	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 1 / 14

RELATED PARTY TRANSACTIONS POLICY OF FÁBRICA CARIOCA DE CATALISADORES

I- INITIAL PROVISIONS

1.1- The Related Party Transactions Policy of Fábrica Carioca de Catalisadores (or “FCC S.A” or simply “Company” or “Company”) is hereby established as a tool for continuous improvement in the Company's organizational structure and its corporate governance, as well as in its processes, policies and controls in compliance with its internal and external standards and those of its shareholders and other interested parties.

1.2. FCC S.A is composed, equally, that is, in the proportion of 50%, by the company Albermarle S.A and by Petrobras Química S.A – PETROQUISA incorporated by Petróleo Brasileiro S.A- Petrobras (hereinafter referred to simply as Petrobras), being this Policy being of fundamental importance for compliance and requirements of regulatory bodies.


II- POLICY OBJECTIVES

2.1 This Related Party Transactions Policy (“Policy”) aims to establish the principles that guide FCC S.A and establish guidelines and rules to be observed by the company and its administrators, employees and potential collaborators and suppliers when entering into transactions with related parties, in order to ensure the interests of the Company, in accordance with the requirements of competitiveness, conformity, transparency, equity and commutativity, in order to guarantee shareholders, investors and other interested parties, in order to meet the best governance practices corporate in Brazil and abroad.

III- SCOPE

3.1 This Policy is applicable to all members of the statutory bodies and employees of FCC S.A, regardless of their position or functions, and other third parties, including, but not limited to, customers, suppliers, service providers, intermediary agents and any related parties who maintain any legal, business or institutional relationship with the company.

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	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 2 / 14

IV- DEFINITIONS

4.1- For the purposes of this document, the following definitions are adopted, in line with what is referred to in the Related Party Transactions Policy of the partner Petrobras

- 1- **“RELATED PARTY”**: According to the Technical Pronouncement of the Accounting Pronouncements Committee (CPC) 05 (R1), approved by CVM Deliberation No. 642/2010: *“Related party is the person or entity that is related to the entity that is preparing its financial statements (in this Technical Pronouncement, treated as “entity that reports the information”).*

In this regard:


I. A person is related to the Company when they or a close member of their family:

- a) Have full or shared control of the Company;
- b) Have significant influence over the Company;
- c) Is a member of the Company's key management personnel.

II. An entity is related to the reporting entity if any of the conditions below are met:

- a) The entity that reports the information/reporter and the entity that receives the report/reported are members of the same economic group, that is, the controlling company and one or more controlled companies are interrelated, as well as the entities under common control are related between them;
- b) The entity is an affiliate or joint venture of another entity (or an associate or joint venture of an entity that is a member of an economic group of which the other entity is a member);
- c) Both entities are under the joint control (joint venture) of a third entity;
- d) The entity is a post-employment benefit plan whose beneficiaries are employees of both entities, the one reporting the information and the one related to the one reporting the information. If the entity reporting the information is itself a post-employment

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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 FÁBRICA CARIOCA DE CATALISADORES	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 3 / 14

benefit plan, the employees who contribute to it will also be considered parties related to the entity reporting the information;

e) One entity is under the joint control (joint venture) of a third entity and the other entity is an affiliate of that third entity;

f) The entity is controlled, fully or under joint control, by a person identified in item I above

g) The legal entity with full or shared control of the Company has significant influence over the entity, or is a member of the entity's Key Management Personnel (or the entity's parent company);

h) The entity, or any member of the group of which it is a part, provides Key Personnel services to the management of the reporting entity or to the parent of the reporting entity.


2. TRANSACTION WITH RELATED PARTIES

It is the transfer of resources, services or obligations between an entity that reports the information and a related party, regardless of whether a price is charged in return.

The following list, extracted from the Technical Pronouncement of the Accounting Pronouncements Committee (CPC) 05 (R1), approved by CVM Deliberation No. 642/2010, presents, in a non-exhaustive manner, examples of transactions with Related Parties:

- a) Purchases or sales of goods (finished or unfinished);
- b) Purchases or sales of properties and other assets;
- c) Provision or receipt of services;
- d) Leases;
- e) Research and development transfers;
- f) Transfers under license agreements;

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 4 / 14


- g) Transfers of a financial nature (including loans and capital contributions in cash or equivalent);
- h) Provision of guarantees, endorsements or sureties;
- i) Making commitments to do something if a particular event occurs or not in the future, including contracts to be executed (recognized or not);
- j) Settlement of liabilities on behalf of the entity or by the entity on behalf of a related party;
- k) Provision of administrative services and/or any form of use of the entity's physical structure or personnel by the other or others, with or without financial consideration;
- l) Acquisition of rights or purchase options or any other type of benefit and the respective exercise of the right
- m) Any transfers of assets, rights and obligations;
- n) Granting of lending of immovable or movable property of any nature;
- o) Maintenance of any benefits for employees of related parties, such as: supplementary social security plans, medical assistance plan, cafeteria, recreation centers, etc.;
- p) Marketing and technological limitations.

3- KEY ADMINISTRATION PERSONNEL: Persons who have authority and responsibility for planning, directing and controlling the activities of the entity, directly or indirectly, including any administrator (executive or otherwise) of the entity.

4- ADMINISTRATION OR ADMINISTRATOR: They are the members of the Board of Directors and the Executive Board.

5- PUBLIC AGENT: Person who exercises, with or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment or public function, even if temporarily;

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 5 / 14

- 6- **MARKET CONDITIONS:** They refer to commercial transactions characterized by (i) occurring within the standards generally adopted in the market in similar businesses, when it is possible to make such a comparison; (ii) carried out with the objective of serving the best interests of the Company; and (iii) the transaction was concluded with the diligence that would be expected from effectively independent parties.
- 7- **CONFLICT OF INTEREST:** Situation in which someone is not independent in relation to the matter under discussion and can influence or make decisions motivated by interests different from those of the organization and, in accordance with article 3, I of Law 12813/2013 “the situation generated by the confrontation between public interests and private, which may compromise the collective interest or improperly influence the performance of public functions”;
- 8- **PRIVILEGED INFORMATION:** privileged information: that which concerns confidential matters or that which is relevant to the decision-making process within the scope of the federal Executive Branch that has economic or financial repercussions and that is not widely public knowledge”, in accordance with article 3, II of Law 12813/ 2013

This situation must be well examined and dealt with in each specific case, when there is a conflict between the Company's interests and the agent's personal interests.


- 9- **SIGNIFICANT INFLUENCE:** It represents the power to participate in the financial and operational decisions of an entity, but does not necessarily characterize control over these policies. Such significant influence can be obtained through equity participation, statutory provisions or shareholders' agreements.

V- BASILAR PRINCIPLES

5.1- Transactions with related parties must be carried out under market conditions, conducted in the best interests of the Company, without conflict of interests and in compliance with the following principles:

I. Competitiveness: the prices and conditions of services when contracting related parties must be compatible with those practiced in the market (rates, terms and guarantees), and be oriented towards achieving efficiency, efficacy and effectiveness of the company's mission, as referred to in the Code of Conduct of FCC S.A;

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 6 / 14

II. Conformity: the services provided must adhere to and comply with the contractual terms and responsibilities practiced by the company, as well as its policies, internal and external standards, procedures, internal controls, periodic records, company communication channels, among others, to diagnose, mitigate and correct possible risks, including, but not limited to, reputational, legal, financial, operational and other risks.

III. Continuous review and improvements: In accordance with Law 13,303/2016, which deals with the governance of mixed-capital companies, such as Petrobras), relationships with related parties must undergo review, through accountability, carried out by an external audit, for example, in order to promote optimizations or continuous improvements in the practices listed in this policy and correct any flaws or non-conformities.

IV. Transparency: the disclosure of information involving transactions with related parties must be carried out in a clear, informed, diligent, accurate, complete, easy to understand and objective manner, allowing interested parties a better understanding in decision-making, observing due confidentiality when applicable;

IV. Commutativity: They must generate benefits for both parties, and there must be a “win-win” relationship for them to be considered valid transactions, considering, and all relevant factors must also be considered, such as exchange ratio, adequacy of the evaluation methodology adopted for the assets involved, reasonableness of projections and verification of alternatives available on the market.


VI Equity: fair and balanced treatment in transactions, with impartiality and respect for the rights of the parties involved with the establishment of mechanisms that prevent discrimination or privileges and practices that ensure the non-use of privileged information or business opportunities for the benefit of individuals or third parties;

VI- IDENTIFICATION OF RELATED PARTIES AND CELEBRATION OF CONTRACTS WITH THEM

The Company's units responsible for the operation may consult Annex I to this Policy in advance.

The principles listed above must be fully complied with in the event of transactions that are not related parties, varying depending on the value and nature of the transaction, with compliance with the following criteria being mandatory:

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 7 / 14

- A) Be concluded in compliance with market conditions, on a commutative basis or with an appropriate compensatory payment, in accordance with current legislation, as referred to in the fourth and fifth chapters mentioned above;
- B) Be formalized in writing, specifying its main characteristics and conditions, including values, deadlines, guarantees, rights and obligations involved.

In the specific case of transactions with Related Parties involving the Union, its agencies, foundations and federal state-owned companies, the latter, when classified as outside the normal course of the company's business, must undergo a more rigorous approval process, in order to avoid situations of Conflict of interests.

VII- DECISIONS INVOLVING RELATED PARTIES OR OTHER POTENTIAL CONFLICTS OF INTEREST


7.1 As referred to in section four of this Policy, there is a conflict of interest in the event of a situation in which the interest of an employee, member of the executive committee, director, advisor, supplier or business partner is or may become in conflict with the interest of the company, which may compromise its independence and freedom from judgment when carrying out an act, carried out to the detriment of the company.

7.2- Given the complexity, relevance and severity of a given conflict of interest situation, it must be analyzed on a case-by-case basis.

7.2.1- If such a conflict of interest is identified, the administrator/collaborator/employee or other third party must claim to be prevented and refrain from participating in the negotiation, structuring and decision-making process relating to the operation, with the aim of guaranteeing the exclusive interest of the Company.

7.2.2- If private gain is proven resulting from a decision riddled with a conflict of interest for the benefit of any member of the Board of Directors or Board of Directors and the latter does not declare himself prevented from doing so due to conflict, in violation of art. 115 of the Corporation Law (LSA) may suffer civil, labor, criminal and administrative sanctions and penalties as a result of their duties of loyalty, good faith, information, transparency and others listed by articles 153 to 157 of the LSA and by other legal provisions.

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 8 / 14

7.3- If another member of the Board of Directors becomes aware of the results and/or private gains obtained from a particular negotiation, practice or act that constitute a conflict of interest, he or she must notify the other interested parties and the Company, without prejudice to the statement being included in the minutes of the situation of conflict of interests and the subsequent abstention of the conflicted and/or prevented person.

In reference to Law 12813/2013 - which provides for conflict of interests in the role of president, vice-president and director, or equivalent, of a mixed-capital company, as is the case of Petrobras, a partner of FCC S.A, with special emphasis in its article 5th and 6th, , Constitute a conflict of interests in the exercise of position or employment

I - Disclose or make use of privileged information, for one's own benefit or that of a third party, obtained as a result of the activities carried out;

II - Carry out an activity that involves the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the public agent or the collegial body in which they participate;

III - Carry out, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or job, considering as such, including the activity carried out in related areas or matters;


IV - Act, even informally, as an attorney, consultant, advisor or intermediary for private interests in bodies or entities of direct or indirect public administration of any of the Powers of the Union, the States, the Federal District and the Municipalities;

V - Carrying out an act for the benefit of the interest of a legal entity in which the public agent, his or her spouse, partner or relatives, blood or similar, in a direct or collateral line, up to the third degree, participate, and which may be benefited by him or influence his actions management;

VI - Receiving a gift from anyone who has an interest in the decision of the public agent or the collegial body in which he or she participates outside the limits and conditions established by regulation; and (Regulation)

VII - Provide services, even if occasional, to a company whose activity is controlled, supervised or regulated by the entity to which the public agent is linked.

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 9 / 14

I at any time, disclose or make use of privileged information obtained because of the activities carried out; and

II - within a period of 6 (six) months, counting from the date of waiver, exoneration, removal, dismissal or retirement, except when expressly authorized, as the case may be, by the Public Ethics Commission or the Comptroller General of the Union:

a) provide, directly or indirectly, any type of service to an individual or legal entity with whom they have established a relevant relationship due to the exercise of their position or employment;

b) accept a position as administrator or advisor or establish a professional relationship with an individual or legal entity that performs activities related to the area of competence of the position or job held;

c) enter into service, consultancy, advisory or similar activity contracts with bodies or entities of the federal Executive Branch, linked, even if indirectly, to the body or entity in which they held the position or job; or


d) intervene, directly or indirectly, in favor of a private interest before a body or entity in which he or she has held a position or job or with which he or she has established a relevant relationship due to the exercise of the position or job.

VIII- PROHIBITED TRANSACTIONS

8.1- In addition to transactions that conflict with the principles highlighted in section five of this Policy, taking into account the provisions of Law 12813/2013, the following transactions with related parties are also prohibited:

- a) Free contracts, that is, without compensation for society;
- b) Contracts with related parties that involve remuneration for charging a management fee or that contain a remuneration clause based on a measure of operational economic performance, such as turnover, revenue, operational cash generation, net profit or market value, in order to avoid the undue transfer of company results;

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 10 / 14

- c) Granting of loans and guarantees of any kind to controlling shareholders and administrators; and
- d) Any operations, including corporate restructuring, that do not ensure equitable treatment for all Company shareholders.

8.2- The following transactions with related parties are also prohibited:

- A) Those carried out under conditions other than market conditions and/or in a way that harms the interests of FCC S.A;

- B) That involve the participation of employees and Administrators whose business of a private or personal nature interferes or conflicts with the interests of the Company or arises from the use of confidential information obtained as a result of the exercise of the position or function they occupy at FCC S.A, as referred to above;

- C) Granting of loans and guarantees of any kind to Controlling Shareholders and Administrators;


- E) Entered into with companies whose administrator or partner with management power is a family member of an employee of the company in a trust role:
 - (i) responsible for authorizing hiring;
 - (ii) responsible for signing the contract;
 - (iii) responsible for demand;
 - (iv) responsible for hiring;
 - (v) hierarchically immediately superior to the person responsible for the demand;
 - (vi) hierarchically immediately superior to the person responsible for hiring;

- F) Entered into with individuals who are employees or who have a family relationship, up to the third civil degree, with a Company Administrator or employees whose functions of trust involve working in the area responsible for hiring;

- G) Any operations, including corporate restructuring, that do not ensure equitable treatment for all of the Company's shareholders.

IX- REPORTING CHANNEL

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 11 / 14

9.1- The following are established as formal Reporting Channels for receiving reports involving Transactions with Related Parties

Site: (<https://denuncia.iauditcloud.com.br/fccsa>)

Email: canaldedenuncias@fccsa.com.br

Telephone: Dial 0800-9400158. Free call from anywhere in Brazil, Monday to Friday, from 8am to 6pm

In person: by prior appointment

X- GENERAL GUIDELINES

10.1- When evaluating the negotiation, the way in which the transaction with related parties was proposed, structured, deliberated, approved and disclosed must be considered.

10.2- All relevant factors must be evaluated, such as reputational risks, the exchange ratio, adequacy of the methodology for evaluating the assets involved, reasonableness of projections and verification of available alternatives.

10.2.1- It is the duty of administrators to exercise preventive control over the admissibility of transactions with related parties, through initial verification of their reasonableness and the adequacy of the decision-making mechanism adopted.

XI- LEGAL AND NORMATIVE BASIS

11.1- This policy for transactions with related parties is based on the following documents:


I - Bylaws of FCC S.A;

II- FCC S.A. Code of Conduct;

III- FCC S.A. Conflict of Interest Policy

IV- Consequences and Disciplinary Measures Policy; from FCC S.A;

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

 FÁBRICA CARIOCA DE CATALISADORES	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 12 / 14

II - Law No. 6,404, of October 31, 1976, which provides for Joint Stock Companies;

III - Law No. 13,303, of June 30, 2016, which provides for the legal status of public companies, mixed capital companies and their subsidiaries, within the scope of the Union, the States, the Federal District and the Municipalities; It is

IV - CPC Technical Pronouncement No. 5, issued by the Accounting Pronouncements Committee and approved by the Securities and Exchange Commission (CVM), in accordance with Resolution No. 642/10.


V- Law 12813, of May 16, 2013, which provides for conflicts of interest in the role of president, vice-president and director, or equivalent, of a mixed-capital company, as is the case of Petrobras, a partner of the FCC S.A

XII- FINAL PROVISIONS

12.1- FCC S.A will promote continuous updating programs for the Administration, disseminating the principles that must be followed when carrying out Transactions with Related Parties.

12.1.1-This Policy must be reviewed at least annually.

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	--

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 13 / 14

ANNEX I - FORM FOR IDENTIFICATION OF RELATED PARTIES

Identification of the employee/Director/Advisor:

Name

CPF

I. PERSONS LINKED TO THE COLLABORATOR/OFFICER/ADVISOR

Identification of linked person: Close family members up to second degree in a straight line (father, mother, grandfather, grandmother, son, daughter, grandson or granddaughter); collateral (spouse, partner, companion, brother or sister); or by affinity (father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather, stepmother, stepson, stepdaughter, brother-in-law or sister-in-law).

Related person:

Name

CPF

Degree of kinship

II. COMPANY(IES) OR ENTITY(IES) LINKED TO THE EMPLOYEE/OFFICER/ADVISOR OR THE LINKED PERSON(S)

Name of the Related Person:

Name of the Company, Organization or Entity:

CNPJ:

Link with the Company or Entity:

Name:

CPF:

Name:


CPF:

Degree of kinship:

III. ISSUES APPLICABLE TO ANY MODE OF TRANSACTION WITH RELATED PARTIES

1 - Are you an advisor, executive, representative, employee, partner or shareholder, who holds a stake equal to or greater than 5% in any Organization that conducts

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
--------------------------------------	--	---

	RELATED PARTY TRANSACTIONS POLICY	
	PS714.4-007	Revision: 00
	Date: 29/06/2023	Page: 14 / 14

business or has a relationship, which could influence your decision in relation to FCC S.A?

Yes/No

If yes, please report:

2 - Do you have any family members, up to the second degree, in Organizations/companies/entities or any other type of legal entity that have a notorious relationship or interaction with FCC S.A?

Yes/No

If yes, please report:

3 - Do you or a family member, up to the second degree, have, directly or indirectly, any employment, compensation or investment relationship, in which the shareholding is equal to or greater than 5%, with any legal entity that does business with FCC S.A. which could result in for personal benefit to you or your family member?

Yes/No

If yes, please report:

Prepared by: Catia Pereira	Consensus by: Luiz Santos; Paulo Saturnino	Approved by: Cid Carvalho; Luiz Eduardo Valente
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