

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Mineradora Santo Expedito

CERTIFICATE NUMBER
446

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**BUREAU VERITAS
CERTIFICATION**

DATE OF ISSUE
21 MARCH 2025

DATE OF EXPIRY
20 MARCH 2028

CERTIFIED SINCE
21 MARCH 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

The planning, mining, transport and
dry processing of Bauxite at
Mineradora Santo Expedito (MSE) in
Barro Alto, Goiás, Brazil.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------------|--|
| MEMBER NAME | Mineradora Santo Expedito LTDA. |
| ENTITY NAME | Mineradora Santo Expedito |
| CERTIFICATION SCOPE | The planning, mining, transport and dry processing of Bauxite at Mineradora Santo Expedito (MSE) in Barro Alto, Goiás, Brazil. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">Bauxite Mining |
| ASI STANDARD | Performance Standard V3 |
| AUDIT TYPE | <ul style="list-style-type: none">Initial Certification Audit |
| AUDIT FIRM | Bureau Veritas Certification |
| AUDIT DATE | <ul style="list-style-type: none">16 – 20 December 2024 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">4 February 2025 |
| AUDIT SCOPE | <p>The Audit Scope includes the planning, mining, transport, processing of Bauxite at Mineradora Santo Expedito (MSE) in Barro Alto, Goiás, Brazil.</p> <p>The Supply Chain Activities included in the Audit Scope:</p> <ul style="list-style-type: none">Bauxite Mining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> |
| AUDIT OUTCOME | <ul style="list-style-type: none">Certification |
| AUDIT METHODOLOGY DECLARATION | <p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective. |
| CERTIFICATION PERIOD | 21 March 2025 - 20 March 2028 |
| NEXT AUDIT TYPE | Surveillance Audit |

NEXT AUDIT DATE 20 March 2026

CERTIFICATE NUMBER 446



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EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Mineradora Santo Expedito (MSE) (the 'Entity') began its operations in 2013 in the rural area of Barro Alto, Goiás, Brazil, managing a 122 hectares area. The Entity specialises in the extraction and dry processing of high-quality Bauxite, with an annual production over 650,000 tonnes, serving both domestic and international metallurgical and industrial markets.

The Facility has crushers, vibrating screens, ore classifiers, and multiple storage yards. It is supported by extensive infrastructure, such as maintenance workshops, laboratories, warehouses, and a nursery for native seedlings, as well as a diverse array of mining and processing machinery and equipment. The operation employs 60 Workers, including 10 women.

The Entity is located near the micro-watersheds of the Gaiola and Inferninho streams, rural properties and other mining companies such as Anglo American and Companhia Brasileira de Alumínio (CBA). The Entity's area is about three hours away from the capital Brasília and surrounded by other mining sites and farming land. It is free of settlements, traditional communities, cultural landmarks, significant bodies of water, environmental protection areas, natural reserves, and other relevant biodiversity features.

The Entity operates collaboratively in the Bauxite mining operations in Barro Alto and shares the facilities and teams of professionals with the Terra Goyana Mineradora company, also an ASI Member.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

| | GOVERNANCE | ENVIRONMENT | SOCIAL | COMBINED RATING |
|--------------------|---------------|-------------|--------|-----------------|
| SYSTEMS | Medium | Medium | Medium | MEDIUM |
| RISKS | Medium | Medium | Medium | MEDIUM |
| PERFORMANCE | Medium | Medium | Medium | MEDIUM |
| OVERALL | MEDIUM | | | |

FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| 1. BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity monitors its legal requirements through the GreenLegis legal compliance platform, which constantly monitors its Compliance and updates on legal requirements. These documents show that the Entity can access the legal requirements to which it is subject at all stages of the mining operation. |
| 1.2 Anti-Corruption | Conformance | The Entity's Anti-Corruption Policy is implemented, establishing the guidelines and means to combat Bribery, extortion, and all other forms of Corruption according to Brazilian legislation and international standards. The Policy is available at: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-_UzYgd |
| 1.3a-e Code of Conduct | Conformance | The Entity's Code of Ethics and Conduct is available on the company website to all interested parties. The Entity's Documented Information Procedure establishes that all documents included in the Integrated Management System, including the Code of Ethics and Conduct presented, must be reviewed every two years in the event of any changes in the company that alter Material environmental, social, and governance risks. https://drive.google.com/drive/folders/1C5QcU6L0ly2xXvP_EDxCKtIpMu26ebuo |
| 2. POLICY AND MANAGEMENT | | |
| 2.1a-f Environmental, Social, and Governance Policy | Conformance | The Entity's Environmental, Social, and Governance Responsibility has been formally approved by management, documented, and communicated to all direct employees, contractors, and the public through the website, meetings, and the Entity's digital channels. The Environmental Policy (Politica de Ambiental das Mineradoras), Social Responsibility Policy (Politica de Responsabilidade Social das Mineradoras) and Governance Policy (Politica de Governance das Mineradoras) are available at: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-_UzYgd |
| 2.2a-c Leadership | Conformance | The Entity's senior management has demonstrated leadership and commitment to the Integrated Management System and appointed a Management Representative. This role has the authority to implement, communicate and guarantee all requirements, standards and procedures linked to the implementation of the ASI Performance Standard, including Environmental, Social and Governance Policies. |
| 2.3a Environmental and Social Management Systems - Environmental | Conformance | The Entity's Integrated Management System (IMS) is structured to improve performance through the implementation of environmental management requirements based on the ISO 14001 standard and the ESG principles of the ASI Performance Standard. |
| 2.3b Environmental and Social Management Systems - Social | Conformance | The Entity has implemented a Social Management System which is integrated with its IMS. Whilst the System is still maturing, it has all the |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| | | basic requirements addressed and the Entity has implemented a continuous improvement cycle. |
| 2.4a-e Responsible Sourcing | Conformance | The Entity has established a Responsible Sourcing Policy, which has been communicated to all suppliers. The Responsible Sourcing Policy establishes the main guidelines for the Entity, its suppliers and other Stakeholders and is available at: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-UzYgd |
| 2.5a-g Environmental and Social Impact Assessments | Not Applicable | This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects since the Entity joined ASI. Regardless, the Entity has conducted environmental, social, cultural, and Human Rights Impact Assessments, including gender analysis, and has a process in place to ensure Impact Assessments are undertaken for New Projects and planned Major Changes. https://drive.google.com/drive/folders/1sjYY4K5iysBEveFNLOniFjBwJvtSGCRg |
| 2.6a-h Human Rights Impact Assessment | Not Applicable | This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects since the Entity joined ASI. Regardless, the Entity has implemented documented procedures to identify and assess Human Rights and business ethics risks, establishing control measures based on the ASI Performance Standard and relevant legal requirements. The Human Rights Impact Assessment report and management plans are publicly available at: https://drive.google.com/drive/folders/1sjYY4K5iysBEveFNLOniFjBwJvtSGCRg |
| 2.7a-f Emergency Response Plan | Conformance | The Entity has developed and implemented Emergency Response Plans as part of its management processes. These plans include controls for mitigating impacts on people, the environment, and assets and are coordinated by the Occupational Safety and Environment departments. https://drive.google.com/drive/folders/19ArKkBMFzNVKoH5jJwKujhr0CKOxdc0F |
| 2.8a-d Suspended Operations | Conformance | The Entity has developed a Resilience Plan for a potential operational suspension. The plan aims to ensure the Entity's ability to respond to operational suspensions while minimising economic, social, and environmental impacts. |
| 2.9a-b Mergers and Acquisitions | Conformance | There are no planned mergers or acquisitions at present. However, senior management has committed to conducting Due Diligence for any future mergers or acquisitions, ensuring conformance with the environmental, social, and governance practices outlined in the ASI Performance Standard. |
| 2.10a-b Closure, Decommissioning and Divestment | Conformance | The Entity has established a planning process for the closure, decommissioning, or divestment of operations based on ongoing assessment, identification, and mitigation of risks, as per the assessment of identified impacts. Mine Closure Plans are reviewed and updated every five years or in the event of a significant change that impacts the Management System's structure, alters the Entity's Material environmental, social, and governance risks, or indicates any control gaps. |

| CRITERION | RATING | COMMENT |
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| 3. TRANSPARENCY | | |
| 3.1a-b Sustainability Reporting | Conformance | The Entity's Sustainability Report is presented to Stakeholders through meetings, training, and awareness programs and is available at: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU |
| 3.2 Non-compliance and Liabilities | Conformance | The Entity discloses in its Sustainability Report if there are any significant fines, sentences, penalties, and non-monetary sanctions for non-compliance with Applicable Law. |
| 3.3a-c Payments to Governments | Conformance | The Entity only makes payments to governments on legal and/or contractual bases. To guarantee this compliance, external audits are undertaken. The Entity's financial information is publicly disclosed in the Sustainability Report: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | The Entity has its own 'whistleblower' channel, 'Ethics Line', which is publicised among its employees, contractors, neighbouring Communities, and other Stakeholders through training and on its website. https://www.terragoyana.com.br/ The whistleblower channel is available at: https://app.denouncefy.com/portal/bautek |
| 4. MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment | Conformance | The Entity has conducted a Life Cycle Assessment (LCA) of the impacts of its Products, which will be provided to customers and other interested parties upon request. |
| 4.1b-c Environmental Life Cycle Assessment - Disclosure | Conformance | The Entity has publicly disclosed its LCA Report and offers 'cradle-to-gate' LCA data for its Products. The Entity's LCA results are provided to customers and other interested parties upon request, as presented on its website: https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQyAKWfPyJgKK |
| 4.2 Product Design | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.3a-b Aluminium Process Scrap | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.4d Collection and Recycling of Products at End of Life | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| CRITERION | RATING | COMMENT |
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| 5. GREENHOUSE GAS EMISSIONS | | |
| 5.1a-b Disclosure of GHG Emissions and Energy Use | Conformance | <p>The Entity has disclosed its Greenhouse Gas (GHG) Emissions and energy usage data. It has only two energy sources, grid energy and diesel, which directly power generators and machines. The GHG Emissions data has been verified by a Third Party in accordance with ISO 14064 and GHG Protocol Brazil standards.</p> <p>For further information, please see: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQTyAKWfPyJgKK https://drive.google.com/drive/folders/10bRyu_2_85eJhVyJPTpUGfB_yss9TtK7</p> |
| 5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020 | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3a-e GHG Emissions Reduction Plans | Conformance | <p>The Entity has developed and implemented a GHG Emissions Reduction Plan based on its 2022 data, including Scopes 1, 2, and 3, which define short, medium, and long-term targets. The Entity has utilised the reduction plan proposed by the International Aluminium Institute (IAI) and the ASI Performance Standard. The Entity's sustainability goals are available in its Sustainability Report and GHG Reduction Plan.</p> <p>GHG Reduction Plan: https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQTyAKWfPyJgK</p> <p>Combined GHG Report, page 9: https://drive.google.com/drive/folders/10bRyu_2_85eJhVyJPTpUGfB_yss9TtK7</p> |
| 5.4 GHG Emissions Management | Conformance | The Entity has recently implemented its GHG Emission reduction Policies, targets, and implementation guidelines. Although its GHG Emission reduction protocols are still maturing, the plan and its management are well structured. |
| 6. EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1a-f Emissions to Air | Conformance | <p>The Entity has implemented an Emissions to Air monitoring plan and reporting program governed by legal authority regulations and internally by company environmental targets. As demonstrated by the environmental records, its air emissions are controlled, mitigated, and found to be within compliance limits.</p> <p>https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU</p> |

| CRITERION | RATING | COMMENT |
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| 6.2a-g Discharges to Water | Conformance | The Entity quantifies and reports its Discharges to Water, which may adversely affect humans and the environment. It has implemented management plans to reduce adverse impacts as verified in the inventory and reduction targets established annually in the Sustainability Report: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU |
| 6.3a-g Assessment and Management of Spills and Leakages | Conformance | The Entity has implemented an Environmental Management System to address Spills and Leakages, including chemical discharges into water. A risk assessment has been undertaken, and the results are communicated through the Entity's Management System: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU https://drive.google.com/drive/folders/19ArKkBMFzNVKoH5jJwKujhr0CKOxdc0F |
| 6.4a-b Public Disclosure of Spills and Leakages | Conformance | The Entity makes public disclosures on Spills and Leakages in its annual Sustainability Report, page 67: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU |
| 6.5a-c Waste Management and Reporting | Conformance | The Entity collects, segregates, and suitably stores its Hazardous and Non-Hazardous Wastes. According to legal requirements, all Waste is linked to documentation, such as an internal gate pass for internal Waste processing or a manifest for disposal by an external agency. The Entity has developed a Waste Management Plan focusing on Waste efficiency, recovery, waste reduction at source, and prevention of landfilling. Data on Hazardous and Non-Hazardous Waste quantities are disclosed in the Sustainability Report, page 61: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU |
| 6.6a-g Bauxite Residue | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7a-f Spent Pot Lining (SPL) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8a-d Dross | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 7. WATER STEWARDSHIP | | |
| 7.1a-b Water Assessment and Disclosure | Conformance | The Entity has a Water Management Plan documented as part of its Environmental Management System, and the results of the monitoring program are reported in the Entity's Sustainability Report: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQtyAKWfPyJgKK |
| 7.2a-e Water Management | Conformance | The Entity has established and implemented a Water Management Plan, and these results are communicated to the environmental authorities, which are published in the Entity's Sustainability Report: |

| CRITERION | RATING | COMMENT |
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| | | https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU https://drive.google.com/drive/folders/19ArKkBMFzNVKoH5jJwKujhr0CKOxdc0F |
| 8. BIODIVERSITY AND ECOSYSTEM SERVICES | | |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment | Conformance | <p>The Entity has assessed the risks and Materiality of the impacts on Biodiversity and Ecosystem Services from the land use and activities of mine operations in its Area of Influence as defined by the environmental authorities. The Entity's Area of Influence was an agricultural land use in the 1950s, and then surrounded by other mining companies in the 1980s. When the Entity was established in 2013 the area was already highly anthropized.</p> <p>Although the Risks and Impacts of the current Entity's operations were deemed low, the Entity has established the necessary measures to avoid further risks and impacts on the original "Cerrado" ecosystem.</p> |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Not Applicable | <p>This Criterion is not applicable to the Entity, as the Biodiversity and Ecosystem Services Risk and Impact Assessment has deemed the risks low. Nonetheless, the Entity has developed a Biodiversity and Ecosystem Services Management Program, which maps the potential risks and impacts that the Entity's operations may cause to Biodiversity and Ecosystem Services and actions to prevent, mitigate, or offset such impacts. The Biodiversity and Ecosystem Services Management Program is divided into actions, and involved consultation with Stakeholders. The results of the fauna monitoring campaigns carried out in 2023, as well as the cumulative data, can be found in the Entity's Sustainability Report, available at:</p> <p>https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU</p> |
| 8.2a-g Biodiversity Management | Conformance | <p>The Biodiversity and Ecosystem Services Action Plan integrates actions to protect Biodiversity in mining operations and aims to guide the Entity's practices to align with best environmental practices and current regulations. The Plan (Programa de Biodiversidade e Servicos Ecosistemicos) contains the defined actions and associated goals, and was developed in consultation with Stakeholders, available at:</p> <p>https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQtyAKWfPyJgKK</p> |
| 8.3a-c Management of Priority Ecosystem Services | Not Applicable | <p>This Criterion is not applicable to the Entity, as the Biodiversity Risk Assessment determined the risks as low. However, the Entity has developed an Ecosystem Services Action Plan that integrates actions to protect biodiversity in mining operations and aims to guide the Entity's practices to align with best environmental practices and current regulations.</p> |
| 8.4 Alien Species | Conformance | <p>The Entity has implemented measures to prevent the introduction of Alien Species. The plan, developed in consultation with Stakeholders, is available on the company's website.</p> |
| 8.5a-b Commitment to "No Go" in World Heritage Properties | Conformance | <p>The Entity is committed to the "No Go" principle in World Heritage Properties and has developed relevant Policies in support of it. There</p> |

| CRITERION | RATING | COMMENT |
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| | | are no future expansion plans that will negatively impact World Heritage Properties. |
| 8.6a-d Protected Areas | Conformance | The Entity has established the Standard Operating Procedure for Protected Areas, which aims to establish the essential guidelines for monitoring and controlling Protected Areas in mining operations. However, the Entity is not within the vicinity of Protected Areas. |
| 8.6e Protected Areas - Bauxite Mining | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 8.7a-i Mine Rehabilitation | Conformance | <p>The Entity has established adequate resources to meet the needs of Mine Rehabilitation and closure in accordance with the Mine Closure Plan and the Degraded Areas Recovery Plan (PRAD), which also aligns with the Standard Operating Procedure on Erosion Control and Recovery of Degraded and Anthropized Areas.</p> <p>As the mine's useful life is at least 100 years, consultation on the Plan will occur closer to the execution phase. The Entity is currently undertaking rehabilitation of some areas with the aim of identifying the best methodology to be applied for large-scale rehabilitation. Rehabilitation reporting is provided to the environmental regulatory agency periodically and included in the Sustainability Report: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU</p> |
| 9. HUMAN RIGHTS | | |
| 9.1a-d Human Rights Due Diligence | Conformance | <p>The Entity has established a Human Rights Due Diligence process, addressed through the Code of Conduct and a baseline risk assessment, by its Integrated Management System Policy. It has also implemented a gender-responsive Human Rights Policy committing to respect Human Rights in all its activities: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-_UzYgd</p> |
| 9.2a-e Gender Equity and Women's Empowerment | Conformance | <p>The Entity has implemented a women's empowerment program, 'ELAS', which promotes gender equality in mining companies through a more inclusive work environment and fair opportunities. The ELAS Program adopts practices such as neutral job descriptions, diversity in selection, training on unconscious bias, and mentoring to strengthen female leadership. In addition, the program aligns with Entity's Policies, reinforcing actions against Discrimination and promoting community engagement, ensuring the sustainability and transparency of gender equality initiatives. The Entity is committed to equal opportunities and reaffirms its compliance with Human Rights in its Code of Conduct, which is accessible at: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-_UzYgd</p> |
| 9.3a-i Indigenous Peoples | Not Applicable | There are no identified Indigenous peoples in the Entity's Area of Influence. However, the Entity recognises the existence of the Quilombola community in the municipality of Santa Rita do Novo Destino, which is outside the Entity's Area of Influence. In addition to consulting official sources of information, the Entity contacted the community representative directly to reach this conclusion. The Entity |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| | | considered it essential to highlight the existence of this community in its diagnosis in case there are future changes in its operations. |
| 9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes | Not Applicable | This Criterion is not applicable to the Entity, as no Indigenous Peoples have been identified in its Area of Influence. Regardless, the Entity recognises the existence of the Quilombola community, which will be considered in future for any New Projects or Major Changes. |
| 9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining | Not Applicable | This Criterion is not applicable to the Entity, as no Indigenous Peoples have been identified in its Area of Influence. |
| 9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support | Not Applicable | This Criterion is not applicable to the Entity, as no Indigenous Peoples have been identified in its Area of Influence. |
| 9.5a Cultural and Sacred Heritage - Identification | Conformance | The Entity has conducted an assessment, and no cultural or sacred heritage sites or values were identified within the Facility's Area of Influence. |
| 9.5b Cultural and Sacred Heritage - Impacts | Not Applicable | This Criterion is not applicable as no Indigenous Peoples are identified in the Entity's Area of Influence. |
| 9.6a-i Displacement | Not Applicable | This Criterion is not applicable as no New Projects or Major Changes are planned, and there is no former, current or planned requirement for resettlement. |
| 9.7a-h Affected Populations and Organisations | Conformance | The Entity has undertaken impact assessments and consultation, which addressed the Local Communities' rights and customs. The Entity develops and manages several programs to continuously explore opportunities to respect and support the livelihoods of Local Communities. Strategic goals have been designed to support different activities, such as contributing to quality education, environmental education, quality of life improvement, and Local Community business opportunities. Further information is available in the Sustainability Report: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU Social Diagnostic of Santa Rita do Nove Destino and Barro Alto Municipalities: https://drive.google.com/drive/folders/1sjYY4K5iysBEveFNLONiFjbWjvtSGCRg |
| 9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems | Not Applicable | This Criterion does not apply to the Entity, as it does not directly or indirectly acquire Bauxite, Alumina or primary Aluminium nor is it within a Conflict-Affected and High-Risk Area. |
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks | Not Applicable | This Criterion does not apply to the Entity, as it does not directly or indirectly acquire Bauxite, Alumina or primary Aluminium nor is it within a Conflict-Affected and High-Risk Area. |
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks | Not Applicable | This Criterion does not apply to the Entity, as it does not directly or indirectly acquire Bauxite, Alumina or primary Aluminium nor is it within a Conflict-Affected and High-Risk Area. |

| CRITERION | RATING | COMMENT |
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| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence | Not Applicable | This Criterion does not apply to the Entity, as it does not directly or indirectly acquire Bauxite, Alumina or primary Aluminium nor is it within a Conflict-Affected and High-Risk Area |
| 9.8e Conflict-Affected and High-Risk Areas - Report annually | Not Applicable | This Criterion does not apply to the Entity, as it does not directly or indirectly acquire Bauxite, Alumina or primary Aluminium nor is it within a Conflict-Affected and High-Risk Area. |
| 9.9 Security practice | Conformance | The Entity demands respect for Human Rights and follows standards and good practices. The operating practices are clear and well-defined in contracts, and security Workers are trained according to best practices and global guidelines on respecting Human Rights. |
| 10. LABOUR RIGHTS | | |
| 10.1a-c Freedom of Association and Right to Collective Bargaining | Conformance | The Entity has established an agreement with its Workers and their Union under Brazil's current labour legislation (CLT) and the ILO Conventions. It has also established and implemented the Employee Integration Program, which is communicated when hiring employees. |
| 10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law | Not Applicable | This Criterion is not applicable as Freedom of Association or Collective Bargaining is not limited by Applicable Law (Brazil). |
| 10.2a Child Labour | Conformance | The Entity has established and implemented the internal Recruitment and People Selection Standard and Human Rights Policy. These procedures prescribe that the Entity does not accept or support Child Labour. |
| 10.3a-c Forced Labour | Minor Non-Conformance | <p>The Entity's Code of Conduct and Human Rights Policy prohibit the illegal practice of Forced Labour. The Entity does not require a deposit or Recruitment Fee. Employees have freedom of movement and can leave the workplace as required.</p> <p>However, it was found that the Entity has not established a Policy specifically related to (that is, containing the term and definition of) Modern Slavery.</p> |
| 10.4a-c Non-Discrimination | Conformance | <p>The Entity has developed, implemented, and maintained systems, Policies, and procedures related to Discrimination, as defined in its Human Rights Policy and Code of Conduct.</p> <p>The Entity has established a Human Rights Policy and Code of Conduct, which guarantee equal opportunities and not to engage in or support acts of discrimination based on gender, race, national or social origin, caste, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition in hiring processes.</p> <p>Human Rights Policy: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-UzYgd</p> <p>Code of Conduct: https://drive.google.com/drive/folders/1C5QcU6L01y2xXvP_EDxCKtipMu26ebuo</p> |

| CRITERION | RATING | COMMENT |
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| 10.5 Communication and engagement | Conformance | The Entity ensures communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues without the threat of reprisal, intimidation, or harassment. Information about the communication channels and procedures is widely disseminated in the Entity facilities and internal platforms. This ensures that all Workers know their options and feel comfortable reporting any issues. |
| 10.6a-g Violence and Harassment | Conformance | The Entity is committed to a respectful working environment. It has prohibited any form of Harassment, Violence or pressure in the workplace. It does not tolerate Discrimination or corporal punishment, as established by the Entity's Violence and Harassment Policy: https://drive.google.com/drive/folders/1C05b500GMvVHT5xe6JLSqifjB-UzYgd |
| 10.7a-c Remuneration | Conformance | The Entity has established Policies and procedures that conform to the ASI Performance Standard requirements related to Worker remuneration, including payments, Overtime, and deductions. |
| 10.8a-c Working Time | Conformance | The Entity has developed, implemented, and maintained systems, policies, and procedures that conform to the ASI Performance Standard requirements related to working hours. This was evidenced through a sample of working hours records, associated policies, procedures, and Worker interviews. |
| 10.9a-b Informing Workers of Rights | Conformance | The Entity's Workers are informed about Human and Labour Rights during the onboarding process. All Workers receive documented training on key documents such as the Code of Conduct and other internal policies. |
| 11. OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Management System | Minor Non-Conformance | The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System comprising policies, procedures, and records. The principles of the Integrated Policy and the OH&S requirements are communicated, and regular training is provided. Visitors are informed of the health and safety requirements, and Workers and Contractors are aware of their roles. However, there was inadequate safety signage at the crushing process stage in the beneficiation area, contravening the Entity's Emergency Plan and its Occupational Safety Policy. |
| 11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure | Conformance | The Entity has developed an OH&S Management Manual and various Procedures. Training is provided to help employees and related parties understand the OH&S rules. The Entity conducts regular management reviews of its OH&S Management System and when there are indications of control gaps. The Entity publicly discloses its OH&S performance in the Sustainability Report and OH&S Statistics and Indicators document: https://drive.google.com/drive/folders/1_Jlc4rsQMCxC1zujzn89v33W7p_pmh2TU https://drive.google.com/drive/folders/1n5uJUIU15cOqwQomJQuQTyAKWfPyJgKK |

| CRITERION | RATING | COMMENT |
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| 11.2 Employee engagement on Health and Safety | Conformance | The Entity has implemented a mechanism for collecting employee feedback on OH&S issues, including via suggestion boxes, employee representatives' meetings, and other meetings. Relevant records have been retained since the mechanism was established. The Entity has established the Internal Accident Prevention Committee (CIPA) and all Workers are eligible to participate with elections held annually. The Committee holds regular meetings and actively participates in proposing actions aimed at OH&S management. |

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DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE | NOTES |
|----------|---------------|--|
| 0 | 21 March 2025 | Initial Certification Audit – Full Certification |