

ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

COMPANHIA
BRASILEIRA
DE ALUMÍNIO

CERTIFICATE
NUMBER

46

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

19 SEPTEMBER 2019

DATE OF EXPIRY

18 SEPTEMBER 2022

CERTIFIED SINCE

19 SEPTEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall'.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Companhia Brasileira de Alumínio in Brazil, including bauxite mine (Poços de Caldas/MG), bauxite mine (Mirai/MG), bauxite mine (Itamarati/MG), alumina refinery (Alumínio/SP), smelter and associated potlines, casthouses, anode production, SPL treatment plant and downstream productions (Alumínio/SP), and headquarters (São Paulo/SP).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Companhia Brasileira de Alumínio
ENTITY NAME	Companhia Brasileira de Alumínio
CERTIFICATION SCOPE	Companhia Brasileira de Alumínio in Brazil, including bauxite mine (Poços de Caldas/MG), bauxite mine (Miraí/MG), bauxite mine (Itamarati/MG), alumina refinery (Alumínio/SP), smelter and associated potlines, casthouses, anode production, SPL treatment plant and downstream productions (Alumínio/SP), and headquarters (São Paulo/SP).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Casthouse• Semi-Fabrication Aluminium• Re-melting/Refining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	24 June 2019 – 15 July 2019
AUDIT REPORT SUBMISSION	16 August 2019
AUDIT SCOPE	<ul style="list-style-type: none">• Headquarter (São Paulo/SP)• Bauxite mining (Poços de Caldas/MG)• Bauxite mining (Miraí/MG)• Bauxite mining (Itamarati/MG)• Alumina Refinery (Alumínio/SP)• Smelter (potlines I to VII) (Alumínio/SP)• Smelter – Anode production (Alumínio/SP)• Smelter – SPL treatment plant (Alumínio/SP)• Cast House – Ingots production (Alumínio/SP)

- Cast House – Billets production (Alumínio/SP)
- Cast House – Caster rolls production (Alumínio/SP)
- Cast House – Plate sheets production (Alumínio/SP)
- Cast House – Scrap consumption (Alumínio/SP)
- Downstream - Sheets production (Alumínio/SP)
- Downstream - Foils production (Alumínio/SP)
- Downstream – Extruded and anodizing profiles production (Alumínio/SP)

Other audited business activities included:

- Central and Sales Office São Paulo (SP)
- Alumínio Unit (SP) Plant
- Mirai Unit (MG) Mining
- Itamarati de Minas Unit (MG) Mining
- Poços de Caldas Unit (MG) Mining

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Casthouse
- Semi-Fabrication Aluminium
- Re-melting/Refining

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

19 September 2019 – 18 September 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

19 March 2021

CERTIFICATE
NUMBER

46

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>CBA developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard's (hereafter referred to as the Standard) Legal Compliance requirements. The Entity has implemented a robust Compliance Programme which was reviewed by an independent third-party, KPMG and allows adequate awareness of legal requirements and robust procedures to ensure compliance with Applicable Law. We observed there is a robust governance framework in place for Business Ethics and Compliance and training is delivered to relevant personnel on a regular basis. For more information about CBA's Governance and Compliance Framework, please visit: https://www.cba.com.br/en/cba/governanca-e-compliance/</p>
1.2 Anti-Corruption	Conformance	<p>CBA works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. CBA established adequate anti-corruption measures, such as policies, training, due diligence checks and whistleblowing line, endorsed by senior management. CBA employees participate in regular training related to anti-bribery and corruption laws and regulations. Please find below references to CBA's Anti-Corruption Policy: http://www.cba.com.br/wp-content/uploads/2019/07/Politica_Anticorruptcao_CBA_2017_eng-.pdf.</p> <p>Potential unethical behaviour or non-compliance with the Policy or Code of Conduct, including alleged corruption can also be confidentially reported through the Ethics Line via telephone (0800 892 0791) or via the web https://secure.ethicspoint.com/domain/media/en/gui/53296/index.html</p>
1.3 Code of Conduct	Conformance	<p>The Code of Conduct is disclosed to all internal and external stakeholders and is available on the CBA's website (http://www.cba.com.br/wp-</p>

CRITERION	RATING	COMMENT
		<p>content/uploads/2019/03/Codigo-de-Conduta_CBA_mar-2019_en.pdf).</p> <p>We observed there is a robust governance framework to ensure the implementation of the Code of Conduct. CBA Conduct Committee regularly reviews all types of complaints raised by internal and external stakeholders and ensures adequate measures are taken. An Ethics Line is available to report any potential breaches of the Code of Conduct in a confidential manner. Any interested party can access the Ethics Line, operated by an independent third party via telephone (0800 892 0791) or via the web (https://secure.ethicspoint.com/domain/media/en/gui/53296/index.html), to raise questions or to report a complaint.</p>

PRINCIPLE2 POLICY & MANAGEMENT

2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>CBA adopted an Integrated Management Policy which was reviewed to align with the environmental, social and governance criteria included in the ASI Performance Standard. The Policy is available at: https://www.cba.com.br/wp-content/uploads/2019/07/CBA_Integrated-Management-Policy_May-2019.pdf</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>CBA demonstrated senior management endorsement for the Integrated Management Policy and secures resources to implement the Policy. There are regular reviews of Capital Expenditure, (CapEx) investments which address key environmental, social and governance issues included in the ASI Performance Standard. Senior management interviews were conducted during the audit as evidence.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>CBA adequately communicates its Integrated Management Policy to internal and external stakeholders, through the Integration Day Training, communication to contractors, display of the Policy in workshop locations as well as further training. It was further evidenced in worker and contractor interviews that they are aware of the requirements of the Policy. The Policy is available at:</p>

CRITERION	RATING	COMMENT
		https://www.cba.com.br/wp-content/uploads/2019/07/CBA_Integrated-Management-Policy_May-2019.pdf
2.2 Leadership	Conformance	<p>CBA nominated senior management representatives as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard and documented these roles in its Integrated Management System. We also conducted senior management interviews as part of the audit to verify endorsement for issues included in the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>CBA's Alumínio Unit (SP) Plant is certified against ISO9001: 2015 and ISO14001: 2015 Standards, which have been issued by Certification Body DNV GL and are valid for the Entity's ASI Certification Period. CBA's Bauxite Mining Units, Poços de Caldas, Itamarati de Minas and Mirai are certified against ISO14001:2015, issued by DNV GL and valid for the Entity's ASI Certification Period. CBA established a robust and well documented Integrated Management System, including the identification of significant environmental aspects and impact, environmental risk assessment, monitoring and measurement and action planning, aligned to local regulatory requirements.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>CBA maintains a robust Social Management System. The Alumínio Factory, Itamarati de Minas and Mirai Mining Units completed a Sedex/SMETA audit in 2019, verified by third party, DNV GL. CBA integrated socio-economic risks into its Enterprise Risk Management framework which is regularly reviewed by senior leadership. Furthermore, CBA also carried out a materiality assessment with an independent third party consultancy, in which it engaged internal and external stakeholders. Further information about the materiality assessment can be accessed via CBA's Sustainability Report: http://www.cba.com.br/RelatorioAnual2018/en/ .</p>
2.4 Responsible Sourcing	Conformance	<p>CBA adopted a Responsible Sourcing Policy which is being rolled out and communicated to suppliers. The Policy is available from the link below:</p>

CRITERION	RATING	COMMENT
		<p>http://www.cba.com.br/wp-content/uploads/2019/05/CBA-Responsible-Sourcing-Policy.pdf</p> <p>CBA's Supply chain management strategy and future plans include the roll out of the new digital compliance system, supplier risk assessment and due diligence, such as second party audits at key suppliers.</p>
2.5 Impact Assessments	Conformance	<p>CBA has a defined Impact Assessment methodology to assess the environmental, social, cultural and Human Rights impacts of new projects. We reviewed CBA's Capital Expenditure (CAPEX) approval process and assigned roles and responsibilities. CBA has a number of new projects and investments which require an impact assessment, as per ASI definition. The Impact Assessments included an analysis of baseline conditions and alternative design options, where the most environmentally positive option was chosen (e.g. design options for the alumina refinery furnace, including coke or biomass. Due to substantial carbon savings, the biomass option was chosen and the biomass boiler is being implemented.) We noted the social impact assessment procedure was recently updated following our ASI readiness assessment in January 2018, and thus there have been no examples of the implementation of the procedure which will be tested at the next surveillance audit. More information about CBA's Biomass and other environmental investments can be found in: http://www.cba.com.br/RelatorioAnual2018/en/ , page 44).</p>
2.6 Emergency Response Plan	Conformance	<p>CBA operates a robust Emergency Response Plan on which it regularly consults with Workers, Local authorities and emergency response brigades, as well as the Local community. CBA operates residue dams in Aluminio Factory, Mirai and Itamarati Mining Units. To meet increasing stakeholder expectations, CBA is proactively engaging with the local community on dam safety through multiple engagement methods: engagement with community leaders, installation of sirens and emergency routes, registration of local residents, education and awareness raising through social media.</p>

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	CBA developed an adequate procedure to assess environmental, social and governance issues of mergers and acquisitions. CBA did not acquire or merged with new businesses since it joined ASI, thus the effectiveness of the procedure could not be tested.
2.8 Closure, Decommissioning and Divestment	Minor Non-Conformance	<p>CBA developed closure, decommissioning and divestment plans for its Alumínio Factory, and Mining Units which were detailed and considered key environmental and social impacts. It also included provisional budget allowances to cover the costs of closure and rehabilitation of the land to its prior state.</p> <p>We noted two Minor Non-conformances related to the supporting documentation.</p> <p>(1) We noted that the Decommissioning plan of Alumínio Unit (SP) Plant, including associated provisional budget allowances were not signed or otherwise formally approved by a CBA senior management representative.</p> <p>(2) We also noted that the Conceptual closure plan of Pocos de Caldas Mining Unit did not include Associated Facilities in its scope, as required by the ASI Performance Standard.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>CBA's Annual Report (2018) includes its governance approach to social, environmental and governance issues. The report is third-party assured by PwC, based on ISEA 3000 as well as Brazilian best practice standards. The report is aligned to the GRI guidelines. The report is available via:</p> <p>http://www.cba.com.br/RelatorioAnual2018/en/</p> <p>Following good practice, CBA conducted a materiality assessment, based on IIRC principles with a third-party consultancy, engaging with key external and internal stakeholders. The outcomes of the materiality exercise are included in its Annual Report.</p>
3.2 Non-compliance and liabilities	Conformance	<p>CBA publicly discloses information on significant fines for failure to comply with Applicable Law. There were no fines or penalties imposed on the Entity as reported in 2018 sustainability report. The Report is available at:</p>

CRITERION	RATING	COMMENT
		<p>http://www.cba.com.br/RelatorioAnual2018/en/ , page 65.</p> <p>CBA payed a financial penalty from the local government in 2017 due to contamination of the river as a result of the uncontrolled leak in 2014. The incident was disclosed in CBA's 2017 Annual Report as per GRI guidelines. The Report is available at: http://cba.com.br/relatorio-de-sustentabilidade-2017/en/pdf/CBA-RelatorioAnual-2017.pdf , page 67.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>Third-party, PwC assures the payments to governments made by CBA or on its behalf as part of the annual financial accounting review. In 2018 the company paid the government \$3.87 million in mining taxes to the Agência Nacional de Mineração (National Mining Agency), the former “Departamento Nacional de Produção Mineral” (National Department of Mineral Production). Further information is available from CBA's Annual Report 2018: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 65.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	<p>As per GRI guidelines, payments to governments are disclosed in CBA's Annual Report (referenced in ASI 3.3b on page 65). In 2018 the company paid the government \$3.87 million in mining taxes to the Agência Nacional de Mineração (National Mining Agency), the former “Departamento Nacional de Produção Mineral” (National Department of Mineral Production). Further information is available from CBA's Annual Report 2018: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>In-scope Facilities in CBA's ASI Certification scope are certified to ISO 14001:2015 Environmental management system, which is recognised as meeting the requirements of the ASI Performance Standard. CBA developed robust procedures for its Mining Units to register stakeholder complaints and established controls to follow up on the resolution of these complaints. Stakeholder grievances are also monitored as part of management reviews. CBA's Complaints Resolution Mechanism is available at:</p>

CRITERION	RATING	COMMENT
		https://secure.ethicspoint.com/domain/media/en/gui/53296/index.html
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	CBA carried out an Environmental Life Cycle Assessment (LCA) for its major products, such as Casthouse products (caster rolls, plate sheet, ingot and billets) and Downstream products (CC sheets, DC sheets, foils and extruded profiles, anodized profiles) based on a cradle-to-gate LCA approach. The LCA methodology was aligned with ISO 14040:2016 and ISO 14044:2016.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	CBA shares GHG emissions and related data with customers (e.g. fuel consumption, electricity consumption etc.) on a regular basis and it is prepared to share LCA information with customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	CBA has not yet communicated about its Environmental Life Cycle Assessment in the public domain. LCA information is however available upon request to customers, and this information will include assumptions on system boundaries. As CBA only recently completed its LCA assessment, there were no examples of requests for communication about its LCA assessment to customers, thus the effectiveness of this measure will be tested at the next surveillance audit.
4.2 Product design	Minor Non-Conformance	We noted that CBA had processes in place to improve some aspects of the sustainability performance of its Product Design (e.g. yield improvement), however these objectives were not clearly defined and it appeared they did not yet align with the environmental life cycle analysis CBA recently carried out. Training about the CBA's life cycle impacts and sustainability impacts of CBA's products was not yet provided to relevant personnel involved in Product Design.
4.3a Aluminium Process Scrap (targets)	Conformance	CBA operates a robust Aluminium Process Scrap reduction and recycling plan, 100% of the internal scrap is recycled in CBA's furnaces. The site implemented a Continuous Improvement programme with the target to reduce the amounts of scrap generated, aligned to the site's ISO 9001 management system

CRITERION	RATING	COMMENT
		certification. Management reviews were in place to ensure targets are regularly monitored.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	CBA operates a robust Aluminium process scrap recycling plan and controls to separate aluminium alloys for recycling internally, aligned with the site's ISO 9001 certificate.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	CBA established an end-of-life product recycling strategy, with the aim of increasing scrap in its billet production to 50% by 2034. CBA implemented a roadmap and demonstrated investments to support this target, such as the installation of new type of furnace and other internal process improvements.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>CBA actively takes part in ABAI (Brazilian Aluminium Association) meetings. CBA started working with ABAL in 2016. The Association's key aims are to:</p> <ul style="list-style-type: none"> • Increase the recycling of aluminium • Formalise tax systems within regions in Brazil • Nurture education and culture - circular economy for aluminium and design for recycling. <p>CBA has representatives on the Board of Directors and in various committees, subcommittees and working groups with the Association.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>CBA accounts for and publicly discloses total greenhouse (GHG) emissions and total energy consumption by source on an annual basis through its Annual Report available via the link below: http://www.cba.com.br/en/cba/sustentabilidade , page 44 and 63.</p> <p>This includes GHG Scope 1 emissions (1,336.6 tonnes of CO₂e in 2018), GHG Scope 2 emissions (17.9 tonnes of CO₂e in 2018) and GHG Scope 3 emissions (as it relates to the transportation of bauxite) 29.2 tonnes of CO₂e. CBA applied a calculation methodology aligned to the GHG Protocol and ISO 14064-1:2006 and inventory includes all downstream and upstream processes. Third-party PwC provided independent assurance of CBA's GHG emissions data in 2018. The assurance</p>

CRITERION	RATING	COMMENT
		statement is made publicly available through the Brazilian GHG Protocol - Programa Brasileiro GHG Protocol.
5.2 GHG emissions reductions	Conformance	CBA set a time-bound GHG emissions reduction target (Reducing total GHG emissions by 16% until 2025, baseline year 2017). Further information is disclosed in CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 15, 44 and 63. CBA implements a robust GHG emission reduction plan, targeting material sources of GHG emissions. These actions include a biomass-fired Steam Production Unit (SPU), Green Sodeberg project in the potrooms, mobile beneficiation project in mining and other efficient resource use projects. Further environmental investments and projects are disclosed in CBA's Annual Report.
5.3a Aluminium Smelting (management system)	Conformance	CBA implemented a robust management system to limit Direct GHG emissions from the Aluminium Smelting process. CBA started to implement The Green Soderberg project, a technology undergoing tests in CBA's Smelters in Aluminio factory. The automatic feeding of electrolytic pots and the change in the anode paste composition will help reduce air emissions and water used for gas treatment, thus making aluminium far more environmentally competitive. Another noteworthy initiative started last year is the biomass steam boiler project, which will lead to lower greenhouse gas emissions and broaden CBA's energy matrix. We also noted the CBA's electricity generation is coming from low-carbon hydropower source. Further information is available via: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf
5.3b Aluminium Smelting (up to and including 2020)	Conformance	Primary aluminium emissions were 2.52 tCO ₂ /t of Aluminium compared to the 8 tCO ₂ /t of Aluminium as required by the ASI Standard. Third-party, PwC provided independent assurance over CBA's GHG emissions data.
5.3c Aluminium Smelting (after 2020)	Not Applicable	Not applicable. Operations started in 1955.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	CBA developed and implemented policies, systems, procedures and processes that

CRITERION	RATING	COMMENT
		<p>conform to ASI Performance Standard's air emissions requirements and are in compliance with the legal permit thresholds on air emissions. Emissions to air are also disclosed in CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf ., page 44.</p> <p>Emissions to air are monitored through CBA's ISO 14001 certified Environmental Management System. Plans to reduce emissions to air, such as fluoride and sulphur and nitrogen oxides, are in place. CBA maintains effective controls and practices performance improvements, to ensure that these emissions are within the established legal limits or below where possible. There was significant reduction in CBA's nitrogen, sulphur and particulate matter emissions due to the temporary suspension of Nickel Business. Furthermore, CBA is implementing the Green Soderberg project in its smelting processes, which will bring significant reductions to air emissions.</p>
6.2 Discharges to Water	Conformance	<p>CBA has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's discharges to water requirements. CBA obtained ISO 14001 certificate and is compliant with legal requirements on water discharges. Industrial water discharge treatment facility is operated onsite. There were no adverse impacts identified from water discharges that would require mitigation measures. Nonetheless, CBA regularly monitors the water quality of rivers and aquatic environments in its Area of Influence.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>CBA has developed, implemented and maintained systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. Controls were reviewed to prevent contamination of air, soil and water due to major spills and leakages. There is regular internal audit regarding this subject area. Assessment of spills and leakages is also governed by CBA's ISO 14001 certified Environmental management system. No significant leaks occurred in 2018. Please see: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf</p>

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	CBA developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. The Entity's controls and external communication plan are detailed in its emergency response plan and are regularly reviewed.
6.4a Reporting of Spills (immediate disclosure)	Conformance	CBA implemented a robust process to inform relevant authorities and stakeholders of Major Spills and Leakages. The 2018 Annual Sustainability Report references on page 64 item 306-3 that there was no significant leakage in 2018.
6.4b Reporting of Spills (regular reporting)	Conformance	CBA implemented a robust process to inform relevant authorities and stakeholders of Major Spills and Leakages. The 2018 Annual Sustainability Report references on page 64 item 306-3 that there was no significant leakage in 2018.
6.5a Waste management and reporting (strategy)	Conformance	CBA developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's waste management and reporting requirements. CBA established a 35% waste reduction target. More information in CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 42 and 64.
6.5b Waste management and reporting (disclosure)	Conformance	Please see 306-2 in CBA's Annual Report 2018: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf
6.6a Bauxite Residue (storage construction)	Conformance	CBA demonstrated robust controls over its Bauxite Residue Areas. There are 3 bauxite analyte dams in Aluminio Factory, Mirai and Itamarati de Minas Mining Units. Palmital Dam with current volume of 20 million m3 Class II A (non-inert). The dam receives waste from the Alumina Refinery located at the Aluminio Factory. Mirai dam with current maturity volume of 18 million m3 Class II B (inert). Itamarati de Minas Mining Unit Dam with a current volume of 11 million m3 of Class II B (inert) rejection. At the Poços de Caldas Mining Unit, the bauxite is only crushed and sieved and then transported to the Aluminio Factory, therefore there is no Bauxite Residue Area operating there. CBA

CRITERION	RATING	COMMENT
		<p>used the SIGBAR software to monitor the 3 dams (Aluminio Factory, Mirai and Itamarati de Minas Mining Units). There are regular visual inspections on the dams, as well as inspections carried out by external parties to ensure dam safety. CBA implemented a pilot utilising dry stacking technology to deposit materials at the Palmital Dam. This project aims to increase the lifetime of the waste disposal system, ensuring continuity of operations. At the current pace of operations, the operating life of the dam would expire in 2023. To extend the operating life of the dam, CBA will change the form of waste disposal, from wet disposal (with low concentration of solids) to dry disposal (with 75% concentration of solids), using filter presses. More information can be found in CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf</p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>Regular third party inspections are carried out at bauxite residue storage sites as per SIGBAR methodology. There are also daily visual inspections at the dam. The local community is engaged on dam safety and receives information on dam safety measures and inspections from CBA.</p>
6.6c Bauxite Residue (water discharge)	Conformance	<p>CBA operates water treatment stations at the Bauxite Residue dams, where the water is treated and neutralized according to local environmental legislation. In the Aluminio factory, there is no external discharge of water from the dam, all water is reused internally. At the Mining Units, CBA treats the water as per its environmental license prior to discharge to municipal wastewater system.</p>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	<p>No discharges to marine and aquatic environments from Bauxite Residue Areas at the In-Scope Facilities.</p>
6.6e Bauxite Residue (start of the art technologies)	Conformance	<p>CBA implemented trials for state-of-the-art technology, such as filter press in Aluminio factory. The project will optimize the reservoir's operating life cycle, and allow the caustic soda residue to be recovered and then reused in the bauxite refining process. Please see CBA's Annual Report:</p>

CRITERION	RATING	COMMENT
		http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 47.
6.6f Bauxite Residue (remediation)	Conformance	<p>In 2001 at the Pocos de Caldas Mining Unit, CBA stopped the bauxite washing process and rehabilitated the dam area by replanting the local vegetation. The Auditors visually inspected the rehabilitated area during the audit.</p>
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	<p>CBA developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements. SPL inventory is maintained and complies with the Entity's permit. For more than 15 years Spent Pot Lining (SPL) material has been stored inside the CBA Alumínio Factory, with no disposal to external landfill. From 2007, CBA began to send the disposal of Spent Pot Lining (SPL) waste to the cement companies of the Votorantim Group, and started projects to dismantle and treat the SPL internal landfill. Today, no SPL is sent to the internal landfill and all hazardous waste is sent to third parties for adequate treatment. CBA is currently recovering the area where SPL was stored within the parameters of the Alumínio site.</p>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	<p>CBA implemented projects to optimise processes for the recovery and recycling of carbon and refractory materials. It was evidenced that CBA is investing and has already started the Green Soderberg Project which will eradicate have black mud, from the dry scrubber. The project delivers a number of environmental benefits, such as less consumption of raw materials (paste and fluoride blended with aluminium oxide), reduction of CO₂ emissions and achieve further efficiency gains. We evidenced the Green Soderberg pilot during the audit in one of the oven rooms, where CBA separated the waste from the carbon block (sold to Steel), Spent Pot Lining (SPL) and the recovered bath. A sieve will be installed, along with a conveyor belt and dedusting system. Tactical Environmental Risk and Opportunity Management identified the Spent Pot Lining (SPL) transport and disposal risk and the Opportunity to use Spent Pot Lining (SPL) waste as a flux in the steel industry.</p>

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	CBA has stopped the landfill Untreated SPL in 2019. This was an internal landfill within the parameters of the Aluminio site. The recovery of the area is in progress.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	CBA reviews alternative options to landfilling of treated SPL and/or stockpiling of SPL on an ongoing basis. See 6.7a.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	There is no discharge of SPL to marine and aquatic environments.
6.8a Dross (recovery)	Conformance	CBA has developed and implemented policies, systems, procedures and processes that conform to these dross requirements. Dross generated onsite is processed to maximise aluminium recovery. All dross generated is processed by specialised external companies, licenses and associated compliance documents were reviewed by the Auditors.
6.8b Dross (recycling)	Conformance	Foundry slag waste is currently destined for LATASA, OMEGA, METALUR and ALMEIDA. Associated disposal methods were indicated and sent to third-parties for recycling. CBA maximises the recycling of treated dross residue through third parties.
6.8c Dross (review of alternatives)	Conformance	CBA demonstrated through licensing agreements with third parties that no dross is sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	CBA identified and mapped its water withdrawal and use by source and type. The site has undertaken a water balance analysis and identified major sources of water input. Further information is found in its Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 63.
7.1b Water assessment (risk assessment)	Conformance	CBA completed a water risk assessment and regularly monitors water balance, as required by its environmental license. The water risk assessment included water-related risks in watershed and catchment areas in the Entity's Area of Influence.
7.2a Water management (management plans)	Conformance	CBA demonstrated robust controls of water management and water balance monitoring. CBA has set a target to reduce its freshwater

CRITERION	RATING	COMMENT
		consumption by 22% until 2025. Further information on CBA's water consumption can be found via its Annual Report: http://www.cba.com.br/AnnualReport2018/en , page 63.
7.2b Water management (monitoring)	Conformance	CBA regularly monitors the implementation of the water management plan and reports water consumption and water efficiency metrics publicly: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 63.
7.3 Disclosure of water usage and risks	Conformance	CBA discloses water usage and risks via its Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 63. 201-2.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	CBA carried out a biodiversity risk assessment at all In-Scope Facilities. In the Alumínio Factory, the risk assessment included the site's Area of Influence (e.g. green belt surrounding the factory). The classification of protected areas was informed by SNUC, Sistema Nacional de Unidades de Conservação.. A biodiversity baseline assessment was carried out in June 2013, and a new study is planned to verify the results under different weather conditions. Vulnerable groups of Species have been identified. The site consulted the Ibama (Brazilian Institute of Environment and Natural Resources) endangered species list. No adverse impacts were identified in regards to noise, effluents and there are no direct discharges to aquatic environments. The air emission dispersion study shows some potential adverse impacts; therefore, a biodiversity monitoring plan was implemented. CBA implemented biodiversity risk assessment in its mining operations as well as part of the licensing process. In Poços de Caldas, there is no alteration of native forest, the Entity carries out preliminary study of the areas that will be mined, where it has eucalyptus plantation and cattle pasture mainly. In Mirai and Itamarati Mining Units, biodiversity risk assessments are carried out as part of the mining licensing operations.

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>CBA implemented a robust Biodiversity Action Plan, addressing key aspects identified in its biodiversity risk assessment. At the Factory, it includes regular biodiversity monitoring. CBA's main impact on biodiversity is in a mining context on which it reports via its Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 35 - 36.</p> <p>After the bauxite extraction is complete, the mined areas undergo environmental rehabilitation, process that lasts around four years, and creates optimal soil conditions, with restoration of the native vegetation and/or the replanting of agricultural and livestock activities. The quality of this rehabilitation is certified by studies and scientific research carried out through a partnership with the Federal University of Viçosa (UFV). The collaboration with the University also address natural forest rehabilitation, eucalyptus, coffee crops, native species, and pasture area.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>In a mining context, CBA is working closely with scientific partners, such as the University of Viçosa (UFV) to restore natural areas, and increase yields for crops, such as coffee and eucalyptus in collaboration with the farmers. As part of its Integrated Policy, CBA communicates with farmers on the land rehabilitation and soil quality outcomes. This was evidenced in our independent interviews with farmers.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>CBA reports on Biodiversity Outcomes via its Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 63. 304-2.</p>
8.3 Alien Species	Conformance	<p>CBA works to proactively prevent accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. CBA demonstrated legal compliance related to Alien Species.</p>
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	<p>CBA regularly evaluates areas according to their protected classification as part of the licensing process. CBA is conducting its mining activities in accordance with Applicable Law, and it has no current or planned operations in World Heritage Properties.</p> <p>http://idesisema.meioambiente.mg.gov. http://www.unesco.org/new/en/brasilia/home/</p>

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Conformance	CBA regularly evaluates areas according to their protected classification as part of the licensing process. CBA is conducting its mining activities in accordance with Applicable Law, and it has no operations in World Heritage properties. http://idesisema.meioambiente.mg.gov http://www.unesco.org/new/en/brasil/ia/home/ .
8.5a Mine rehabilitation (best available techniques)	Conformance	After the bauxite extraction is complete, which has a mining cycle of three to six months, the mined areas undergo environmental rehabilitation, a process that lasts around four years, and creates optimal soil conditions, with restoration of the native vegetation and/or the replanting of agricultural and livestock activities. The quality of this rehabilitation is certified by studies and scientific research carried out through a partnership with the Federal University of Viçosa (UFV). Further information can be found: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf (page 35.) We also conducted independent interviews with farmers where CBA conducts or conducted mining activities in the past and rehabilitation of the mining areas took place. All farmers we spoke to were satisfied with the quality of the rehabilitation and highlighted good levels of engagement with CBA.
8.5b Mine rehabilitation (financial provisions)	Conformance	Financial provisions for mine rehabilitation are provided prior to the start of a project and also made clear in licensing agreements with farmers or other affected stakeholders.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	CBA's Code of Conduct stipulates a commitment to the UN Guiding Principles on Business and Human Rights: http://www.cba.com.br/wp-content/uploads/2019/03/Codigo-de-Conduca_CBA_mar-2019_en.pdf The Code of Conduct addresses issues related to human rights and ethical standards all employees should uphold.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	CBA has not yet conducted a human rights due diligence process, which involves the identification of salient human rights risks attributed to the company's activities or its

CRITERION	RATING	COMMENT
		<p>business partners' activities. CBA is in the process of appointing a third-party consultancy to carry out such analysis. We however noted that some elements of social risks were integrated into CBA's Enterprise Risk Management (e.g. dam safety and community impact) CBA also carried out a social impact assessment study in 2015 in Aluminio which considered the potential positive and adverse impacts on the community as a result of CBA's activities.</p>
<p>9.1c Human Rights Due Diligence (remediation)</p>	<p>Conformance</p>	<p>We observed that CBA has a robust governance framework to ensure the implementation of the Code of Conduct and remediation for Human Rights Impacts. CBA's Conduct Committee regularly reviews all types of complaints raised by internal and external stakeholders and ensures adequate measures are taken, including any issues related to human rights. An Ethics Line is available to report any potential breaches of the Code of Conduct in a confidential manner. Any interested party can access the Ethics Line, operated by an independent third party via telephone (0800 892 0791) or via the web (https://secure.ethicspoint.com/domain/media/en/gui/53296/index.html), to raise questions or to report a complaint. We noted that to date, there were no remediation cases related to human rights caused or contributed to by CBA's activities.</p>
<p>9.2 Women's Rights</p>	<p>Conformance</p>	<p>We observed that CBA implemented a robust Diversity strategy in line with best practice. CBA incorporated strategic goals for increasing female representation in its workforce as well as in its senior management and implemented initiatives to increase diversity and inclusion within the company. These included for instance support mechanisms (e.g. maternity and paternity leave beyond legal minimum in Brazil), training and development, as well as a Diversity Day to raise further awareness within the company. CBA also conducted workshops in the local community with its partners to discuss impacts of economic dependency on women in Aluminio.</p>
<p>9.3 Indigenous Peoples</p>	<p>Not Applicable</p>	<p>Indigenous Peoples are not present at the locations where CBA operates and are not in the</p>

CRITERION	RATING	COMMENT
		scope of this ASI certification audit. We inspected maps to this affect via: https://www.survivalinternational.org/about/funai
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Indigenous People are not present in locations where CBA operates. Please see comments in 9.3.
9.5 Cultural and sacred heritage	Conformance	No cultural or sacred heritage sites were identified in locations where CBA operates. However, as part of CBA's CAPEX due diligence process, prior to new mining activities and the licensing process, archaeological/cultural/sacred heritage sites need to be evaluated as required by IPHAN (National Historic and Artistic Heritage Institute, Brazil).
9.6a Resettlements (avoid or minimise)	Conformance	CBA demonstrated respect for the Human Rights requirements as stated in the Code of Conduct under "Relationship with the Community" and observes the United Nations Guiding Principles on Business and Human Rights. It intends to avoid resettlements, and considers feasible alternatives in project design, as incorporated in CBA's procedures. It was noted that in Mirai Mining Unit, during the process of road construction it was necessary to relocate 2 residents in the community of direct influence, and the Entity carried out the remediation and compensation of the owner with the construction of new residences. However, it was evidenced that the resettlement occurred in projects prior to CBA joining ASI.
9.6b Resettlements (where unavoidable)	Conformance	CBA demonstrated respect for the Human Rights requirements as stated in the Code of Conduct under "Relationship with the Community" and respects the United Nations Guiding Principles on Business and Human Rights. In Mirai Mining Unit, during the process of road construction it was necessary to relocate two residents in the community of direct influence, and the Entity carried out the remediation and compensation of the owner with the construction of new residences. However, it was evidenced that the resettlement occurred in projects prior to CBA joining ASI.
9.7a Local Communities (rights and interests)	Conformance	CBA implemented a Social and Local Community Strategy aligned with best practices.

CRITERION	RATING	COMMENT
		<p>CBA operates a robust governance of the Local Community Strategy, informed by social and economic impact assessments, based on Votorantim Group (parent company) methodology. CBA identified the legal and customary rights of local communities, keeps a stakeholder register where vulnerable groups are identified. CBA's investment planning is based on three pillars: 1. Education, 2. Economic dynamics of the location, 3. Public management support (i.e. administration support to local town halls). Further information is enclosed in CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/ , page 50 - 55.</p>
9.7b Local Communities (impacts)	Conformance	<p>CBA carried out a Social impact assessment study (Dec. 2015) which informs its Social and Local Community Engagement Strategy (next update due in 2021). CBA identified critical aspects of its activities and their potential impact on the local community, and integrated these into its Enterprise Risk Assessment. CBA carries out regular Social dialogue and has dedicated resources to lead on engagement with the local community where it operates. Regarding CBA's complaints mechanism, please see our comments under 3.4 Stakeholder complaints, grievances and requests for information.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>CBA implemented a Social and Local Community Engagement Strategy which is aligned with best practices and informed by social impact assessments and robust methodologies adopted from the Votorantim Group (parent company). We particularly noted initiatives to increase the capacity of the local community (e.g. entrepreneurship workshops) in partnership with local NGOs as best practice. CBA's Local community programme is based on three pillars: 1. Education, 2. Economic dynamics and 3. Public management support. CBA supports more than 38 ongoing projects and there is a robust monitoring process in place to ensure the objectives are met. For further information, please see CBA's Annual Report: http://www.cba.com.br/RelatorioAnual2018/en/CBA_RA18.pdf , page 50 - 55.</p>

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>CBA established a Responsible Sourcing Policy which stipulates requirements aligned to ASI requirements on conflict affected and high risk areas: http://www.cba.com.br/wp-content/uploads/2019/05/CBA-Responsible-Sourcing-Policy.pdf</p> <p>CBA also carries out due diligence checks prior to starting commercial relationships with suppliers. We noted CBA's own operations are not located in conflict affected or high risk areas.</p>
9.9 Security practice	Conformance	<p>CBA implemented policies, systems and procedures that conform to the ASI Performance Standard's requirements on Security practices. The third-party Security personnel have been trained on the CBA's Code of Conduct, Applicable Human Rights Law and the company's Risk Management Plan. CBA monitors the training records internally and to date, there have been no disciplinary actions against security personnel related to human rights.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>CBA developed and implemented policies, systems, procedures and processes that conform to the Freedom of Association and Right to Collective Bargaining requirements. Workers have the freedom of association without interference from the Entity. Collective bargaining agreements were regularly updated and agreed with the labour union. In interviews with union representatives, it was verified that the local union and the top management of the company have a good relationship. CBA carried out a Sedex/SMETA audit at the Alumínio Factory, Mirai and Itamarati Mining Units in 2019, carried out third-party by DNV GL. There were no observations made related to Labour rights, but there were positive points raised. Sedex/SMETA audit addressed ASI Labour rights requirements 10.1 - 10.8.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>CBA respects the rights of workers and maintains records of negotiations between the Entity and a union or workers' association, including collective agreement, and compliance with national laws. We reviewed the collective bargaining agreement at all In-scope Facilities,</p>

CRITERION	RATING	COMMENT
		meeting minutes of labour union meetings and interviewed labour union representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	It was evidenced that as defined in the Code of Conduct, CBA's employees have the right to union membership and to initiate an Internal Union process and that the rights are respected. However, the criterion is not applicable because freedom of association and collective bargaining is not restricted by applicable law in Brazil.
10.2a Child Labour (minimum age)	Conformance	CBA does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law. The age of workers is regularly checked as part of their onboarding process.
10.2b Child Labour (hazardous)	Conformance	CBA does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law including. CBA is not engaging in or supporting Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	CBA does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law. CBA is not engaging in or supporting worst forms of child labour. CBA requires its suppliers to respect all laws in their jurisdiction with regards to child labour, as stipulated by its Responsible Sourcing Policy.
10.3a Forced Labour (human trafficking)	Conformance	CBA neither engage in nor support the use of forced labour as defined in ILO Conventions C29, along with protocol P29 (2014) to this Convention, and C105. CBA does not engage in or support human trafficking either directly or through any employment or recruitment agencies. Please see CBA's Code of Conduct: http://www.cba.com.br/wp-content/uploads/2019/03/Codigo-de-Conducta_CBA_mar-2019_en.pdf This was further evidenced in the review of employment contracts and worker interviews with employees and contractors.
10.3b Forced Labour (deposits, fees, advances)	Conformance	CBA developed, implemented and maintains systems, policies and procedures to conform

CRITERION	RATING	COMMENT
		with ASI Performance Standard requirements related to forced labour. Worker interviews confirmed that no recruitment fee or deposit are required.
10.3c Forced Labour (migrant workers)	Conformance	CBA developed, implemented and maintains systems, policies and procedures to conform with ASI Performance Standard requirements related to forced labour. It does not require migrant workers to lodge deposits.
10.3d Forced Labour (debt bondage)	Conformance	CBA developed, implemented and maintains systems, policies and procedures to conform with ASI Performance Standard requirements related to forced labour. This was evidenced in the review of policies, procedures, employment contracts and worker interviews with employees and contractors.
10.3e Forced Labour (freedom of movement)	Conformance	CBA developed, implemented and maintains systems, policies and procedures to conform to the ASI Performance Standard requirements related to forced labour. The site does not restrict the free movement of workers as confirmed by worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	CBA has developed, implemented and maintains systems, policies and procedures that conform to the ASI Performance Standard requirements related to forced labour. It does not confiscate worker's original identification documents. Copies of these are kept on personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	CBA developed, implemented and maintains systems, policies and procedures that conform to the ASI Performance Standard requirements related to forced labour. Employees have the right to terminate their employment at any time without penalty, given notice of reasonable length, as specified in the employment contract.
10.4 Non-Discrimination	Conformance	CBA has developed, implemented and maintained systems, policies and procedures that conform to ASI Performance Standard requirements related to non-discrimination. Please see CBA's Code of Conduct for further detail: http://www.cba.com.br/RelatorioAnual2018/en/

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, CBA ensures communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment (e.g. team briefings, infoboard, meetings with worker representatives)
10.6 Disciplinary practices	Conformance	CBA developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Disciplinary practices. The Entity operates an Ethics Line and an independent hotline for confidential reporting: https://www.cba.com.br/en/cba/governanca-e-compliance/
10.7a Remuneration (living wage)	Conformance	CBA developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration. The Entity's labour rights performance was further evidenced in its Sedex/SMETA audit report completed in 2019 at Aluminio Factory, Mirai and Itamarati Mining Units.
10.7b Remuneration (method of payment)	Conformance	CBA developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration. This was evidenced in the sampling of payslips, wage documentation and worker interviews, which included contractors.
10.8 Working Time	Conformance	CBA developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Working hours. This was evidenced through a sample of working hours records, associated policies and procedures, and worker interviews. CBA also conducted a Sedex/SMETA audit at its Aluminio Factory, Mirai and Itamarati Mining Units, as referenced in 10.1.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	It was evidenced that the Entity has defined and communicated the Integrated Policy which included Occupational Health and Safety aspects.

CRITERION	RATING	COMMENT
		http://cba.com.br/wp-content/uploads/2019/07/CBA_Politica-de-Gestao-Integrada-NiCBA-ASI_maio-2019-assinada.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	CBA operates a robust Occupational Health and Safety Policy which is regularly communicated. The principles of the Integrated Policy, and Occupational Health and Safety requirements are clearly communicated to workers, and regular training is provided. Visitors are briefed on the health and safety requirements. Workers and contractors are aware of their duties, which was evidenced in worker interviews.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	CBA demonstrated compliance to Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety. CBA conducts regular internal audits to ensure the Policy is implemented.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	CBA stipulates the right of workers to understand the hazards and the safe practices for their work, and also includes the duty to refuse or stop any unsafe work. CBA conducts a regular and robust health and safety risk assessment and implements practices that encourage safety behaviour onsite (e.g. Golden Rules).
11.2 OH&S Management System	Conformance	CBA defined Documented Occupational Health and Safety management systems (OHSMS) comprising Occupational Health and Safety policies, procedures and records.
11.3 Employee engagement on health and safety	Conformance	CBA has developed and implemented policies, systems, procedures and processes that conform to the employee engagement on health and safety requirements. OHSRSMA Multidisciplinary Committee was created to integrate actions from the Environment, Health and Safety and Hygiene areas both internally and externally. We especially noted good practices on the engagement with contractors on occupational health and safety (regular briefings and engagement).
11.4 OH&S performance	Conformance	CBA established OHS metrics and implemented regular management reviews of its data for the

CRITERION	RATING	COMMENT
		continuous improvement of its health and safety performance.
