

1. OBJECTIVES

Establish Gerdau's guidelines, obligations and commitment to follow the best practices of Compliance and Ethics, in accordance with Gerdau's principle of ***Do What is Right***.

2. SCOPE

This Policy applies to all of Gerdau's Business Divisions, its employees, managers, directors, board members and third parties representing Gerdau.

3. DEFINITIONS

- a) Compliance: to comply with legislation, rules and procedures, ethical standards and corporate principles, externally and internally, that guarantee the best Corporate Governance practices.
- b) Integrity Program: consists of a set of initiatives aimed at preventing and/or identifying conduct that is not in accordance with Compliance practices, identifying risks and/or causes, acting preventively and/or correctively, and promoting a culture that demands compliance with the established rules and ethical conduct.
- c) Integrity Risks: the result of actions that may favor or facilitate practices of corruption, fraud, bribery, irregularities and ethical and conduct deviations.

4. GUIDELINES

4.1. Gerdau is committed to remaining ethical and fair throughout all of its global operations. Therefore, the Company expects the same behavior from its employees regardless of their position, as well as its advisors, suppliers, clients, service providers, representatives and any companies or individuals with which Gerdau does or intends to do business.

4.2 Maintaining Compliance is an individual obligation of each Gerdau employee, including senior management and directors, which implies that everyone is responsible for knowing and complying with the Code of Ethics and Conduct, Gerdau's Policies and Guidelines, laws and legislation.

4.3. The Code of Ethics and Conduct is the foundation that sustains the Company's behavior and consistently demonstrates its commitment to ethical practices with its suppliers, customers, shareholders, employees and community.

4.4 Additionally, Gerdau has Internal Policies and Guidelines that outline the best governance practices, aimed at achieving excellence and integrity in everything it does.

4.5 Gerdau spares no efforts to promote a culture of ethics and integrity, through awareness and education of its employees and business partners, in accordance with its Values, Code of Ethics and Conduct, and Compliance with applicable laws and regulations, with an emphasis on Anti-Corruption laws.

4.6 Gerdau does not support or condone any unethical practice or disrespect of the laws and regulations in force in the countries in which it operates and applicable to their operations, either by its employees or business partners. Any form of non-compliance is considered a serious infraction, which may result in disciplinary sanctions, including the termination of contracts (employment).

4.7 Any suspected action(s) of non-compliance that one sees or is aware of, should be reported to GerdaU through its reporting channel – “Ethics Helpline”, available on the intranet and internet. The Ethics Helpline guarantees total anonymity, confidentiality and non-retaliation of all complaints reported made in good faith. GerdaU supports, disseminates and promotes the use of its Ethics Helpline for its employees, suppliers, clients and all persons or entities that have a relationship with the Company.

4.8 The Compliance area is responsible for executing and reviewing the Company's Integrity Program, ensuring its evaluation and constant improvement.

4.9 The Compliance area reports directly to the Board of Directors, with independence in relation to other areas and processes, having autonomy for checks, access to information and criticism that it deems necessary. This area has communication channels directly with the Executive Board, Fiscal Council (Audit Committee) and participates in the Risk Committee, to report results related to Compliance practices, improvements, the Integrity Program, irregularities and/or identified failures.

5. GERDAU'S INTEGRITY PROGRAM

GerdaU is committed to maintaining an ethical environment free of any situation that may pose a risk of corruption, contrary to the ethics, the laws, or Compliance practices. For this, the Company has in its organizational structure, control areas and initiatives that complement each other to guarantee the reliability of its transactions and transmit transparency of the processes to its internal and external partners.

GerdaU's Governance, Corporate Culture, Control Environment and Management Systems are the basis for combating corruption, complying with laws and regulations, and acting ethically; all of which are complemented by its Integrity Program.

The Integrity Program is defined to achieve the objectives of ensuring ethics and the fight against corruption, broken down into PILLARS as described below, support and reinforce the business environment at GerdaU.

5.1. TONE AT THE TOP: GerdaU's Compliance area reports directly to the Board of Directors, who monitors and approves the actions of the Integrity Program. Additionally, through all its Operational Leaders, the ethical message is enforced in the alignment of the culture, behavior and commitment of all teams.

5.2. POLICIES AND GUIDELINES: An integral part of the control environment definition, is GerdaU's Policies and Guidelines, as well as GerdaU's Code of Ethics and Conduct (for employees and third parties) as the basis that support business and operations with and in compliance with guidelines, controls and rules defined for processes, as well as reinforce ethical behavior and business culture expected from all. GerdaU's Policies, Guidelines and Code of Ethics and Conduct are available to all employees and controlled by the Compliance area, ensuring they are up to date, disclosed and address the main risks.

5.3 ETHICS HELPLINE: GerdaU has its own ethics helpline (whistleblower), an essential part of the Anti-Corruption system and a key SOX requirement, which is annually audited. It is characterized by the guarantee of anonymity, the investigation of all applicable ethical complaints; reporting of results to the Board, Risk Committee and to the Fiscal Council; Availability and periodic disclosure to employees, customers and vendors. It is available via telephone, or on the Intranet and Internet.

5.4. DISSEMINATION OF ETHICAL AND COMPLIANCE CULTURE: Several means are used for ethics and compliance to be a part of the overall employee experience. Such as face-to-face training, mandatory e-learning courses, communication campaigns, registration of purchase orders and contracts, Gerdau's internal and external websites, supplier and employees commitment terms, and support from the Business Compliance area for questions or doubts regarding ethics and Compliance.

5.5. MONITORING: Compliance area performs a monthly review of records that may pose or contribute to compliance risk, such as the analysis of purchase orders, payments, conflict of interests, donations, sponsorships and associations.

5.6. RISK ASSESSMENT: The Compliance area is responsible for performing periodic evaluations of processes to identify risks and verify that they are properly addressed, considering their impact on the business, image, regulatory issues and of corruption and money laundering prevention and combat. These analyses follow the compliance risk matrix, specific laws, quality of evidence, quality of established controls, and reporting of identified improvements.

5.7. DUE DILIGENCE / REPUTATIONAL ASSESSMENT: In order to support the business in decision-making and in a preventive way, the Compliance area must warn of exposure to integrity risks in contracts or partnerships, according to the scope contracted. To do this, it carries out a routine reputational assessment of companies and their controlling partners, when contracting or with ongoing monitoring, and may request more details through due diligence questionnaires, in which governance, company data, history, reputation and control structures are assessed to avoid integrity risks.

6. FINAL PROVISIONS

6.1. This Policy is associated with Gerdau's Code of Ethics and Conduct, Anti-Corruption Policy and must direct all internal Guidelines.

6.2. This Compliance Policy was revised and approved at a meeting of the company's Board of Directors on March 27th, 2025, which establishes through this Policy, the personal commitment of its members and that all Gerdau employees must follow its Codes, Policies and Guidelines to combat corruption, guaranteeing legality and acting ethically.
