

1. GOALS

a) Establishing guidelines for actions led by respect, inclusion, equality, and appreciation for human diversity in the development of all business-related activities.

b) Reinforcing Gerdau's ambition for Diversity:

To be one of the most inclusive companies in its industry. Work so that all employees are committed to promoting equality, thus creating an inclusive culture of respect and appreciation for Diversity.

Being recognized as a company that promotes the development of society in line with the goal of “empowering people who build the future.”

Mirroring the diversity of the regions where the company operates in its internal team, so that we can advance as a company and individuals with sustainability.

c) This Policy details concepts of the Human Rights Policies, the Sustainability Policy and the Code of Ethics and Conduct.

2. SCOPE

This Policy applies to all of Gerdau's Business Operations and Corporate Processes and must be considered in the relationship with stakeholders, notably suppliers, customers, employees, communities, regulatory bodies, financial and capital markets, the press, and other relationships.

In its relationship with suppliers, Gerdau acknowledges the importance of its role and its commitment to encouraging and raising awareness of responsible management throughout its chain. It seeks to empower business relationships with partners who share Gerdau's principles and values.

3. DEFINITIONS

Promoting Equality: providing equal conditions for individuals to carry out their activities with impartial treatment, equal access to opportunities and resources, promotions, and recognition in accordance with the criteria established by our business strategy.

Inclusive environment: work environment in which all individuals feel safe to be who they are, with respect for individuality. An environment and leadership that encourage and provide resources and/or accommodations that promote inclusion, as well as training for leaders and teams to facilitate that integration.

Unconscious Bias: a set of preconceived views, opinions and judgments that develop throughout one's life and correspond to a quick association regarding groups of people, places, or situations. These biases are formed since childhood, through the opinions of family members, our culture, media, contacts with friends, education etc. This bias is triggered when we create a quick judgment, without assessing the history of experiences and personal values about what is being judged. The impacts of this bias are also not considered, which can often cause mistaken views.

4. WHAT WE DO NOT TOLERATE

Gerdaul does not accept any act that represents an infringement of current legislation and human rights. Additionally, considering the respect and appreciation for Diversity as a fundamental premise for good coexistence, the company does not condone or tolerate any violence, intolerance, discrimination, prejudice, and harassment of any nature.

In the event of any incident or complaint contrary to this Policy, appropriate in the circumstances, and as may be required by law, Gerdaul will investigate incidents and complaints made under this Policy in a fair, impartial, and timely manner. Based on those findings, Gerdaul will impose appropriate corrective action, including discipline up to and including dismissal.

5. GUIDELINES

5.1 Gerdaul Principles

Diversity is connected to our business strategy; it is one of Gerdaul's principles and is an integral part of our goals and different Human Resources processes.

The guidelines described in this document guide all activities carried out by Gerdaul and comply with its principles of "Diverse and Inclusive Environment" and "Doing the Right Thing," and aim at:

a) Promoting an environment of respect for all individuals: recognize and value individualities, ensuring a work environment where all people are respected: employees, customers, suppliers, communities, shareholders, government, civil society, and non-governmental organizations. Respect and care have been in Gerdaul's DNA since its founding. People are the essence of its culture and activities globally. It is through them that the company transforms and evolves.

b) Building a psychologically-safe environment: ensure an environment in which people feel included, feel safe to learn, contribute to and question the *status quo*. An environment where people are free to be themselves, to be heard and where dialogue happens with truth and respect.

c) Establishing processes that are free of prejudice: more than a duty, it is our obligation not to tolerate any prejudice, discrimination, or harassment of people, whether on grounds of biological sex, race, ethnicity, sexual orientation, gender identity, nationality, social class, political, social, and religious convictions, age, disability, refugee status, justice system involvement or any personal characteristics not mentioned. That logic is incorporated into the company's culture, employee awareness and the fight against discrimination.

d) Mechanisms or positive actions to ensure an environment free of prejudice, discrimination, harassment and other forms of intolerance and violence. Failure to comply with this Policy's principles may lead to the application of disciplinary measures in accordance with the Code of Ethics and Conduct, in addition to the legal provisions applicable to each case.

e) Commitment to equal opportunities: Eliminating discriminatory behavior in all levels of employment and leadership. Ensuring that the commitments included in this Policy are reflected, when applicable, in processes and procedures, supporting and encouraging diversity and inclusion.

f) Promotion of Diversity, Equity, and Inclusion: Gerdau provides training, opportunities for reflection and awareness, as well as encourages dialogue on diversity, equality, and inclusion. It trains and develops management to lead teams that respect individualities and question biases.

All employees are responsible for building a diverse team and an inclusive culture.

5.2 Accessibility

All production, distribution and office units must seek to continuously adapt to ensure accessibility, as a way to integrate and offer their employees and third parties suitable conditions and resources to conduct their activities. Needs may be identified both upon admission and at any time during one's contract.

5.3 Leadership Responsibility

Gerdau considers all leadership to play a critical part in building an inclusive organizational culture and a psychologically-safe environment. Therefore, it is essential that leaders are aware of and exemplify this Policy.

Gerdau provides training and develops all leaders so that they learn to recognize their biases and prevent discriminatory conduct. For this reason, it provides the "Unconscious Bias" and "Inclusive Leadership" training courses as part of the leadership development path, in addition to promoting open dialogue introducing and developing the principles on which we operate for all employees.

In this context, Gerdau leadership must:

- Hire and develop teams that represent the diversity of our society.
- Develop active listening, valuing the principle of Openness with Truth and Respect regardless of hierarchical level.
- Monitor indicators and establish an action plan for their areas to promote Diversity, Equality, and Inclusion.
- Fulfill the goals related to Diversity.
- Take a stand when witnessing harassment and/or discrimination and reinforce the use of the Ethics Channel.
- Utilize the Ethics Channel in situations involving failure to comply with this Policy and/or the Code of Ethics.
- Apply sanctions or disciplinary actions whenever necessary.

6. GOVERNANCE

Gerdau has in its structure a dedicated team, with its own budget, to propose strategies that promote Diversity, Equity and Inclusion, actions to disseminate culture and related practices together with other corporate and business areas, with a global reach.

The dissemination of results related to Diversity, Equity and Inclusion actions and projects takes place through internal and external channels. Gerdau ensures honesty and consistency in disclosing information out of respect for shareholders and investors.

Gerdau seeks transparency, both internally and externally, when reporting its main diversity indicators, which are measured, monitored, and controlled by the Business Operations.

Operations seek continuous performance improvement with well-defined goals broken down by these indicators.

The CEO and senior leadership are responsible for approving strategic decisions that promote appreciation of diversity. The inclusion of Diversity indicators in the Long-Term Incentive are submitted to the designated committees for approval.

Additionally, the Diversity Committee has been formed, comprised of one or more representatives in each unit per country in which Gerdau operates. The committee contributes to setting up strategies, coordinating local actions and supporting the deployment of all activities to promote Diversity.

7. ETHICS AND COMPLAINTS CHANNEL

We encourage education, training, dialogue, and empathy so that our employees are empowered to speak out against harassment, violence or any form of discrimination/prejudice based on gender, race, sexual orientation, nationality, social status, age, disability, and other personal characteristics not previously mentioned.

Employee actions are shaped by their commitment to our corporate purpose, the Code of Ethics and Conduct and the company's principles.

Gerdau encourages its internal and external stakeholders to report any complaints or cases of suspected violations of the Code of Ethics and Conduct for Employees and Third Parties and the company's Policies and Guidelines, using the Ethics Channel, a resource that guarantees confidentiality, non-retaliation, investigation of all occurrences and anonymity of the reporting party.

8. FINAL PROVISIONS

This Diversity and Inclusion Policy was approved at a meeting of the Company's Board of Directors on December 06th 2022, with immediate effect.
