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Author: VICTOR ALOTA IGNÁCIO PEREIRA

Approver: MARCIO PITZER

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1 GOAL

This Global Conflict of Interest Directive establishes the rules for identifying, declaring and mitigating actual, potential or perceived Conflicts of Interest involving Braskem and its members, in accordance with applicable laws.

2 SCOPE

This Directive is applicable to Braskem S.A., its Members and all its Subsidiaries and Subsidiaries, as applicable and as provided for in their own governance, both in Brazil and abroad.

3 REFERENCES

- Braskem's Code of Conduct
- BRK-POL-00-000294 – Compliance System Policy
- BRK-POL-00-000296 – Braskem's Global Anti-Corruption Policy
- BRK-PRO-00-000332 – Disciplinary Measures Directive
- BRK-DIR-00-000374 – Business Courtesy Guideline
- BRK-DIR-00-000372 – Visitor Attraction and Identification Guideline

4 DUTIES AND RESPONSABILITIES

4.1 MEMBERS

- Refrain from activities, relationships, and ties that may result in an actual, potential, or perceived Conflict of Interest;
- Declare and report, to the best of their knowledge, activities, relationships and ties that may characterize conflicts with Braskem's interests and business; and
- Collaborate in the resolution or mitigation of Conflicts of Interest.

4.2 LEADERS

- Support members in a better understanding of the concepts and the need to report activities, relationships and bonds that may characterize a Conflict of Interest; and
- Assist Members in the Compliance and P&O areas, as necessary, in the identification and implementation of Conflict of Interest mitigation plans, in accordance with this Directive;

4.3 PEOPLE AREA (P&O)

- Request final candidates for any position or area at Braskem, including interns, complete a Conflicts of Interest declaration, before issuing the Letter of Intent (to hire);
- Support the Compliance area, as necessary, with the development and monitoring of mitigation plans for any real or perceived Conflicts of Interest; and
- Review and approve together with the Legal team, when requested, the hiring of Public Agents when allowed by local law;

4.4 COMPLIANCE AREA

- Manage Braskem's Conflicts of Interest Program, as well as the tool defined for declaring any Conflicts of Interest by candidates and Members of Braskem;
- Supporting Members, as necessary, in identifying and declaring, as well as developing and implementing plans to mitigate actual, potential or perceived Conflicts of Interest;
- Promote Communication and Training to Members on Conflict of Interest topics;
- Whenever deemed necessary, in joint alignment of the Compliance, P&O and Leader teams of the Member, report to the Ethics Committee any Conflicts of Interest declared by Members that may increase Braskem's exposure; and
- Keep the Corporate Governance team aware of any mitigation plans related to Conflicts of Interest that have been reported by Members of the Board of Directors.

4.5 ETHICS COMMITTEE

- Whenever deemed necessary, in joint alignment of the Compliance, P&O and Leader teams, assist in determining the existence of a real or perceived Conflict of Interest, as well as in the development of mitigation plans deemed appropriate for cases of Conflicts of Interest that may generate an increase in the company's exposure.

4.6 STATUTORY AUDIT AND COMPLIANCE COMMITTEE (CCAEC)

- Be aware of the Compliance recommendations for any Conflicts of Interest declared by Directors.

4.7 LEGAL AREA

- Whenever requested, evaluate with the P&O area the feasibility of hiring a Public Agent, when allowed by local law; and
- Whenever requested by the Compliance area, support the determination of the existence of a real or perceived Conflict of Interest, as well as the development of mitigation plans deemed appropriate for cases of Conflicts of Interest that may generate an increase in the company's

exposure, especially in cases that may be linked to potential non-compliance with regulations or laws.

5 GUIDELINES

5.1 SETTINGS EXPECTATIONS REGARDING CONFLICTS OF INTEREST

It is the responsibility of all Braskem Members to conduct their relationships with other Members, with the Company and all customers, competitors, suppliers, distributors, business partners, or other Third Parties, with ethics, integrity and transparency. Braskem's Members must always act in the best interest of the Company.

Conflicts of Interest occur when there is an incompatibility between the personal or professional interests of a member and the interests of Braskem, which may generate undue personal benefits to the member or to a third party. These Conflicts can be segregated into:

- **Potential:** Situations that may evolve into a real conflict but have not yet.
Example: A member has received an offer and is considering taking a second job at a competing company. Although they have not yet accepted the offer, this situation can become a real conflict of interest if the member decides to work for both companies.
- **Perceived:** Situations that may imply or appear to be a conflict of interest.
Example: A buyer selects a supplier with whom he happens to also have a personal friendship, and the supplier offers the best technical and/or commercial conditions. This action, despite serving the Company's best interests, may appear to be a conflict of interest for other members.
- **Actual:** Situations that clearly represent a conflict of interest.
Example: A member uses his influence to formalize a high-value contract, with financial and technical conditions that are not in the best interest of the company, but that bring benefit the third-party. The Member's decisions are intended to exclusively benefit the third party because there is also undue benefit to the Member or a Relative of the Member directly, characterizing a real conflict of interest.

All Members have the duty to ensure that their actions, both related to their professional responsibilities and their personal activities, do not generate a Conflict of Interest with Braskem. In addition, no external activity, relationship or interest of the Members shall interfere with or override their professional responsibilities or harm Braskem's business or reputation.

If any Member has any doubt as to whether an activity facilitation, or relationship constitutes or creates a Conflict of Interest, the Member should consult with Compliance before taking any action.

Failure to declare an activity, relationship and affiliation that may be characterized as an actual, potential or perceived Conflict of Interest may lead to corrective action or disciplinary action, in accordance with **BRK-PRO-00-000332** – Disciplinary Measures Guideline.

5.2 IDENTIFYING CONFLICTS OF INTEREST

While Conflicts of Interest can arise in a number of situations, the most common types of activities, affiliations, and relationships that Members may engage in are:

- Financial or investment interests;
- External or other commercial interests;
- Personal relationships (Relatives); and
- Offering and receiving business courtesies.

5.2.1 FINANCIAL OR INVESTMENT INTERESTS

Braskem Members are prohibited from participating in any decision-making, negotiation or approval process related to Third Parties in which they or their Relative(s) have a relevant financial interest, such as ownership, equity interest, exercise of executive function or legal representation.

Members must not influence the hiring, nor participate in the contractual management or approval of payments of Third Parties that provide services in the Member's area, when he or his Relative(s) are or have been partners/legal guardians of the Third Party in the last 2 years.

Members must not engage in current or potential competitor, supplier, or customer activities that could lead to a Conflict of Interest. It is prohibited to accept anything of value from a Third Party, including payments, fees, commissions, benefits, courtesies or any other form of remuneration or value, directly or indirectly, in exchange for the provision of Braskem's business or more favorable business conditions for the Third Party.

5.2.2 BUSINESS OR OTHER OUTSIDE INTERESTS

Members may perform additional activities, paid or unpaid, provided that:

- (i) such activities do not compete, in any way, with the activities performed by Braskem;

- (ii) such activities have been communicated and formally aligned with the member's leadership, as well as with the P&O team;
- (iii) such activities are performed outside the working hours defined in the contract and do not affect the Member's ability to perform his/her duties at Braskem;
- (iv) the Member does not use Braskem's facilities, not even corporate equipment and means (e.g., e-mails, telephones, meeting rooms, printers, systems, among others);
- (v) such activities do not violate Braskem's values and principles, or local laws and regulations.

When participating in public events resulting from a parallel activity not related to Braskem's activity (seminars, lectures, discussion forums and teaching activities), if the Member wants to mention Braskem, they must care for company information, and only disclosure content clearly available in the public domain, always aiming to represent the company and its brand in a positive manner.

5.2.3 PERSONAL RELATIONSHIPS

The hiring of Relatives of Braskem members is allowed, provided that:

- (i) They do not occupy positions or functions in which there is direct hierarchical reporting or indirect influence among themselves;
- (ii) They do not answer to the same direct leader; and
- (iii) They do not perform correlated or interdependent activities, according to the evaluation of P&O activities.

In general, Members should not exercise a direct leadership role or management of Relatives who act as Third Parties in the provision of services to Braskem.

Positions, including internships, should not be created specifically to accommodate a Relative or as a favor to them. There must always be a legitimate business need for the creation of any new job, internship, or student position, and the hired individual must be qualified to perform the duties and responsibilities of the position.

All candidates for vacancies who are related to Braskem Members must be submitted to the same selection and evaluation criteria as other candidates, removing the benefit of any type of favoritism or privilege, and the Member is prohibited from participating in and/or influencing the selection process. The hiring decision will only occur after evaluation by the P&O area, considering the candidate's technical qualifications to occupy the intended position.

5.2.4 BUSINESS COURTESIES

The receipt or offer of Business Courtesy by a Member during the bid process or contract negotiation phase with Third Parties, even if it does not generate influence on the hiring or undue benefit, may be understood as a perceived Conflict of Interest and, therefore, is strongly discouraged by Braskem.

5.3 DECLARING ACTIVITIES, RELATIONSHIPS AND TIES THAT MAY CHARACTERIZE A CONFLICT OF INTEREST

Braskem requires every Member to declare in the tool defined by the company for the assessment of potential Conflicts of Interest, any activities, relationships and ties that may characterize real, potential or perceived Conflicts of Interest. Such situations must be declared, whenever possible, before the Member engages in the conduct in question and/or on behalf of Braskem with the entity or person with whom a Conflict of Interest may be characterized.

All members must keep their COI declarations updated in the Compliance System, adjusting the information previously declared whenever there are new activities, relationships and affiliations, or when there is a need to change the information previously declared.

The Company also requires all candidates to declare activities, relationships and ties that may be understood as Conflicts of Interest during the hiring process. The P&O team is responsible for supporting and ensuring that applicants complete their declarations before submitting the Letter of Intent. If the hiring of members is carried out without the proper process being completed, the P&O area must rectify the situation within 30 days from the hire date. The deviations identified may be subject to disciplinary action, according to internal normative documents.

If a Member is unable to access the tool or quickly declare an activity, relationship or affiliation, he/she must, at least, inform the Compliance area so that alternatives for the declaration can be indicated.

Members of the Board of Directors or independent members of Committees must declare their activities, relationships or ties that may be understood as Conflicts of Interest to the Corporate Governance area.

5.4 MITIGATING CONFLICT OF INTEREST

When a Conflict of Interest is reported, Compliance will work with the Member's Leader, P&O and Legal as necessary to assess the situation, develop a mitigation plan and notify the impacted Member, its Leader and other areas/Members, if applicable, in order to implement the defined recommendation.

Members and their Leaders shall be responsible for implementing any recommendations or plans defined to mitigate a Conflict of Interest. The P&O area shall support, whenever necessary, the Members and Leaders in the implementation of the recommendations and plans addressed herein.

If the Compliance, P&O and the Leader of the conflicted Member are unable to agree on the proposed mitigation plans for a Conflict of Interest, the issue should be referred for discussion with the members of the Ethics Committee. The Legal area should also be consulted before the topic is taken to the Ethics Committee, especially if the Conflict of Interest identified is related to possible non-compliance with local regulations or legislation. If the members of the Ethics Committee deem it necessary, the topic may be taken for discussion with the members of the CCAE.

If deemed necessary, any Conflicts of Interest declared by members of the Board of Directors or independent members of Committees, which require mitigation plans, will be taken for knowledge and discussion with the members of the CCAE (non-implicated members).

6 GENERAL PROVISIONS

Members are responsible for knowing and understanding all Normative Documents that are applicable to them. Similarly, Leaders are responsible for encouraging all Members of their team to understand and follow the Normative Documents applicable to the Company.

Members who have questions or doubts regarding this Directive, including its scope, terms or obligations, should contact their respective Leaders and, if necessary, the Compliance area for clarification.

DEFINITIONS

Below are definitions of the capitalized terms used in this Directive.

"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 capacity); (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) an international public organization, such as the United Nations, the World Bank, or the World Trade Organization. In addition, any political party, party official, candidate for political office, or any individual acting in an official capacity on behalf of any of the foregoing.

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

"Conflict of Interest" or "Conflicts of Interest": Conflicts of Interest occur when there is an incompatibility between the personal or professional interests of a member and the interests of Braskem, which may generate undue personal benefits to the member or to a third party. **"Directors":** Members of Braskem's Board of Directors.

"Business Courtesy" or "Business Courtesies": Any item or benefit offered free of charge or below market value to any recipient, whether a Public or Private Agent, during the performance of business for Braskem. Examples include gifts, travel, meals and beverages, lodging, hospitality, entertainment, job offers, or visa assistance.

"Normative Documents": A formal Braskem document that provides content on corporate decisions, rules and guidelines that are vital to direct Braskem's work with legitimacy, traceability and applicability and must be observed and practiced by a certain defined universe of Members.

"Member(s)": employees/employees who work at Braskem at all levels, including executives, directors, committee members, officers, interns and apprentices (as applicable in geographic locations).

"Leader(s)": A member who leads a team.

"Company Guidance Materials": Guiding Documentation, supporting documentation, training and other guidelines adopted by Braskem.

"Relative(s)" means any spouse, common-law partner, parents, grandparents, siblings, children, niece, nephew, aunt, uncle or cousin, related by blood or marriage; including the family members of the individual's spouse and/or partner; and any other person who shares the same household with the individual.

"Action Program" or "PA": Agreement agreed between Leader and Subordinate that defines the responsibilities of the Subordinate and the Leader's commitment to the monitoring, evaluation and judgment of the Subordinate based on his/her performance.

"Third Party" or "Third Parties": Any person, natural or legal entity, acting on behalf of, in the interest or for the benefit of Braskem, providing services or providing other goods, as well as business partners

who provide services to Braskem, directly related to obtaining, retaining or facilitating business, or for the conduct of Braskem's business, including, without limitation, any distributors, agents, brokers, brokers, intermediaries, supply chain partners, consultants, resellers, contractors, and other professional service providers.

CONTROL INFORMATION

Change tracking:

Date	Version	Document issuer	Change made
30.01.2019	2.0	Andreas Schwentek	Definition of material financial interest and monitoring process by the Compliance area Spelling adjustments
02/05/2023	3.0	Marcelo Almeida	Revision of item 5.5
13.12.2023	4.0	Adriana Araujo	<ul style="list-style-type: none"> Content review being the main ones Adjustment of the maximum time for the member to update the Conflicts form. Inclusion of a reference to the conflict of interest risk matrix. Inclusion of the provision for hiring, on an exceptional basis, a public agent, Replacement of "Friend" to "Close Friend"
22.05.2025	5.0	Victor Alota	Cancel review
22.05.2025	6.0	Victor Alota	Adjustments and revision of the content, aiming at greater objectivity of the text and adaptation to the processes defined by the Compliance team, as part of the Business Transformation Project and Compliance Optimization Project.