

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
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

19 SEPTEMBER 2019

DATE OF EXPIRY

18 SEPTEMBER 2022

CERTIFIED SINCE

19 SEPTEMBER 2019

AUTHORISED BY

A stylized signature in black ink, likely representing the Aluminium Stewardship Initiative Ltd.

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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

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), aluminium re-melting/refining, casthouses and downstream production (Itapissuma/PE), casthouses (Araçariguama/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 (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), aluminium re-melting/refining, casthouses and downstream production (Itapissuma/PE), casthouses (Araçariguama/SP) and headquarters (São Paulo/SP).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (24 June – 15 July 2019)• Surveillance and Scope Change Audit (8 October – 25 November 2020)• Scope Change Audit (13 – 15 October 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 24 June – 15 July 2019 (Initial Certification Audit)• 8 October – 25 November 2020 (Surveillance and Scope Change Audit)• 13 – 15 October 2021 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 16 August 2019 (Initial Certification Audit)• 8 December 2020 (Surveillance and Scope Change Audit)• 18 November 2021 (Scope Change Audit)
AUDIT SCOPE	<u>Initial Certification Audit (24 June – 15 July 2019)</u> The audit scope covers the activities at the Companhia Brasileira de Alumínio sites:

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- 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)
 - Casthouse – Ingots production (Alumínio/SP)
 - Casthouse – Billets production (Alumínio/SP)
 - Casthouse – Caster rolls production (Alumínio/SP)
 - Casthouse – Plate sheets production (Alumínio/SP)
 - Casthouse – Scrap consumption (Alumínio/SP)
 - Downstream - Sheets production (Alumínio/SP)
 - Downstream - Foils production (Alumínio/SP)
 - Downstream – Extruded and anodizing profiles production (Alumínio/SP)
 - Downstream – Center of Solution and Services (Alumínio/SP)
 - Downstream – Aseptic packaging Foil Production (Alumínio/SP)
 - Downstream – Flexible Packaging Foil Production (Alumínio/SP)
 - Downstream – Automotive Fin Stock Production (Alumínio/SP)
 - Downstream – Industrial HVAC Fin Stock Production (Alumínio/SP)
 - Downstream – Laminated packaging Foil production (Alumínio/SP)
 - Downstream – Extruded Profiles Production (Alumínio/SP)
 - Downstream – Painted Extruded Profiles Production (Alumínio/SP)

Other audited business activities included:

- Central and Sales Office São Paulo (SP)
- Alumínio Unit (SP) Plant
- Miraí 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
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

Surveillance and Scope Change Audit (8 October 2020 – 25 November 2020)

The audit scope covers the activities at the Companhia Brasileira de Alumínio sites:

- 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)
- Casthouse – Ingots production (Alumínio/SP)
- Casthouse – Billets production (Alumínio/SP)
- Casthouse – Caster rolls production (Alumínio/SP)
- Casthouse – Plate sheets production (Alumínio/SP)
- Casthouse – Scrap consumption (Alumínio/SP)
- Downstream - Sheets production (Alumínio/SP)
- Downstream - Foils production (Alumínio/SP)
- Downstream – Extruded and anodizing profiles production (Alumínio/SP)
- Downstream – Center of Solution and Services (Alumínio/SP)
- Downstream – Aseptic packaging Foil Production (Alumínio/SP)
- Downstream – Flexible Packaging Foil Production (Alumínio/SP)
- Downstream – Automotive Fin Stock Production (Alumínio/SP)
- Downstream – Industrial HVAC Fin Stock Production (Alumínio/SP)
- Downstream – Laminated packaging Foil production (Alumínio/SP)
- Downstream – Extruded Profiles Production (Alumínio/SP)
- Downstream – Painted Extruded Profiles Production (Alumínio/SP)
- Casthouse – Caster rolls production (Itapissuma/PE)
- Casthouse – Plate sheets production (Itapissuma/PE)
- Casthouse – Scrap consumption (Itapissuma/PE)
- Downstream - Sheets production (Itapissuma/PE)
- Downstream - Foils production (Itapissuma/PE)
- Downstream – Aseptic packaging Foil Production (Itapissuma/PE)
- Downstream – Flexible Packaging Foil Production (Itapissuma/PE)
- Downstream – Automotive Fin Stock Production (Itapissuma/PE)

Supply chain activities included in the audit scope:

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

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

At the time of the audit (October – November 2020), whilst the majority of facilities in the audit scope were audited on-site, access to some facilities was not possible due to COVID-19 related travel restrictions. Those facilities were audited as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Scope Change Audit (13 – 15 October 2021)

The audit scope covers the activities at the Companhia Brasileira de Alumínio site Araçariguama/SP:

- Casthouse – Billets production (Araçariguama/SP)
- Casthouse – Scrap consumption (Araçariguama/SP)

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses

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

Re-Certification Audit

NEXT AUDIT
DUE DATE

18 September 2022

CERTIFICATE
NUMBER

46

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard's Legal Compliance requirements. The Entity has implemented a robust Compliance Programme which was reviewed by an independent third-party to confirm the programme ensures compliance with Applicable Law. A robust governance framework is in place for Business Ethics and Compliance and training is delivered to relevant personnel on a regular basis. For more information on the Governance and Compliance Framework, please visit:</p> <p>https://www.cba.com.br/en/cba/governanca-e-compliance</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has established adequate Anti-Corruption measures, such as policies, training, due diligence checks and a whistleblowing line, endorsed by Senior Management. The Anti-Corruption Policy is analysed and evaluated on an annual basis and can be accessed at:</p> <p>https://cba.com.br/wp-content/uploads/2021/10/Politica-Anticorr-final-protocolo-Projeto-Natural-13-05.pdf</p> <p>All employees receive training on the Anti-Corruption Policy along with the Code of Conduct during integration day training and at regular compliance training.</p> <p>Potential unethical behaviour or non-compliance with the Policy or Code of Conduct, including alleged corruption can also be made through the Ethics Line via telephone or the website:</p> <p>https://cba.com.br/cba/governanca-e-compliance</p> <p>Whilst the Araçariçuama (METALEX) Unit accesses the Anti-Corruption Policy and Code of Conduct on the Votorantins Group website its content is different from the Entity's official website.</p>
1.3 Code of Conduct	Minor Non-Conformance	<p>The Code of Conduct is disclosed to all internal and external stakeholders and is available on the Entity's website:</p> <p>https://cba.com.br/wp-content/uploads/2021/06/codigo-de-conduta-cba-21-versao-final.pdf</p>

CRITERION	RATING	COMMENT
		<p>The Entity has a robust governance framework to ensure the implementation of the Code of Conduct. The Entity's 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 via telephone or the website: https://cba.com.br/cba/governanca-e-compliance</p> <p>Whilst the Araçariquama (METALEX) Unit accesses the Anti-Corruption Policy and Code of Conduct on the Votorantins Group website its content is different from the Entity's official website.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity's Integrated Management Policy is posted on the website in both English and Portuguese. The Policy was reviewed to align with the ASI Performance Standard requirements.</p> <p>The organisational structure was reviewed which reflected the roles and responsibilities and is provided at: https://cba.com.br/cba/governanca-e-compliance</p> <p>The Policy is available at: https://www.cba.com.br/wp-content/uploads/2020/08/Politica-Gestão-Integrada-NiCBA-ASI-2019-SET.pdf</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity undertakes annual management reviews and strategic planning. This includes market analysis, labour and capital expenditure investments and resources needed for social, environmental and governance and product innovation projects.</p> <p>The status of capital expenditure investments for environmental and social projects are regularly reviewed by the Entity's Senior Leadership team.</p> <p>The Entity's Integrated Management Policy is posted on the website in both English and Portuguese. The Policy was reviewed to align with ASI requirements.</p> <p>The corporate structure of the Entity is provided at: https://cba.com.br/cba/governanca-e-compliance</p> <p>The Policy is available at: https://www.cba.com.br/wp-content/uploads/2020/08/Politica-Gestão-Integrada-NiCBA-ASI-2019-SET.pdf</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity communicates its Integrated Management Policy to internal and external stakeholders through training, communication to contractors and through the</p>

CRITERION	RATING	COMMENT
		display of the Policy in workshops. The Policy is available at: https://www.cba.com.br/wp-content/uploads/2020/08/Politica-Gestao-Integrada-NiCBA-ASI-2019-SET.pdf
2.2 Leadership	Conformance	The Entity has 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.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an Integrated Management System that addresses issues of Quality, Environment, Occupational Health and Safety, Social Responsibility and commitment to Sustainability, including policies, procedures and documented records. The Management System is certified against ISO 9001:2015 and is available at: https://cba.com.br/wp-content/uploads/2020/08/Sistema-de-Gestao-Integrado-2020.pdf
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity maintains a detailed Social Management System. The Entity has integrated socio-economic risks into its Enterprise Risk Management framework which is regularly reviewed by senior management. The Entity also carried out a materiality assessment with an independent Third Party consultancy, in which it engaged internal and external stakeholders. The Araçariguama (METALEX) unit is certified against ISO 9001:2015 and the scope is available at: https://cba.com.br/wp-content/uploads/2020/08/Sistema-de-Gestao-Integrado-2020.pdf Further information on the materiality assessment can be accessed via the Entity's Annual Report: https://relatorioanual2020.cba.com.br/?lang=en
2.4 Responsible Sourcing	Conformance	The Entity has adopted a Responsible Sourcing Policy which is communicated to suppliers. The Policy is available at: https://aluminioessencial.com.br/wp-content/uploads/2021/10/PO-VM-AL-SUP-002-Politica-de-Supri-Sust_ING-Vexterno.pdf The Entity's supply chain management strategy and future plans include implementation of the new digital compliance system, supplier risk assessment and due diligence, such as second party audits at key suppliers.

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	The Entity has a defined Impact Assessment methodology to assess the environmental, social, cultural and Human Rights impacts of new projects. The Entity has a number of new projects and investments which required an Impact Assessment which included an analysis of baseline conditions and alternative design options.
2.6 Emergency Response Plan	Conformance	The Entity has an Emergency Response Plan and regularly consults with Workers, local authorities and emergency response brigades, as well as the local Community. The Entity operates residue dams at several sites and in order to meet increasing stakeholder expectations, the Entity is proactively engaging with the local Community on dam safety through multiple engagement methods.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed an appropriate procedure for assessing environmental, social and governance issues in mergers and acquisitions. The Entity demonstrates compliance with the procedure and the integration of the new unit to the ASI Performance Standard Certification.
2.8 Closure, Decommissioning and Divestment	Minor Non-Conformance	The Entity has 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. However, the Araçariçuama (METALEX) Unit specifically did not provide any documentation or action plans as evidence of compliance with the Criterion.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's Annual Report includes its governance approach to social, environmental and governance issues. The report has been third party verified and is aligned to the GRI (Global Reporting Initiative) Guidelines. The report is available via: https://relatorioanual2020.cba.com.br/?lang=en The Entity has conducted a materiality assessment, with assistance from a third-party consultancy and engaged with key external and internal stakeholders. The outcomes of the materiality exercise are included in the Annual Report.
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information about significant fines for non-compliance with Applicable Law. Whilst there were no environmental fines or

CRITERION	RATING	COMMENT
		penalties imposed, tax-related penalties were received, which are detailed in the Annual Report, page 128 and 130: https://relatorioanual2020.cba.com.br/?lang=en
3.3a Payments to governments (legal and contractual)	Conformance	A Third Party has confirmed the Entity's payments to governments are recorded in the computerized system (SAP). Main payments to governments include mining royalties and state taxes. A Third Party report did not identify royalties and payments to governments as a compliance risk. Further information is available in the Annual Report, page 111: https://relatorioanual2020.cba.com.br/?lang=en
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	A Third Party has confirmed the Entity's payments to governments are recorded in the computerized system (SAP). Main payments to governments include mining royalties and state taxes. A Third Party report did not identify royalties and payments to governments as a compliance risk. Further information is available in the Annual Report, page 111: https://relatorioanual2020.cba.com.br/?lang=en
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity is certified against the ISO 14001:2015 Environmental Management System. The Entity has developed 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. The Entity's Complaints Resolution Mechanism is available at: https://cba.com.br/cba/governanca-e-compliance
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has undertaken an environmental Life Cycle Assessment (LCA) for its major products, including (caster rolls, plate sheet, ingot and billets,) sheeting, foils, and extruded and anodized profiles) based on a cradle-to-gate LCA approach. The LCA methodology used was aligned with ISO 14040:2016 and ISO 14044:2016.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity shares GHG emissions and related data with customers (e.g. fuel consumption, electricity consumption etc.) on a regular basis and shares Life

CRITERION	RATING	COMMENT
		<p>Cycle Assessment information with customers upon request.</p> <p>Some information is also available in the Annual Report: https://relatorioanual2020.cba.com.br/?lang=en</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has communicated about its environmental Life Cycle Assessment in the public domain, available in the Annual Report, page 89: https://relatorioanual2020.cba.com.br/?lang=en</p>
4.2 Product design	Conformance	<p>The Entity has integrated clear objectives in the design and development process of products or components to increase sustainability, including the impacts of the environmental life cycle of the final product.</p> <p>The Entity has collaborated with key clients on aligning with their product design objectives.</p> <p>The Entity is producing alloys aligned to industry standards, but does not produce its own specification.</p> <p>The Entity uses a software-based system (SAP) to manage the product design phase.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity implements an Aluminium Process Scrap reduction and recycling plan and 100% of the internal scrap is recycled in the Entity's furnaces.</p> <p>The Entity implements a continuous improvement programme with the target to reduce the amount of scrap generated, aligned with the ISO 9001 certification. Management reviews are in place to ensure targets are regularly monitored.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has an Aluminium Process Scrap recycling plan and implements controls to separate aluminium alloys for recycling internally, aligned with the ISO 9001 certification and is implementing a bay layout improvement plan for stock purchased scrap and owned scrap, and separating specific bays for rejection of common alloy and special/premium alloy.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has established an end-of-life product recycling strategy with the aim to increase scrap in billet production to 50% by 2034. The Entity has implemented a roadmap and demonstrated investments to support this target, including the installation of new type of furnace and other internal process improvements.</p> <p>The Entity has defined specific recycling targets in its 2030 ESG strategy to increase the proportion of recycled aluminium from scrap.</p>

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity actively participates in ABAI (Brazilian Aluminium Association) meetings since commencing involvement in 2016. The Entity has representatives on the Board of Directors and in various committees, subcommittees and working groups with the Association.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>A Third Party provides independent assurance of the Entity's GHG emissions data, available through the Brazilian GHG Protocol (Programa Brasileiro GHG Protocol): https://rpe-gvces.s3.amazonaws.com/tmp/cache/pdf/dd7875bb/companhia-brasileira-de-aluminio.pdf</p> <p>The Entity has GHG emissions reduction goals established for 2030. Further information on annual material GHG emissions and energy use by source on are available in the Annual Report, page 97: https://relatorioanual2020.cba.com.br/?lang=en</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity's 2030 ESG strategy is outlined in the 2020 Annual Report: https://relatorioanual2020.cba.com.br/?lang=en</p> <p>The Entity has a GHG emissions reduction target of 16% by 2025 and further reduction goals for 2030, including the reduction of emissions by 40% (on average for cast products, cradle-to-gate), offering customers a carbon-neutral product range, creation of a roadmap to becoming emissions neutral by 2050, and develop a climate change adaptation plan. Further information on annual material GHG emissions and energy use by source are available in the Annual Report, page 97: https://relatorioanual2020.cba.com.br/?lang=en and from the Brazilian GHG Protocol (Programa Brasileiro GHG Protocol): https://rpe-gvces.s3.amazonaws.com/tmp/cache/pdf/dd7875bb/companhia-brasileira-de-aluminio.pdf</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity has implemented a Management System to limit Direct GHG emissions from the aluminium smelting process.</p> <p>The Entity has implemented projects to limit Direct GHG emissions, further information is available in the 2019 Annual Report: https://www.cba.com.br/RelatorioAnual2019</p> <p>The Entity's electricity is sourced from low-carbon hydropower.</p>

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity disclosed the Scope 1 and Scope 2 GHG emissions of 2.56 tonnes CO ₂ -eq per tonne Aluminium. A Third Party has provided independent assurance of the Entity's GHG emissions data. Further information is available in the Entity's Annual Report: https://www.cba.com.br/RelatorioAnual2019
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as operations commenced in 1955.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard's Emissions to Air requirements and are in compliance with the legal permit thresholds on air emissions.
6.2 Discharges to Water	Minor Non-Conformance	The Entity has developed and implemented policies, systems, procedures and processes for Discharges to Water. The Entity has obtained ISO 14001 certification and is compliant with legal requirements relating to Discharges to Water. The Araçariguama (METALEX) Unit does not have an Effluent Treatment Station and discharges effluent into the network of SABESP (Basic Sanitation Company of the State of São Paulo). Water discharge is averaged per employee and is reported on the water balance map.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed, implemented and maintained systems, procedures and processes that conform to the ASI Performance Standard's assessment and management of Spills and Leakage requirements. The Entity undertakes regular internal audits and assessment of Spills and Leakages is governed by the ISO 14001 certified Environmental Management System. No significant Spills or Leakages have occurred in 2020 and in 2021. For more information see the Annual Report, page 128: https://relatorioanual2020.cba.com.br/?lang=en
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the 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. There were no significant Spills or Leakages during 2020 and 2021.

CRITERION	RATING	COMMENT
		For more information see the Annual Report, page 28: https://relatorioanual2020.cba.com.br/?lang=en
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has implemented a process to inform relevant authorities and stakeholders of major Spills and Leakages. There were no significant Spills and Leakages during 2020 and 2021.</p> <p>For more information see the Annual Report, page 28: https://relatorioanual2020.cba.com.br/?lang=en</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has implemented a process to inform relevant authorities and stakeholders of major Spills and Leakages. There were no significant Spills and Leakages during 2020 and 2021.</p> <p>For more information see the Annual Report, page 28: https://relatorioanual2020.cba.com.br/?lang=en</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that address waste management and reporting requirements. The Entity has established a 35% waste reduction target (from a 2017 baseline).</p> <p>The Entity implements a solid waste management plan designed in accordance with the Waste Mitigation Hierarchy. The annual solid waste declaration is communicated to the Environmental Agency (CETESB).</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that address waste management and reporting requirements. The Entity established a 35% waste reduction target (from a 2017 baseline), and discloses the quantity of Hazardous and Non-Hazardous Waste generated in the Annual Report, pages 92 and 93: https://relatorioanual2020.cba.com.br/?lang=en</p> <p>The annual solid waste declaration is communicated to the Environmental Agency (CETESB).</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>There are three bauxite residue facilities in Alumínio Factory, Mirai and Itamarati de Minas Mining Units. The Entity uses the SIGBAR software to monitor the three dams (Alumínio Factory, Mirai and Itamarati de Minas Mining Units). There are regular visual inspections on the dams, as well as inspections undertaken by qualified external parties to ensure dam safety. The Entity has implemented a pilot which utilises dry stacking technology to deposit materials at the Palmital Dam, which aims to increase the lifetime of the waste disposal system. The Entity will change the form of waste disposal, from wet disposal (with low</p>

CRITERION	RATING	COMMENT
		concentration of solids) to dry disposal (with 75% concentration of solids) using filter presses. More information can be found in the Annual Report: https://relatorioanual2020.cba.com.br/?lang=en
6.6b Bauxite Residue (integrity checks and controls)	Conformance	Regular Third Party inspections are undertaken at Bauxite Residue storage sites in accordance with the monitoring system (SIGBAR) methodology. Daily visual inspections are also undertaken. The local Community is engaged on dam safety and receives information on dam safety measures and inspections from the Entity.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity operates water treatment stations at the Bauxite Residue dams, where the water is treated and neutralized according to local environmental legislation. At the Alumínio Factory, there is no external discharge of water from the dam, all water is reused internally. At the Mining Units, the water is treated in accordance with the environmental license prior to discharge to the municipal wastewater system.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	There is no discharge of Bauxite Residue to marine and aquatic environments.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The Entity has implemented trials for state-of-the-art technology, such as filter press at the Alumínio Factory. The project will optimize the facilities operating life cycle, and allow caustic soda residue to be recovered and then reused in the bauxite refining process. Further information is available in the Annual Report: https://relatorioanual2020.cba.com.br/?lang=en
6.6f Bauxite Residue (remediation)	Conformance	The Entity ceased the bauxite washing process in 2001 at the Pocos de Caldas Mining Unit and rehabilitated the dam area using local vegetation, which was sighted during the audit.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	An SPL inventory is maintained and complies with the Entity's permit. All SPL and Hazardous Waste is sent to third parties for adequate treatment. For more than 15 years previously, untreated SPL material was stored inside the Entity's Alumínio Factory. From 2007, the Entity sent SPL waste to cement companies and commenced a project to dismantle and treat the SPL internal landfill, which is currently undergoing rehabilitation.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has implemented projects to optimise processes for the recovery and recycling of carbon and refractory materials, including a Green Soderberg

CRITERION	RATING	COMMENT
		Project to eradicate black mud from the dry scrubber. The project will deliver environmental benefits including a reduction in raw material consumption, reduction in CO ₂ emissions and further efficiency gains. The Tactical Environmental Risk and Opportunity Management identified the Spent Pot Lining (SPL) transport and disposal risk and the opportunity to use SPL waste as a flux in the steel industry.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity ceased the practice of landfilling untreated Spent Pot Lining at its Alumínio site in 2019. This landfill facility is currently undergoing rehabilitation.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity reviews alternative options to landfilling of treated Spent Pot Lining (SPL) and/or stockpiling of SPL on an ongoing basis.
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	The Entity has developed and implemented policies, systems, procedures and processes that effectively manage Dross. Dross generated onsite is processed to maximise aluminium recovery. All Dross generated is processed by specialised external companies. Currently, the Dross generation target is 4.5%.
6.8b Dross (recycling)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that effectively manage Dross. Dross generated onsite is processed to maximise Aluminium recovery. All Dross generated is processed by specialised external companies. Currently, the Dross generation target is 4.5%.
6.8c Dross (review of alternatives)	Conformance	The Entity has licensing agreements with third parties and no Dross is sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>The Entity has identified and mapped its water withdrawal and use by source and type and undertaken a water balance analysis and identified major sources of water input.</p> <p>Water Balance maps include consumption sources such as the artesian well, water from the concessionaire and disposal (loss due to evaporation, loss of purges and disposal to the sanitation concessionaire).</p> <p>Further information is found in the Entity's Annual Report, page 106:</p> <p>https://relatorioanual2020.cba.com.br/?lang=en</p>

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7.1b Water assessment (risk assessment)	Conformance	The Entity has 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 and the risk on water consumption is highlighted. The methodology for the mapping and managing strategic risks changed in July 2021 and from November the Entity will start evaluating the strategic risk of the water resource.
7.2a Water management (management plans)	Conformance	The Entity has internal guidelines in place for managing water and effluents which ensures conformance to the legal requirements. The target for 2025 was to reduce water withdrawal by 22%, from a 2017 baseline. The Entity achieved a reduction of 20.9% in 2020 and implements action required to achieve goals established in the new 2030 ESG strategy. The Entity is participating in several water minimisation initiatives. Further information on water use is available in the Annual Report: https://relatorioanual2020.cba.com.br/?lang=en
7.2b Water management (monitoring)	Conformance	The Entity has internal guidelines in place for managing water and effluents which ensures conformance to the legal requirements. The target for 2025 was to reduce water withdrawal by 22%, from a 2017 baseline. The Entity achieved a reduction of 20.9% in 2020 and implements action required to achieve goals established in the new 2030 ESG strategy. The Entity is participating in several water minimisation initiatives. Further information on water use is available in the Annual Report: https://relatorioanual2020.cba.com.br/?lang=en
7.3 Disclosure of water usage and risks	Conformance	The Entity discloses water usage and risks in the Annual Report, page 107 – 109: https://relatorioanual2020.cba.com.br/?lang=en
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has undertaken a biodiversity risk assessment. The Araçariguama (METALEX) Unit is partially within a special environmental protection zone and a Private Reserve of Natural Heritage is adjacent the site.

CRITERION	RATING	COMMENT
		<p>No species of fauna and flora under threat of extinction were identified.</p> <p>Further details are available in the Annual Report, pages 115 – 121: https://relatorioanual2020.cba.com.br/?lang=en</p>
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	<p>The Entity has implemented a Biodiversity Action Plan, addressing key aspects identified in its biodiversity risk assessment.</p> <p>The Entity's main impact on biodiversity is in a mining context on which it reports via its Annual Report, pages 115 – 121: https://relatorioanual2020.cba.com.br/?lang=en</p> <p>After the bauxite extraction is complete, the mined areas undergo environmental rehabilitation, 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). Whilst some facilities have undertaken a biodiversity assessment, a biodiversity action plan with time-bound targets to address the material impacts identified have not been prepared for these facilities.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>No species of fauna and flora under threat of extinction were identified with one invasive specimen of fauna was identified (leucine, a plant native to Central America), and it was recommended by specialists to control erosion adjacent to the forest fragment region, the management of exotic species and planting native tree species that are attractive to fauna.</p> <p>More details are available in the Annual Report, pages 115 – 121: https://relatorioanual2020.cba.com.br/?lang=en</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity reports on biodiversity outcomes via the Annual Report, page 128: https://relatorioanual2020.cba.com.br/?lang=en</p>
8.3 Alien Species	Conformance	<p>The Entity proactively prevents accidental or deliberate introduction of Alien Species</p> <p>No species of fauna and flora under threat of extinction were identified with one invasive specimen of fauna was identified (leucine, a plant native to Central America), and it was recommended by specialists to control</p>

CRITERION	RATING	COMMENT
		<p>erosion adjacent to the forest fragment region, the management of exotic species and planting native tree species that are attractive to fauna.</p> <p>More details are available in the Annual Report, pages 115 – 121:</p> <p>https://relatorioanual2020.cba.com.br/?lang=en</p>
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	<p>The Entity regularly evaluates areas according to their protected classification as part of the licensing process. The Entity conducts its mining activities in accordance with Applicable Law, and has no current or planned operations in World Heritage Properties.</p> <p>http://idesisema.meioambiente.mg.gov.</p> <p>http://www.unesco.org/new/en/brasilia/home</p>
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Conformance	<p>The Entity regularly evaluates areas according to their protected classification as part of the licensing process. The Entity conducts its mining activities in accordance with Applicable Law, and has no operations in World Heritage properties.</p> <p>http://idesisema.meioambiente.mg.gov</p> <p>http://www.unesco.org/new/en/brasilia/home</p>
8.5a Mine rehabilitation (best available techniques)	Conformance	<p>Mining areas undergo environmental rehabilitation which creates optimal soil conditions through restoration of the native vegetation and/or the replanting of agricultural and livestock activities. The quality of this rehabilitation has been certified by studies and scientific research carried out through a partnership with the Federal University of Viçosa (UFV). Further information can be found:</p> <p>https://www.cba.com.br/wp-content/uploads/2020/03/Relatorio-Anual-CBA-2019_final.pdf</p> <p>We also conducted independent interviews with farmers where CBA conducts or conducted mining activities in the past and rehabilitation of the mining areas.</p>
8.5b Mine rehabilitation (financial provisions)	Conformance	<p>Financial provisions for mine rehabilitation are provided prior to commencing any project and are presented in licensing agreements with farmers or other affected stakeholders.</p>
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity’s Code of Conduct provides a commitment to the UN Guiding Principles on Business and Human Rights.</p> <p>The Code of Conduct addresses issues related to human rights and ethical standards all employees should uphold.</p>

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		<p>The Code of Conduct includes a Policy commitment with respect to Human Rights, page 14:</p> <p>https://cba.com.br/wp-content/uploads/2021/06/codigo-de-conduta-cba-21-versao-final.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>A Human Rights Due Diligence has been undertaken across the Entity, which raised 17 potential risks to human rights.</p> <p>Four significant risks were identified and are currently being addressed by the Entity.</p> <p>For more information, see the Annual Report, page 36:</p> <p>https://relatorioanual2020.cba.com.br/?lang=en</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity'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, which is accessible via telephone or via the website:</p> <p>https://cba.com.br/cba/governanca-e-compliance</p> <p>Currently, there are no remediation cases related to human rights at the Entity.</p>
9.2 Women's Rights	Conformance	<p>The Entity has implemented a robust Diversity strategy in line with leading practice and has 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 include support mechanisms such as maternity and paternity leave beyond the legal minimum in Brazil, training and development and the delivery of a Diversity Day to raise further awareness within the company. The Entity has also conducted workshops in the local community with its partners to discuss impacts of economic dependency on women.</p>
9.3 Indigenous Peoples	Not Applicable	<p>Indigenous Peoples are not present at the locations where the Entity operates and are not in the scope of this ASI Certification Audit. Further information is available at the following links:</p> <p>https://www.survivalinternational.org/about/funai</p> <p>http://idesisema.meioambiente.mg.gov.br</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>Indigenous Peoples are not present at locations where the Entity operates nor in the Certification Scope.</p>

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Conformance	No cultural or sacred heritage sites have been identified in locations where the Entity operates. However, as part of the Entity's capital expenditure due diligence process, prior to new mining activities and the licensing process, archaeological, cultural and/or sacred heritage sites require evaluation as required by IPHAN (National Historic and Artistic Heritage Institute, Brazil).
9.6a Resettlements (avoid or minimise)	Conformance	The Entity demonstrates respect for the Human Rights requirements as stated in the Code of Conduct and observes the United Nations Guiding Principles on Business and Human Rights. It intends to avoid resettlements, and considers feasible alternatives in project design.
9.6b Resettlements (where unavoidable)	Conformance	The Entity demonstrates respect for the Human Rights requirements as stated in the Code of Conduct and respects the United Nations Guiding Principles on Business and Human Rights.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented a Social and Local Community Strategy aligned with best practices. Examples of engagement with local communities include supporting public health management with respect to COVID-19, the transfer of financial resources to the Municipality, the donation of food baskets during the COVID-19 pandemic and the donation of masks gloves, caps and alcohol gel were donated to local municipalities. Further information is available in Annual Report, page 75: https://relatorioanual2020.cba.com.br/?lang=en
9.7b Local Communities (impacts)	Conformance	The Entity has undertaken a social impact assessment study which assisted in developing its Social and Local Community Engagement Strategy. The Entity has identified critical aspects of its activities and their potential impact on the local community, and integrated these into its Enterprise Risk Assessment. The Entity undertakes regular engagement with local Communities and has dedicated resources to lead on engagement with the local Community where it operates. Further information is available in Annual Report, page 75: https://relatorioanual2020.cba.com.br/?lang=en
9.7c Local Communities (livelihoods)	Conformance	The Entity has, implemented a Social and Local Community Engagement Strategy which is aligned with leading practices.

CRITERION	RATING	COMMENT
		<p>Examples of engagement with local communities include supporting public health management with respect to COVID-19, the transfer of financial resources to the Municipality, the donation of food baskets during the COVID-19 pandemic and the donation of masks gloves, caps and alcohol gel were donated to local municipalities.</p> <p>Further information is available in Annual Report, page 75: https://relatorioanual2020.cba.com.br/?lang=en</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has established several actions for improving the relationship with the communities, which stipulates requirements aligned to ASI requirements on Conflict-Affected and High-Risk Areas.</p> <p>For more information, refer to the Annual Report at: https://relatorioanual2020.cba.com.br/?lang=en</p>
9.9 Security practice	Conformance	<p>The Entity has implemented policies, systems and procedures on Security practices. Third-party security personnel have been trained on the Entity's Code of Conduct, Applicable Human Rights Law and the company's Risk Management Plan. The Entity monitors 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>The Entity has 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 are regularly updated and agreed with the Labour Union. In interviews with union representatives, it was verified that the Local Union and the top management have a good relationship. The Entity has advised employees they are free to join the SMETAL Union (and allows the Union to meet at any time with employees.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity 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.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>The Entity's employees have the right to union membership and to initiate an internal union process.</p>

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10.2a Child Labour (minimum age)	Conformance	<p>The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182. The Entity does comply with relevant national and international law. The Entity does not engage in nor supports Hazardous Child Labour.</p> <p>The Code of Conduct states 'We have zero tolerance for child labor or work analogous to slavery in our operations or those of our business partners', available at: https://cba.com.br/wp-content/uploads/2021/06/codigo-de-conduta-cba-21-versao-final.pdf</p> <p>The Entity participates in the Young Apprentice Program with young people aged 15 and over in a partnership with SENAI (Young Apprentice - For Companies - Industry Portal).</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity does neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law including. The Entity is not engaging in nor supporting Hazardous Child Labour.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity does neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law. The Entity does not engage in nor supports Worst Forms of Child Labour. The Entity requires its suppliers to respect all laws in their jurisdiction with regards to Child Labour, as stipulated by its Responsible Sourcing Policy.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity does neither engage in, nor support the use of Forced Labour as defined in ILO Conventions C29, as well as protocol P29 (2014) to this Convention, and C105. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has developed, implemented and maintains systems, policies and procedures to conform with all requirements related to Forced Labour. Workers interviewed have confirmed that no recruitment fee or deposit is required.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has developed, implemented and maintains systems, policies and procedures to conform with all requirements related to Forced Labour. It does not require Migrant Workers to lodge deposits.</p>

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10.3d Forced Labour (debt bondage)	Conformance	The Entity has developed, implemented and maintains systems, policies and procedures to conform with all 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	The Entity has developed, implemented and maintains systems, policies and procedures to conform with all 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	The Entity has developed, implemented and maintains systems, policies and procedures to conform with all requirements related to Forced Labour. It does not confiscate original identification documents. Copies of these are kept on personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has developed, implemented and maintains systems, policies and procedures to conform with all 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 employment contracts.
10.4 Non-Discrimination	Conformance	<p>The Entity has developed, implemented and maintained systems, policies and procedures to effectively manage Non-Discrimination. Refer to the Entity's Code of Conduct, page 17 Item 3.2: https://cba.com.br/wp-content/uploads/2021/06/codigo-de-conduta-cba-21-versao-final.pdf</p> <p>The Entity's Equal Employment Opportunity Policy prohibits all types of discrimination. There is a process in place for the reporting and investigation of allegations of Discrimination, outlined in the Code of Conduct.</p>
10.5 Communication and engagement	Conformance	The Entity 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, information boards, and meetings with worker representatives).
10.6 Disciplinary practices	Conformance	The Entity has developed, implemented and maintained systems, policies and procedures that effectively manage issues relating to Disciplinary

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		practices. The Entity operates an Ethics Line and an independent hotline for confidential reporting: https://cba.com.br/cba/governanca-e-compliance
10.7a Remuneration (living wage)	Conformance	The Entity has developed, implemented and maintained systems, policies and procedures that effectively manage issues relating to remuneration.
10.7b Remuneration (method of payment)	Conformance	The Entity has developed, implemented and maintained systems, policies and procedures that effectively manage issues relating to remuneration. This was confirmed by sampling payslips, wage documentation and worker interviews, which included contractors.
10.8 Working Time	Conformance	The Entity has developed, implemented and maintained systems, policies and procedures that effectively manage issues relating to working hours. This was evidenced through a sample of working hours records, associated policies and procedures, and worker interviews.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has defined and communicated the Integrated Policy which includes Occupational Health and Safety aspects. https://www.cba.com.br/wp-content/uploads/2020/08/Politica-Gest%C3%A3o-Integrada-NiCBA-ASI-2019-SET.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has developed a detailed 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. https://www.cba.com.br/wp-content/uploads/2020/08/Politica-Gest%C3%A3o-Integrada-NiCBA-ASI-2019-SET.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity demonstrates compliance to Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety. The Entity also conducts regular internal audits to ensure the Policy is implemented.

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11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity stipulates the right of Workers to understand the hazards and the safe practices for their work which also includes the right to refuse or stop any unsafe work. The Entity conducts a regular and detailed health and safety risk assessment and implements practices that encourage safety behaviour onsite (e.g. Golden Rules).
11.2 OH&S Management System	Conformance	The Entity has 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	The Entity has developed and implemented policies, systems, procedures and processes that conform to the employee engagement on health and safety requirements. A Health and Safety Multidisciplinary Committee has been created to integrate actions from the Environment, Health and Safety and Hygiene areas both internally and externally. Good practices were noted on the engagement with contractors on occupational health and safety (regular briefings and engagement).
11.4 OH&S performance	Conformance	The Entity has established OH&S metrics and has implemented regular management reviews of its data for the continuous improvement of its health and safety performance.

Document Control and Version History

Revision	Date	Notes
0	19 September 2019	Issued (Full Certification)
1	15 January 2021	Surveillance and scope change audit. Updated to reflect Certification Scope change with addition of the casthouses and downstream productions (Itapissuma/PE) and update to the Initial Certification Audit Scope to the Supply Chain Activities list due to an error and to the sites included for clarity.
2	20 December 2021	Scope Change Audit – Certification Scope updated to include Araçariçuama/SP (METALEX) site. Update to the Certification Scope to include 'aluminium re-melting/refining' as one of the activities for Itapissuma/PE.