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ASI CERTIFICATION  
PERFORMANCE  
STANDARD



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PRESENTED TO

# MINERAÇÃO RIO DO NORTE - MRN

CERTIFICATE  
NUMBER

175

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

17 JANUARY 2022

DATE OF EXPIRY

16 JANUARY 2025

CERTIFIED SINCE

17 JANUARY 2022

AUTHORISED BY

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

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*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

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

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Mineração Rio do Norte - MRN
ENTITY NAME	Mineração Rio do Norte - MRN
CERTIFICATION SCOPE	Planning, mining, transport, processing, river shipment of Bauxite and power generation at the Mineração Rio do Norte - MRN facility in Porto Trombetas, Brazil.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (13 – 17 December 2021)</li><li>• Surveillance Audit (3 – 8 December 2022)</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>• 13 – 17 December 2021 (Initial Certification Audit)</li><li>• 3 – 8 December 2022 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 4 January 2022 (Initial Certification Audit)</li><li>• 24 February 2023 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 17 December 2021)</u></p> <p>The audit scope includes the planning, mining, transport, processing, river shipment of Bauxite and power generation at the Mineração Rio do Norte - MRN facility in Porto Trombetas, Brazil.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (3 – 8 December 2022)</u></p> <p>The audit scope includes the planning, mining, transport, processing, river shipment of Bauxite and power generation at the Mineração Rio do Norte - MRN facility in Porto Trombetas, Brazil. The audit scope also included in-person discussions and interviews with external stakeholder groups,</p>

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including several interviews with representatives of Quilombolas peoples and riverine communities.

The Supply Chain Activities included in the audit scope:

- Bauxite Mining

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

17 January 2022 – 16 January 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

16 January 2024

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CERTIFICATE  
NUMBER

175

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has systems in place to maintain awareness of and ensure compliance with Applicable Law. The Entity tracks legal requirements that must be met through the LegNet System, which monitors on a daily basis the fulfilment and updating of legal requirements. The Entity holds valid ISO 14001 and ISO 45001 Certifications.
1.2 Anti-Corruption	Conformance	The Entity acts against Corruption in all its forms, including extortion and bribery, in accordance with applicable law and current international standards. The Entity has established an Anti-Corruption Policy and Integrity Program, which are implemented through training, awareness actions and compliance activities. The Code of Conduct is communicated to all employees and contractors. Training and surveys are conducted and integrated into the Integrated Management System. The general guidelines for performance are established. This document is publicly available on the Entity's website: <a href="https://ethicspeakup.com.br/mrnouvidoria">https://ethicspeakup.com.br/mrnouvidoria</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct Procedure, including principles relevant to environmental, social and governance performance for employees, representatives, suppliers, customers, shareholders, partners and third parties, who must act in accordance with the guidelines established in the code. The Code of Conduct was revised in November 2022. Interviews with employees confirmed knowledge of the code and that training is provided. The Code of Conduct is available at: <a href="https://relatoconfidencial.com.br/mrnouvidoria/codigo_de_conduta.pdf">https://relatoconfidencial.com.br/mrnouvidoria/codigo_de_conduta.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's CEO and senior management staff demonstrate commitment to the implementation and endorsement of Policies, and they support regular reviews of Policies to ensure compliance with ASI Performance Standard requirements as stated in the Integrated Management System Manual. The Entity's Integrated Policy and its sustainability culture is accessible at: <a href="https://www.mrn.com.br/index.php/en">https://www.mrn.com.br/index.php/en</a>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has a nominated senior Management Representative who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard requirements. This is communicated and presented in the Entity's organisational chart.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity frequently communicates its integrated Policy and engagement initiatives through various internal communication channels, including intranet displays, bulletin boards, events, seasonal and commemorative campaigns. The Entity also communicates externally some of its main integrated Policies on the Entity's website: <a href="http://www.mrn.com.br">www.mrn.com.br</a>
2.2 Leadership	Conformance	The Entity has nominated a senior Management Representative who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard requirements. This is communicated and presented in the Entity's organisational chart.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Integrated Management System, including the Environmental Management System. The Entity is certified to ISO 14001:2015 valid until March 2023. The 2021 Sustainability Report includes the relevant information, and is accessible on the Entity's website: <a href="https://mrn.com.br/index.php/pt/sustentabilidade">https://mrn.com.br/index.php/pt/sustentabilidade</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an Integrated Management System, including the Social Management System. The 2021 Sustainability Report (issued in 2022) includes the relevant information, and is accessible on the Entity's website: <a href="https://mrn.com.br/index.php/pt/sustentabilidade">https://mrn.com.br/index.php/pt/sustentabilidade</a> The Integrated Social and Environmental Management System will also see improvements to the complaints mechanisms and existing relationship channels with external stakeholders. The Entity's Risk Identification and Management System has also seen additional social and reputational risks identified and operational controls developed and implemented. The Entity has established the risk management to all company areas and has established the process, methods and criteria for identifying, evaluating, analysing, monitoring and communicating risks and their respective preventive and corrective control actions.

CRITERION	RATING	COMMENT
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented relevant environmental, social and governance issues that relate to the sourcing of goods and services. The Entity has identified the risks associated with staff, suppliers and all subcontractors. Mitigation actions are in place to mitigate the related risks to humans, the environment and the corporate governance. The effectiveness of actions are investigated regularly in the management review meetings. Senior management ensures that the Integrated Management System conforms to the related and identified requirements.</p>
2.5 Impact Assessments	Conformance	<p>The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for existing or New Projects and for planned Major Changes, specifically related to environment and occupational health and safety. The ISO 14001 and ISO 45001 Management Systems direct the manner in how assessments of environmental aspects and occupational hazards and risks are undertaken. The Entity also has a systematised risk assessment process where it is continually seeking to achieve identification of all possible risks, and mitigation of possible impacts. A comprehensive external Human Rights due diligence and impact assessment in the Para State has been performed and actions on improvement areas addressed. A summary report will be publicly disclosed at a later stage.</p> <p>The Entity has also completed the 'Study of the Quilombola Component (ECQ) of Alto Trombetas II and Boa Vista in Rima' and addresses the Mitigation and Compensatory Measures and Environmental Programs (Item 9) of the EIA.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has a site specific emergency response plan developed in collaboration with potentially affected stakeholder groups, including Local Communities, Workers and their representatives and relevant agencies. The effectiveness of the Emergency Response Plan is verified regularly and trainings are undertaken. Implementation of the Emergency Response Plan is being coordinated by the Workplace Safety and Environment areas, including the Dam Environment Management team.</p>
2.7 Mergers and Acquisitions	Conformance	<p>No mergers and acquisitions have occurred in the last 12 months. The Entity is not planning any mergers or acquisition for the next years, and it is not in the strategic planning. However the Entity has appropriate</p>

CRITERION	RATING	COMMENT
		systems and procedures in place should this ever occur in future.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established corporate processes and procedures to review environmental, social and governance issues related to the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its environmental, social and economic impacts in its 2021 Sustainability Report: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed its 2021 Sustainability Report and annual Management Reports. These reports include any fines, sentences, penalties and significant non-monetary sanctions for non-compliance with applicable legislation. Statements are also disclosed if the Entity's efforts are sufficient and if there are no non-conformities. The Entity publishes information on its website to inform the public and interested parties: <a href="http://www.mrn.com.br">www.mrn.com.br</a>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes, or has made on its behalf, payments to governments on a legal and/or contractual basis. This is disclosed in the Sustainability Report and in the Management Report on page 104: <a href="https://www.mrn.com.br/index.php/en/sustainability">https://www.mrn.com.br/index.php/en/sustainability</a>
3.3b Payments to governments (disclosure - bauxite mining)	Conformance	The Entity has publicly disclosed payments to governments, building on existing audit and assurance systems, with financial information published in the Management Report on the Entity's website: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its Bauxite mining operations. The Entity's complaints channels are publicly disclosed on the website, with the ombudsman channel being the most prominent, where interested parties can register their report: <a href="https://ethicspeakup.com.br/mrnouvidoria">https://ethicspeakup.com.br/mrnouvidoria</a>

CRITERION	RATING	COMMENT
		<p>During visits to communities as part of the audit, it was evident that Local Communities have access to WhatsApp groups, email, telephone, boxes within communities, satisfaction surveys and complaint forms – ‘Fala ai Comunidade’ and the Borealis platform.</p> <p>The Social Complaints Control worksheet demonstrates the dealings and feedback provided to communities which includes: the type of contact, date of complaint, corresponding process, belonging territory or institution, name of the complainant - contact - Description of the problem, action of the treatment, responsible for the treatment, forecast completion date, feedback date, and level of urgency.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity establishes and maintains Life Cycle Assessment (LCA) reports, based on their main processes and products, regarding Bauxite mining activities. The detailed LCA is in accordance with the principles established in ISO 14040 and ISO 14044. The summary report on the LCA studies is available at the Entity’s website:  <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity assesses the Bauxite life cycle impacts and makes ‘cradle-to-gate’ LCA information available to customers and other interested parties.’</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity publishes summary LCA information on the Entity’s website:  <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p> <p>General LCA information is also included in the Sustainability Report:  <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p>
4.2 Product design	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
4.3a Aluminium Process Scrap (targets)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	<p>This Criterion is not applicable to the Entity’s Certification Scope.</p>



CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has disclosed its GHG emissions and energy usage. The data are verified in accordance with the Brazilian GHG Protocol Program and this information is available to the public through the Entity's 2021 Sustainability Report: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
5.2 GHG emissions reductions	Conformance	The Entity has developed and implemented a GHG Emissions Reduction Plan and its Sustainability Goals, which are available on the Entity's website: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented an air emissions monitoring plan and reporting programme which is in accordance with legal authority regulations and meets internal environmental targets. The Entity's Emissions to Air are controlled, mitigated and found to be within compliance limits, as demonstrated by the environmental records.
6.2 Discharges to Water	Conformance	The Entity reports on Discharges to Water in the Sustainability Report and monitors and controls its water discharges as established in the Directive Plan of Sustainability and in accordance with the Entity's water-related targets. The Entity has developed and implemented monitoring plans of the industrial effluent at 18 measurement points, where an average 95% of measurements comply with the VMP (maximum

CRITERION	RATING	COMMENT
		permissible value) as determined by Conama (national environment legal authority).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity operates an appropriate Spills and Leakage control system for all mining operations that may present a risk to environment and neighbouring Communities. In addition, the Entity regularly assesses the major areas where potential Spills or Leakage may occur through the risk assessment process.</p> <p>The Entity has implemented actions to attend to emergencies in each of its structures that fall under the legislation, and has implemented sound alert systems (sirens) in the waste water usage system, together with the Self-Rescue Zones (ZAS) and support to civil defences for preparation of municipal contingency plans.</p> <p>The Entity regularly assesses major risks related to environmental aspects, including potential spills and leakage from the mine production processes. An internal procedure identifies and records the major risk areas in the mining operations.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity manages an appropriate system, which includes internal procedures and external legal communications and recommendations, compliance controls and a monitoring programme to prevent and detect Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented an appropriate system that has adequate procedures in place to manage external communications immediately following an incident..
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has developed and implemented an appropriate system that has adequate procedures in place to manage external communications, including the reporting and disclosure of significant Spills in the Sustainability Report. There were no Spills reported at the Entity during the 2021 - 2022 reporting period.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented a waste management plan and a relevant reporting system. The waste segregation system has been developed and designed in accordance with the Waste Mitigation Hierarchy and the legal requirements and the Directive Plan of Sustainability.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has established a systematic waste management system that controls and monitors the amount of Hazardous and Non-Hazardous Waste

CRITERION	RATING	COMMENT
		generated in its operations. The summary results from the waste management plan are published in the Sustainability Report annually, available on the Entity's website: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
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.
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 a documented Water Management Plan as part of the Environmental Management

CRITERION	RATING	COMMENT
		<p>System and the results of the monitoring programme are reported in the 2021 Sustainability Report, issued in September 2022, available on the Entity's website: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p> <p>The Entity maintains a procedure 'Waste Disposal System and Valuation of Fines Revision of the Operation Manual of the Mine and Port of Trombetas dams' and also the procedure 'Risks - Management Manual of Risks'.</p> <p>Licenses and water consumption (output) monitoring data are maintained for the following six sampling points: Trombetas River, Igarapé Saracá, Saracazinho, Saracazinho/Almeidas, Agarapé and Monto Branco. Monitoring data for 2022 has been collected.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has implemented a Water Usage and Water Monitoring System, which is in compliance with the ASI Performance Standard. The Entity has implemented operational control procedures to reduce water-related risks, such as recirculating water in the beneficiation process and prioritising water sources.</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has established and implemented a water management plan that includes actions and controls, which are also documented in the Entity's risk analysis records.</p> <p>The Entity has established the internal procedure in the Tailing Water System Management Manual. This procedure demonstrates the overall operations controls of the reservoirs for the management and control of the excess water during the rainy season. This procedure has the main objective of establishing operating rules to ensure the safety of MRN's discharge water system, by managing excess water during the wet season.</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity has established and implemented a water management plan and these results are communicated to the environmental authorities, and the monitoring of KPI targets are published in the 2021 Sustainability Report: <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity reports water withdrawal and use and discloses material water-related risks in the 2021 Sustainability Report:</p>

CRITERION	RATING	COMMENT
		<a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity assesses the risks and materiality of the impacts on biodiversity from the land use and activities of mine operations in its Area of Influence as defined by the environmental authorities.</p> <p>The Entity also conducts environmental biological studies and diversity monitoring programs, taking account biological groups including flora, fauna, herpetofauna, avifauna, and mammal fauna, which included primates.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has implemented a Biodiversity Management Programme, with fauna and flora monitoring programs, including time-bound targets to address material impacts of its Bauxite mining operations. The Programme includes a wild fauna management plan, road and corridor monitoring program, environmental education programs for both the community and employees, a flora program including an invasive species program, and revegetation program.</p> <p>The Entity has implemented programs related to fauna and flora rescue activities during their routine operations. Prior to commencing the removal of forest vegetation, fauna is rescued and released to other forest area. In this step, information previously collected and recorded in the species inventory is used to determine a suitable new habitat.</p> <p>The Entity has established and manages the Wild Animal Screening Centre (CETAS), managed by a multidisciplinary team composed of biologists and veterinarians and that receives, rehabilitates and returns to nature, fauna rescued from the bauxite mining areas.</p> <p>Plant species are collected before and during clearing of new mine areas. An inventory of existing species in the area to be mined is undertaken so that reforestation can occur later by recomposing the forest with these species.</p> <p>Biodiversity outcomes are shared with stakeholders and made publicly available in the Entity's 2021 Sustainability Report.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has established its Biodiversity Action Plan in accordance with the Biodiversity Mitigation Hierarchy. The Entity assesses the risk and materiality of the impacts on biodiversity from the</p>

CRITERION	RATING	COMMENT
		land use and activities in its area of bauxite mine operations and local geographic influence as defined by the environmental authorities. The biodiversity impacts pertaining to land clearing and other mining-related activities, such as transport to and from the mine within the exploration license, are included into the environmental license scope.
8.2c Biodiversity management (reporting)	Conformance	The Entity publicly discloses the biodiversity assessment results in the 2021 Sustainability Report, issued in 2022, available at the Entity's website: <a href="https://mrn.com.br/index.php/pt/sustentabilidade">https://mrn.com.br/index.php/pt/sustentabilidade</a>
8.3 Alien Species	Conformance	<p>The Entity is committed to biodiversity programs and to not use exotic or invasive species in its facilities and operations. Internal procedures address the requirement to proactively assess and prevent the accidental or deliberate entry of Alien Species that may have a significant adverse impact on the biodiversity.</p> <p>Alien Species are continuously monitored through periodic checks, as outlined in the monitoring plan required by the ISO 14001 Environmental Management System. Formalizing the assessment of risks related to biodiversity is effective. The likelihood of the introduction of new alien species, in addition to existing species, that could have significant adverse or negative impacts on biodiversity is low.</p>
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Conformance	The Entity has made a commitment to not explore or operate in World Heritage properties and to ensure that any future operations near or adjacent to World Heritage properties are not incompatible with their Corporate Sustainability Policy and/or natural values.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Conformance	At present, the Entity's mine is not located in World Heritage properties.
8.5a Mine rehabilitation (best available techniques)	Conformance	<p>The Entity's Mine Rehabilitation Plan is adequate and is fully documented. The process was verified and well implemented. The plan includes seedling and planting programs using native tree species, and the preparation of soil and other growth media (including black earth and organic forest residues). The Degraded Area Recovery Program in 2022 delivered the production of 568,000 seedlings across 95 species of the Amazon biome, for the recovery of 382 hectares of degraded areas.</p> <p>The Entity captures monitoring data related to reforestation, area preparation and hydroseeding</p>

CRITERION	RATING	COMMENT
		(hidrossemeadura) monthly and this data are also presented in the GDP Monthly Production Closing Report prepared by the Production, Planning and Control Department.
8.5b Mine rehabilitation (financial provisions)	Conformance	<p>The Entity has established adequate resources to meet rehabilitation and mine closure requirements, according to the Master Environmental Plan and annual budget.</p> <p>Financial provisions are updated annually and in response to a review of the MRN Nursery requirements, monitoring data and Monthly Production Closure Reports, which are prepared by the Production, Planning and Control Department.</p>
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has established a Human Rights Policy and a Human Rights Due Diligence process, addressed through the Code of Conduct and a baseline risk assessment, in accordance to its Integrated Management System. A continuous management process has been implemented, with the aim of meeting its demands and responsibility to respect Human Rights, which is the responsibility of the Strategic Management and Risk Management, Compliance Management and Community Relations Management departments. The Entity has developed and disseminated a Human Rights guidance document that addresses good practices as well as sensitive aspects that may infringe human dignity. A process of interviews with interested parties is undertaken as part of internal audits, seeking to identify sensitive aspects and areas for improvement so that the Entity can give due treatment in the context of integrity and transparency of relationships and as good human rights practices. These interviews address all issues of diversity and inclusion, women's rights and discrimination. In situations where the Entity finds that it has caused or contributed to adverse impacts on Human Rights, it will proceed in accordance with the "consequences of violation" item in the Entity's Code of Conduct.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has established a Human Rights Due Diligence process, addressed through the Code of Conduct and a baseline risk assessment, in accordance to its Integrated Management System. The Entity has undertaken a broad study on compliance in Human Rights, involving all stakeholders mapped and identified in its integrated</p>

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		<p>Policy, with information on the perception of the Entity from the employees and their family members , representatives of companies hired by the Entity, employees of the School and/or Hospital and members of traditional communities (Quilombolas and riverine communities). The interviews focus on environmental, governance and human rights issues.</p>
<p>9.1c Human Rights Due Diligence (remediation)</p>	<p>Conformance</p>	<p>The Entity takes remediation actions if needed, through legitimate processes which are prescribed in the Human Rights Policy. These processes assess, prevent and repair potential adverse impacts on Human Rights.</p> <p>The internal Code of Conduct and Human Rights Policy procedure provide the framework and methodologies to provide or collaborate with the due reparation of the affected parties, through legitimate processes, when necessary and applicable, as stated in the Entity's Integrated Management System Manual.</p>
<p>9.2 Women's Rights</p>	<p>Conformance</p>	<p>The Entity has implemented Policies and processes to ensure respect for the rights and interests of Women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Entity's commitment to respecting women's rights is made clear through its Code of Conduct and through the 'Harassment Prevention Guide on Moral and Sexual, Bullying, Gender Discrimination and Ethnic-Race Prejudice'.</p> <p>The Entity's Code of Conduct clearly affirms gender equality and is working to increase women's participation in the labour market, via the Entity's 'For Everyone Program' (MRN Programa para Todos), which can be accessed through the website: <a href="https://mrn.com.br/index.php/pt/pessoas-e-carreiras/nossa-cultura">https://mrn.com.br/index.php/pt/pessoas-e-carreiras/nossa-cultura</a></p> <p>The Entity adheres to Brazilian labour standards, which with regard to women's rights, must comply with issues such as the right to maternity leave (natural or adopted), rest in cases of spontaneous abortion, breastfeeding breaks, absence for the pregnant woman's medical appointment, change of function and stability during the pregnancy period, prohibition of the requirement of examination for pregnancy or sterility, among other women's rights. The Entity is a signatory of the 'Brazil Woman in Mining Movement', which endorse the policy for a program of management of women's participation in the company's leadership and operational positions.</p>



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9.3 Indigenous Peoples	Conformance	<p>The Entity has implemented Policies and processes to respect the rights and interests of Indigenous Peoples. The Entity has undertaken an Indigenous Peoples specific risk assessment which identified the loss of the social licence and collision of boats in the Trombetas River as two potentially significant risks. Both these scenarios were identified as potential and inherent risks as part of the Entity's recent risk assessment update. No such incidents have occurred under the Entity's current management. As part of the audit, records were reviewed of relationship information with the community on the Igarapé de Água Fria, with upstream and downstream monitoring, close to the Boa Vista community. There are no differences in water quality in the community of Boa Vista.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity has conducted Environmental Impact studies, prepared Environmental Impact Assessment reports and has internal procedures for New Projects to address the potential impacts for Indigenous Peoples, which also includes consulting affected parties, prior to new mining projects. The Entity's Community Relationship Manual, Human Rights Guidelines, EIA RIMA and meeting minutes confirm that several Indigenous Peoples representatives are regularly consulted and engaged on FPIC. In cases where FPIC is regulated by national legislation, consultation occurs with the participation of the Brazilian Government, through the National Institute of Colonization and Agrarian Reform (INCRA) and also recently via the Palmares Cultural Foundation (FCP). For Quilombolas people and other traditional communities, engagement is undertaken directly and in an ongoing manner, through formalized and scheduled engagements. These engagements are typically issue-specific (e.g. mine dam safety), but can also take place more informally, subject to discussions on issues raised by community leaders.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity uses internal procedures and mapping records of cultural and sacred heritage sites in the Entity's Area of Influence, and has determined that there are no cultural and sacred heritage sites. The Entity undertakes, through its integrated Policy, research prior to any exploration and communicates the results concerning cultural and sacred heritage sites.</p>

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9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity's historical data and its strategic plan for future Bauxite mining areas shows that no Resettlement is required for the bauxite mine prior to 2026. There has been no resettlement associated with the Entity's current management. Potential future resettlement risks are identified and monitored in conjunction with local and national agencies (including Fundação Cultural Palmares, INCRA, ICMBio and IBAMA).</p> <p>When designing projects, the Entity will consider viable alternatives to prevent or minimise physical and/or economic displacement, while balancing costs and benefits environmental, social and financial, paying special attention to impacts on the less fortunate and vulnerable, including women.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>The Entity's historical data and its strategic plan for future Bauxite mining areas shows that no resettlement is required for the bauxite mine prior to 2026.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity undertakes impact assessments and consultation processes, which address the rights and customs of Local Communities. The Entity's recent impact assessments confirms that it respects the legal and traditional rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. The Entity has implemented internal training and awareness programmes to enable employees to better interact with Local Communities.</p> <p>The Entity respects the rights, culture, customs and interests of communities that interface with the company, taking the appropriate measures to prevent and repair any adverse impacts resulting from its activities, as detailed in the documented procedures concerning the communities and the information obtained by the Human Rights Due Diligence Survey (Relatório de Due Diligence - Direitos Humanos).</p> <p>The Entity has mapped the Local Communities and Quilombola territories directly and indirectly impacted by the mining activity in the region, which includes the Quilombola territories of Boa Vista, Alto Trombetas I, Alto Trombetas II, Middle Trombetas, Lake Sapucuá and Lake Maria Pixi. This map is controlled by the Community Relations area..</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has developed and manages several programs to continuously explore opportunities to respect and support livelihoods of the Local</p>

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		<p>Communities. Strategic goals have been developed to support different activities, such as contributing to quality education, environmental education, quality life improvement and Local Communities business opportunities. Further information is available in the 2021 Sustainability Report :  <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p> <p>Long-term programs and projects are managed and sponsored by the Entity, with established performance indicators. The Entity acts with respect to the legal and customary rights and interests of the local communities in their lands, means of subsistence and use of natural resources, as demonstrated by the results presented in the Human Rights Due Diligence report. The Entity determines and implements measures to prevent and address any adverse impacts on the livelihoods of the local community resulting from its operational bauxite mining activities.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has several programs to continuously explore opportunities to respect and support livelihoods of the Local Communities. The Entity has developed a corporate social responsibility program that facilitates engagement between the Entity and stakeholders in the Local Community. This program is summarised in the 2021 Sustainability Report:  <a href="https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios">https://mrn.com.br/index.php/pt/quem-somos/nossos-relatorios</a></p> <p>The Entity has mapped all Local Communities and Quilombola territories directly and indirectly impacted by the mining activity in the region. These communities include the Quilombola territories of Boa Vista, Alto Trombetas I, Alto Trombetas II, Middle Trombetas, Lake Sapucua and Lake Maria Pixi.</p> <p>Social programs have been developed by the Entity and include (but not limited to) the following:</p> <ul style="list-style-type: none"> <li>- Program of Social and Environmental Education Project</li> <li>- Meliponiculture Support (bee and honey husbandry)</li> <li>- Support to Agro-Forestry Systems</li> <li>- Support to Family Farming</li> <li>- Project Support for Fish Farming (aquaculture fish farming)</li> <li>- Project Support for Microsystems and Artesian Wells</li> <li>- Project Fighting Malaria</li> <li>- Project Quilombo.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>- Project "Pé de Pincha" (Pincha Foot)</li> <li>- Management of Copaíbas Trees</li> <li>- Program of Environmental Education</li> <li>- Program of Environmental and Heritage Education</li> <li>- Program Chelonians (Fresh water turtles) on Rio Trombetas</li> <li>- Program Support for Basic Education</li> <li>- Program Support to Higher Education.</li> </ul>
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High Risk Areas. The Entity's Human Rights Policy does not permit any kind of Human Rights abuses. The Entity has undertaken campaigns and prevention actions in order to maintain the commitment to never to engage or contribute - directly or indirectly - to armed conflicts or human rights abuses in high-risk and conflict-affected areas.
9.9 Security practice	Conformance	The Entity demands respect for Human Rights, in line with standards and good practices. Operating practices are clear and well defined in contracts and security workers are trained in accordance with the best practices and overall corporate Entity policies and guidelines for respecting human rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The agreement with the Entity's Workers and their Union is in accordance with Brazil's current labour legislation (CLT), and with ILO conventions. The Entity has established and implemented the Employee Integration Program, which is communicated to employees at the commencement of employment.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has established procedures, contracts and documents relevant to human resource issues, including the Recruitment and Selection Standard procedure and the Labour Relationship Guide. The recognition of the principle of Freedom of Association and the right to join employee organizations is outlined in these procedures. Collective Bargaining agreements are implemented.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Freedom of Association or Collective Bargaining is not limited by Applicable Law.
10.2a Child Labour (minimum age)	Conformance	The Entity has established and implemented the internal Recruitment and Selection Standard and the

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		Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and does not employ children below the age of 15.
10.2b Child Labour (hazardous)	Conformance	The Entity has established and implemented the internal Recruitment and Selection Standard and the Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and does not employ children below the age of 15.
10.2c Child Labour (worst forms)	Conformance	The Entity has established and implemented the internal Recruitment and Selection Standard and the Labour Relationship Guide. These procedures clearly prescribe that the Entity does not accept Child Labour and does not employ children below the age of 15.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct restricts all Forced Labour. The Entity follows the provisions of Conventions 29 and 105 of the International Labour Organization (ILO), together with Protocol P29 (2014) of the Convention 29 and complies with labour legislation and the National Penal Code. This commitment is stated in the Entity's Integrated Management System Manual.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for an organization in Brazil to practice Forced Labour. No Forced Labour incidents were observed at the Entity. No deposits or recruitment fees are required by the Entity. The Entity follows the policies and procedures that state the commitment and approach to forced or compulsory labour, as stated in the Code of Conduct and the Employee Integration Program.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organisation in Brazil to practice Forced Labour. No incidents were found at the Entity's site concerning migrant Workers being required to lodge deposits or security payments.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. No incidents were found at the Entity's site concerning holding Workers in debt bondage.

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10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. According the Entity's Labour Policy, Brazil's Labour Laws and the Union Workers agreement, all the Entity's Workers are free to leave the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. No original identity papers are kept by the Entity, only copies are on file.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Code of Conduct prohibits the illegal practice of Forced Labour. It is illegal for any organization in Brazil to practice Forced Labour. All the Entity's Workers are free to terminate their employment at any time without penalty, provided notice of reasonable length is offered. No incidents were found at the Entity.
10.4 Non-Discrimination	Conformance	<p>The Entity has developed, implemented and maintained systems, Policies and procedures related to Non-Discrimination, as defined in its Code of Conduct. No Discrimination was observed during the audit and interviews at the Entity.</p> <p>The Entity's Code of Conduct states that equal opportunities are guaranteed by the Entity and that the company does not get involved or support any type of discrimination or prejudice in any situation; including hiring, salary, promotion, training, advancement or termination opportunities for any worker; based on gender, expression or gender identity, sexual orientation, race, ethnicity, national or social origin, religion, disability (capacitation), political affiliation, marital status, family responsibilities, age or any other condition that may give rise to Discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity's communication and engagement process is appropriate. An employee survey is undertaken regularly.</p> <p>For matters relating to labour issues, Human Resources Management is qualified to assist and respond to any demands on the subject and the Entity guarantees the right of Workers to seek information on unions, representation bodies and councils.</p> <p>It was evidenced that any individual that wishes to report a suspected case or misconduct can use the MRN Ombudsman Channel (ouvidoria), available on</p>

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		the Entity's website. A report can also be made via a toll free number or e-mail, or made in-person to the Ombudsman team in the Compliance and Governance area.
10.6 Disciplinary practices	Conformance	<p>The Entity has established and implemented Policies and procedures to ensure no disciplinary practices will occur. No incidents of mental or physical punishment were observed at the Entity during the audit.</p> <p>In accordance to the Entity's corporate policy, the Entity does not engage in, nor tolerates the use of corporal punishment, mental or physical coercion, humiliation, psychological pressure, , embarrassment, "stress management", bullying and violence of any kind, including sexual harassment or verbal abuse of Workers.</p>
10.7a Remuneration (living wage)	Conformance	The Entity has established Policies and procedures including methodologies on remuneration of Workers, including payments, Overtime and deductions.
10.7b Remuneration (method of payment)	Conformance	The Entity's payments of wages are conducted monthly in a punctual manner. All Workers receive payslips with payment details.
10.8 Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time. The Entity applies different shift models and all working hours are registered.</p> <p>The Entity has established a 'Collective Labor Agreement Relating to Shifts, Days and Hours Negotiated' with the Union (sindicato).</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Occupational Health and Safety (OHS) Policy is established. The Entity has implemented a local, integrated Policy covering health and safety and the Management System is ISO 45001 certified.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's integrated Policy on Health, Safety and Environment is communicated via a number of methods including the Entity's website, visually on boards and through training and contracts with external stakeholders.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's integrated Policy addressing Health and Safety has a commitment to comply with all Applicable Laws.

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11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's integrated Policy on Health, Safety and Environment addresses the rights of Workers to refuse or stop unsafe work. The Policy contains a commitment to comply with all Applicable Labour Laws.
11.2 OH&S Management System	Conformance	The Entity has implemented and maintains an Occupational Health and Safety (OH&S) Management System, and is certified to ISO 45001. This includes and demonstrates continual improvement of OH&S performance, the fulfilment of legal requirements and the achievement of OH&S objectives.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a mechanism to raise, discuss and participate in the resolution of Occupational Health and Safety issues.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and various KPI's are addressed on Occupational Health and Safety. The Entity has several tools for evaluating performance and continuous improvement and the Management System is certified to ISO 45001.

#### **Document Control and Version History**

Revision	Date	Notes
0	17 January 2022	Initial Certification Audit – Full Certification
1	28 February 2022	Incorporates further context and clarification provided by Lead Auditor into specific Public Headline Statements for Criteria 2.3b, 8.5a, 8.5b, 9.3, 9.4, 9.6a and 9.7a.
2	6 March 2023	Surveillance Audit