ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Companhia Brasileira de Alumínio

CERTIFICATE NUMBER

46

ASI STANDARD

PERFORMANCE STANDARD (V3.1 2023)

DATE OF ISSUE

28 NOVEMBER 2023

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

27 NOVEMBER 2026

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

19 SEPTEMBER 2019

AUTHORISED BY

The __

Aluminium Stewardship Initiative Ltd ACN 606 661 125, Australia info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Companhia Brasileira de Alumínio in Brazil, including bauxite mine (Poços de Caldas/MG), bauxite mine (Miraí/MG), bauxite mine (Itamarati/MG), alumina refinery (Alumínio/SP), smelter and associated potlines, casthouses, anode production, SPL treatment plant and downstream productions (Alumínio/SP), aluminium remelting/refining, casthouses and downstream production (Itapissuma/PE), casthouses (Araçariguama/SP) and headquarters (São Paulo/SP).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Companhia Brasileira de Alumínio				
ENTITY NAME	Companhia Brasileira de Alumínio				
CERTIFICATION SCOPE	Companhia Brasileira de Alumínio in Brazil, including bauxite mine (Poços de Caldas/MG), bauxite mine (Miraí/MG), bauxite mine (Itamarati/MG), alumina refine (Alumínio/SP), smelter and associated potlines, casthouses, anode production, SPL treatment plant and downstream productions (Alumínio/SP), aluminium remelting/refining, casthouses and downstream production (Itapissuma/PE), casthouses (Araçariguama/SP) and headquarters (São Paulo/SP).				
SUPPLY CHAIN ACTIVITIES	 Bauxite Mining Alumina Refining Aluminium Smelting Aluminium Re-melting/Refining Casthouses Semi-Fabrication 				
ASI STANDARD	Performance Standard V3.1				
AUDIT TYPE	 Initial Certification Audit (24 June – 15 July 2019) Surveillance and Scope Change Audit (8 October – 25 November 2020) Scope Change Audit (13 – 15 October 2021) Re-Certification Audit (4 – 27 July 2022) Re-Certification and Scope Change Audit (18 – 29 September 2023) Surveillance Audit (12 – 30 May 2025) 				
AUDIT FIRM	DNV Business Assurance Services UK Ltd.				
AUDIT DATE	 24 June - 15 July 2019 (Initial Certification Audit) 8 October - 25 November 2020 (Surveillance and Scope Change Audit) 13 - 15 October 2021 (Scope Change Audit) 4 - 27 July 2022 (Re-Certification Audit) 18 - 29 September 2023 (Re-Certification and Scope Change Audit) 12 - 30 May 2025 (Surveillance Audit) 				
AUDIT REPORT SUBMISSION	 16 August 2019 (Initial Certification Audit) 8 December 2020 (Surveillance and Scope Change Audit) 18 November 2021 (Scope Change Audit) 26 August 2022 (Re-Certification Audit) 17 October 2023 (Re-Certification and Scope Change Audit) 25 June 2025 (Surveillance Audit) 				
AUDIT SCOPE	Initial Certification Audit (24 June – 15 July 2019)				

The Audit Scope covers the activities at the Companhia Brasileira de Alumínio sites:

- Headquarter (São Paulo/SP)
- Bauxite mining (Poços de Caldas/MG)
- Bauxite mining (Miraí/MG)
- Bauxite mining (Itamarati/MG)
- Alumina Refinery (Alumínio/SP)
- Smelter (potlines I to VII) (Alumínio/SP)
- Smelter Anode production (Alumínio/SP)
- Smelter SPL treatment plant (Alumínio/SP)
- Casthouse Ingots production (Alumínio/SP)
- Casthouse Billets production (Alumínio/SP)
- Casthouse Caster rolls production (Alumínio/SP)
- Casthouse Plate sheets production (Alumínio/SP)
- Casthouse Scrap consumption (Alumínio/SP)
- Downstream Sheets production (Alumínio/SP)
- Downstream Foils production (Alumínio/SP)
- Downstream Extruded and anodizing profiles production (Alumínio/SP)
- Downstream Center of Solution and Services (Alumínio/SP)
- Downstream Aseptic packaging Foil Production (Alumínio/SP)
- Downstream Flexible Packaging Foil Production (Alumínio/SP)
- Downstream Automotive Fin Stock Production (Alumínio/SP)
- Downstream Industrial HVAC Fin Stock Production (Alumínio/SP)
- Downstream Laminated packaging Foil production (Alumínio/SP)
- Downstream Extruded Profiles Production (Alumínio/SP)
- Downstream Painted Extruded Profiles Production (Alumínio/SP)

Other audited business activities included:

- Central and Sales Office São Paulo (SP)
- Alumínio Unit (SP) Plant
- Miraí Unit (MG) Mining
- Itamarati de Minas Unit (MG) Mining
- Poços de Caldas Unit (MG) Mining

Supply chain activities included in the Audit Scope:

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

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

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

The Audit Scope covers the activities at the Companhia Brasileira de Alumínio sites:

- Headquarter (São Paulo/SP)
- Bauxite mining (Poços de Caldas/MG)
- Bauxite mining (Miraí/MG)
- Bauxite mining (Itamarati/MG)
- Alumina Refinery (Alumínio/SP)
- Smelter (potlines I to VII) (Alumínio/SP)
- Smelter Anode production (Alumínio/SP)
- Smelter SPL treatment plant (Alumínio/SP)
- Casthouse Ingots production (Alumínio/SP)
- Casthouse Billets production (Alumínio/SP)
- Casthouse Caster rolls production (Alumínio/SP)
- Casthouse Plate sheets production (Alumínio/SP)
- Casthouse Scrap consumption (Alumínio/SP)
- Downstream Sheets production (Alumínio/SP)
- Downstream Foils production (Alumínio/SP)
- Downstream Extruded and anodizing profiles production (Alumínio/SP)
- Downstream Center of Solution and Services (Alumínio/SP)

- Downstream Aseptic packaging Foil Production (Alumínio/SP)
- Downstream Flexible Packaging Foil Production (Alumínio/SP)
- Downstream Automotive Fin Stock Production (Alumínio/SP)
- Downstream Industrial HVAC Fin Stock Production (Alumínio/SP)
- Downstream Laminated packaging Foil production (Alumínio/SP)
- Downstream Extruded Profiles Production (Alumínio/SP)
- Downstream Painted Extruded Profiles Production (Alumínio/SP)
- Casthouse Caster rolls production (Itapissuma/PE)
- Casthouse Plate sheets production (Itapissuma/PE)
- Casthouse Scrap consumption (Itapissuma/PE)
- Downstream Sheets production (Itapissuma/PE)
- Downstream Foils production (Itapissuma/PE)
- Downstream Aseptic packaging Foil Production (Itapissuma/PE)
- Downstream Flexible Packaging Foil Production (Itapissuma/PE)
- Downstream Automotive Fin Stock Production (Itapissuma/PE)

Supply chain activities included in the Audit Scope:

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

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

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

Scope Change Audit (13 - 15 October 2021)

The Audit Scope covers the activities at the Companhia Brasileira de Alumínio site Araçariguama/SP:

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

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

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

Re-Certification Audit (4 - 27 July 2022)

The Audit Scope covers the activities at the bauxite mine (Poços de Caldas/MG); bauxite mine (Miraí/MG); bauxite mine (Itamarati/MG); alumina refinery (Alumínio/SP); smelter and associated potlines, casthouses, anode production, SPL treatment plant and downstream productions (Alumínio/SP); aluminium remelting/refining, casthouses and downstream production (Itapissuma/PE); casthouses (Araçariguama/SP) and headquarters (São Paulo/SP).

Supply chain activities included in the Audit Scope:

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

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

Re-Certification and Scope Change Audit (18 - 29 September 2023)

The Audit Scope covered the activities at the following Facilities:

- Bauxite Mining Poços de Caldas/MG
- Alumina Refining Alumínio /SP
- Casthouses Araçariguama/SP (Metalex)

Supply chain activities included in the Audit Scope:

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

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

Surveillance Audit (12 - 30 May 2025)

The Audit Scope covered the headquarters (São Paulo/SP) and activities at the following Facilities:

- Miraí/MG Bauxite Mining
- Alumínio /SP Alumina Refining, Aluminium Smelting, Casthouses and Semi-Fabrication
- Itapissuma/PE Aluminium Re-melting/Refining, Casthouses and Semi-Fabrication

The Entity used the ASI multi-site approach and sites at Poços de Caldas/MG (Bauxite Mining), Itamarati/MG (Bauxite Mining) and Araçariguama/SP (Metalex) (Aluminium Re-melting/Refining and Casthouses) were not visited during the Audit.

Supply chain activities included in the Audit Scope:

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

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope with exception of those considered low risk for a Surveillance Audit.

AUDIT OUTCOME

Certification

AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☑ The findings are based on verified Objective Evidence relevant to the time period
 for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

28 November 2023 - 27 November 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE	27 November 2026
CERTIFICATE NUMBER	46



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: https://aluminium-stewardship.ethicspoint.com/

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

Companhia Brasileira de Alumínio (CBA) (the 'Entity') was founded in 1955 and is the first national Aluminium manufacturing industry in Brazil. CBA, which is part of Votorantim SA's business portfolio, is the only company in Latin America to operate with a fully integrated operation, from bauxite processing to the production of Primary Aluminium (ingots, billets, rebar and boards) and processed products (plates, coils, sheets and profiles).

The Entity's headquarters is located in the city of Alumínio (State of São Paulo (SP)), where it occupies 700,000 m² of constructed area.

The Entity has three Bauxite Mining plants, established in the municipalities of Miraí, Itamarati de Minas and Poços de Caldas, in Minas Gerais, with a combined estimated capacity of approximately three million tonnes per year of raw bauxite. The Poços de Caldas mine has an installed capacity of around 1.3 million tonnes per year, while the Miraí unit operates with a similar open-pit ore capacity and is distinguished by a beneficiation plant with an annual capacity of 2.5 million tonnes. The Itamarati mine, in operation since 1992, complements this group, consolidating the Entity's total Bauxite extraction volume.

In the state of São Paulo, is the industrial facility in the municipality of Alumínio, which integrates refining, smelting, and Aluminium transformation operations. The Metalex unit specialises in Aluminium scrap recycling. In the north-east, the industrial unit in Itapissuma, Pernambuco is dedicated to the production of rolled products and extruded profiles.

The Alumina Refinery has an installed capacity of approximately 800 thousand tonnes per year. The production of molten Aluminium, carried out in the smelting and casting facilities, ranges between 430 and 475 thousand tonnes annually, reflecting recent expansions and operational optimizations. The Metalex unit has the capacity to process approximately 90 thousand tonnes of metallic Scrap annually, with prospects to expand to 100 thousand tonnes. This unit significantly contributes to the company's commitment to the circular economy and the reduction of carbon emissions. In Brazil's Northeast region, the Itapissuma unit, located in Pernambuco, produces Aluminium sheets and extruded profiles, with an estimated capacity of approximately 50 thousand tonnes per year.

The Entity also owns its own power generation system, with around 1.2 GW of installed capacity, mostly from hydroelectric sources and, more recently, wind power, ensuring approximately 100% energy self-sufficiency.

The Entity has developed and implemented the ReAl Project, which utilises innovative technology to allow the recycling of multilayer carton and flexible packaging at the Entity.

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	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		HIG	ЭH	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard's legal compliance requirements. The Entity has implemented a compliance programme which was reviewed by an independent third party to confirm the programme ensures Compliance with Applicable Law. The Entity has also implemented a governance framework for business ethics and compliance, and training is regularly delivered to relevant personnel. For more information, refer to Entity's 2022 Annual Report, pages 59, 62–66 and 68: https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-en.pdf
1.2 Anti-Corruption	Conformance	The Entity has established a commitment to anti-Corruption through its governance and compliance program and has implemented an Anti-Corruption Policy in accordance with Applicable Law and current international standards: https://d2biijvbg5ozmx.cloudfront.net/politica_anticorrupcao_2023_ju l24_b4a51659f7.pdf Any employee, manager or third party who knows or suspects that a violation of this Policy has occurred or is imminent, can contact their supervisor and/or the Legal - Business - Compliance Department or the Ethics Line, either via the website or by telephone. The Ethics Line is available 24 hours a day (0800 892 0791) or at: https://canaldeetica.com.br/companhiabrasileiradealuminio
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Conduct, including principles relevant to Environmental, Social and Governance (ESG) performance: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugues_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09T14:00:53.530Z Training is undertaken annually and during the onboarding process for all Workers. Any employee, manager or third party who knows or suspects that a violation of this Policy has occurred or is imminent, can contact their supervisor and/or the Legal - Business - Compliance Department or the Ethics Line, either via the website or by telephone. The Ethics Line is available 24 hours a day (0800 892 0791) or at: https://canaldeetica.com.br/companhiabrasileiradealuminio
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an Integrated Management Policy, which has been signed by the Entity's Chief Executive Officer (CEO). The Policy has been reviewed to align with the ASI Performance Standard requirements. The Policy is available on the Entity's website at: https://www.cba.com.br/wp-content/uploads/2023/06/Poli%CC%8Itica-de-Gesta%CC%83o-Integrada_ING.pdf The Entity has issued and published a Policy in the local language that addresses Occupational Safety and Health, environment and energy, Human Rights and environmental social responsibility. All Policies are

CRITERION	RATING	COMMENT
		reviewed annually through management review. New employees receive induction training on these Policies. The Entity has communicated its Integrated Management Policy to internal and external Stakeholders through training, communication with contractors and display of the Policy in workshop areas.
2.2a-c Leadership	Conformance	The Entity has designated responsibilities to the General Manager and their direct management team for the implementation and communication of Policies and the provision of resources to implement, maintain and improve the Management System, which is aligned with the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an Integrated Management System that addresses issues of quality, environment, occupational health and safety, social responsibility, and commitment to sustainability, and includes Policies, procedures and documented records. The Integrated Management Policy is available at: https://www.cba.com.br/wp-content/uploads/2023/06/Poli%CC%8Itica-de-Gesta%CC%83o-Integrada_ING.pdf
		The Entity holds a valid ISO 14001:2015 certification, excluding the Araçariguama (Metalex) Unit.
		The Entity's valid certifications, ratings, indices, recognitions and commitments are declared in the Annual Report 2024, page 19: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity maintains a Social Management System. The Entity has integrated socio-economic risks into its corporate risk management structure, which is regularly reviewed by senior management. The Entity's Social Responsibility Policy is available at: https://www.cba.com.br/wp-content/uploads/2023/06/Social-Responsibility-Policy.pdf
		The Entity joined the United Nations Global Compact in February 2020 For more information refer to: https://www.unglobalcompact.org/what-is-gc/participants/138299- Companhia-Brasileira-de-Aluminio and https://ungc-production.s3.us-west- 2.amazonaws.com/commitment_letters/138299/original/Carta_Pacto_Global.pdf?1576497300
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy, an Anti-Corruption Policy and a Privacy Policy to address anti-Corruption, Bribery, environmental, social and governance topics. The Policies are implemented and are made available to suppliers via the supplier approval process and on the Entity's website at: https://d2biijvbg5ozmx.cloudfront.net/politica_ssuprimentos_sustentavel_marco24_f5labcfl6c.pdf
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity has implemented an internal procedure for the undertaking of Environmental and Social Impact Assessments for New Projects or Major Changes to existing Facilities. Risk assessments and actions derived from the management plan are conducted annually. The Entity has demonstrated that it has not made any changes to

CRITERION	RATING	COMMENT
		their Facilities that would have negative environmental or social impacts, but rather, investments to improve operations and eliminate or reduce risks. The Entity has a process to determine an environmental and social impact management plan to prevent, mitigate and, if necessary, remediate any identified Material impacts, although it is evident that its use has not been necessary in recent years. Additional information on environmental and social impact assessments, as well as actions and results relating to Environmental and Social Impact Assessments are available in the 2022 Annual Report, pages 71, 114, 121, 159, 162 and 163: https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-pt.pdf
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has implemented an internal procedure for the undertaking of Environmental and Social Impact Assessments, including assessment of potential impacts to Human Rights for New Projects or Major Changes to existing Facilities. Risk assessments and actions derived from the management plan are conducted annually. The Entity has demonstrated that it has not made any changes to their Facilities that would have negative environmental or social impacts, but rather, investments to improve operations and eliminate or reduce risks. The Entity has a process to determine an environmental and social impact management plan to prevent, mitigate and, if necessary, remediate any identified Material impacts, although it is evident that its use has not been necessary in recent years.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented Emergency Response Plans (ERPs) that address emergency scenarios/crisis organisation, communication guidelines and business continuity plans. The emergency response team has been established and undergoes training annually in accordance with the established schedule. Emergency Response Plans are publicly disclosed on the Entity's website and can be accessed by any interested party: https://www.cba.com.br/quem-somos/#documentos Miraí - https://d2biijvbg5ozmx.cloudfront.net/250924_HBR_26_21_CBA_REL_0 06_R5_SITE_9f164a7dd8.pdf Itamarati de Minas: https://d2biijvbg5ozmx.cloudfront.net/250924_HBR_26_21_CBA_REL_0 01_R5_SITE_ac9b7d6729.pdf Palmital (Alumínio): https://d2biijvbg5ozmx.cloudfront.net/pae_palmital_compressed_5ce3f099c5.pdf
2.8a-d Suspended Operations	Conformance	The Entity has demonstrated the development and implementation of contingency response plans. In 2021 it implemented a specific business function dedicated to business continuity for internal and external demands. The Entity has a business continuity management system in which resilience plans are being developed in accordance with the ISO 22301 and ISO 22313 Standards. The Entity has implemented a Business Continuity Policy and mapped interruption scenarios applicable to mining, refinery, furnace room, foundry and commercial (i.e. primary and commercial). Operational

CRITERION	RATING	COMMENT
		continuity plans define actions before, during and after shutdowns (i.e. preparation, activation and deactivation).
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Business Development Activities Procedure, which includes a Due Diligence process to be enacted prior to any merger or acquisition. The implementation of these procedures in the process of acquiring assets of subsidiaries in the previous year is in accordance with the ASI Performance Standard. The Entity has also developed a procedure for assessing environmental, social and governance issues for mergers and acquisitions. For further information on the acquisition process, refer to the Annual Report 2024, pages 8 and 14: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf The Entity is projecting investments of R\$ 2.3 billion and increased competitiveness by 2026 in the 'Rondon' Bauxite project, in Pará, announced in 2021: https://revistamineracao.com.br/2024/10/23/cba-projeta-investimentos-de-r-23-bilhoes-e-aumento-da-competitividade
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed closure, decommissioning and divestment plans for its Alumínio Unit, Araçariaguama (Metalex) and Mining Units which were detailed and considered key environmental and social impacts. It also included provisional budget allowances to cover the costs of closure and rehabilitation of the land to its prior state. Further information on asset decommissioning is available in the Financial Statements, page 49 at: https://api.mziq.com/mzfilemanager/v2/d/73a23c6c-b1fd-4abb-beba-056de474f2ec/ce36716c-035e-9630-d077-a0a82df62390?origin=1
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published an Annual Report that includes its governance approach and social, environmental, and governance issues. The report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards and Sustainability Accounting Standards Board, and has been verified by a Third Party. Annual Report 2024: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf 2024 Indicators Notebook: <a agenda_climatica_2024_10217a7646.pdf"="" d2biijvbg5ozmx.cloudfront.net="" href="https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fd2biijvbg5ozmx.cloudfront.net%2FCBA_Caderno_de_Indicadores_2024_b0ed5953e1xlsx&wdOrigin=BROWSELINK Climate Agenda 2024 Report: https://d2biijvbg5ozmx.cloudfront.net/agenda_climatica_2024_10217a7646.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 2024 Indicators Notebook: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fd2biijvbg5ozmx.cloudfront.net%2FCBA_Caderno_de_Indicadores_2024_b0ed5953el.xlsx&wdOrigin=BROWSELINK

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	The Entity has publicly disclosed its independently verified financial results, including payments to governments, to investors and shareholders: Further information on financial results is available at: https://ri.cba.com.br/informacoes-financieiras/central-de-resultados
		https://api.mziq.com/mzfilemanager/v2/d/73a23c6c-b1fd-4abb- beba-056de474f2ec/418fc3ad-d874-9ef4-b177- b4acfc1b8008?origin=1
		https://api.mziq.com/mzfilemanager/v2/d/73a23c6c-b1fd-4abb- beba-056de474f2ec/734053dc-1ece-8ea4-4d7e- e8ec53b4542f?origin=1
		The Entity has disclosed the Payment of Mining Fees (BRL) in the Indicators Notebook 2024. The amounts paid to the National Mining Agency as Financial Compensation for the Exploration of Mineral Resources (CFEM) is available at: https://www.gov.br/anm/pt-br
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable and gender and culturally sensitive Complaints Resolution Mechanisms, suitable for dealing with complaints, claims and requests for information from interested parties related to its operations, through an Ethics Line channel. The Ethics Line is the Entity's official channel for receiving reports of behaviour that may violate the principles and guidelines of the Code of Conduct, as well as any violations of laws, regulations, policies and other internal rules.
		The channel can be accessed by employees, the community, suppliers, customers and business partners. External communications are recorded through the following channels: Ethics Line, 'contact us' details on the website, emails, correspondence, phone calls, or official letters. At the Mining Units, communications made in person or through messages with the Entity's employees or third parties are also formally recorded as External Communication Records (ECRs).
		These records cover the following topics: questions or complaints regarding processes related to production activities such as rehabilitation, recovery of mined areas, or ore transportation, negotiations with rural producers, Human Rights, requests from Stakeholders, including community demands or those from strategic Stakeholders that are not merely informational, requests for information, and suggestions or compliments.
		In 2024, the Entity's Mining Units recorded 310 ECRs, an increase of 34 compared to 2023. Of these, 231 communications (75%) originated from the Local Community. The remaining 25% came from landowners, suppliers, public and environmental agencies, academic partners, municipal governments, city councils, and employees.
		All records are properly addressed and responded to by the Entity in accordance with the principles of open dialogue, ethics, and transparency, ensuring the quality of Stakeholder relationships. Further information is available at: https://canaldeetica.com.br/companhiabrasileiradealuminio
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has undertaken an environmental Life Cycle Assessment (LCA) for its major products (including caster rolls, plate sheet, ingot and billets, sheeting, foils, and extruded and anodized profiles) based on a cradle-to-gate LCA approach. The LCA methodology used is aligned with both ISO 14040 and ISO 14044.

CRITERION	RATING	COMMENT
		In 2022, the Entity acquired software called SimaPro®, which has the most used database worldwide (EcoInvent) to undertake its LCA studies internally. Integrated Factory products are being updated and will undergo external verification in 2023, as well as the study undertaken in 2021 at Metalex by an external consultancy. The LCA at the Itapissuma Unit, undertaken in 2021, underwent external verification in 2022 and is available to be shared with clients and disseminated externally: https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-caderno-divulgacao-complementar-en.pdf (Page 34).
4.lb-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has undertaken an environmental Life Cycle Assessment (LCA) for its major Products (including caster rolls, plate sheet, ingot and billets, sheeting, foils, and extruded and anodized profiles) based on a cradle-to-gate LCA approach. The LCA methodology used is aligned with both ISO 14040 and ISO 14044. In 2022, the Entity acquired software called SimaPro®, which has the most used database worldwide (EcoInvent) to undertake its LCA studies internally. Integrated Factory Products are being updated and will undergo external verification in 2023, as well as the study undertaken in 2021 at Metalex by an external consultancy. The LCA at the Itapissuma Unit, undertaken in 2021, underwent external verification in 2022 and is available to be shared with clients and disseminated externally. https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-caderno-divulgacao-complementar-en.pdf (Page 34).
4.2 Product Design	Conformance	The Entity has integrated clear objectives in the design and development process to enhance sustainability. The Entity has collaborated with key clients on alignment with their Product design objectives. The Entity produces alloys aligned to industry standards, but does not produce its own specification, and has demonstrated that all innovation projects undergo an assessment of ESG aspects. It highlights the portfolio of 30 projects with direct sustainability attributes, which represent 35% of the pipeline in 2022, an increase of 7% compared to 2021. Further information is available in the Annual Report, page 55: https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-en.pdf
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented an Aluminium Process Scrap reduction and recycling plan, and 100% of the internal scrap is recycled in the Entity's furnaces. The Entity implements a continuous improvement programme with the target to reduce the amount of scrap generated, aligned with the ISO 9001 certification. Management reviews are undertaken to ensure targets are regularly monitored. The Entity has implemented an Aluminium Process Scrap recycling plan and has implemented controls to separate Aluminium alloys for recycling internally. The bay layout improvement plan has been implemented to separate stock purchased scrap and internal scrap and for the rejection of common alloy and special/premium alloy. Further information is available on the website at: https://www.cba.com.br/reciclagem/#reciclagem-na-pratica
4.4a-c Collection and Recycling of Products at	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
End of Life - Material Conversion and other Manufacturing		
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is actively participating in the Brazilian Aluminium Association (ABAL) meetings since commencing involvement in 2016, and has representatives on the Board of Directors and in various committees, subcommittees and working groups: https://www.cba.com.br/reciclagem/#estrategia
5. GREENHOUSE GAS EMISSIO	SNC	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gas (GHG) Emissions data are independently assured by a Third Party and are available through the Brazilian GHG Protocol: https://registropublicodeemissoes.fgv.br/estatistica/estatistica-participantes/2614 The emissions and energy use data are disclosed in the Annual Report 2024, pages 84-90: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable as operations commenced prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has publicly disclosed its Primary Aluminium Scope 1 and Scope 2 GHG Emissions as 3.16 t CO ₂ e/tonne in 2024. Including Scope 3 emissions, the GHG emissions intensity is below the 11 t CO ₂ e/tonne threshold. Independent assurance on the GHG Emissions data has been provided by a Third Party: https://registropublicodeemissoes.fgv.br/estatistica/estatistica-participantes/2614 The Entity has adopted a 100% renewable energy matrix, sourced either through its own generation or by purchasing renewable energy certificates. This approach significantly contributes to the reduction of GHG emissions.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan in its ESG 2030 Strategy with established decarbonisation actions to reduce Scope 1, 2 and 3 emissions. The GHG Emissions Reduction Pathway has been established based on the Entity's commitments to the First Movers Coalition and the Science Based Targets Initiative (SBTi). The Pathway is aligned with the reduction slope generated for the Entity using the ASI GHG Pathways Calculation Tool. The Entity has targets approved by the SBTi that include a 40% reduction in emissions intensity (Scopes 1 and 2) in the Refinery and Electrolysis stages compared to 2018, with 9.9% already achieved, a 35% reduction in absolute emissions of Scopes 1 and 2 by 2030 in other units (Mining and the Foundry and Plastic Transformation stages) compared to 2018, with 2.1% already reached; and a 13.5% reduction in Scope 3 emissions (categories 1, 3, 4, and 9) across all units by 2030

CRITERION	RATING	COMMENT
		compared to 2019, having achieved a 45% reduction, surpassing the target.
		The data is benchmarked against that of other companies in the sector, ensuring alignment with market best practices and promoting transparency regarding the Entity's performance.
		The Entity's ESG 2030 Strategy with a trajectory to carbon neutralisation by 2050, includes developing a carbon-neutral product line, 100% renewable sources of electricity in production processes and focused investment for three main areas including a biomass boiler, modernisation of furnace technology and increased Scrap usage.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway. The Entity has established a 2030 target to reduce emissions intensity by 40% and the Pathway includes year-on-year emissions intensity targets.
		The Entity has publicly disclosed its GHG Emissions Reduction Plan and Pathway with details included in the Annual Report 2024, pages 83-91: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
5.4 GHG Emissions Management	Conformance	The Entity has implemented a Management System to mitigate direct GHG Emissions from the Aluminium Smelting process.
		It has assessed future opportunities with the goal of building a path towards climate neutrality. In 2024, the Entity updated its mapping of studies with potential for emissions reductions and continued to advance carbon credit generation projects, with a special emphasis on carbon capture initiatives. The Entity also calculates various carbon emission indicators at each stage of its production process and considers the carbon footprint of its products as part of its climate management strategy. The Entity demonstrated that these figures are compared with those of other companies in the sector to ensure alignment with best market practices and promote transparency regarding its performance, enabling it to achieve its GHG actions and targets.
		Furthermore, throughout 2024, the Entity updated climate projections for all its units and held four climate adaptation workshops for strategic areas. These initiatives resulted in a complementary mapping of climate risks and adaptation opportunities in all production units, enabling the achievement of GHG actions and targets defined by the Entity.
6. EMISSIONS, EFFLUENTS ANI	D WASTE	
6.1a-f Emissions to Air	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the Emissions to Air requirements and are in compliance with the legal permit thresholds on air emissions.
		The Entity's atmospheric emissions data are included in the 2024 Annual Report 2024, pages 84, 161, and 171-173: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf Additional disclosure is included in the 2024 Indicators Notebook, in the 'Climate Change' tab: https://www.cba.com.br/relatorio-desustentabilidade

CRITERION	RATING	COMMENT
6.2a-g Discharges to Water	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes for Discharges to Water. The Entity has obtained ISO 14001 certification and is compliant with legal requirements relating to Discharges to Water.
		The Entity's discharges data are included in the Annual Report 2024, pages 162 and 192: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
		Additional disclosure is included in the 2024 Indicators Notebook, 'Water Resources' tab: https://www.cba.com.br/relatorio-de-sustentabilidade
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has regularly assessed major risks related to environmental aspects, including potential Spills and Leakages from the production processes, in accordance with its ISO 14001 certification. The risk identification and assessment results, management plan, compliance controls, and a monitoring program to prevent and detect Spills and Leakages are disclosed in the Emergency Response Plans. Emergency Response Plan - Spill and Leak Management: https://d2biijvbg5ozmx.cloudfront.net/cba_aluminio_relatorio_pae_a 4_compactado_9ea12e12ae.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity communicates information on Spills and Leakages in the Annual Report 2024, page 164: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has demonstrated robust management of Hazardous and Non-Hazardous Waste through actions that seek to minimise environmental impacts and promote the efficient use of resources, as well as the introduction of best practices and safe disposal solutions for proper disposal.
		The Entity has progressed its projects that transform Waste into by-products with consideration of Circular Economy principles. The Entity generates 85 types of Waste in its processes, with 41 characterised as saleable by-products. In 2024, the Entity's co-products area underwent a comprehensive strategic review, focusing on a five-year planning horizon.
		The quantities of Hazardous and Non-Hazardous Waste generated are disclosed in the Annual Report 2024, pages 103-107: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
6.6a-g Bauxite Residue	Conformance	A Bauxite Residue dam exists at the Aluminium Unit and the Entity adheres to the SIGbar Dam Management Information System and complies with state legal guidelines. As required by Brazilian law, the Entity's dams have both a Dam Safety Plan and Emergency Action Plan. The Entity has implemented a strategy and developed solutions to eliminate waste disposal in dams by 2030. The Entity has implemented a system of checks and controls based on the SIGbar Dam Management Information System.
		The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the water discharge

CRITERION **RATING** COMMENT requirements. At the Alumínio Unit, there is no discharge to the external environment, and there is 100% recirculation of treated water. The Aluminium Unit has an internal lagoon that receives all the industrial and domestic effluent. This water is pumped to an Industrial Water Treatment Station and undergoes a physical-chemical treatment before reuse. For the dry disposal of waste to commence in 2024, the Entity has implemented a technology to allow the reuse of water from the reservoir at the refinery, which has reduced the volume of water within the dam by over 85%. There is no discharge of Bauxite Residue to marine and aquatic environments. The Entity has implemented a strategy and developed solutions to eliminate waste disposal in dams by 2030. The Entity is investing R\$ 420 million in a project to change the destination of the waste from Alumina production at the Palmital dam in Alumínio (SP). Currently, disposal is wet with 45% solids and in future, the disposal will be dry with 75% solids following the installation of press filters, which remove a fraction of the liquid before the tailings reach the dam. The equipment will separate the impurities present in the water, generating clean water, calcium carbonate (used externally as a soil corrector) and caustic soda, which is reused at the Alumina Refinery. This project will extend the operational life by over 20 years and is underway with an expected date of operation in 2024. A pilot filter was mounted in an experimental landfill in the reservoir to simulate the disposal of dry waste, with testing and monitoring. In 2025, emergency response drills were conducted at the Miraí (MG) and Itamarati de Minas (MG) mining dams, as well as at the Fábrica de Alumínio (SP) dam, involving the population of the respective 'selfrescue zones' at these dams. These drills had the direct or indirect participation of over 1,300 participants. These drills are held annually and involve teams from local government agencies, city halls, civil defence, fire departments, and military police. Further information is available in the Annual Report 2024, pages 108-113: https://d2biiivbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf https://d2biijvbg5ozmx.cloudfront.net/Relatorio_Geotecnico_e_Tercei ras_Mirai_2_Semestre_2024_8fda6b9d5a.pdf https://d2biijvbg5ozmx.cloudfront.net/Relatorio_Monitoramento_da_ Qualidade_da_Agua_e_Poeira_da_Barragem_de_Rejeitos_Mirai_2_ semestre_de_2024_4efld0ell1.pdf 6.7a-f Spent Pot Lining Conformance The Entity has maintained a Spent Pot Lining (SPL) inventory and (SPL) complies with its permit requirements. For over 15 years, SPL material has been stored inside the Entity's Alumínio Unit (Factory), with no disposal to external landfill. There is storage for refractory waste, secondary Alumina, scraping Alumina, cathode, anode, and bath, all having a defined destination and relevant environmental documentation, in accordance with state and federal legislation. Since 2007, the Entity has sent its SPL waste to the cement companies of the Votorantim Group, and initiated projects to dismantle and treat SPL that had been internally landfilled. The Entity reviews alternative options to landfilling of treated SPL and/or stockpiling of SPL on an ongoing basis. Since 2017, there has been no internal landfilling of SPL and all Hazardous Waste is sent to third parties for appropriate treatment and accompanied by a Waste Transport Manifest.

CRITERION	RATING	COMMENT
		There is no discharge of SPL to marine and aquatic environments. 2024 Indicators Notebook, 'Waste and co-products' tab: https://www.cba.com.br/relatorio-de-sustentabilidade Annual Report 2024, pages 103-105: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
6.8a-d Dross	Conformance	The Entity's Dross is stored on-site in accordance with legal and permitting requirements. The Entity maintains Scrap statistics documented in the annual waste report. The Dross is sent to an external service provider for recycling. The Entity is investing in innovative technologies to treat black Dross, a residue generated in the production of Secondary Aluminium. The goal is to reuse its components and generate products such as ammonia and urea, which can be used in agriculture.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has established an ESG 2030 Strategy to reduce new water consumption by 10.9%. Each of the Entity's Units has implemented documented procedures for water assessment and management, including mapping the water balance to indicate input and output flows and the analysis of strategic, tactical and operational risks within the Area of Influence of each Unit. Further information on the Entity's water management is outlined in the Annual Report 2024, pages 101–102: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
7.2a-e Water Management	Conformance	The Entity has implemented internal guidelines on the management of water and effluents and complies with legal requirements. Plans have been developed to support the reduction of the Entity's water footprint, including the voluntary participation in the 'El Agua nos Une' project, which aims to improve corporate water stewardship practices through water footprint assessments. The Entity's 2024 water intensity per tonne of Liquid Aluminium reduced by 10% since 2023 and 39% since 2019. Indicators Notebook 2024, 'Water resources' tab: https://www.cba.com.br/relatorio-de-sustentabilidade Annual Report 2024, pages 101-102: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
8. BIODIVERSITY AND ECOS	SYSTEM SERVICES	
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity assessed the risk and Materiality of impacts on Biodiversity resulting from land use and activities in its Area of Influence. The management of Biodiversity and Ecosystem Services occurs through the Entity's Biodiversity Policy, Integrated Management Policy, Code of Conduct and Biodiversity and Protected Areas Action Plan. There is also a specific Management Standard, complemented by an Environmental Aspects and Impacts Assessment Matrix, which identifies, classifies and controls impacts, including those that address

CRITERION	RATING	COMMENT
		Biodiversity, promoting preventive management and continuous improvement. In the Annual Report 2024, the Entity adopted the guidelines of the Taskforce on Nature-related Financial Disclosures (TNFD). The adoption of the TNFD recommendations follows the implementation of the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD), which commenced in 2022. After analysis, the Entity identified that 14 TNFD recommendations are already managed, monitored and measured through corporate Policies and best disclosure practices. Further information is included in the Indicators Notebook 2024. 'Materiality' tab: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fd2biijvbg5ozmx.cloudfront.net%2FCBA_Caderno_de_Indicadores_2024_b0ed5953e1.xlsx&wdOrigin=BROWSELINK Annual Report 2024, page 93: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has demonstrated that in situations where it contributes to, or is likely to have an impact on Ecosystem Services, it undertakes a systematic assessment, in consultation with and, where possible, with the participation of Affected Populations and Organisations, to identify Priority Ecosystem Services that are relevant to Affected Populations and Organisations. Further information on Biodiversity and Ecosystem Services, risk and impact assessment is available in the Annual Report 2024, page 93: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf Access the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD) is included in the Indicators Notebook 2024, 'Materiality' tab: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fd2 biijvbg5ozmx.cloudfront.net%2FCBA_Caderno_de_Indicadores_2024_b0ed5953e1xlsx&wdOrigin=BROWSELINK
8.2a-g Biodiversity Management	Conformance	The Entity has implemented a Biodiversity Action Plan to address key aspects identified in its Biodiversity risk assessment. For the Entity's mining units, the quality of rehabilitation is verified by studies and scientific research undertaken through a partnership with the Federal University. The Entity has developed a Biodiversity Action Plan in accordance with the Biodiversity Mitigation Hierarchy and has demonstrated that the Biodiversity Action Plan includes time-bound targets to address Material risks and impacts. The plan of actions, risks, impacts, targets and results are available in the Annual Report 2024, pages 93-100: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity has established procedures for the protection of Biodiversity and Ecosystem Services. A Biodiversity risk assessment report has been prepared, which includes Ecosystem Services. The Entity has developed a Biodiversity Management Plan that includes the evaluation of risks and the Materiality of the impacts on Biodiversity related to the activities and land use in its Area of Influence.

CRITERION	RATING	COMMENT
		Further information is available in the Annual Report 2024, page 96: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
8.4 Alien Species	Conformance	The Entity has prescribed relevant requirements for Alien Species in its ASI Performance Assurance Manual, including the evaluation and control of Alien Species accidentally introduced by the Entity through operational activities. As per the Biodiversity risk assessment report, the only source which could introduce Alien Species are the wooden pallets used for product packaging, which are treated before use. This is integrated into the Entity's Biodiversity Management Plan.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not undertake activities, nor do they occupy spaces or areas considered World Heritage Properties. The Entity has demonstrated that the changes to Facilities derived from investments have been developed within the current site and do not exceed the limits of the Entity's Facilities. The Entity regularly evaluates areas according to their protected classification as part of the licensing process. The Entity has conducted its mining activities in accordance with Applicable Law and has no current or planned operations in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has conducted a study on the overall impact that development activity could have on the environment, surrounding areas, and Biodiversity and Ecosystem Services. The study confirmed that there are no Protected Areas within the Entity's Area of Influence. The Entity has demonstrated that the changes in the installations derived from investments on the current site do not exceed the limits of the Entity's Facilities. The Entity demonstrates that they do not undertake activities nor occupy spaces or areas considered as Protected Areas.
8.6e Protected Areas - Bauxite Mining	Conformance	The Entity has conducted a study on the overall impact that development activity could have on the environment, surrounding areas, Biodiversity, and Ecosystem Services. The study confirmed that there are no Protected Areas within the Entity's Area of Influence. The Entity has demonstrated that the changes in the installations derived from investments on the current site do not exceed the limits of the Entity's Facilities. The Entity demonstrates that they do not undertake activities nor occupy spaces or areas considered as Protected Areas. Additional information on how the Entity operates and manages its operations only in permitted areas is available in the Entity's 2022 Annual Report on pages 114 and 165.
8.7a-i Mine Rehabilitation	Conformance	Following Bauxite extraction, which has a mining cycle of between three to six months, the mined areas undergo environmental rehabilitation. The rehabilitation process continues for approximately four years and creates optimal soil conditions for the restoration of native vegetation and/or replanting for agricultural and livestock activities. The quality of this rehabilitation is verified by studies and scientific research carried out through a partnership with the Federal University of Viçosa (UFV). The Entity has conducted independent interviews with farmers regarding the rehabilitation activities and the level of satisfaction with the quality of the rehabilitation.

CRITERION	RATING	COMMENT
		Financial provisions for mine rehabilitation are provided prior to the start of a project and are made clear in the licensing agreements with farmers or other affected Stakeholders. The Entity describes information on the Mine Rehabilitation process in its 2022 Annual Report on page 114: https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-en.pdf
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity respects and supports individual and collective Human Rights and is committed to assessing, preventing and remedying potential adverse impacts consistent with international instruments on Human Rights. It has implemented a Human Rights Due Diligence process, which includes a risk assessment and a relevance matrix to map the impact and importance of communities within its Area of Influence.
		The Entity has implemented Stakeholder Complaints and Grievance Management Procedures.
		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 operations. This is accessible through a link on the Entity's website and other local means.
		The Entity provides a communication channel with external parties including Communities, which is available on the Entity's website.
		The CBA Ethics Line is the official channel for reporting any conduct that violates the principles and guidelines of the Code of Conduct or that is at odds with the ethical practices of Company. Open to all Stakeholders, the channel is a safe and transparent tool to file complaints and clarify doubts, reinforcing CBA's commitment to ethics and integrity.
		Annual Report 2024, pages 81, and 124-129: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
		Code of Conduct: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugue s_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09T14:00:53.530Z
		Human Rights Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Direitos_Humanos_vf_10_07_b294f6004e.pdf
		Social Responsibility Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Responsabilidade_Social_c79b990d2f.pdf
		Code of Conduct for Suppliers: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_forneced ores_jun24_d0d0aad24e.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Human Rights Policy to remove barriers to professional development, Discrimination, Violence, and Harassment. The Entity has established a program that promotes gender equity and women's empowerment. The program is reviewed

CRITERION	RATING	COMMENT
		periodically and the effectiveness of the measures taken to promote gender equality are publicly disclosed annually. Diversity, Equity and Inclusion Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Diversidade_E quidade_e_Inclusao_f4344c97c1.pdf CBA diversity and inclusion program: https://www.cba.com.br/cba-mais-diversa/ https://d2biijvbg5ozmx.cloudfront.net/CBA_Guia_da_Diversidade_073
		abdecef.pdf Annual Report 2024, pages 53-59: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. The Entity has no impact from its operations on Indigenous Peoples, which has been confirmed through surveys via websites that publicly disclose the location of Indigenous tribes. The Entity does not have any record of impact or manifestation of conflicts in Indigenous reserve areas.
		Further information is available in the Annual Report 2024, page 81: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. The Entity demonstrates in the Annual Report that it is not aware of active conflicts in the areas of Indigenous reserves or within their operational vicinity. Reservations are not located in or near Indigenous Peoples and areas with protected conservation status.
		Annual Report 2024, page 81: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence. The Entity demonstrates in the Annual Report that it is not aware of active conflicts in the areas of Indigenous reserves or within their operational vicinity. Reservations are not located in or near Indigenous Peoples and areas with protected conservation status. Annual Report 2024, page 81:
		https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_ 2024_4047b67e3d.pdf
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	No cultural or sacred heritage sites have been identified in locations where the Entity operates. However, as part of the Entity's capital expenditure due diligence process, prior to new mining activities and the licensing process, archaeological, cultural and/or sacred heritage sites require evaluation as required by the National Historic and Artistic Heritage Institute (IPHAN).

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no cultural or heritage sites have been identified, nor are there any Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity demonstrates respect for Human Rights as stated in its Code of Conduct and observes the United Nations Guiding Principles on Business and Human Rights. The Entity intends to avoid Resettlements and considers feasible alternatives in project design. The Entity has implemented Policies and practices that are in line with the International Finance Corporation (IFC) Performance Standard 5: Land Acquisition and Involuntary Resettlement and the Letter of Commitment to the United Nations Global Compact.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a Local Social and Community Strategy that is aligned with best practices and the Sustainable Development Goals. The Entity also works to guarantee the rights of children and adolescents, training the Municipal Council for the Rights of Children and Adolescents to better fulfill its social role.
		During 2024, the Entity carried out 51 projects across 23 municipalities, with a social investment of R\$10.2 million (invested, including incentivised resources, its own and from external partners), impacting 1,079,241 people, as presented in the 2024 Annual Report, page 67: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has demonstrated that it has implemented a Management System to avoid involvement in armed conflicts or violations of Human Rights through Policies, procedures and manuals aimed at the best integrity practices. The main documents facilitating this include the CBA Code of Conduct, Code of Conduct for Suppliers, Sustainable Supply Policy, Anti-Corruption Policy, Compliance Program Handbook, Competitive Manual and Management Standards on Donations and Sponsorships and Relationships with the Public Sector.
		Employees, counsellors, member committees and third parties receive training on the topics. Due Diligence is undertaken which aims to mitigate reputational risks for all Stakeholders. This occurs through the analysis of the supplier base, surface dealers, banks and customers.
		Supplier information on the Entity's website: https://www.cba.com.br/fornecedores/#suprimento-sustentavel
		Sustainable Supply Policy: https://d2biijvbg5ozmx.cloudfront.net/politica_ssuprimentos_sustentavel_marco24_f5labcf16c.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity does not directly or indirectly purchase Bauxite, Alumina, or Primary Aluminium, except from units within the Certification Scope and within Brazil (which do not qualify as Conflict-Affected and High-Risk Areas (CAHRAS)). The Entity developed a 'Responsible Supply Program', which incorporates ESG criteria in all stages of the purchasing process, mitigates risks and promotes more responsible practices in the value chain based on the ISO 20400 standard and is guided by seven fronts of action:
		1 Sustainable Purchasing Policy and Strategy 2 Supplier Approval and Monitoring 3 Sustainable Selection and Requisition

CRITERION	RATING	COMMENT
		4 Contract Management 5 Partnerships with Strategic Suppliers 6 Supplier Development 7 Engagement and Communication Further information is available in the Annual Report 2024, pages 138-144: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity does not directly or indirectly purchase Bauxite, Alumina, or Primary Aluminium, except from units within the Certification Scope and within Brazil (which do not qualify as CAHRAs). The Entity has demonstrated that it has a Management System implemented to respond to the risks identified during Due Diligence in accordance with the OECD Guidelines through the activities included in the Supplier Management Standard and the Operational Procedure for Due Diligence Integrity.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The risks identified during the Due Diligence undertaken in accordance with the OECD Guidelines are publicly disclosed on an annual basis in the Annual Report 2024, page 139: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
9.9 Security practice	Conformance	The Entity has a contracted security guard company that has a continuous presence at the gatehouse and entrance to Facilities to ensure access control and the protection of people, property, and assets. The security guards do not carry weapons. The security company is authorised by the Police authority. The Entity has demonstrated security personnel have good practices and respect for the Code of Conduct and Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the Freedom of Association and right to Collective Bargaining requirements. The Entity's Workers have the Freedom of Association without interference from the Entity. Collective Bargaining Agreements are regularly updated and agreed with Labour Unions. The Labour Union and senior management demonstrate a good
		relationship. Further information is available in the Code of Conduct, page 9: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugues_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09Tl4:00:53.530Z The Entity respects the rights of Workers and maintains records of
		negotiations between the Entity and the Union or Workers' association, including the Collective Bargaining Agreement, in compliance with national laws.

CRITERION	RATING	COMMENT
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the Freedom of Association or Collective Bargaining is not limited by law where the Entity operates (Brazil).
10.2a Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour as defined in ILO Conventions C138 and C182. The Entity complies with relevant national and international law. The Entity's Code of Conduct (page 9) states a commitment to zero tolerance for Child Labour: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugue s_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09T14:00:53.530Z Human Rights Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Direitos_Hum anos_vf_10_07_b294f6004e.pdf Social Responsibility Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Responsabilid ade_Social_c79b990d2f.pdf Code of Conduct for Suppliers: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_forneced ores_jun24_d0d0aad24e.pdf The Entity also requires its suppliers to respect all laws in their jurisdiction with regard to Child Labour, as stipulated by its Responsible Sourcing Policy, available at: https://www.cba.com.br/fornecedores/#suprimento-sustentavel
10.3a-c Forced Labour	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in Brazilian labour laws and ILO Conventions C29 and C105. The Entity's Human Rights Policy outlines this commitment, which applies to all Workers including subcontractors: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Direitos_Humanos_vf_10_07_b294f6004e.pdf Code of Conduct: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugues_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09Tl4:00:53.530Z Code of Conduct for Suppliers: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_fornecedores_jun24_d0d0aad24e.pdf The Entity has established and publicly disclosed a Modern Slavery Statement: https://d2biijvbg5ozmx.cloudfront.net/Declaracao_Escravidao_Moderna_2024_v5_PT_23efdfafc5.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has demonstrated a commitment to promoting diversity, equity and inclusion and has adopted Policies and practices aimed at guaranteeing a work environment free of Discrimination. The Diversity, Equity and Inclusion Policy establishes clear guidelines for the elimination of any form of Discrimination, whether based on gender, race, sexual orientation, disability or any other personal attribute. This Policy is considered a condition of employment and applies to all employees, third-party contractors and suppliers. In addition, the Entity has a Diversity Committee, made up of employees from different functions and hierarchical levels.

CRITERION	RATING	COMMENT
		Diversity, Equity and Inclusion Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Diversidade_E quidade_e_Inclusao_f4344c97c1.pdf
		Salary Transparency Report: https://d2biijvbg5ozmx.cloudfront.net/CBA_relatorio_transparencia_2 025_Atualizado_marco_5la917dce8.pdf
		Code of Conduct: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugue s_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09TI4:00:53.530Z
		Human Rights Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Direitos_Humanos_vf_10_07_b294f6004e.pdf
		Social Responsibility Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Responsabilidade_Social_c79b990d2f.pdf
		Code of Conduct for Suppliers: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_forneced ores_jun24_d0d0aad24e.pdf
10.5 Communication and engagement	Conformance	The Entity has communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues via team briefings, information boards and meetings with Worker representatives. https://relatorioanual2022.cba.com.br/pdfs/relatorio-anual-2022-caderno-divulgacao-complementar-en.pdf
10.6a-g Violence and Harassment	Conformance	The Entity has developed, implemented, and maintained systems, Policies, and procedures to manage issues related to disciplinary practices. In consultation with Workers and their representatives, the Entity has established a Policy against Violence and Harassment in the workplace. For any issues, a communication channel involving senior management is available, ensuring resolutions are handled according to an internal procedure for managing complaints. Workers receive training on Violence and Harassment.
		Code of Conduct: https://d2biijvbg5ozmx.cloudfront.net/codigo_de_conduta_portugue s_maio_24_cfab3f7a31.pdf?updated_at=2024-05-09T14:00:53.530Z
		Human Rights Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Direitos_Humanos_vf_10_07_b294f6004e.pdf
		Social Responsibility Policy: https://d2biijvbg5ozmx.cloudfront.net/CBA_Politica_de_Responsabilidade_Social_c79b990d2f.pdf
10.7a-c Remuneration	Conformance	The Entity respects Workers' rights to a minimum wage and a work contract that ensures payment for a standard working day according to local legislation. The minimum wage offered by the Entity exceeds the legal minimum wage for a standard working month and includes additional benefits such as shift allowances, travel allowances and bonuses.
		The Entity also guarantees that Workers are paid the wages defined in their employment contracts. Overtime is compensated at a premium rate following Applicable Law. Salaries are paid monthly by bank

CRITERION	RATING	COMMENT
		transfer, and the Entity provides Workers with a summary of hours worked and payment calculations.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards regarding Working Time, public holidays, and paid annual leave. Working Time is incorporated into the Collective Bargaining Agreement and all employment contracts.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights through the Code of Conduct and Human Rights Policy through established communication channels, including the Works Council and the Trade Unions, which all employees are free to join. The Entity ensures that all employees are aware of their rights through the integration process, which is provided to all employees upon joining the Entity and is posted on the Entity's intranet.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System comprising of OH&S Policies, procedures, and records. The Entity has defined 33 OH&S management tools (e.g. prevention tools, support tools, safety management and consequence mitigation) to support the implementation of the Management System. Further information is available in the Annual Report 2024, pages 63-66: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented a documented OH&S Management System comprising of OH&S Policies, procedures, and records. This also includes review and disclosure mechanisms. The OH&S Management System is subject to an annual internal audit and an annual management review and has successfully undertaken an independent Third Party ISO 45001:2018 audit. The review of the latest external audit report confirmed no non-conformances. To date, no fines or corrective action requests have been received from government agencies or other Stakeholders. The Entity undertakes comparative analyses of its performance. Further information is available in the Entity's Annual Report 2024, page 65: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to employee engagement on OH&S requirements. The Entity has a Multidisciplinary Committee which has been created to integrate actions from the OH&S, environment and occupational hygiene areas, both internally and externally. Further information is available in the Annual Report 2024, page 66: https://d2biijvbg5ozmx.cloudfront.net/relatorio_de_sustentabilidade_2024_4047b67e3d.pdf

CRITERION	RATING	COMMENT
		The Entity maintains an official communications channel to receive reports of behaviour that violates the principles and guidelines of the Code of Conduct, as well as violations of laws, regulations, Policies and other internal rules. The channel can be accessed by all the Stakeholders including employees, the community, suppliers, customers and business partners. Reports can be sent by telephone on 0800 300 4535 or via the CBA Ethics Line website (available in both Portuguese and English): https://canaldeetica.com.br/companhiabrasileiradealuminio

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	19 September 2019	Initial Certification Audit – Full Certification
1	15 January 2021	Surveillance and scope change audit. Updated to reflect Certification Scope change with addition of the casthouses and downstream productions (Itapissuma/PE) and update to the Initial Certification Audit Scope to the Supply Chain Activities list due to an error and to the sites included for clarity.
2	20 December 2021	Scope Change Audit – Certification Scope updated to include Araçariguama/SP (METALEX) site. Update to the Certification Scope to include 'aluminium remelting/refining' as one of the activities for Itapissuma/PE.
3	19 October 2022	Re-Certification Audit – Full Certification
4	28 November 2023	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply PS V3.
5	11 December 2025	Surveillance Audit Correction to the rating and comment for Criterion 9.5b in Rev 4 to reflect 'Not Applicable'.