
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

FUSÃO LIGAS COM. E IND. LTDA

CERTIFICATE
NUMBER

269

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

28 MARCH 2023

DATE OF EXPIRY

27 MARCH 2026

CERTIFIED SINCE

28 MARCH 2023

AUTHORISED BY

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

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

Management of industrial by-products, transforming waste into products at Fusão Ligas Comércio e Indústria Ltda (Brazil).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	FUSÃO LIGAS COM. E IND. LTDA
ENTITY NAME	FUSÃO LIGAS COM. E IND. LTDA
CERTIFICATION SCOPE	Management of industrial by-products, transforming waste into products at Fusão Ligas Comércio e Indústria Ltda (Brazil).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Material Conversion (Production and Transformation)• Other manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 13 – 6 February 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 2 March 2023
AUDIT SCOPE	<p>The audit scope covers the Fusão Ligas production unit of João Monlevade - Minas Gerais (Brazil), whose business model is the management of industrial by-products, transforming waste into products (alumina, slag and sludge after aluminum smelting).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Material Conversion (Production and Transformation)• Other manufacturing or sale of products containing Aluminium <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.

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- 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.
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CERTIFICATION PERIOD 28 March 2023 – 27 March 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 17 September 2024

CERTIFICATE NUMBER 269

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a system to maintain knowledge and ensure compliance with the Applicable Law. Legal compliance requirements are verified through external audits and the legal requirements applicable are monitored through the regulations management system.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Law and current international standards through the implementation of the Entity's Anti-Corruption Policy:</p> <p>http://www.fusaoligas.com.br/FL%20R%20GDQ%20029%20%20%20%20POL%C3%8DTICA%20DE%20ANTISUBORNO%20E%20ANTICORRUP%C3%87%C3%83O.pdf</p> <p>The Entity has a communication channel available to stakeholders:</p> <p>http://www.fusaoligas.com.br</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct with relevant principles for environmental, social and governance performance, available on the Entity's website:</p> <p>http://www.fusaoligas.com.br/FL%20P%20GDQ%20016%20C%C3%93DIGO%20DE%20%C3%89TICA%20E%20CONDUTA.pdf</p> <p>All employees receive training on the Code of Conduct during the integration process.</p> <p>The Entity has a direct communication channel for reporting violations of the Code and other complaints available for interested parties:</p> <p>http://www.fusaoligas.com.br</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented Policies consistent with environmental, social and governance practices, including an Integrated Policy, Diversity and Inclusion Policy, Anti-Bribery and Corruption Policy and Social Responsibility Policy, available on the website:</p> <p>http://www.fusaoligas.com.br</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has implemented Policies consistent with environmental, social and governance practices that are endorsed by the Entity's presidency, supported through the provision of resources and reviewed annually.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has implemented Policies consistent with environmental, social and governance practices and has made these available internally on information boards and externally through the Entity's website.
2.2 Leadership	Conformance	The Entity's senior management is responsible for implementation of the ASI Performance Standard and are supported by the Entity's ASI Internal Committee, appointed in 2022, which has overall responsibility and authority to ensure compliance with the requirements of the Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System through the development of an environmental management plan, comprising the environmental management plan procedures, aspects survey matrix and environmental impacts and performance indicators. The Entity has an ISO 14001:2015 external certification audit scheduled for March 2023.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Social Management System through the development of policies, procedures, communication channels and assessment of social legal requirements through an independent contractor. The Integrated Policy is available, refer to page 3: http://www.fusaoligas.com.br/FL%20P%20GDQ%20016%20C%3%93DIGO%20DE%20C%3%89TICA%20E%20CONDUTA.pdf Social Responsibility Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20028%20%20%20%20POL%3%8DTICA%20DE%20RESPONSABILIDADE%20SOCIAL.pdf
2.4 Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy and a Code of Conduct for Suppliers, which includes environmental, social and governance issues: http://www.fusaoligas.com.br/FL%20R%20GDQ%20026%20POL%3%8DTICA%20DE%20FORNECIMENTO%20RESPONS%3%81VEL.pdf http://www.fusaoligas.com.br/FL%20P%20COM%20%200031%20C%3%93DIGO%20DO%20FORNECEDOR.pdf The Entity has developed a communication channel, available on the Entity's website: http://www.fusaoligas.com.br
2.5 Impact Assessments	Conformance	The Entity has implemented the procedure for 'Surveying Environmental Aspects and Impacts' and maintains a hazard and risk register to address hazards

CRITERION	RATING	COMMENT
		and risks and a checklist for environmental, social, cultural and Human Rights Impact Assessments, including gender analysis and for New Projects or Major Changes to existing and ongoing facilities.
2.6 Emergency Response Plan	Conformance	The Entity has implemented site-specific emergency response plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives and relevant agencies. Annually, the Entity performs simulated exercises to demonstrate the level of preparation for each emergency scenario.
2.7 Mergers and Acquisitions	Conformance	No merger or acquisition process was identified in which the Entity is involved. However, the Entity has a procedure for reviewing environmental, social and governance issues for mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	There are no closure, decommissioning or divestment activities. However, the Entity has a procedure for reviewing environmental, social and governance issues and has developed a due diligence checklist and terms of environmental responsibility.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social and economic impacts in the Sustainability Report: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTENTABILIDADE%20REV.1.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed information on significant fines, judgments, penalties and non-monetary sanctions for non-compliance with Applicable Law in the Sustainability Report, page 1: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTENTABILIDADE%20REV.1.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has demonstrated that it only makes payments in its name, following an approval process with management and senior management, including payments to suppliers, government fees, payment to employees and collection of fees for issuing licenses. The Entity has created a Transparency Policy and an Anti-Corruption Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20050%20POL%C3%8DTICA%20DE%20TRANSPARENCIA.pdf

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		http://www.fusaoligas.com.br/FL%20R%20GDQ%20029%20%20%20%20POL%C3%8DTICA%20DE%20ANTISUBORNO%20E%20ANTICORRUP%C3%87%C3%83O.pdf
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has defined mechanisms for resolving complaints that are accessible, transparent, understandable, culturally and gender sensitive, and suitable for handling complaints and requests from stakeholders related to its activities. The communication channel is available on the Entity's website, via QR codes on vehicles and promotional materials at the Entity: http://www.fusaoligas.com.br There is also a communication box for Workers present on site.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and evaluated the life cycle impacts of processed Alumina and Aluminium sludge materials.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has demonstrated that, in the event of any request from customers, it can provide information on the Life Cycle Assessment (LCA) of the processed product (cradle-to-gate). There are no records of any customer requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and evaluated the life cycle impacts of processed Alumina and Aluminium sludge materials and has disclosed this information in the Sustainability Report, page 7: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTINABILIDADE%20REV.1.pdf
4.2 Product design	Conformance	The Entity is involved in processing and selling materials that contain Aluminium, primarily the recovery of the Aluminium obtained as the waste from Alumina producers and/or Aluminium melting. The Entity uses resources to extract and maximize Aluminium recovery and after this process, extracted material is returned to the customer and/or transformed into a by-product to be sold. According to the defined procedure and stages of the processing process, the Entity assesses the impacts of the environmental life cycle of the final product, as presented in the Sustainability Report, pages 8-10:

CRITERION	RATING	COMMENT
		http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTENTABILIDADE%20REV.1.pdf
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's business activities are focused on the decommissioning of processes and management of by-products that contain Aluminium. All process material acquired by the Entity is industrialised and transformed into raw material for industry use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's business activities are focused on the decommissioning of processes and management of by-products that contain Aluminium and it is evidenced that all process material 100% follows for recycling and/or by-products (Aluminium alloys separation derived from alumina and/or slag after Aluminium melting received from other entities).
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity's business is focused on the deactivation of industrial processes of other Aluminium producing entities, where all process material received is recycled and/or reused and no waste is sent to landfill.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has demonstrated its involvement with local collection and recycling systems, supporting the development of recycling collectors to increase recycling rates. In addition, the Entity is working to develop a cooperative to increase Aluminium can recycling in the region. For further information refer to: https://www.abralatas.org.br/wp-content/uploads/2022/12/relatorio_esg_abralatas_2022.pdf
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity records and publicly discloses material GHG emissions by source (Scope 1 and Scope 2) and energy use by source annually on the website and in the Sustainability Report, page 20: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO-DE-SUSTENTABILIDADE-REV-2.pdf
5.2 GHG emissions reductions	Conformance	The Entity has implemented a GHG emissions reduction plan with initiatives that address Scope 1 and Scope 2 emissions including installation and operation of photovoltaic and wind power generation; optimisation of the supply chain fleet, transport routes and the company's fleet vehicles and; optimising business travel. The Entity has disclosed its target to become 100% self-sufficient in clean and renewable energy in the Sustainability Report, pages 19-21:

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		http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO-DE-SUSTENTABILIDADE-REV-2.pdf
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 quantifies and reports atmospheric emissions that have adverse effects on both humans and the environment in accordance with the conditions of the environmental licenses by type of source: including chimney stacks, company vehicles and vehicles of contracted companies.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports Discharges to Water that have adverse effects on human beings and the environment in accordance with the conditions of the environmental licenses. The operations undertaken by the Entity does not use natural resources such as water, so there is no requirement for a treatment plant.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil through the 'Survey of Environmental Aspects and Impacts' procedure.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has conducted an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil through the 'Survey of Environmental Aspects and Impacts' procedure and periodically performs simulated efficiency tests in accordance with the emergency response plan.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has an emergency response plan, which includes the external communications plan to disclose details of a Spill to affected parties, should an incident occur.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented a process to publicly disclose Spills and Leakage in the Sustainability Report. There have been no situations of spills and/or contamination, as disclosed in the Sustainability Report, page 26:

CRITERION	RATING	COMMENT
		http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTINABILIDADE%20REV.1.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy designed in accordance with the Waste Mitigation Hierarchy, which includes a goal of 'Zero Disposal' for waste from processed materials, thus preventing waste and by-products from being stored or disposed of improperly. In addition, all material acquired by the Entity is industrialized and transformed into raw material for other industries.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed its commitment to Zero Disposal and the amount of Hazardous and Non-Hazardous Waste generated in the Sustainability Report, pages 22 and 25: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO%20DE%20SUSTINABILIDADE%20REV.1.pdf
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 (state 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.

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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.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped water intake by source and type in each unit, confirming that consumption is adequate with authorisation from the Environmental Agency. The Entity has demonstrated that more than 90% of water used is sourced from the public distribution system of the Local city.
7.1b Water assessment (risk assessment)	Conformance	The Entity has mapped water abstraction by source and type and assessed the risks related to consumption for river basins in its Area of Influence. This assessment determined a 'very low' risk for the hydrographic basins.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable as the risk assessment determined a 'very low' risk. However, the Entity has implemented a Water Management Plan.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable as the risk assessment determined a 'very low' risk. However, the Entity has implemented a Water Management Plan.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water usage and the Water Management Plan in the Sustainability Report, pages 22-23: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO-DE-SUSTENTABILIDADE-REV-2.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of impacts on biodiversity from land use and activities in its Area of Influence using Integrated Biodiversity Assessment Tool (IBAT). The assessment covered a range of 15 kilometres and identified the predominant species and areas of environmental protection. The results indicated that the Entity has no impact on

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		biodiversity and has a positive impact for the preservation of biodiversity.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the biodiversity assessment determined the Entity has no impact on biodiversity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The biodiversity risk assessment determined the Entity has no impact on biodiversity and has a positive impact for the preservation of biodiversity.
8.2c Biodiversity management (reporting)	Conformance	The biodiversity risk assessment determined the Entity has no impact on biodiversity and has a positive impact for the preservation of biodiversity.
8.3 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity in its Area of Influence. The risk of Alien Species was considered in the biodiversity risk assessment.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has developed Policies and commitments with respect for Human Rights, including:</p> <p>Human Rights Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%C3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf</p> <p>Diversity and Inclusion Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20027%20POL%C3%8DTICA%20DE%20DIVERSIDADE%20E%20INCLUS%C3%83O.pdf</p> <p>Social Responsibility Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20028%20%20%20%20POL%C3%8DTICA%20DE%20RESPONSABILIDADE%20SOCIAL.pdf</p>

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9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed a checklist for the Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights in its Area of Influence. The Entity has developed a risk matrix that demonstrates the commitment, mitigation actions and monitoring actions for cases in which the Entity has caused some Human Rights impacts to Workers (direct and indirect) and Communities within its Area of Influence. The result of the Due Diligence assessment has determined that the Entity does not cause actual or potential Human Rights impacts.
9.1c Human Rights Due Diligence (remediation)	Conformance	The result of the Due Diligence assessment has determined that the Entity does not cause actual or potential Human Rights impacts.
9.2 Women's Rights	Conformance	The Entity has developed a Labour Policy that includes commitment and respect for women: http://www.fusaoligas.com.br/FL%20R%20GDQ%20031%20POLITICA%20TRABALHISTA.pdf The Entity has publicly disclosed its commitment in the Sustainability Report. Currently, women make up 23% of Workers and the Entity is committed to increasing this by 10% in 2023 in accordance with its Diversity and Inclusion Policy.
9.3 Indigenous Peoples	Conformance	The Entity has developed and implemented an Indigenous Peoples and Traditional Communities Policy to ensure respect for the interests of Indigenous Peoples, in accordance with ILO Convention 169, despite the fact that the Entity is not located close to Indigenous lands and/or Indigenous tribes. The Entity has publicly addressed the commitment in the Human Rights Policy: http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%20C3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity is not located and does not have projects or operational improvements, close to Indigenous lands, Indigenous Peoples and/or Indigenous tribes. However, the Entity has developed and implemented an Indigenous Peoples and Traditional Communities Policy to ensure respect for the interests of Indigenous Peoples.
9.5 Cultural and sacred heritage	Conformance	The Entity has cooperated to identify places and values of cultural or sacred heritage within its Area of Influence and, where identified, will take appropriate measures to guarantee continued rights of access to the places and

CRITERION	RATING	COMMENT
		<p>values identified.</p> <p>The municipality of João Monlevade, state of Minas Gerais, where the Entity is located, has some recognised cultural heritage place, such as Igreja São José Operário, Hotel Cassino, CEAM 'Centro de Educação Ambiental'. However these places are not within the Entity's Area of Influence.</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as the Entity has demonstrated that none of its operational activities required the physical displacement of community members.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as the Entity has demonstrated that none of its operational activities required the physical displacement of community members.
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity has developed and implemented the Human Rights Policy, which includes commitment to support and promote the livelihoods of Local Communities: http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%20C3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf</p> <p>The Entity does not have a direct operational impact on Local Communities, however it has developed actions with a positive social impact to improve the development of the Community, including the hiring of local workers.</p>
9.7b Local Communities (impacts)	Conformance	The Entity does not have a direct operational impact on Local Communities, however it has developed actions with a positive social impact to improve the development of the Community, including the hiring of local workers.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable as the Entity did not identify known or potential impacts on Local Communities during the Due Diligence assessment.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has evaluated its supply chain through the implementation of the Code of Conduct and the Human Rights Policy, which includes the commitment of not contributing to armed conflicts or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented security practices that include camera monitoring by a Contractor. The Entity has a commitment to respect Human Rights and the prohibition of abuse of power and inhumane treatment by private security personnel:

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		http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%C3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the Workers' right to freely associate in Trade Unions and to represent and join Workers' Councils, as defined in the Human Rights Policy.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the Workers' right to freely associate in Trade Unions and to represent and join Workers' Councils, as defined in the Human Rights Policy, after the Entity completes the negotiation process with the Union, individual work contracts are developed in accordance with the standard that was negotiated with the local Union.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity is not located in a country where the right to freedom of association and collective bargaining is restricted.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented and published a Policy expressing a commitment to respect Human Rights, making reference to the UN Guiding Principles on Business and Human Rights. Child Labour is not used. The Entity does not hire Workers under 18 years of age, except for apprenticeships. http://www.fusaoligas.com.br/FL%20R%20GDQ%20031%20POLITICA%20TRABALHISTA.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented and published a Policy expressing a commitment to respect Human Rights, making reference to the UN Guiding Principles on Business and Human Rights. Child Labour is not used. The Entity does not hire Workers under 18 years of age, except for apprenticeships.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented and published a Policy expressing a commitment to respect Human Rights, making reference to the UN Guiding Principles on Business and Human Rights. Child Labour is not used. The Entity does not hire Workers under 18 years of age, except for apprenticeships and in a location that does not present risks to apprentice employees and undertakes not to support the worst forms of child labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented and published a Policy expressing a commitment to respect Human Rights, making reference to the UN Guiding Principles on

CRITERION	RATING	COMMENT
		Business and Human Rights, assuming the commitment not to engage in or support Human Trafficking directly or through any agency of employment or recruitment through its Code of Conduct: http://www.fusaoligas.com.br/FL%20P%20GDQ%20016%20C%3%93DIGO%20DE%20C%89TICA%20E%20CONDUTA.pdf
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not require any form of deposit, recruitment fee or advance of equipment from Workers, directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not require Migrant Workers to make deposits or payments of bonds at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not keep Workers in debt bondage or force them to work to settle debts.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not unjustifiably restrict the freedom of movement of Workers in the workplace or in their homes in the location.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not store original copies of Workers' identity documents, work permits, trip or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has implemented and published a policy expressing a commitment to respect Human Rights, and to not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon reasonable notice.
10.4 Non-Discrimination	Conformance	The Entity has implemented the Labour Policy and Diversity and Inclusion Policy, and these policies are made available to managers and Workers: http://www.fusaoligas.com.br/FL%20R%20GDQ%20031%20POLITICA%20TRABALHISTA.pdf http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	<p>The Entity has developed process to ensure open communication and direct involvement with Workers and their representatives in relation to working conditions and resolution of labour and compensation issues, without threat of reprisal, intimidation or harassment, as established in the Labour Policy and Code of Conduct.</p> <p>The Entity demonstrates that communication with Workers takes place in daily meetings before the start of activities through Safety Dialogues, information in the Management Board meetings and through monthly meetings of the Internal Commission for Accident Prevention, formed by Workers.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has demonstrated that it does not engage in, nor tolerates the use of corporal punishment, mental or physical coercion, harassment and gender violence, including sexual harassment or verbal abuse of workers, through its Human Rights Policy and the Code of Conduct:</p> <p>http://www.fusaoligas.com.br/FL%20R%20GDQ%20030%20POL%C3%8DTICA%20DE%20DIREITOS%20HUMANOS.pdf</p> <p>http://www.fusaoligas.com.br/FL%20P%20GDQ%20016%20C%C3%93DIGO%20DE%20C3%89TICA%20E%20CONDUTA.pdf</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity respects the right of Workers to a minimum wage and ensures that wages paid per day of work meet local legislation and that Workers are paid wages as agreed in individual employment contracts.</p> <p>The Entity provides Workers with a statement of working hours and calculation of payment in accordance with its Labour Policy.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity makes wage payments to Workers monthly via bank deposit and provides a statement of working hours and calculation of payment.</p>
10.8 Working Time	Conformance	<p>The Entity respects the rights of Workers to a minimum wage and ensures that wages are paid for hours worked (including Overtime), holidays and annual leave, as determined by local legislation. Workers are paid the wage agreed in individual work contracts.</p> <p>The Entity provides workers with extracts of working hours performed monthly. The working day complies with local legislation and the Entity's Labour Policy.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed and implemented an Integrated Policy that includes a commitment to</p>

CRITERION	RATING	COMMENT
		Occupational Health and Safety (OH&S) endorsed by management. The Entity publicly discloses the Policy included in the Code of Conduct, page 3: http://www.fusaoligas.com.br/FL%20P%20GDQ%20016%20C%3%93DIGO%20DE%20C%3%89TICA%20E%20CONDUTA.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented an introductory training system for employees, visitors and service providers prior the start of activities.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed and implemented an Integrated Policy that includes a commitment to OH&S and compliance with applicable local legislation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed and implemented an Integrated Policy that includes a commitment to OH&S and has implemented a 'Right of Refusal' safety mechanism, in which Workers have the right to understand the dangers and safe practices of their work and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has developed and implemented an Occupational Health and Safety Management System documented through the 'Health and Safety Management Plan Procedure'. These safety mechanisms are publicly disclosed in the Sustainability Report, pages 29-30: http://www.fusaoligas.com.br/FUS%C3%83O-RELATORIO-DE-SUSTENTABILIDADE-REV-2.pdf
11.3 Employee engagement on health and safety	Conformance	The Entity has the 'Internal Commission for the Prevention of Accidents' (CIPA Committee) that consists of Workers, to raise, discuss and participate in the resolution of Occupational Health and Safety issues.
11.4 OH&S performance	Conformance	The Entity has demonstrated that it has a system for evaluating the performance of Occupational Health and Safety with the establishment of mechanisms for the prevention of dangers and risks, reduction of accidents at work, control of occupational medical examinations and health prevention campaigns.

Document Control and Version History

Revision	Date	Notes
0	28 March 2023	Initial Certification Audit – Full Certification