5 LEGAL

- Responsible for supporting the Compliance area and P&O in reviewing, defining, and facilitating the remediation of reports of potential violations of law.

## 4.6 LEADERS

- Responsible for internally and externally demonstrating, through their Action Program (“PA”) or otherwise, their commitment to conducting the Company’s business in compliance with all Applicable Anti-Corruption Laws and Company Guidance Materials, including the Code of Conduct and this Anti-Corruption Policy through the execution of their responsibilities, including the leadership of their Team Members;
- Responsible for reporting any known allegations of potential violations of law or Company Guidance Materials, including the Code of Conduct and this Anti-Corruption Policy.

## 4.7 TEAM MEMBERS (INCLUDING THE LEADERS)

- Responsible for acting in accordance with this Anti-Corruption Policy and seeking advice from the Compliance area regarding any issues or concerns arising under this Policy; and
- Responsible for reporting any known allegations of potential violations of laws or Company Guidance Materials, including the Code of Conduct and this Anti-Corruption Policy.

## 5. POLICY AGAINST CORRUPTION

Consistent with Braskem’s Code of Conduct and commitment to conduct business ethically, with integrity and transparency and in compliance with applicable laws, Braskem does not tolerate any form of bribery or corruption. It is the policy of Braskem to conduct its operations and activities in compliance with all Applicable Anti-Corruption Laws. Braskem prohibits its Team Members and Third Parties from engaging in corruption in any form or context.

As such, no Team Member or Third Party may ever:

- Offer, promise, pay, or authorize an offer or payment of money or anything of value to a Public Agent, or any other person or entity, directly or indirectly (including through a Third Party), which is:
  - intended to corruptly influence any action (or failure to act) or decision in the recipient’s capacity or in violation of the recipient’s duty;
  - intended to corruptly induce the recipient to use influence to affect any act or decision of the entity involved;

- intended to corruptly secure an improper advantage or to assist Braskem in obtaining or retaining business; or
- intended as gratitude for the recipient having made a decision or acted in a way that benefited Braskem improperly.
- Request or accept any money or item of value, directly or indirectly, which is:
  - intended to improperly influence the judgment or conduct of the recipient, whether to take an action, fail to act, or to use his or her influence in his or her job responsibilities; or
  - intended as gratitude for having made a decision or acted in a way that benefited improperly the person or entity giving the item of value to the recipient.

These prohibited Improper Payments are not limited to cash payments, but include corrupt:

- Gifts;
- Entertainment, meals, travel and other hospitality;
- In-kind contributions and/or services;
- Business, employment, or investment opportunities;
- Uncompensated or discounted use of Braskem's services, facilities, equipment, or property;
- Commercial discounts of Braskem's products or services;
- Charitable Donations, Sponsorship or other Corporate Social Investments;
- Political Contributions made to political parties, candidates, and/or their staff;
- Assistance to, or support of, family members and friends; and
- Other personal or professional benefits or advantages.

Furthermore, Braskem and its Team Members shall not engage in extortion, fraud, falsification of documents or intentional preparation of incorrect financial transaction statements, or any other activity that may constitute corruption or a violation of Applicable Anti-Corruption Laws.

For the avoidance of doubt, no Team Member or Third Party may offer, give, promise, receive, or request, or direct others to give or receive any Improper Payment to or from anyone, at any time, or for any reason, in connection with their work for Braskem. Bribery is never an acceptable business practice and is not tolerated by Braskem.

These prohibitions are described in more detail in the following sections.

### **5.1.1 BRIBERY OF PUBLIC AGENTS**

Braskem, its Team Members, and its Third Parties are prohibited from giving, promising, offering, or authorizing, directly or indirectly, any Improper Payment to a Public Agent, or to a Relative of a Public Agent, or to any other person at the request of a Public Agent or with the Public Agent's assent or acquiescence.

Braskem also prohibits any payment, promise, offer, or authorization of the giving of an Improper Payment to anyone while knowing it will be given to or shared with a Public Agent, Relative of a Public Agent, or other designee.

### **5.1.2 COMMERCIAL BRIBERY**

Braskem prohibits its Team Members and Third Parties from giving, promising, offering, or authorizing, directly or indirectly, any Improper Payment, including any bribe, kickback, payoff, or other form of commercial bribery, to a supplier, client, or other Third Party to improperly influence the actions of another party to secure an improper advantage from his or her employer's or principal's commercial conduct.

Note: in many instances commercial bribery occurs without the knowledge of the recipient's employer or principal – even in those instances giving, promising, offering, or authorizing, directly or indirectly, an Improper Payment is prohibited.

### **5.1.3 RECEIPT OF IMPROPER ADVANTAGES**

No Team Member or Third Party may request or accept an Improper Payment from any other person. Positive Third Party relationships are important to Braskem, and accepting any thing of value from a Third Party, including Business Courtesies, can be a legitimate way of building those relationships so long as they are transparent, consistent with Applicable Anti-Corruption Laws and Company Guidance Materials, and not intended to induce (or reward) an inappropriate or corrupt act or decision. No Team Member should accept any thing of value from a Third Party that would unduly influence business decision-making. As such, Team Members should not accept:

- Any money or any thing of value, including Business Courtesies, in return for business services, information, or improper business advantages;
- Any money or any thing of value, including any Business Courtesies, that is inconsistent with applicable law, Company Guidance Materials, or designed or intended for any purpose other than furthering a legitimate and transparent business purpose or relationship; or

- Any product or services discounts, or other goods, services, or benefits offered to improperly gain or reward the provision of an advantage, information, or benefit.

## 5.2 FACILITATION PAYMENTS PROHIBITED

Facilitation Payments – sometimes referred to as “grease payments” – are small value payments made to a Public Agent to encourage, expedite, or secure the performance of an existing duty or obligation, such as the issuance of customs documents, licenses, or certificates, or providing police protection or mail delivery. While not illegal in every instance, Facilitation Payments are expressly prohibited under many Applicable Anti-Corruption Laws, and create significant corruption risk. For this reason, Braskem prohibits all forms of Facilitation Payments.

## 5.3 HEALTH AND SAFETY PAYMENTS

Health and Safety Payments are defined as payments to a Public Agent where a Team Member is exposed to an imminent threat to health, safety, or welfare.

If a Health and Safety Payment is made, the Team Member who made the payment must report the payment to the Leader of the Compliance area and Legal as soon as the immediate threat has subsided. Where a Health and Safety Payment is made, the Compliance area works to ensure the payment is appropriately recorded in the Company’s books and records.

It is the responsibility of Team Members to ensure proper documentation to meet health and immigration requirements to reduce risk of being detained or subjected to potential physical harm.

## 5.4 THIRD-PARTY RELATIONSHIPS

Consistent with our commitment to ethical business and this Policy, Braskem prohibits Third Parties acting on behalf of Braskem from engaging in any conduct that would be prohibited if undertaken by a Team Member of Braskem, whether using Company funds or its own; whether acting directly or through another individual or entity. It is the responsibility of all Team Members to ensure that the Third Parties with whom Braskem does business understand this Anti-Corruption Policy. Braskem expects all Third Parties to adopt the same ethical standards that Braskem adopts for itself. Braskem must never hire Third Parties to do something that would be prohibited under Braskem’s Anti-Corruption Policy or any Applicable Anti-Corruption Law.



## 5.5 BOOKS AND RECORDS

Many of the Applicable Anti-Corruption Laws also contain provisions that require Braskem to (a) make and keep records that in reasonable detail, accurately and fairly reflect transactions and the disposition of assets, and (b) maintain internal controls that will provide reasonable assurances that transactions are executed and recorded properly. Accordingly, all Team Members and Third Parties must accurately document and record all expenditures on behalf of Braskem and are prohibited from hiding or misrepresenting company expenditures or making payments on behalf of Braskem without the appropriate approvals and supporting documentation that verify the validity of the transaction.

Every Team Member and Third Party is responsible for accurately and properly recording on the Company's books and records, in a timely manner, all transactions and financial records, regardless of value. This requirement covers every type of activity. Transactions must be recorded using the appropriate accounting codes, supported by required documentation, and made in accordance with applicable accounting requirements.

No Team Member or Third Party may ever make a false representation or mischaracterize any information provided in Braskem's books and records. Specifically, no Team Member or Third Party may intentionally distort or disguise the true nature of any transaction in any accounting or business record, including by omitting relevant information, making an inaccurate representation regarding a transaction, whether in a document or verbally, or establishing any undisclosed or unrecorded funds or assets for any purpose.

## 6. MISCELLANEOUS

Team Members are responsible to know and understand all Company Guidance Materials applicable to them – including this Anti-Corruption Policy. Similarly, Leaders are responsible to ensure that all of their Team Members understand and abide by this Policy.

Team Members who have questions or concerns about Applicable Anti-Corruption Laws, the Company's Compliance System, or this Anti-Corruption Policy, should contact the Leader of their respective Compliance area.

### 6.1 VIOLATIONS

Failing to comply with this Anti-Corruption Policy and Applicable Anti-Corruption Laws can result in potentially severe consequences, including a loss of business, restrictions on doing business (such as

suspension or debarment from bidding), civil and/or criminal liability for Braskem and/or the individual actors, monetary fines, and damage to the Company's reputation. In addition, Team Members or Third Parties who violate this Policy, or fail to report a known violation thereof, may be subject to disciplinary action, including possible termination of employment or affiliation with Braskem.

## 6.2 REPORTING OBLIGATIONS AND NON-RETALIATION

If any Team Member or Third Party becomes aware of possible illegal or unethical conduct, including potential violations of Applicable Anti-Corruption Laws and/or Company Guidance Materials, including this Policy, the Team Member or Third Party must immediately report the possible violation. To facilitate reporting, Braskem maintains a number of reporting outlets, several of which allow for anonymity:

- Ethics Line available twenty-four hours a day, seven days a week either by phone or internet:
  -  Brazil: 0800 377 8021 - [www.linhadeeticabraskem.com](http://www.linhadeeticabraskem.com)
  -  Germany: 0800 183 0763 - [www.lineethikbraskem.com](http://www.lineethikbraskem.com)
  -  Holland: 0800 022 7714 - [www.ethieklinebraskem.com](http://www.ethieklinebraskem.com)
  -  Mexico: 01 800 681 6940 - [www.lineadeeticabraskemidesa.com](http://www.lineadeeticabraskemidesa.com)
  -  United States: 1 800 950 9280 - [www.ethicslinebraskem.com](http://www.ethicslinebraskem.com)
  -  Argentina: 0800 222 0394 – [www.lineadeeticabraskem.com](http://www.lineadeeticabraskem.com)
  -  Colombia: 01 800 518 4806 – [www.lineadeeticabraskem.com](http://www.lineadeeticabraskem.com)
  -  Peru: 0800 76757 - [www.lineadeeticabraskem.com](http://www.lineadeeticabraskem.com)
  -  Chile: +56-448909744 - [www.lineadeeticabraskem.com](http://www.lineadeeticabraskem.com)
  -  Singapore: +65-31585409 – [www.ethicslinebraskem.com](http://www.ethicslinebraskem.com)
  
- Any member of the Compliance area;

All Leaders must continually encourage their Team Members to report potential violations through the Ethics Line Channel. Braskem is committed to timely and appropriate responses to all potential concerns by investigating in confidence and in accordance with the law. Braskem does not tolerate retaliation against anyone who makes a report of a potential violation or concern in good faith. Failing to follow the Code and the local law may lead to disciplinary action, including dismissal. Nothing in Company Guidance Material,



including this Procedure, prohibits Team Members from reporting any concern or illegal activity to the appropriate regulatory authorities.

Braskem is committed to timely and appropriate responses to all potential concerns. Braskem does not tolerate retaliation against anyone who makes a report of a potential violation or concern in good faith. Nothing in Company Guidance Materials, including this Policy prohibits Team Members or Third Parties from reporting any concern or illegal activity to the appropriate regulatory authorities.

### **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 regarding the follow-up, evaluation, and judgment of the Team Member based on his/her performance.

**"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.

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

**"Business Courtesy"** or **"Business Courtesies"**: Any thing or benefit provided free of charge or below market value to any recipient, whether Public Agent or private, while conducting business for Braskem. Examples include, gifts, travel, meals and beverages, lodging expenses or entertainment.

**"Charitable Donations"**: Money, goods, equipment or services for cultural, social, or environmental development offered to charitable, philanthropic, or community entities to give a clear and verifiable benefit to specific stakeholders, but that do not provide a direct benefit to the Company.

**"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.

**"Corporate Social Investment"**: Voluntary, planned and monitored use of Braskem resources for the execution of initiatives in the public interest, involving (i) the planning, monitoring and assessing of projects; (ii) a results-oriented strategy that generate social impacts aligned with the Company's strategy; and (iii) the community's involvement/support in developing the initiative.

**"Facilitation Payment(s)"**: Small value payments made to a Public Agent to encourage, expedite, or secure the performance of an existing duty or obligation, such as the issuance of customs documents, or providing police protection or mail delivery.

**"Health and Safety Payment(s)"**: Payments made by a Team Member to a Public Agent where extorted by an imminent threat to health, safety, or welfare.

**"Improper Payment(s)"**: Includes a broad range of corrupt payments of money or anything of value or any advantage, which does not need to be financial, made or given in order to influence favorably some

decision affecting Braskem's business, to obtain an improper advantage, induce or reward improper performance, where the payment or advantage itself is improper.

**"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, traceability 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.

**"Relative(s)":** any couple/partner, parents, grandparents, sons, daughters, grandsons, granddaughters, uncles, nephews, nieces, cousins<sup>1</sup> or sons/daughters in law of the person; in addition to parents, sons, daughters, brothers and sisters of the couple/partner of the person.

**"Sponsorships":** The transfer of Braskem financial resources, to non-profit or for profit entities, to carry out projects or events for commercial, technical and/or promotional purposes. Sponsorships provide the Company with clear and specific benefits, such as advertising, participation in events, signage or brand exposure.

**"Subsidiary(ies) or "Controlled Entity(ies)" or "Controlled Company(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.

**"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.

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<sup>1</sup> Per law definition, cousins are considered as the sons/daughters of your parents' brothers.

### CONTROL INFORMATION

#### Control of Changes:

Date	Version	Support Member	Change Made
06/25/2020	3.0	Everson Bassinello	Updated "Relative" definition in order to comply with the term provided by the Code of Conduct

#### Languages:

Language(s)				
Operative Language:	<input checked="" type="checkbox"/> English	<input type="checkbox"/> German	<input type="checkbox"/> Portuguese	<input type="checkbox"/> Spanish
Other Language(s):	<input type="checkbox"/> English	<input checked="" type="checkbox"/> German	<input checked="" type="checkbox"/> Portuguese	<input checked="" type="checkbox"/> Spanish

#### Areas / Regions Involved in the Development of this Policy:

Duties	Name	Area / Region	Date of Approval
Support Member:	Everson Bassinello	CC8	06/25/2020
Reviewer:	Marcelo Almeida	Corporate Compliance Coordinator	06/25/2020
Reviewer:	Tiago Tebecherani	SAM Legal	06/16/2020
Reviewer:	Ana Paula Tarossi Silva	Corporate Governance	06/24/2020
Reviewer:	Lilian Porto Bueno	Corporate Governance	06/16/2020
Reviewer:	Roberto Simões	CEO	06/22/2020
Reviewer:	Consejo de Administración	Legal	06/22/2020
Reviewer:	Board of Directors	Corporate	06/25/2020
Reviewer:	Board of Directors	Board of Directors	02/14/2019
Reviewer:	Fernando Musa	CEO	11/12/2018

Duties	Name	Date of Approval
Internal Controls Reviewer:		