
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

MINERAÇÃO RIO DO NORTE - MRN

CERTIFICATE
NUMBER

175

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

17 JANUARY 2022

DATE OF EXPIRY

16 JANUARY 2025

CERTIFIED SINCE

17 JANUARY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a light green background.

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*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

Planning, mining, transport, processing, river shipment
of Bauxite and power generation at the Mineração Rio
do Norte - MRN facility in Porto Trombetas, Brazil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Mineração Rio do Norte - MRN
ENTITY NAME	Mineração Rio do Norte - MRN
CERTIFICATION SCOPE	Planning, mining, transport, processing, river shipment of Bauxite and power generation at the Mineração Rio do Norte - MRN facility in Porto Trombetas, Brazil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">• 13 – 17 December 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 4 January 2022
AUDIT SCOPE	<p>The audit scope includes the planning, mining, transport, processing, river shipment of Bauxite and power generation at the Mineração Rio do Norte - MRN facility in Porto Trombetas, Brazil.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

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- ✔ 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.
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CERTIFICATION PERIOD 17 January 2022 – 16 January 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 16 January 2023

CERTIFICATE NUMBER 175

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with applicable law. The Entity tracks legal requirements that must be met through the LegNet System, which monitors on a daily basis the fulfilment and updating of legal requirements. The Entity holds valid ISO 14001 and ISO 45001 Certifications.
1.2 Anti-Corruption	Conformance	The Entity acts against Corruption in all its forms, including extortion and bribery, in accordance with applicable law and current international standards. The Entity has established an Anti-Corruption Policy and Integrity Program, which are implemented through training, awareness actions and compliance activities. The Code of Conduct is communicated to all employees and contractors. Training and surveys are conducted and integrated into the Integrated Management System. The general guidelines for performance are established. This document is publicly available on the Entity's website: https://ethicspeakup.com.br/mrnouvidoria/
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct Procedure, including principles relevant to environmental, social and governance performance for employees, representatives, suppliers, customers, shareholders, partners and third parties, who must act in accordance with the guidelines established in the code. The Code of Conduct was revised in October 2020. Interviews with employees confirmed the knowledge and confirmed that trainings were provided.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's CEO and senior management staff demonstrate commitment to the implementation and endorsement of Policies, and they support regular reviews of Policies to ensure compliance with ASI Performance Standard requirements as stated in the Integrated Management System Manual. The Entity's Integrated Policy and its sustainability culture is accessible at: https://www.mrn.com.br/index.php/en
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has a nominated senior management representative which has overall responsibility and authority for ensuring conformance with the ASI

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		Standard requirements. This is communicated and presented in the Entity's organisational chart.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity frequently communicates its integrated Policy and engagement initiatives through various internal communication channels, like intranet displays, bulletin boards, events, seasonal and commemorative campaigns. The Entity also communicates externally some of its main integrated Policies on the Entity's website: www.mrn.com.br
2.2 Leadership	Conformance	The Entity has nominated a senior management representative in order to have overall responsibility and authority for ensuring conformance with the ASI Standard requirements. This is communicated and presented in the Entity's organizational chart.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Integrated Management Systems, including the Environmental Management System. The Entity is certified to ISO 14001:2015 valid until March 2023. The 2020 Sustainability Report includes the relevant information, and is accessible on the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an integrated Social Management Systems. This consists of governance procedures from the corporate division, through the Code of Conduct framework, and corporate social responsibility initiatives. The 2020 Progress Report and Sustainability Report are available on the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios The Entity is currently implementing an Integrated Social and Environmental Management System which will also see improvements to the complaints mechanisms and existing relationship channels with external stakeholders. The Entity's Risk Identification and Management System has also seen additional social and reputational risks identified and operational controls developed and implemented.
2.4 Responsible Sourcing	Conformance	The Entity has implemented relevant environmental, social and governance issues that relate to the sourcing of goods and services. The Entity has identified the risks associated with staff, suppliers

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		and all subcontractors. Mitigation actions are in place to mitigate the related risks to humans, the environment and the corporate governance. The effectiveness of actions are investigated regularly in the management review meetings. Senior management ensures that the Integrated Management System conforms to the related and identified requirements. The responsibility to report on the performance of environmental, social and governance issues has been assigned to qualified personnel.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for existing or new projects and for planned major changes, specifically related to Environment and Occupational Health and Safety. ISO 14001 and ISO 45001 Systems directs the manner in how assessments of environmental aspects and occupational hazards and risks are undertaken. The Entity also has a systematised risk assessment process where it is continually seeking to achieve identification of all possible risks, and mitigation of possible impacts.
2.6 Emergency Response Plan	Conformance	The Entity has a site specific emergency response plan developed in collaboration with potentially affected stakeholder groups, including Local Communities, Workers and their representatives and relevant agencies. The effectiveness of the Emergency Response Plan is verified regularly and trainings are undertaken.
2.7 Mergers and Acquisitions	Not Applicable	No mergers and acquisitions have occurred in the last 12 months. The Entity is not planning any mergers or acquisition for the next years, and it is not in the strategic planning.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established corporate processes and procedures to review environmental, social and governance issues related to the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its environmental, social and economic impacts in its 2020 Annual Sustainability Report on their website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses its Annual Sustainability Report and Management Reports on the Entity's website, including its governance approach and its governance, socio-environmental and economic impacts. The criteria of the ASI Performance Standard are observed in preparation of these reports. These reports include any fines, sentences, penalties and significant non-monetary sanctions for non-compliance with applicable legislation. Statements are also disclosed if the Entity's efforts are sufficient and if there are no non-conformities. The Entity publishes information on its website to inform the public and interested parties: www.mrn.com.br
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the Sustainability Report and in the Management Report on page 104: https://www.mrn.com.br/index.php/en/sustainability
3.3b Payments to governments (disclosure - bauxite mining)	Conformance	The Entity publicly discloses payments to governments, building on existing audit and assurance systems, with financial information published in the Management Report on the Entity's website: www.mrn.com.br
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its Bauxite mining operations.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity establishes and maintains Life Cycle Assessment (LCA) Reports, based on their main processes and products, regarding Bauxite mining activities. The LCA studies are published and available at the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity assesses the Bauxite life cycle impacts and makes the information available to interested parties on the 'cradle-to-gate' LCA, for which the general data is publicly available on the Entity's website, in the section "Sustainability" and/or in Sustainability Reports:

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		https://www.mrn.com.br
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publishes and communicates Life Cycle Assessment information through international study patterns, such as ISO 14040 and ISO 14044, available on the Entity's website: www.mrn.com.br
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions and energy usage. It is verified that this information is available to the public through the Entity's 2020 Sustainability Report, available at the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
5.2 GHG emissions reductions	Conformance	The Entity has developed and implemented a GHG Emissions Reduction Plan and its Sustainability Goals, which are available at the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented an air emissions monitoring plan and reporting programme which is

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		in accordance with legal authority regulations and internally by company environmental targets. The Entity's air emissions are controlled, mitigated and found to be within compliance limits, as demonstrated by the environmental records.
6.2 Discharges to Water	Conformance	The Entity reports on Discharges to Water in the Sustainability Report and monitors and controls its water discharges as established in the Directive Plan of Sustainability and in accordance with the Entity's water-related targets.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity operates an appropriate Spills and Leakage control system for all mining operations that may present a risk to environment and neighbouring Communities. In addition, the Entity regularly assesses the major areas where potentially Spills or Leakage may occur through the risk assessment process.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity manages an appropriate system, which includes internal procedures and external legal communications and recommendations, compliance controls and a monitoring programme to prevent and detect Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented an appropriate system that has adequate procedures in place to manage external communications, compliance controls and a monitoring programme to prevent and detect Spills and Leakage.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has developed and implemented an appropriate system that has adequate procedures in place to manage external communications, compliance controls and a monitoring programme to prevent and detect Spills and Leakage. The Entity has systems in place on reporting and disclosure to address any potential significant Spills. This is publicly reported in the Sustainability Report, page 51. There were no Spills reported at the Entity in the 2020 reporting period.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented a waste management plan and a relevant reporting system. The waste segregation system, which has been developed and designed in accordance with the Waste Mitigation Hierarchy and in accordance the legal requirements and the Directive Plan of Sustainability is in use on site

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has established a systematic waste management system that controls and monitors the amount of Hazardous and Non-Hazardous Waste generated in its operations. The summary results from the waste management plan are published in the Sustainability Report annually, which is available on the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has a documented Water Management Plan as part of the Environmental Management System and the results of the monitoring programme are reported in the 2020 Sustainability Report, available on the Entity's website: https://mrn.com.br/index.php/pt/sustentabilidade
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented a Water Usage and Water Monitoring Systems, which are in compliance with the ASI Standard.
7.2a Water management (management plans)	Conformance	The Entity established a Water Usage and superficial Water Monitoring System, which are in compliance with the ASI standard and legal requirements.
7.2b Water management (monitoring)	Conformance	The Entity has established and implemented a water management plan and these results are communicated to the environmental authorities, and the monitoring of KPI targets are published in the 2020 Sustainability Annual Report: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
7.3 Disclosure of water usage and risks	Conformance	The Entity reports water withdrawal and use and discloses material water-related risks, which are included in the 2020 Sustainability Annual Report: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity assesses the risks and materiality of the impacts on biodiversity from the land use and activities of mine operations in its Area of Influence as defined by the environmental authorities.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has implemented a Biodiversity Management Programme, with fauna and flora monitoring programs, including time-bound targets to address material impacts of its Bauxite mining operations. The Programme includes a wild fauna management plan, road and corridor monitoring program, environmental education programs for both the community and employees, a flora program including an invasive species program, and revegetation program.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has established its Biodiversity Action Plan in accordance with the Biodiversity Mitigation Hierarchy.

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8.2c Biodiversity management (reporting)	Conformance	The Entity publicly discloses the biodiversity assessment results in the 2020 Sustainability Annual Report, which can be accessed at the Entity's website: https://mrm.com.br/index.php/pt/sustentabilidade
8.3 Alien Species	Conformance	The Entity is committed to biodiversity programs to not use exotic or invasive species in its facilities and operations, the internal procedures include proactively assessing and preventing of the accidental or deliberate entry of Alien Species that may have a significant adverse impact on the biodiversity.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Conformance	As per the Entity's commitment, they will not explore or operate in World Heritage properties and ensure that any future operations near or adjacent to World Heritage properties are not incompatible with their Corporate Sustainability Policy and/or natural values.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Conformance	In present, the Entity's mine is not located in World Heritage properties.
8.5a Mine rehabilitation (best available techniques)	Conformance	The Entity's Mine Rehabilitation Plan is adequate and is fully documented. The process was verified and well implemented. The plan includes seeding and planting programs using native tree species, the preparation of soil and other growth media (including black earth and organic forest residues). The Entity has an overall objective to maintain the lowest possible ratio between the impacted area and the recovered/rehabilitated area. Progressive rehabilitation is practiced, with 522 hectares rehabilitated in 2021. For sloping and walled surfaces, a 'hydroseeding' technique is used. The Entity's forest nursery has an annual production capacity of approximately 800,000 seedlings. Some seedlings are also purchased for reforestation from local communities. In partnership with IBAMA (Nacional Environmental Agency), the Entity maintains a germplasm bank for the conservation of samples of the genetic variability of different populations of Brazil nut trees.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity has established adequate resources to meet rehabilitation and mine closure requirements, according to the Master Environmental Plan and annual budget.

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		Financial provisions are updated annually and in response to a review of the MRN Nursery requirements, monitoring data and Monthly Production Closure Reports, which are prepared by the MRN Production, Planning and Control Department.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Due Diligence process, addressed through the Code of Conduct and a baseline risk assessment, in accordance to its Integrated Management System Policy.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Due Diligence process, addressed through the Code of Conduct and a baseline risk assessment, in accordance to its Integrated Management System Policy.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity takes remediation actions if needed, through legitimate processes which are prescribed in the Human Rights policy. These processes assess, prevent and repair potential adverse impacts on Human Rights.
9.2 Women's Rights	Conformance	The Entity implements Policies and processes to ensure respect for the rights and interests of Women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Conformance	The Entity has implemented Policies and processes to respect the rights and interests of Indigenous Peoples. The Entity has undertaken an Indigenous Peoples specific risk assessment which identified the loss of social licence and the collision of boats in the Trombetas River as two potentially significant risks. Both these scenarios were identified as potential and inherent risks as part of the Entity's recent risk assessment update. No such incidents have occurred under the current Entity's management of the facility.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity conducts Environmental Impact Studies and the Environmental Impact Report and has internal procedures for new projects and the possible impacts for Indigenous Peoples. Including consulting affected parties, prior to new mining projects. The Entity's Community Relationship

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		<p>Manual and Human Rights Guidelines and EIA RIMA and meeting minutes confirm that several Indigenous Peoples representatives are regularly consulted and engaged on FPIC.</p> <p>In cases where FPIC is regulated by national legislation, consultation occurs with the participation of the Brazilian Government, through the National Institute of Colonization and Agrarian Reform (INCRA) and also recently via the Palmares Cultural Foundation (FCP). For Quilombolas people and other traditional communities, engagement is undertaken directly and in an ongoing manner, through formalized and scheduled engagements. These engagements are typically issue-specific (e.g. mine dam safety), but can also take place more informally, subject to discussions on issues raised by community leaders.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity uses internal procedures and mapping records of cultural and sacred heritage sites in the Entity's Area of Influence, that there are no cultural and sacred heritage sites. The Entity undertakes, through its integrated Policy, research prior to any exploration and communicate the results concerning cultural and sacred heritage sites, important in the region.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity's historical data and its strategic plan for future Bauxite mining areas shows that no resettlement is needed for the bauxite mine until year 2026. There has been no resettlement during the current Entity's management. Potential future resettlement risks are being identified and monitored in conjunction with local and National agencies (including Fundação Cultural Palmares, INCRA, ICMBio and IBAMA).</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>The Entity's historical data and its strategic plan for future Bauxite mining areas shows that no resettlement is needed for the bauxite mine until year 2026. Current mine expansion projections indicate that no resettlement will be required.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity undertakes impact assessments and consultation processes, which includes the rights and customs of Local Communities. The Entity's recent impact assessments confirms that it respects the legal and traditional rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. No relevant complaints were reported.</p>

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		The Entity has implemented internal training and awareness programmes to enable employees to better interact with local communities.
9.7b Local Communities (impacts)	Conformance	The Entity develops and manages several programs to continuously explore opportunities to respect and support livelihoods of the Local Communities. Strategic goals have been developed to support different activities, such as contributing to quality education, environmental education, quality life improvement and Local Communities business opportunities. The 2020 Annual Sustainability Report addresses these issues, and is published on the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
9.7c Local Communities (livelihoods)	Conformance	The Entity has several programs to continuously explore opportunities to respect and support livelihoods of the Local Communities. The Entity has developed a corporate social responsibility program that facilitates engagement between the Entity and stakeholders in the Local Community. This program is summarised in the 2020 Annual Sustainability Report, published at the Entity's website: https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High Risk Areas. The Entity's Human Rights Policy does not permit any kind of Human Rights abuses.
9.9 Security practice	Conformance	The Entity demands respect for Human Rights, in line with standards and good practices. The operating practices are clear and well defined in contracts, and security workers are trained in accordance with best practices and global guidelines on respecting Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The agreement with the Entity's Workers and their Union is in accordance with Brazil's current labour legislation (CLT), and with ILO conventions. The Entity has established and implemented the Employee Integration Program, which is communicated at start of hiring any employees.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established procedures, contracts and documents relevant to human resource issues which comply with this Criterion, including the

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		Recruitment and Selection Standard procedure and the Labour Relationship Guide. The recognition of the principle of Freedom of Association and the right to join employee organizations is outlined in these procedures. The collective bargaining agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Freedom of Association or collective bargaining is not limited by Applicable Law.
10.2a Child Labour (minimum age)	Conformance	The Entity has established and implemented the internal Standard of Recruitment and People Selection and the Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and will not employ children below the age of 15.
10.2b Child Labour (hazardous)	Conformance	The Entity has established and implemented the internal Standard of Recruitment and People Selection and the Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and will not employ children below the age of 15.
10.2c Child Labour (worst forms)	Conformance	The Entity has established and implemented the internal Standard of Recruitment and People Selection and the Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and will not employ children below the age of 15.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for an organization in Brazil to practice Forced Labour. No Forced Labour incidents were observed at the Entity. No deposits or recruitment fees are required by the Entity.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. No incidents were found at the Entity's site concerning migrant Workers to lodge deposits or security payments.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any

CRITERION	RATING	COMMENT
		organization in Brazil to practice Forced Labour. No incidents were found at the Entity's site concerning holding Workers in dept bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. According the Entity's Labour Policy, Brazil's Labour Laws and the Union Workers agreement, all the Entity's Workers are free to leave their working place.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. No original identity papers are stored by the Entity, only copies are stored.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. All Entity's Workers are free to terminate their employment at any time without penalty, given notice of reasonable length. No incidents were found at the Entity's site.
10.4 Non-Discrimination	Conformance	The Entity has developed, implemented and maintained systems, Policies and procedures related to Non-Discrimination, as defined in its Code of Conduct. No Discrimination was observed during the audit and interviews at the Entity.
10.5 Communication and engagement	Conformance	The Entity's communication and engagement process is appropriate. An employee survey is undertaken regularly.
10.6 Disciplinary practices	Conformance	The Entity established and implemented Policies and procedures to ensure no disciplinary practices will occur. No incidents of mental or physical punishment were observed during the audit at the Entity.
10.7a Remuneration (living wage)	Conformance	The Entity established Policies and procedures including methodologies on remuneration of workers, including payments, overtime and deductions.
10.7b Remuneration (method of payment)	Conformance	The Entity's payments of wages are conducted monthly in a punctual manner. All Workers receive payslips with payment details.

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10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on working time. The Entity applies different shift models and all working hours are registered.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Occupational Health and Safety (OHS) Policy is established. The Entity has implemented a local, integrated policy covering health and safety and is ISO 45001 certified.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's integrated Policy on Health, Safety and Environment is communicated via a number of methods including the Entity's website, visually on boards and through training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's integrated Policy addressing Health and Safety has a commitment to comply with all Applicable Laws.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's integrated Policy on Health, Safety and Environment addresses Rights of Workers to refuse or stop unsafe work. The Policy contains a commitment to comply with all Applicable Labour Laws.
11.2 OH&S Management System	Conformance	The Entity has implemented and maintains an Occupational Health and Safety (OH&S) Management System, and is certified to ISO 45001. This includes and demonstrates continual improvement of OH&S performance, the fulfilment of legal requirements and the achievement of OH&S objectives.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism to raise, discuss and participate in the resolution of Occupational Health and Safety issues.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and various KPI's are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuous improvement and is certified to ISO 45001.

Document Control and Version History

Revision	Date	Notes
0	17 January 2022	Initial Certification Audit – Full Certification
1	28 February 2022	Incorporates further context and clarification provided by Lead Auditor into specific Public Headline Statements for Criteria 2.3b, 8.5a, 8.5b, 9.3, 9.4, 9.6a and 9.7a.

