

MINE SITE ASSESSMENT PUBLIC SUMMARY REPORT

MINE SITE

Barro Alto Nickel Mine

OPERATING COMPANY

Anglo American Brazil

COUNTRY OF OPERATION

Brazil

FEBRUARY 2024

Acknowledgements

IRMA believes that third-party, independent audits are most credible when there is robust participation not only from participating mines, but also from workers and stakeholders, particularly those from affected communities.

Outside stakeholders are not remunerated for their participation, and willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize the Barro Alto mine and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

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Audit Details

Name of Mine:	Barro Alto Mine
Operating Company:	Anglo American Brazil
Mine Owner:	Anglo American Brazil
Country of Operation:	Brazil
Mined Material(s):	Nickel (in FeNi alloy)
# Employees / contractors:	900 employees and 1597 contractors at the time of audit
IRMA audit webpage:	https://responsiblemining.net/barroalto
Audit Type:	Initial Certification Audit
Audit Dates:	Stage 1: 25 October – 30 November 2020 Stage 2: 29 November 2021 – 03 December 2021 Follow-Assessment: 12 – 19 October 2022
Audit Team:	Alex Teran – Lead Assessor Paulo Rezende – Social Assessor Tatiane Moraes – Social Assessor Eduardo Huergo – EHS Assessor Jorge David – EHS Assessor Felipe Marques – Social Support Laura Andrade – Social Support
Audit Firm Declaration:	<p>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers and stakeholders) as presented during the Stage 1 and Stage 2 audit activities.</p> <p>✓ The audit team members were deemed to have no conflicts of interest with the mine.</p> <p>✓ The audit team members were professional, ethical, objective and truthful in their conduct of audit activities.</p> <p>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p>
Scope of Assessment	Open pit mines, processing plant, ancillary facilities, and other supporting activities for exploration, mining, processing and transport of nickel ore.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
Certification Body (CB):	ERM CVS
CB Technical Reviewer:	Will Huggett
IRMA Achievement Level	IRMA 75
Achievement Decision Date:	07 February 2024
Achievement Valid Until	06 February 2027 (contingent upon outcome of surveillance audit and continuous compliance with the IRMA independent audit processes)

IRMA Reference Number:

IRMA-00050-STD01.0-01-INT
OLD: IRMA-STD-ERM-001-V-03392

1. Mine Site Overview

1.1. Overview of location

The municipality of Barro Alto is located inside the Central-West region of Brazil, in the state of Goiás, about 170km north-west of Brasília, and 150km from Anglo American's Codemin nickel operation. The main urban centers neighboring Barro Alto are Uruaçu and Goianésia, both located in the state of Goiás. Founded in 1958, Barro Alto is one of the youngest municipalities in the state. The municipality is 1,231 square kilometers and has an approximate population of 11,408 inhabitants.

The city of Barro Alto has experienced high population growth in recent decades. As of the latest Brazilian Census (2010), the population density of Barro Alto corresponded to less than half of the average for the state of Goiás, - a common characteristic in sparsely populated municipalities. The municipality of Barro Alto had a population growth rate higher than those observed both in the state context and in the context of the capital Goiânia between 2015 and 2017. This may be associated with the attraction of labor to fill jobs in the nickel and bauxite mining ventures, and sugar and alcohol sectors in the municipality.

Goiás is characterized by a landscape of plateaus and occupies a large plateau which stands between 750 and 900 meters above sea level and forms the divide between three of Brazil's largest river systems: to the south, Goiás is drained by the Paranaíba River, to the east it is drained by tributaries of the São Francisco River; and northward the state is drained by the Araguaia River and the Tocantins River. Goiás is covered with a woodland savannah with some tropical forests lining the rivers. The climate in this region is tropical with temperatures of 26 degrees Celsius in the warmest month to 22 degrees Celsius in the coldest.

The Ceres region in which Barro Alto is located, is historically known for agricultural, primarily coffee plantations, where immigrants from various parts of Brazil sought new land for exploration beginning in the 1930s. Cattle ranching was also popularized at this time, supported by the fertile land and favorable climate conditions for planting pastures. Currently, extractive industries, primarily mineral extraction, are the key economic contributors in the region. Although not the primary economy, agricultural activity such as sugarcane and beef cattle continue in the region.

1.2. Overview of operation

The Barro Alto Industrial Complex includes six mining areas and an industrial processing plant. The Mine was completed in 2004 and nickel production began in 2011, when the construction of the pyro-metallurgical plant was finalized. Prior to the completion of the onsite plant, ore was transported 170 km to the CODEMIN facility in Niquelândia.¹

¹ Stakeholder Engagement Plan and Social Management Plan (SEP and SMP) – Barro Alto. Anglo American, November, 2019.

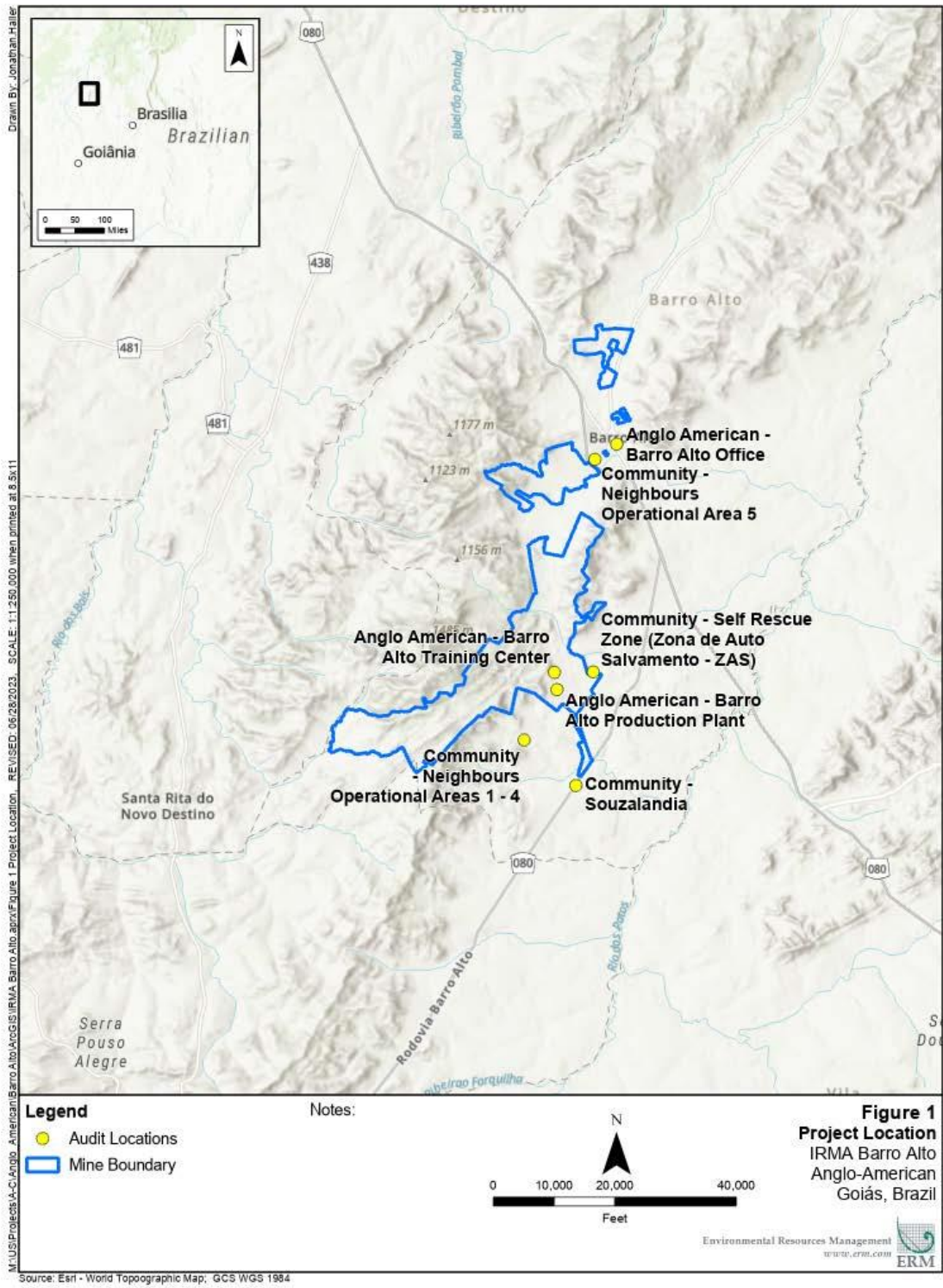
Per the operating plan, the mine's lifetime is estimated to 2041.

The Barro Alto mine currently operates four open pits: Area 1, Area 2, Area 3, and Area 4. A fifth pit, Area 5, was not operational during the time of the assessment. Area 5 became operational in November 2021. Additionally, studies to support the licensing request for a sixth pit (Area 6) are underway. Area 6 would provide an additional slag deposit with additional slag production. This area is anticipated to enter production as other areas are exhausted, therefore no increase in overall production is anticipated by the mine.

The associated facilities at the site are waste rock disposal areas, transportation corridors, on-site power generation or substation, transmission line, containment basin, water intake, mineral disposal areas and parking.

1.2.1. Scope of activities and facilities included in audit

The initial assessment audit for the Barro Alto Mine included the four open pit mines, as well as the onsite processing facilities. Area 5 became operational in November 2021 and therefore was not included in the scope of this assessment. This area will be included in future assessments.



Drawn By: Jonathan Haller
 M:\US\Projects\A-C\Anglo American\Barro Alto\ACCG\IRMA Barro Alto.aprx\Figure 1 Project Location, REVISED: 06/28/2023, SCALE: 1:1250,000 when printed at 8.5x11

2. Mine Site Assessment Process

2.1. Overview of IRMA Process

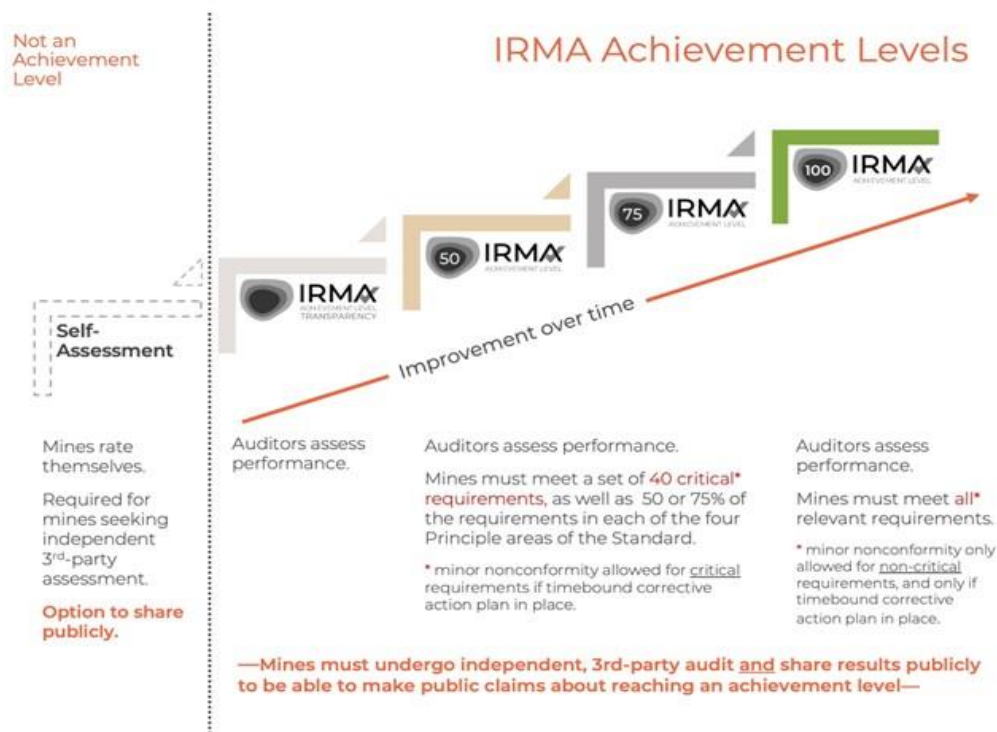
The mine site assessment process begins with mines completing a self-assessment and uploading evidence into an online tool (Mine Measure).¹ When the self-assessment has been completed, the independent, third-party assessment may begin.

Stage 1 of the independent, third-party assessment is a desk review carried out by an IRMA-approved Certification Body, which puts together a team of auditors to review the self-assessment ratings and evidence provided by the mine site. During this stage of the audit additional information may be requested by auditors. Mines may also choose to take time to make improvements to practices prior to commencement of Stage 2.

Stage 2 is the on-site visit, which includes facility and site-based observations, additional review of materials and interviews with mine site personnel, workers, stakeholders, and meetings with affected communities.

Based on observations, interviews and information evaluated during Stage 1 and Stage 2, auditors determine if mines are fully, substantially, partially, or not meeting all of the IRMA Standard requirements relevant at the mine site. The decision regarding a mine site's achievement level is made by the Certification Body.

IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA's Certification Body Requirements, available on IRMA's web site.²



2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by auditors who: have undergone IRMA training, meet IRMA competency requirements and have been deemed to have no conflicts-of-interest with the mine site under assessment.³

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).⁴ In addition to document review, audits include on-site visits of relevant facilities, review of records, and interviews with site personnel and relevant stakeholders.

Auditor evaluations are based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

Audit evidence is based on samples of available information. Therefore, there is an element of uncertainty in auditing, and those acting upon the audit conclusions should be aware of this uncertainty.

2.1.2. IRMA Complaints Process

If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website.⁵ Details on the complaints process can be found in IRMA's Issues Resolution Procedure.⁶

2.2. Audit Process and Timeline

- Anglo American Brazil completed the initial self-assessment for Barro Alto Mine in October 2019. Based on feedback from ERM CVS, the self-assessment was updated and revised between December 2019 and January 2020.
- ERM CVS completed an initial Stage 1 desktop audit in November 2020.
- ERM CVS conducted a Stage 2 on-site audit in November and December 2021.
- ERM CVS conducted a Follow-up Assessment from 12 – 19 October 2022.

The on-site audit included a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs), governmental agencies (described further in Section 2.3); documentation review and visit to operational areas (see Section 2.4).

2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and audit firms, and prior to the on-site audit there is additional outreach carried out by audit firms.

The Stage 2 Assessment was announced on the ERM CVS website 30 days prior to the onsite assessment, and invited stakeholders to participate in the assessment. Further, ERM CVS

prepared a similar announcement in Portuguese that was distributed to representatives in the surrounding communities.

2.3.1. Written comments/inquiries

ERM CVS did not receive any written comments or queries prior to or during the Assessment.

2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

Position/Role
Social Performance Principal – Resettlement
Sustainable Development Analysis
Social Performance Analyst
Accounting Coordinator
Senior Resettlement Analyst
Social Performance Senior Analyst
Tax Manager
Corporate Sustainable Development Coordinator
Communication Coordinator
Social-Institutional Performance Manager
Communication Analyst
Community and Institutional Relations Analyst
Compliance and Governance Coordinator
IMS (Integrated Management System) Analyst
Accounting and Tax Manager
Institutional and Communities Relations Coordinator
Whistleblowing Management
Cultural Heritage Specialist
Environmental Lawyer
Forestral Engineer
Management Coordinator
Human Resources Coordinator
Process Manager
Sustainable Impact Coordinator
Compliance and Governance Manager
Environmental, Health and Safety Manager
Senior Supplier Management
Project Manager Coordinator
Community and Institutional Relations Analyst

Resettlement Coordinator
Human Resources Manager
Social Performance Coordinator
Human Resources and Administration Manager

2.3.3. Workers/Contractors

ERM CVS facilitated a total of 87 scheduled worker engagements including group interviews or focus group with employees and contractors. Scheduled worker interviews were supplemented by additional impromptu interviews with individuals or groups, in various mine work sites during the EHS audit process. Some interviews occurred with specific topics and employees, such as vulnerable groups, contractors, women, security and labor union members, while the most interviews occurred with other general employees from several different departments of Anglo-American Brazil Barro Alto Mine.

These engagements took place on-site at the Anglo-American Training Center, at the plant, and via online video conference facilities. Employee interviews were arranged by Barro Alto personnel but were conducted without management personnel present. Supervisors did not participate in any group meetings so as not to bias or pressure employees' responses; however, some supervisors were interviewed individually.

Date	Meeting Type	Number of Attendees	Female/ Male	Group Type and Notes
11/30/21	Focus Group	3	2 M 1 F	Vulnerable groups
11/30/21	Focus Group	3	1 M 2 F	Contractors
11/30/21	Focus Group	3	0 M 3 F	Women
11/30/21	Focus Group	3	1 M 2 F	Security
12/03/21	Focus Group	4	4 M 0 F	Labor Union
12/03/21	Focus Group	71	41 M 30 F	Mix of Employees

2.3.4. Government Agencies

ERM CVS conducted interviews with government agency representatives identified as having authority over or a relationship with Anglo American Brazil. These interviews were facilitated by Anglo American personnel but were conducted without Anglo American personnel present.

Government Institution
Local Government Mayor

2.3.5. Participating Communities and NGOs

In order to identify stakeholders relevant to the audit process, two social specialists reviewed the stakeholder database provided by Barro Alto to identify vulnerable groups and stakeholders who may represent diverse stakeholder interests. ERM CVS held a working session with the Barro Alto Social Performance team to further understand the Mine stakeholders. To augment this, ERM CVS completed further desktop research and a media review (including social media) to identify additional stakeholders to engage during the Stage 2 Assessment.

During the Stage 2 audit, ERM CVS conducted meetings with community members and NGOs or associations located proximal to the mine or with the potential to be impacted by the Mine. Most of the participants reside in rural properties located in the mine's surroundings, or in the city center of Barro Alto. Meetings were primarily held in the Anglo-American Training Center, the plant facilities in the Barro Alto Industrial Complex, and the Anglo American Brazil Barro Alto Office. The varying locations were intended to allow community members from different areas to access the meetings. The Mine provided transport for those who needed it. Communication and organization of these meetings were facilitated by Anglo American Brazil personnel but were conducted by ERM CVS auditors without Anglo American personnel present. Meetings were held in the communities identified below.

Community, NGO Name	Location	Total Number of Attendees
Neighbors Area 1	Anglo American Training Center	1
Neighbors Area 2	Anglo American Training Center	2
Neighbors Area 4	Anglo American Training Center	2
Neighbors Area 5	Anglo American Barro Alto Office	2
Self-Rescue Zone (Zone de Auto Salvamento – ZAS)	Anglo American Training Center	3
Souzalândia	District of Souzalândia – Barro Alto/GO	2
NGOs and Associations	Anglo American Barro Alto Office	7

2.4. Summary of Mine Facilities Visited

The following areas were visited or observed during the on-site visit:

Operational areas	Barro Alto Mine Areas (1 – 5) Processing Plant Hazardous and Non-Hazardous Waste Storage Areas
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Other areas visited

Anglo American Office in Barro Alto
Anglo American Training Center – near Processing Plant

**Surrounding
Communities**

Neighbors Area 1 – 5
Self-Rescue Zone (Zona de Auto Salvamento – ZAS)
Souzalandia

3. Summary of Findings

Detailed audit findings on a requirement-by-requirement basis can be found in Appendix A.

3.1. Audit outcome

The site is recognized as having achieved the level of IRMA 75 based on the performance recorded during the Stage 1 and Stage 2 audits.

3.2 Scores by IRMA Standard principle and chapter

	Chapter Relevant*	Actual Score	Possible Score	Percent Score
Principle 1: Business Integrity		89	110	81%
Chapter 1.1—Legal Compliance	Yes	14.5	16	91%
Chapter 1.2—Community and Stakeholder Engagement	Yes	24.5	32	77%
Chapter 1.3—Human Rights Due Diligence	Yes	18.5	22	84%
Chapter 1.4—Complaints Mechanism/Access to Remedy	Yes	18	22	82%
Chapter 1.5—Revenue and Payments Transparency	Yes	13.5	18	75%
Principle 2: Planning for Positive Legacies		110.5	148	75%
Chapter 2.1—Env/Soc Impact Assessment and Management	Yes	26.5	34	78%
Chapter 2.2—Free, Prior and Informed Consent	No	Not Relevant	Not Relevant	Not Relevant
Chapter 2.3—Community Support and Benefits	Yes	16	20	80%
Chapter 2.4—Resettlement	Yes	34.5	42	80%
Chapter 2.5—Emergency Preparedness and Response	Yes	10	12	83%
Chapter 2.6—Planning/Financing Reclamation & Closure	Yes	23.5	40	59%
Principle 3: Social Responsibility		155.5	184	85%
Chapter 3.1—Fair Labor and Terms of Work	Yes	53	56	95%
Chapter 3.2—Occupational Health and Safety	Yes	38	46	83%
Chapter 3.3—Community Health and Safety	Yes	10.5	22	48%
Chapter 3.4—Conflict-Affected and High-Risk Areas	No	Not Relevant	Not Relevant	Not Relevant
Chapter 3.5—Security Arrangements	Yes	24	30	80%
Chapter 3.6—Artisanal and Small-Scale Mining	No	Not Relevant	Not Relevant	Not Relevant
Chapter 3.7—Cultural Heritage	Yes	30	30	100%

Principle 4: Environmental Responsibility		120	148	81%
Chapter 4.1—Waste and Materials Management	Yes	36	42	83%
Chapter 4.2—Water Management	Yes	31.5	38	83%
Chapter 4.3—Air Quality	Yes	15.5	18	86%
Chapter 4.4—Noise and Vibration	Yes	6	6	100%
Chapter 4.5—Greenhouse Gas Emissions	Yes	11	14	79%
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas	Yes	20	30	67%
Chapter 4.7—Cyanide Management	No	Not Relevant	Not Relevant	Not Relevant
Chapter 4.8—Mercury Management	No	Not Relevant	Not Relevant	Not Relevant

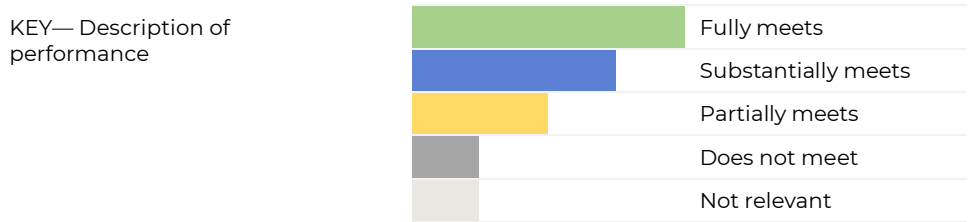
* Chapters are marked as not relevant if auditors have verified that the issues addressed in the chapter are not applicable at the mine site. For example, if the mine can demonstrate that there is no artisanal and small-scale mining (ASM) occurring near the mine, and the mine does not source materials from ASM operations then Chapter 3.6 would be marked as not relevant.

Chapters deemed Not Relevant do not factor into the Principle Scores.

3.3. Performance on critical requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve IRMA 100 must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

3.3.1. Snapshot of performance on 40 critical requirements










3.3.2. Performance on 40 critical requirements.

RATING LEGEND









Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Principle 1: Business Integrity

1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project.	
1.2.2.2	The mine fosters two-way dialogue and meaningful engagement with stakeholders	
1.3.1.1.	The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights.	
1.3.2.1.	and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships.	
1.3.3.3.	The operating company is taking steps to remediate any known impacts on human rights caused by the mine.	
1.4.1.1.	Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation.	
1.5.5.1.	The operating company has developed, documented and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.	

Principle 2: Planning for Positive Legacies

2.1.3.1	The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project.	
2.2.2.2.	New mine sites have obtained the FPIC of indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected indigenous peoples and provides remedies for past impacts on indigenous peoples' rights and interests.	
2.4.7.1.	If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met.	
2.5.1.1.	All operations related to the mining project shall have an emergency response plan	
2.5.2.1.	and there is community participation in emergency response planning exercises.	
2.6.2.1.	Reclamation and closure plans are compatible with protection of human health and the environment,	
2.6.2.6.	and are available to stakeholders.	
2.6.4.1.	Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring).	

Principle 3: Social Responsibility

3.1.2.1	Workers' freedom of association is respected.	L
3.1.3.3.	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	
3.1.5.1.	Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues.	L
3.1.7.2.	No children (i.e., persons under the age of 18) are employed to do hazardous work	L
3.1.7.3.	and no children under the age of 15 are employed to do non-hazardous work.	L
3.1.8.1.	There is no forced labor at the mine site or used by the operating company.	L
3.2.4.1.a, b	Workers are informed of hazards associated with their work, the health risks involved and relevant preventive and protective measures.	
3.3.1.1.	The risks to community health and safety posed by the mining operation are evaluated and mitigated.	
3.4.2.1.	If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights.	—
3.5.1.2.	The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel.	L

Principle 4: Environmental Responsibility

4.1.4.1.	A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities.	L
4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices.	L
4.1.5.6.	The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities.	
4.1.8.1.	The mine does not use riverine, submarine or lake disposal for mine wastes.	—
4.2.4.1.a-e	Water quality and quantity are being monitored at the mine site	L
4.2.4.4	and adverse impacts resulting from the mining operation are being mitigated.	
4.3.2.1.	When significant potential impacts on air quality are identified, the mine develops measures to avoid and minimize adverse impacts on air quality, and documents them in an air quality management plan.	
4.5.1.1.	There is a policy being implemented that includes targets for reducing greenhouse gas emissions.	
4.6.2.1.	The mine has carried out screening to evaluate its potential impacts on biodiversity, ecosystem services and protected areas	L
4.6.4.1.	and these impacts are being mitigated and minimized.	L
4.6.5.3.	New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves	—
4.6.5.4.	and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized.	—
4.7.1.1.	Gold or silver mines using cyanide are certified as complying with the Cyanide Code.	—

4.8.2.3.	Mercury wastes are not permanently stored on site without adequate safeguards,	—
4.8.2.2.	are not sold or given to artisanal or small-scale miners, and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.	—

4. Next Steps

4.1 Corrective Action Plans

Following the Stage 2 Assessment, Barro Alto prepared a Corrective Action Plan to address major non-conformities with critical and other requirements, with the goal of improving their overall achievement level. ERM CVS conducted a follow-up assessment to verify the implementation of corrective actions to improve performance against the Critical Requirements in October 2022.

Barro Alto is in the process of expanding the Corrective Action Plan to address additional areas of performance, with the goal of improving performance during the audit cycle.

In the IRMA system, mines are allowed a 12-month corrective action period if they are interested in addressing non-conformities with critical or other requirements to reach a higher achievement level or gain recognition for improved performance. This enables them to implement changes and have them verified by auditors without waiting until the surveillance or reassessment audit.

During the 12-month period Barro Alto implemented a series of corrective actions to address non-conformities. ERM CVS undertook a follow-up assessment in October 2022 to review progress against the corrective actions, additional evidence, and to update audit findings.

To improve the IRMA level of achievement following the initial audit, Barro Alto prepared a corrective action plan (included in Appendix B) to address minor non-conformities with critical requirements. The audit team will assess the implementation of the corrective action plan during the surveillance audit.

4.2 Disclosure of Summary Audit Report

IRMA requires that all mines that undergo independent, third-party auditing disclose a summary audit report within 12 months of an audit to maintain good standing in the IRMA system.

Barro Alto's public audit report will be posted on the IRMA web site.

Barro Alto will work with IRMA to make a coordinated press release with the result of the Stage 2 audit.

4.3 Timing of Future Audits

The Mine's surveillance audit will take place no more than 18 months after the initial IRMA Assessment Report is published (this Assessment).

APPENDIX A – Results by Requirement

Principle 1: Business Integrity

RATING DESCRIPTION
Description of performance

L	Fully meets
●	Substantially meets
⊖	Partially meets
⊗	Does not meet
—	Not relevant

Chapter 1.1—Legal Compliance

Basis for rating

1.1.1.1.	CRITICAL The operating company shall comply with all applicable host country laws in relation to the mining project.	L	<p>Brazil Nickel operations has developed and implemented a norm of business conduct and governance organization to ensure operations are in full compliance with the applicable regulations, not only Brazilian but all corporate requirements and international agreements.</p> <p>Barro Alto has a system for monitoring legal requirements applicable to the business and referring to the scopes of Safety, Occupational Health, Environment and Social Responsibility (Labor Relations) called the Qualifica System. A documented procedure defines guidelines and responsibilities around the system for accessing, verifying, and controlling the applicable legislation.</p> <p>There is a third-party contract with a law firm to identify new regulations and evaluate their applicability to Brazil Nickel Operations (this applies for Barro Alto and Codemin).</p> <p>Annual compliance audits to assess compliance with Brazilian legislation are carried out on a regular basis.</p> <p>Self-assessments are also performed through the Qualifica System, which is managed by the IMS (Integrated Management System) Nickel team and fed by each relevant area with their information regarding compliance with the applicable legislation.</p> <p>The most recent compliance audit prior to the IRMA onsite audit, was conducted in September 2021. The process requires a root cause analyses and effectiveness verification of the corrective actions, evidence available.</p>
1.1.2.1.	The operating company shall comply with whichever provides the greatest social and/or environmental protections of host country law or IRMA requirements. If complying fully with an IRMA requirement would require the operating company to break host country law then the company shall endeavor to meet the intent of the IRMA requirement to the extent feasible without violating the law.	L	Efforts have been made to include IRMA requirements in Anglo American corporate standards, which are the base to develop local programs and ensure compliance/conformance. However, besides the self-assessment there is no evidence that Barro Alto has performed an analysis of IRMA requirements versus Brazilian regulations to determine if there is any conflict or if the IRMA requirement should be applied to ensure the greatest social and/or environmental protections are implemented. No evidence that IRMA specific requirements have been formally included in the compliance obligation matrix. For example, Brazilian regulations do not require an independent financial assurance instrument for Closure Plan, which is a critical requirement for IRMA.
1.1.3.1.	If non-compliance with a host country law has taken place, the operating company shall be able to demonstrate that timely and effective action was taken to remedy the non-compliance and to prevent further non-compliances from recurring.	L	Barro Alto has defined a process to ensure that the non-compliance issues are addressed. There is an electronic platform where the corrective actions are uploaded for tracking (sistema de gestão SE SUITE). Root cause analyses and effectiveness verification of the corrective actions are performed.
1.1.4.1.	The operating company shall demonstrate that it takes appropriate steps to ensure compliance with the IRMA	L	Barro Alto has developed very detailed contractor manuals, which establish all the environmental and occupational health and safety requirements and expectations for contractors. Meetings, inspections, monthly reports as well as

	Standard by contractors engaged in activities relevant to the mining project.		<p>audits are carried out to verify conformance with the requirements. Compliance with all Barro Alto and Anglo American requirements is part of the formal documented contracts. Policies and procedures are included as part of the contract (Environmental Health and Safety, Social, Human Rights, Code of Conduct, Bribery, etc.). Compliance is verified regularly through internal and external audits. If any issue is raised, corrective action is applied, which could include contract termination.</p> <p>Contractors and supplier's expectations are also informed through the Anglo American Brazil website. During interviews with contractors some gaps in the understanding of these requirements and communications channels were observed.</p>
1.1.5.1.	The operating company shall maintain records and documentation sufficient to authenticate and demonstrate compliance and/or non-compliance with host country laws and the IRMA Standard.	L	<p>Documentation and records are maintained.</p> <p>Barro Alto maintains records and documentation sufficient to demonstrate compliance /non-compliance with all Brazilian law; compliance records are available for review. There is an electronic platform ELO for all the licenses, cates, authorizations, and permits, with indication of renewals. In addition, there is a record keeping procedure; each area maintains a list with the key records indicating location, responsibility, and retention time.</p>
1.1.5.2.	Records related to compliance and/or non-compliance with host country laws shall be made available to IRMA auditors, and shall include descriptions of non-compliance events and ongoing and final investigations, allegations, discussions, and final remedies.	L	All records regarding compliance are maintained in the Sistema Qualifica, in the Governance portal and in other locations according to the records keeping matrixes maintained in different supporting and operational areas. Compliance and non-compliance records as well as investigations records were available for review.
1.1.5.3.	Upon request, operating companies shall provide stakeholders with a summary of the mining project's regulatory non-compliance issues that are publicly available.		<p>There are processes in place to respond to stakeholder requests.</p> <ol style="list-style-type: none"> 1. Management Review (Analise critica): Barro Alto has defined and implemented a Management Review procedure which requires periodic meetings with the Senior Management of the Nickel business. One of the topics that are discussed during these meetings is the feedback from interested parties regarding their expectations and needs. If any stakeholder asks for information about records of non-compliances this request will be evaluated by the Senior management team to determine the communication strategy. However, this process is carried out every 3 months, which could imply delays in the response. 2. According to the interviewees, other processes to respond to stakeholder inquiries are in place. No stakeholder requests regarding compliance issues /status have yet been made, but the company would provide such information to stakeholders if requested. <p>The organization has not made a formal decision regarding publicity of the compliance reports.</p>
1.1.5.4.	Where the operating company claims that records or documentation contains confidential business information, it shall:	L	The organization has implemented a confidentiality policy. Personal information, including medical records, is confidential and cannot be disclosed

	<p>a. Provide to auditors a general description of the confidential material and an explanation of the reasons for classifying the information as confidential; and</p> <p>b. If a part of a document is confidential, only that confidential part shall be redacted, allowing for the release of non-confidential information.</p>		to auditors or other persons unless a court order. Besides this, all records were available for review.
Chapter 1.2—Community and Stakeholder Engagement		Basis for rating	
1.2.1.1.	The operating company shall undertake identification and analysis of the range of groups and individuals, including community members, rights holders and others (hereafter referred to collectively as “stakeholders”) who may be affected by or interested in the company’s mining-related activities.	L	<p>The provided documentation presents the stakeholder engagement plan updated annually, indicating the updating of the mapping and engagement activities, mapping of the vulnerable people, identification and management of impacts and risks, company policy and corporate standards. The 2019 annual engagement plan review includes three areas of improvement. Two of these are addressed in the audit of chapters 2.1 and 2.4. The third area related to this chapter includes opportunity to expand engagement with minority and vulnerable groups in current and future community forums to be established for engagement with stakeholders, considering gender parity and inclusion of people with disabilities, young people, the elderly, among others.</p> <p>The company presented evidence of the mapping and list of stakeholders, and the participants of the activities. The company also presented documents indicating efforts to address the areas of improvement described in the Stakeholder Engagement Plan.</p>
1.2.1.2.	A stakeholder engagement plan scaled to the mining project’s risks and impacts and stage of development shall be developed, implemented and updated as necessary.	L	<p>The company presented a Stakeholder Engagement Plan scaled to the project’s risks and impacts, with evidence of meetings and communication with the stakeholders mapped. The Stakeholder Plan is updated on a regular basis, once a year.</p> <p>The company presented evidence of meetings with the community, and attendance lists to confirm stakeholder participation in the reported activities.</p>
1.2.1.3.	The operating company shall consult with stakeholders to design engagement processes that are accessible, inclusive and culturally appropriate, and shall demonstrate that continuous efforts are taken to understand and remove barriers to engagement for affected stakeholders (especially women, marginalized and vulnerable groups).	●	<p>We agree with the Anglo American rationale that the stakeholder consultation process was carried out through the Social Economic Assessment Toolkit (SEAT), (document analyzed in this step) and, as a result, action plans were developed to mitigate negative impacts, improve positive impacts and engagement with the community. In consultations and engagements activities, vulnerable groups participate, and their issues are considered.</p> <p>However, in the Area 6 Coexistence and Negotiation Committees, Anglo American mentioned as examples of engagement with bilateral, constant, and inclusive dialogue they are facing a low adherence of the landowners to that Negotiation Committee, related to distrust (or rejection) of collective bargaining processes as proposed by the adopted methodology that they must show evidence of how they overcame or are overcoming this issue. In addition, the interviews with community members, employees and subcontractors show that</p>

			the company did not demonstrate that it fully meets the requirements of accessible and culturally appropriate communication and engagement with vulnerable groups.
1.2.1.4.	The operating company shall demonstrate that efforts have been made to understand community dynamics in order to prevent or mitigate community conflicts that might otherwise occur as a result of company engagement processes.	L	The analyzed documentation indicates that the stakeholder participation process is well structured, considers the differences of the communities, creates forums for discussion to attend to different interests and mitigate conflicts considering social indicators. The company presented evidence of the results shown in the reports, with efforts to optimize communication in the communities. The communication analysts in charge of the direct communication with the communities are well evaluated by the community members.
1.2.2.1.	Stakeholder engagement shall begin prior to or during mine planning, and be ongoing, throughout the life of the mine. (Note: existing mines do not need to demonstrate that engagement began prior to mine planning)	L	Stakeholder engagement and management is part of Anglo American's corporate policy at all stages of its projects. In the case of Barro Alto, the policy is in progress and for all new expansion fronts of the mine, actions related to engagement are implemented and the annual update reports bring results about the plan as a whole and about the actions that anticipate the expansion stages from the project. The company presented samples of the meetings attendance, list of stakeholders, records of grievance received, and minutes of the forums established to engage with affected communities and stakeholders, indicating that the engagement process occur in a regular basis.
1.2.2.2.	CRITICAL The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account.		The revised documentation indicates that both in the policy and in the engagement plan with stakeholders, Anglo American promotes a two-way dialogue with stakeholders, has communication devices that seek to provide information to interested parties in a timely manner, considering the opinion of experts to address the issues presented by stakeholders with transparent and ethical dialogue to receive and provide feedback to all stakeholders. According to the interviews with community members, the level of information regarding emergency response and emergency awareness shared with the stakeholders is unbalanced. In general, there is a low level of knowledge about the procedures in case of emergency, and the community members state that this information was initially provided without any further communication or orientation. In some instances, it was not provided at all.
1.2.2.3.	The operating company shall collaborate with stakeholders, including representatives from affected communities, to design and form stakeholder engagement mechanism(s) (e.g., a permanent advisory committee, or committees dedicated to specific issues), to provide stakeholder oversight of the mining project's environmental and social		The community committee (Comitê de Convivência) created within the scope of stakeholder engagement and implementation of the actions of the respective plan is structured in such a way as to be integrated by representatives from different segments of the communities with room for discussing and addressing environmental or social performance issues related to the interests of the participating groups and the community. In the review of other requirements in this chapter, documents have already been verified with results

	performance, and/or input to the company on issues of concern to stakeholders.		<p>of addressing issues submitted by stakeholders, records of committee meetings with list of participants.</p> <p>However, according to the community members interviewed, the committee does not fully meet the requirements of addressing issues or concerns from the community, since the committee is not representative of all the community members.</p>
1.2.2.4.	Engagement processes shall be accessible and culturally appropriate, and the operating company shall demonstrate that efforts have been made to include participation by women, men, and marginalized and vulnerable groups or their representatives.	●	<p>The engagement processes verified in the revised documentation demonstrate the accessibility of gender groups and different social strata.</p> <p>Although the mapping of vulnerable groups was indicated in the reports to update the Stakeholder Engagement Plan, the effective presence of representatives of these groups on the Comitê de Convivência was not observed in the revised documentation.</p> <p>The committee counts on the participation of appropriate social and environmental consultancy to support the definition of forms of engagement and communication to serve the different groups with different cultural traits.</p> <p>The operating company has made efforts to include some but not all marginalized and vulnerable groups or their representatives.</p>
1.2.2.5.	When stakeholder engagement processes depend substantially on community representatives, the operating company shall demonstrate that efforts have been made to confirm whether or not such persons represent the views and interests of affected community members and can be relied upon to faithfully communicate relevant information to them. If this is not the case, the operating company shall undertake additional engagement processes to enable more meaningful participation by and information sharing with the broader community.	⊕	<p>The first composition of the community committee (Comitê de Convivência) was the result of a process of formation and qualification of leaders indicated by the company, but not validated by the community.</p> <p>The bylaws of the coexistence committee provide for the periodicity of the representatives of the stakeholders' renewal (every two years) and have rules for the interference of community members to question the representativeness of those elected and to submit replacement requests when applicable.</p> <p>However, the statute of the committee and other revised documents do not present the dynamics of the communities' broader participation forums for the selection of their representatives.</p> <p>In the context of the mobilization, only one periodic magazine was presented as an instrument for disseminating and calling for participatory events to choose community representatives from each group of stakeholders.</p>
1.2.2.6.	The operating company shall document engagement processes, including, at minimum, names of participants, and input received from and company feedback provided to stakeholders.	L	<p>The company presented documentation in excel format with registration, preparation and interaction with meeting participants, the demands presented, the addresses of the demands and the feedback to the requesters.</p> <p>It also presented a list of stakeholders in an excel spreadsheet, detailing the groups to which they belong, indicating, when it represents vulnerable and the degree of impact of the mine on the represented group and the degree of influence of the stakeholder in decision-making processes.</p> <p>The mine also presented a list of stakeholders in an Excel spreadsheet, identifying the groups to which they belong, consideration of vulnerability, the degree of impact of the mine on the represented group and the degree of influence of the stakeholder in decision-making processes.</p>

1.2.2.7.	The operating company shall report back to affected communities and stakeholders on issues raised during engagement processes.	●	<p>The consulted documentation indicates that the Anglo American registers and seeks to address the issues raised in the engagement processes and discloses in the meetings the progress of actions, deadlines, and results.</p> <p>The documentation presents evidence of meetings with local management authorities and municipal legislators and with coexistence committee representatives. However, there is no evidence of the frequency with which meetings are held to disclose issues and solutions.</p> <p>In the review of this requirement no evidence was found on the general disclosure of issues beyond the committee and meetings with authorities, or how the committee disseminates the information received to the community or its represented groups.</p> <p>In the interviews with Community Relationship Coordinator and team, it was provided explanations on how the company disseminates the information received to the community or its represented groups, and evidence of surveys to verify the degree of stakeholder satisfaction with the company activities.</p>
1.2.3.1.	The operating company shall offer to collaborate with stakeholders from affected communities to assess their capacity to effectively engage in consultations, studies, assessments, and the development of mitigation, monitoring and community development strategies. Where capacity gaps are identified, the operating company shall offer appropriate assistance to facilitate effective stakeholder engagement.	⊕	<p>The coexistence committee's bylaws indicate that the first group of stakeholder representatives elected to the committee were trained to exercise leadership functions. However, no documents were presented showing the training process of the participants.</p> <p>The revised documentation for this requirement does not present evidence that the Anglo American has taken actions to identify the needs of the stakeholders and has carried out actions to train groups or individuals in the community to meet their needs in order to ensure an effective participation on representative activities. Anglo American also did not indicate whether the company adopts agreements or hiring specialized personnel to train community members or their representatives.</p> <p>The members of the communities interviewed did not confirm their participation in training or that they have received details on how to improve their capacity to be effectively engaged and to provide them the guidance to the best way to use their participation in the coexistence committee.</p>
1.2.4.1.	Any information that relates to the mine's performance against the IRMA Standard shall be made available to relevant stakeholders upon request, unless the operating company deems the request to be unreasonable or the information requested is legitimate confidential business information. If part of a document is confidential only that confidential part shall be redacted, allowing for the release of non-confidential information.	L	No stakeholder requests have yet been made, but the company would provide information to stakeholders if requested, and only redact the confidential information.
1.2.4.2.	If original requests for information are deemed unreasonable, efforts shall be made by the operating company to provide stakeholders with overviews or summaries of the information requested.	L	No stakeholder requests have yet been made, but the company would provide information to stakeholders if requested, and only redact the confidential information.

1.2.4.3.	Communications shall be carried out and information shall be provided to stakeholders in a timely manner, and shall be in formats and languages that are culturally appropriate and accessible to affected communities and stakeholders	⊕	<p>The group of communication vehicles includes Radio Dialogue program (monthly), and Dialogo magazine (bimonthly). In addition, whenever necessary, banners, newsletters and / or booklets are produced. It is also possible to find relevant information on the company's website with specific information about Barro Alto.</p> <p>In the interviews with the Communication and Community Relations teams, the company provided evidence of a systematic procedure to present information required by the relevant stakeholders.</p> <p>However, according to the community members interviewed, there are issues in the company capacity to respond and report back the information, taking a long time to do so. The community also states that the answers from the company to the requests are not effective to provide a resolution to the requests.</p>
1.2.4.4.	If requests for information are not met in full, or in a timely manner, the operating company shall provide stakeholders with a written justification for why it has withheld information.	⊗	No documents were made available to assess this item.

Chapter 1.3—Human Rights Due Diligence


Basis for rating

1.3.1.1.	CRITICAL The operating company shall adopt a policy commitment that includes an acknowledgement of its responsibility to respect all internationally recognized human rights	L	The policy states Anglo American commits to respect all internationally recognized human rights (IRHR), in particular: those contained in the International Bill of Human Rights.
1.3.1.2.	<p>The policy shall:</p> <ol style="list-style-type: none"> a. Be approved at the most senior level of the company; b. Be informed by relevant internal and/or external expertise; c. Stipulate the operating company's human rights expectations of personnel, business partners and other parties directly linked to its mining project; d. Be publicly available and communicated internally and externally to all personnel, business partners, other relevant parties and stakeholders; e. Be reflected in the mining project's operational policies and procedures. 	L	<p>The Global Human Rights Policy was issued by the Head of Government Relations. It expresses human rights expectations of personnel, business partners and other parties directly linked to operations. The Code of Conduct operationalizes the policy. Both the policy and the code of conduct are publicly available. The Human Rights Policy and Code of Conduct are widely known between all employees and contractors' levels. There is also an internal procedure to guarantee suppliers and contractors comply with Anglo Human Rights Policy.</p> <p>In addition, the Social and Human Rights Impact and Risk Analysis (SHIRA) NI table shows the Social and Human Rights Impact and Risk Analysis including the measures adopted and their responsibility.</p> <p>Interviews with employees and contractors confirmed their knowledge about the Human Rights Policy, and the activities implemented related to Human Rights Policy. Additionally, the neighbors and representatives of the local communities mentioned meetings with the Barro Alto team, which they have had access to Human Rights actions and measures.</p> <p>In this way, the Barro Alto mining meets all sub-requirements regarding this requirement.</p>

1.3.2.1.	CRITICAL The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.	L	<p>The documentation reviewed shows assessment of labor and employment conditions, community impacts, supply chain management, security forces, company organization, communication and training, and human rights strategy. The Social and Human Rights Impact and Risk Analysis NI table shows the Social and Human Rights Impact and Risk Analysis including the measures adopted and their responsibility.</p> <p>The assessment is reviewed annually, and the next one will be provided in 2022.</p>
1.3.2.2.	<p>Assessments, which may be scaled to the size of the company and severity of human rights risks and impacts, shall:</p> <ul style="list-style-type: none"> a. Follow a credible process/methodology; b. Be carried out by competent professionals; and c. Draw on internal and/or external human rights expertise, and consultations with potentially affected rights holders, including men, women, children (or their representatives) and other vulnerable groups, and other relevant stakeholders. 	⊕	<p>An international methodology was applied and recognized external professionals were used. No evidence of consultations with potentially affected rights holders and other vulnerable and relevant stakeholders were provided, other than Barro Alto representatives and workers.</p> <p>Right holders and vulnerable communities are identified but are not involved at policy development and assessment stages.</p>
1.3.2.3.	<p>As part of its assessment, the operating company shall document, at minimum:</p> <ul style="list-style-type: none"> a. The assessment methodology; b. The current human rights context in the country and mining project area; c. Relevant human rights laws and norms; d. A comprehensive list of the human rights risks related to mining project activities and business relationships, and an evaluation of the potential severity of impacts for each identified human rights risk; e. The identification of rights holders, an analysis of the potential differential risks to and impacts on rights holder groups (e.g., women, men, children, the elderly, persons with disabilities, indigenous peoples, ethnic or religious minority groups, and other disadvantaged or vulnerable groups), and a disaggregation of results by rights holder group; f. Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient human rights issues. 	L	<p>The document reviewed includes the assessment methodology and the identification of human rights impacts related to Barro Alto activities and respective severity. In addition, recommendations for preventing, mitigating, and remediating the identified risks and impacts were provided in this document. The current human rights context in the country is provided in the Voluntary Principles on Security and Human Rights Public Sector Risk Assessment prepared by ERM (18.11.2019).</p> <p>Considering the communities and employees interviews, the Barro Alto team identifies and evaluates the human rights priorities that consider the local vulnerable groups.</p>

1.3.2.4.	At minimum, stakeholders and rights holders who participated in the assessment process shall have the opportunity to review draft key issues and findings that are relevant to them, and shall be consulted to provide feedback on those findings.	L	<p>Evidence includes two (2) meetings minutes with communities' committees, where the identified risks and impacts were discussed.</p> <p>The Human Rights Risks and Impacts Assessment has been reviewed by external and internal stakeholders, considering the interviewees. Since 2019, several activities were provided to mitigate the risk of impact on the right not to discrimination, such as activities against harassment and bullying.</p> <p>In addition to human rights impacts to communities, according to Human Rights Assessment Summary Report (2018), potential impacts were identified to employees (risk of impact on the right not to discrimination) and contractors (risk of impact on the right to employment and to fair and favorable working conditions; and, right to safe conditions of transportation).</p> <p>At November 2021, the Barro Alto mine team presented the Social and Human Rights Impact and Risk Analysis and evidence of the statement of these results and activities with the internal and external stakeholders. Considering the external stakeholders, the main means of communication were the meetings known as "Reuniões de Convivência" and the magazine "Revista Diálogo".</p> <p>The local Barro Alto team also presented the contents of these materials and events. In addition, the local community, including the municipality government and the neighbors of the mine, mentioned having access to these assessments and activities.</p>
1.3.2.5.	The operating company shall demonstrate that steps have been taken to effectively integrate assessment findings at the mine site operational level.	●	<p>An assessment of compliance of Social Way implementation was provided, showing a high level of compliance with the aspects of Social Risk and Impact Management: proactively identify, assess and manage social impacts and risks. Since 2019, Barro Alto has promoted several activities to respond the Human Rights risk and impacts mapped and assessed. During the individual and focal groups interviews with employees and contractors, we identified activities promoted by Barro Alto mine regarding bullying, harassment, and women rights. In addition, employees and contractors mentioned disciplinary measures that were applied when the code of conduct and HR polices were infringed. The women focal group also mentioned the policies for vulnerable groups, such as women, pregnant, and LGBTQI+ community.</p> <p>The main findings regarding the integration of the assessment at the mine site operation were:</p> <ul style="list-style-type: none"> • All employees and contractors participated in activities related to bullying, harassment and diversity rights; • At least 4 employees mentioned people who were fired after being denounced for harassment. However, we did not have access of these information and how these processes were conducted by Barro Alto management; • Barro Alto promoted actions to combat the violence against women after receiving denounces involving employees and contractors. • At least one sector provided a room for breastfeeding in adequate conditions.

			<p>Despite the several activities provided by BA mine, there are persistent demand from vulnerable groups, such as:</p> <ul style="list-style-type: none"> • During the interviews, the occurrence of sexist and discriminatory comments was mentioned; • Employees mentioned the need to provide adequate environments for women in all sectors (bathrooms and breastfeeding rooms). <p>There was no monitoring report of the measures adopted related to human rights policy, and these measures and the policy outcomes were not communicated with all the Barro Alto employees.</p> <p>The contractors didn't have the same level of knowledge about human rights policies as Barro Alto employees.</p>
1.3.3.1.	Mining project stakeholders shall have access to and be informed about a rights-compatible grievance mechanism and other mechanisms through which they can raise concerns and seek recourse for grievances related to human rights.	L	<p>Information provided shows the resources used as grievance mechanisms for the different internal and external stakeholders. This includes an email, a free line, internal newspaper "Mural", emails "Conexao", meetings with supervisors (internally) and with Barro Alto mine representatives (externally). These mechanisms are not human rights specific.</p> <p>During the interviews, all employees and contractors mentioned grievance channels, mainly the phone channel called "Your Voice". Several examples of its effectiveness were mentioned by interviewees, mainly regarding harassment. In addition, during the site visit we found this contact in different mine site locals.</p>
1.3.3.2.	<p>Responding to human rights risks related to the mining project:</p> <ol style="list-style-type: none"> If the operating company determines that it is at risk of causing adverse human rights impacts through its mining-related activities, it shall prioritize preventing impacts from occurring, and if this is not possible, design strategies to mitigate the human rights risks. Mitigation plans shall be developed in consultation with potentially affected rights holder(s). If the operating company determines that it is at risk of contributing to adverse human rights impacts through its mining-related activities, it shall take action to prevent or mitigate its contribution, and use its leverage to influence other contributing parties to prevent or mitigate their contributions to the human rights risks. If the operating company determines that it is at risk of being linked to adverse human rights impacts through its business relationships, it shall use its leverage to influence responsible parties to prevent or mitigate their risks to human rights from their activities. 	L	<p>The Stakeholders Engagement Plan and Social Management Plan (2019) shows the measures to manage impacts and engage with stakeholders in that regard. In November 2021, the Barro Alto team presented the Social and Human Rights Impact and Risk Analysis, which includes the assessment and measures related to human rights risks and impacts due Barro Alto mine activities, including external stakeholders, and impacted groups.</p> <p>Internally, Barro Alto team has identified and addressed several human rights risks such as women rights, bullying and LGBTQ+ rights in a prevention way. They have provided trainings and workshops related to harassment, familiar violence ("Violência Doméstica - Kit de Ferramentas de Conscientização e Apoio"), LGBTQI + and women rights.</p> <p>All the interviewed employees and contractors mentioned have participated in these activities. In addition, the supplier Barro Alto sector presented evidence regarding the human rights requirements for the Barro Alto suppliers, such as supplier management and evaluation procedures ("Norms de Supply Chain - Gestão dos dados mestre de fornecedores" and "Procedimento de Avaliação de Fornecedores").</p>

1.3.3.3.	<p>CRITICAL Responding to actual human rights impacts related to the mining project:</p> <ul style="list-style-type: none"> a. If the operating company determines that it has caused an actual human rights impact, the company shall: <ul style="list-style-type: none"> i. Cease or change the activity responsible for the impact; and ii. In a timely manner, develop mitigation strategies and remediation in collaboration with affected rights holders. If mutually acceptable remedies cannot be found through dialogue, the operating company shall attempt to reach agreement through an independent, third-party mediator or another means mutually acceptable to affected rights holders; b. If the operating company determines that it has contributed to an actual human rights impact, the company shall cease or change any activities that are contributing to the impact, mitigate and remediate impacts to the extent of its contribution, use its leverage to influence other contributing parties to cease or change their activities, and mitigate and remediate the remaining impact; c. If the operating company determines that it is linked to an actual human rights impact through a business relationship the company shall use its leverage to prevent or mitigate the impact from continuing or recurring; and d. The operating company shall cooperate with other legitimate processes such as judicial or State-based investigations or proceedings related to human rights impacts that the operating company caused, contributed to, or was directly linked to through its business relationships. 	—	<p>According to chapter 16 of the Stakeholders Engagement Plan and Social Management Plan, there is no actual human rights impacts. The field audit and the interviews carried out in November 2021 corroborated with the assessment of the human rights impacts.</p>
1.3.4.1.	<p>The operating company shall monitor whether salient adverse human rights risks and impacts are being effectively addressed. Monitoring shall include qualitative and quantitative indicators, and draw on feedback from internal and external sources, including affected rights holders.</p>		<p>Barro Alto has implemented a management system that includes a monitoring tool (SE Suite). This tool allows the team to establish actions, follow-up on implementation and its effectiveness.</p> <p>In November 2021, Barro Alto team presented the Social and Human Rights Impact and Risk Analysis, which includes the human rights risks and impacts assessment, and the associated measures. Despite this document that presents</p>

			<p>the qualitative indicators to be monitored, there are no quantitative indicators regarding the identified human rights risks and impacts.</p> <p>However, the main gap regarding the monitoring of the human rights risks and impacts that Barro Alto has addressed is related to internal stakeholders, since the employees and contractors do not have access to information about the resolutions related to harassment complaints. In addition, there is no documentation showing this quantitative monitoring; for example, the number of complaints considering their topics and sectors.</p>
1.3.4.2.	<p>External monitoring of an operating company's human rights due diligence shall occur if the company's due diligence efforts repeatedly fail to prevent, mitigate or remediate actual human rights impacts; or if its due diligence activities failed to prevent the company from unknowingly or unintentionally causing, contributing to or being linked to any serious human rights abuse. Additionally:</p> <ol style="list-style-type: none"> a. The company shall fund the external monitoring; and b. The form of such monitoring, and selection of external monitors, shall be determined in collaboration with affected rights holders. 	—	<p>According to chapter 16 of the Stakeholders Engagement Plan and Social Management Plan, there is no actual human rights impacts. In addition, the Social and Human Rights Impact and Risk Analysis, provided by the Barro Alto team in November 2021, presented the human rights risks and impacts assessment. Considering this document and internal and external stakeholders, there is no actual human rights impact.</p>
1.3.5.1.	<p>The operating company or its corporate owner shall periodically report publicly on the effectiveness of its human rights due diligence activities. At minimum, reporting shall include the methods used to determine the salient human rights issues, a list of salient risks and impacts that were identified, and actions taken by the operating company to prevent, mitigate and/or remediate the human rights risks and impacts.</p>	⊕	<p>Barro Alto presented two documents related to the HR due diligence actions and results report:</p> <ol style="list-style-type: none"> 1. Table 3C Social and Human Rights Impact and Risk Analysis NI, which includes human rights actions and their monitoring 2. Diálogo Magazine, which is aimed at the external public and presents Barro Alto's social actions. <p>However, these documents do not include information about all due diligence methods and results. In addition, there are due diligence results that are not being disclosed, as we were able to conclude after interviews with the internal and external public. For example, employees and contractors do not have information on how harassment complaints are handled.</p>
1.3.5.2.	<p>If relevant, the operating company shall publish a report on external monitoring findings and recommendations to improve the operating company's human rights due diligence, and the operating company shall report to relevant stakeholders and rights holders on its plans to improve its due diligence activities as a result of external monitoring recommendations.</p>	—	<p>According to the reviewed documents, and interviews, there is no evidence that the company's human rights due diligence in relation to the mining project has repeatedly failed in the prevention, mitigation or remediation of human rights impacts, and no evidence that the company has unknowingly or unintentionally caused serious human rights abuse.</p>
1.3.5.3.	<p>Public reporting referred to in 1.3.5.1 and 1.3.5.2 may exclude information that is politically sensitive, confidential business information, or that may</p>	—	<p>From the sample selected of public reports available by Barro Alto, no excluded information was identified.</p>

	compromise safety or place any individual at risk of further victimization.		
Chapter 1.4—Complaints and Grievance Mechanism and Access to Remedy		Basis for rating	
1.4.1.1.	CRITICAL The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.	L	<p>The document presented entitled "Procedimento do Sistema File Conosco" (System Procedure Contact Us) informs that it follows the company's global corporate policy and adopts the tool Socio-Economic Assessment Toolbox 4A established by Anglo American Social Way. The document details the functioning of the grievance mechanism.</p> <p>In interview with the Communication Team, evidence and detailed explanation were provided on how the grievance mechanism works at an operational level and samples of service records and the complete flow through the conclusion of the response to the stakeholder. The documents show how the mechanism's operators are trained, and how the mechanism is disclosed to meet all the stakeholders and the validation of the effectiveness of the disclosure.</p> <p>According to the interviews with community members and employees, the grievance mechanism and other communication channels existent are recognized by the stakeholders as effective, and the company provides disclosure of the grievance channel in several communication platforms, although some stakeholders still indicate that they have difficulties using the grievances tools.</p>
1.4.2.1.	<p>The operating company shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures that address, at minimum:</p> <ul style="list-style-type: none"> a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights, which include the need for the mechanism to be: (a) Legitimate, (b) Accessible, (c) Predictable, (d) Equitable, (e) Transparent, (f) Rights-compatible, (g) A source of continuous learning, and (h) Based on engagement and dialogue; b. How complaints and grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase; c. How confidentiality of a complainant's identity will be respected, if requested; d. The ability to file anonymous complaints, if deemed necessary by stakeholders; e. The provision of assistance for those who may face barriers to using the operational-level grievance 	⊕	<p>Reviewed documents inform the way that complaints and grievances will be filed, acknowledged, investigated, and resolved; how confidentiality of a complainant's identity will be respected; the assistance for those who may face barriers to using the operational-level grievance mechanism and how complaints and grievances and their resolutions will be tracked and recorded.</p> <p>Despite the document presenting the main items required, there is no evidence that stakeholders were consulted to contribute to the design of a mechanism in a culturally appropriate manner, and no information was found to ensure options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances.</p> <p>In addition, the interviews with community members shown that the provision of assistance for those who may face barriers to using the operational-level grievance mechanism, including women, children, and marginalized or vulnerable groups is not fully meet.</p>

	<p>mechanism, including women, children, and marginalized or vulnerable groups;</p> <p>f. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and</p> <p>g. How complaints and grievances and their resolutions will be tracked and recorded.</p>		
1.4.2.2.	The operating company shall ensure that all complaints and grievance procedures are documented and made publicly available.	L	<p>The reviewed documentation presents the mechanism's operating procedures and the documents, media, other disclosure vehicles and records of the grievance mechanism, including access via the company's website.</p> <p>The company has a community relations office in Barro Alto that is a reference for the local population.</p>
1.4.3.1.	No remedy provided by an operational-level grievance mechanism shall require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.	L	<p>In the revised documentation there is no indication of restrictions imposed by the complaint mechanism that requires the aggrieved parties to waive their right to appeal from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.</p> <p>In the revised documentation, no samples of the assessment of stakeholder satisfaction or any agreement document signed with the Anglo American after resolution of the issues were presented as an example showing the absence of restrictions.</p> <p>Internal stakeholders (workers and subcontractors) and external stakeholders (residents of communities neighboring the mine) did not report any restrictions imposed by the Anglo American or the need to sign any commitment document in case of meeting demands by the Anglo American. No information was provided in the mechanism's procedures to ensure that the interlocutors have the right to choose other means to see their complaint answered.</p>
1.4.4.1.	Complaints and grievances and their outcomes and remedies shall be documented.	L	<p>In the Anglo American procedures, are presented how the complaints and grievances and their outcomes and remedies are documented and how to inform the designated personnel of these procedures.</p> <p>In interview with the Communication Team, evidence and detailed explanation was provided on how the grievance mechanism works at an operational level and samples of service records and the complete flow through to the conclusion of the response to the stakeholder was also provided. The documents show how the mechanism's operators are trained, and how the mechanism is disclosed to meet all the stakeholders and the validation of the effectiveness of the disclosure.</p>
1.4.4.2.	The operating company shall monitor and evaluate the performance of the operational-level complaints and grievance mechanism over time to determine:	L	The company presented evidence of the monitoring and performance evaluation processes of the grievance mechanism to systematically identify any need for improvements, provide the course correction in current and future service, incorporating feedback from interlocutors whose procedures are based

	<p>a. If changes need to be made to improve its effectiveness as per 1.4.2.1.a;</p> <p>b. If changes in company activities can be implemented to prevent or mitigate similar grievances in the future; and</p> <p>c. If outcomes and remedies provided through the mechanism accord with internationally recognized human rights.</p>	<p>on references of internationally recognized human rights, according to the revised documentation presented below.</p> <ul style="list-style-type: none"> • Matriz de Consequência Social - Social Way 3.0 - Seções 3b/3c Gerenciamento de Queixas e Incidentes/SHIRA (SOCIAL CONSEQUENCE MATRIX - SOCIAL WAY 3.0 - SECTIONS 3B/3C COMPLAINTS AND INCIDENT MANAGEMENT/ Social and Human Rights Impact and Risk Analysis) <p>The document presents the social consequences matrix for classifying complaints and incidents to assess Scale, Vulnerability, and possibility of Remedy, related to possible impacts on human and social rights. The Matrix divides potential impacts into six categories: economic; personal and political security; sociocultural networks; infrastructure and services; cultural heritage; and community health and safety to provide the project with a comprehensive analysis of human and social rights impacts on external stakeholders. Additionally, Anglo American's Social Way Policy requires all sites to adopt an Incident Learning procedure.</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Procedimento do fale conosco (2022) - (Contact us procedure (2022)) • Procedimento de investigação e aprendizado de incidentes - (Incident investigation and learning procedure) • Fluxos fale conosco e comitê de investigação social – (Contact us streams and social investigation committee) <p>For internal stakeholders, the Contact Us Procedure defines the flows and responsibilities in the process of receiving, registering, sending, evaluating, solving and returning to manifestations received by the tool and the Incident Investigation and Learning Procedure seeks to standardize, establish the requirements and methodology for communication, classification and investigation of safety, health and environmental incidents, involving own and contracted employees in order to determine the causes and corrective and preventive actions and share the learning acquired.</p> <p>Complaints and social incidents for the month and year to date are monitored monthly, the analyses are shared with the permanent members of the Social Performance Management Committee - SPMC).</p> <p>This group is made up of area managers for the management of socio-environmental issues, risks and impacts and for the sustainable development of Anglo American's operating territories, involving senior personnel at management level regarding complaints and incidents, making it possible to review the process of receiving complaints and investigation and closure of incidents, identifying opportunities for improvement.</p> <p>Annually, the Barro Alto site team evaluates the implementation of complaints and incident management processes and employees carry out training on the "contact us" service.</p> <p>Reviewed documents/related evidence:</p>
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			<ul style="list-style-type: none"> • Monitoramento mensal Fale Conosco e Incidentes Sociais no GSA (Exemplos de 2023 e 2022) – (Monthly monitoring Contact Us and Social Incidents at GSA (Examples from 2023 and 2022)) • Apresentação de Mudanças PRO Fale Conosco no GSA – (Presentation of PRO Changes Contact Us at GSA) • Pesquisa interna GSA sobre PRO Fale Conosco – (GSA internal survey on PRO Contact Us) • Síntese do Processo de Investigação de Incidentes Sociais – (Summary of the Social Incident Investigation Process). • Treinamento do Fale Conosco - (Contact Us Training) • Conscientização do Fale Conosco internamente (Engage, DDS) e externamente (Diálogo Anglo, Momento Anglo Rádio) – (Awareness of Contact Us internally (Engage, DDS) and externally (Diálogo Anglo, Momento Anglo Rádio)).
1.4.4.3.	Stakeholders shall be provided with clearly communicated opportunities to submit feedback on the performance of the complaints and grievance mechanism.	L	<p>There is a process for capturing perceptions about Contact Us, internally and externally. Affected communities and other interested parties are consulted on the site's complaints management process.</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Formulário de Pesquisa Externa sobre Fale Conosco – (External Survey Form about Contact Us) • Pesquisa TV, WhatsApp (2022) – (Search TV, WhatsApp (2021)) • Apresentação de Pesquisa do Fale Conosco no GSA. – (Presentation of Contact Us Research at GSA) <p>At the end of the Contact Us service register, the complainant is invited to respond to an electronic satisfaction survey with questions that determine, with scores from 1 to 5, their opinion about the service, solution, and deadline, with the alternative that the survey can be forwarded by email.</p> <p>Additionally, the company holds community forums (CEFs) as a tool for engaging with communities neighboring the company's operational units. Results are presented annually on the comments received from each community, reinforcing the promotion of the channel, and the search for suggestions for improving service.</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Ata 30_06_22 Fórum Comunitário Barro Alto _ Fale Conosco – (Minutes 30_06_22 Barro Alto Community Forum _ Contact Us) • Ata 25_08_22 Fórum Comunitário Barro Alto tema Poeira (Comitê de Investigação Social) – (Minutes 25_08_22 Barro Alto Poeira Community Forum (Social Investigation Committee) • Ata 28_10_22 Fórum Comunitário Barro Alto temas Apelo, Incidentes Sociais – (Minutes 28_10_22 Barro Alto Community Forum themes Appeal, Social Incidents) • Plano de Ação Comitê Investigação Social Poeira Barro Alto (2022-2023) – (Poeira Barro Alto Social Investigation Committee Action Plan (2022-2023))

			<p>Based on the United Nations Guiding Principles on Business and Human Rights, the company seeks to mediate impasses and avoid the procedures and costs of legal actions, focusing on an impartial and impartial decision, which will come from a neutral third party. Additionally, the company adopts and publishes an “appeal process” that offers an alternative solution to claimants who, perhaps, do not agree with the solution proposed by the company.</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Divulgação do Fale Conosco e Apelo – (Dissemination of Contact Us and Appeal) • Relatório de Capacitação dos Atendentes do Fale Conosco sobre Apelo - (Training Report for Contact Us Agents on Appeals) • Ata 28_10_22 Fórum Comunitário de Barro Alto temas Apelo - (Minutes 10_28_22 Barro Alto Community Forum themes Appeal) • Apresentação Fórum Comunitário Apelo 2023 – (Presentation of the Appeal 2023 Community Forum)
1.4.5.1.	The operating company shall take reasonable steps to inform all stakeholders of the existence of the operational-level complaints and grievance mechanism, its scope, and its procedures.	●	<p>The grievance mechanism is disclosed through several company’s internal and external communication channels in addition to the community service office in Barro Alto and through the community relations team.</p> <p>The company presents documents showing the actions of mapping vulnerable groups. However, there was no evidence of communication procedures and access to the grievance mechanism by vulnerable groups or people with disabilities.</p> <p>According to the interviews with community members the company lacks an engagement procedure aligned with the vulnerable groups.</p>
1.4.5.2.	The operating company shall neither state nor imply that participation in an operational level grievance mechanism precludes the stakeholder from seeking redress through administrative, judicial or other non-judicial remedies.	●	<p>This item was reviewed based on the documentation available for analysis of item 1.4.3.1 of this matrix. In the Procedimento do Sistema Fale Conosco document there is information that the grievance mechanism is operated by a subcontracted company.</p> <p>In the revised documentation there is no indication of restrictions imposed by the grievance mechanism that requires the aggrieved parties to waive their right to appeal from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.</p> <p>In the revised documentation, no samples of the assessment of stakeholder satisfaction or any agreement document signed with the Anglo American after resolution of the issues were presented as an example showing the absence of restrictions. No information was provided in the mechanism's procedures to ensure that the interlocutors have the right to choose other means to see their complaint answered.</p>
1.4.5.3.	The operating company shall inform relevant personnel who interact with stakeholders of the proper procedures for handling stakeholder complaints and grievances, and ensure that personnel directly involved	L	<p>The training material available for review is directed to the company's managers and presents the content of activities to improve the service process and improvements to the mine's operating systems to mitigate impacts. But there is</p>

	in the operational-level mechanism receive instruction on the respectful handling of all complaints and grievances, including those that may appear frivolous.		no evidence of the number of participants, such as attendance list, meeting minutes or training frequency. In the interview with the Communication Team the company presented documents and evidence that employees and subcontractors receive an introductory e-mail with explanations about the grievance mechanism, and the communication about the tool is reinforced from time to time. The team responsible for receiving the complaints from the stakeholders also has training and detailed procedures, as shown in the documents presented by the company.
1.4.6.1.	Periodically, the operating company shall report to stakeholders on grievances received and responses provided. This shall be done in a manner that protects the confidentiality and safety of those filing grievances.	⊗	The company has not submitted documentation to be reviewed on the disclosure of information periodically to stakeholders related to the complaints received and responses provided. In the interview with the Communication Team, no evidence was presented on how the company discloses the results of actions to meet demands presented by stakeholders via the grievance mechanism.

Chapter 1.5—Revenue and Payments Transparency


Basis for rating

1.5.1.1.	The operating company shall comply with 1.5.1.2 and 1.5.1.3, and/or demonstrate how it complies with equivalent reporting and disclosure requirements of the European Union Accounting Directive (2013/34/EU) and the European Union Transparency Directive (2013/50/EU), or an equivalent mandatory transparency regime.	⊕	<p>Since 1 January 2015, Anglo American has been subject to the project-by-project reporting requirements of the UK Reports on Payments to Government Regulations (SI 2014/3209) and Chapter 10 of the European Union Accounting Directive (2013/34/EU). These rules require that the Group prepares and submits to Companies House, the UK registrar of companies, a full analysis of tax and certain other payments made to governments in respect of extractive projects on a project-by-project basis.</p> <p>There are limitations in the scope of the Payments to Governments Regulations (for example, it focuses solely on the Group's extractive activities, excludes consumption and certain other taxes, and it is limited in application to jointly owned entities, etc.). In order to provide a better explanation of the Group's economic contribution, Anglo American has voluntarily extended these principles in the Tax and Economic Contribution report.</p> <p>In the 2019 Report besides the mandatory initiatives, it was reported that other voluntary initiatives have been adopted by Anglo American including:</p> <ul style="list-style-type: none"> • The publication of Country-by-Country data (2018 and 2019 being published prior to the end of 2020). • As part of implementing GRI (Global Reporting Initiative) 207: Tax 2019 reporting requirements, which we will adhere to fully by 1 January 2021, we are working to adopt several requirements early, where possible. Core components of GRI 207 include publishing a breakdown of revenues, profits and taxes paid by jurisdiction of tax residence • Compliance with the voluntary Tax Transparency Code in Australia
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			<ul style="list-style-type: none"> • Endorsing the Responsible Tax Principles established by The B Team • Supporting the Extractive Industries Transparency Initiative, both directly and as part of the International Council on Mining and Metals. • Global Anti-Base Erosion ('Globe') Proposal under Pillar Two of the OECD's Independent assurance statement by Deloitte LLP to Anglo American plc ("Anglo American") on the Payments to Governments submission and other taxes borne are included within the Tax and Economic Contribution Reports 2017-2019. <p>There was evidence of tax payments from Barro Alto as well as tax payment certificates from the agencies. However, taxes and contributions are disclosed in the corporate level reports by country but not by operations. There is a Country-by-Country report for 2018, with more specific data. However, the reports consolidate these Brazilian operations without making specific reference to the Barro Alto operations.</p> <p>Available fiscal year information, including federal tax certificates, also includes consolidated data for Brazilian nickel operations, but there is limited information regarding Barro Alto.</p>
1.5.1.2.	On a yearly basis, the operating company shall publish a report that discloses all material payments made by itself and its corporate owner to the government of the country in which the mining project is located. The report shall be made public within 12 months after the end of each financial year.	—	It is not relevant because the corporate company is subject to EU directives.
1.5.1.3.	The types of payment disclosed shall include as a minimum, as applicable: <ul style="list-style-type: none"> a. The host government's production entitlement; b. National state-owned enterprise production entitlement; c. Profits taxes; d. Royalties; e. Dividends; f. Bonuses, such as signature, discovery and production bonuses; g. License fees, rental fees, entry fees and other considerations for licenses and/or concessions; h. Payments for infrastructure improvements; and i. Any other significant payments and material benefits to government, including in kind payments. 	—	It is not relevant because the corporate company is subject to EU directives.

1.5.1.4.	At minimum, this information shall be broken down by recipient government body (where applicable), by project (where applicable), and by payment type.	⊕	Reporting is not published by operation but consolidated for Brazil Nickel operations.
1.5.2.1.	The operating company shall demonstrate its compliance with the reporting requirements specified in Chapter 10 of the European Union Directive 2013/34/EU or an equivalent mandatory transparency regime, and/or shall comply with the requirements listed under 1.5.2.2 below.	⊕	Barro Alto as a part of Anglo American and its adherence to the EU Directive 2013/34/EU should report and disclosure revenue and payments at project-level. Current reports consolidate Brazil operations but limited information regarding Barro Alto operations.
1.5.2.2.	The operating company shall ensure that the following information at the mining project level is reported on an annual basis and is readily accessible to the public: <ul style="list-style-type: none"> a. Mine production, disaggregated by product type and volume; b. Revenues from sales, disaggregated by product type; c. Material payments and other material benefits to government as listed in paragraph 1.5.1.3, disaggregated according to the receiving government entity (e.g. national, regional, local entity; name of government department); d. Social expenditures, including the names and functions of beneficiaries; e. Taxes, tariffs or other relevant payments related to transportation of minerals; f. Payments to politicians' campaigns, political parties or related organizations; and g. Fines or other similar penalties that have been issued in relation to the project. 	—	The organization marked as Substantially meets and a Socio-Economic Assessment Toolbox report is prepared every 3 years and includes a summary of the data from the Barro Alto operation. However, because Anglo American is under EU Directive project-level reporting and disclosure requirements this should be marked as Not Relevant.
1.5.2.3.	The operating company shall publish annual accounts, following international accounting standards.	⊕	The annual report is a consolidated report and has no specific information for Barro Alto operations.
1.5.3.1.	If the mining project is located in a country without a mandated transparency regime, the operating company shall demonstrate support for the EITI by publishing a clear public statement endorsing the EITI Principles on its external website.	—	In Brazil there is a law that requires publicly traded companies to publish their annual balance sheets. The report is consolidated for Brazil Nickel operations and not by project.

1.5.3.2.	<p>If the mining project is located in a country without a mandated transparency regime and the EITI is active in that country, the operating company shall:</p> <ul style="list-style-type: none"> a. Commit to engage constructively with and support implementation of the EITI consistent with the multi-stakeholder process adopted in its country of operation; and b. Provide links on its external website to completed and up-to-date Company Forms for its operation, if the EITI implementing country has completed at least one validation. 	—	<p>In Brazil there is a law that requires publicly traded companies to publish their annual balance sheets. The report is consolidated for Brazil Nickel operations and not by project. Note, ICMM (International Council on Mining and Metals) members (which Anglo is) are expected to participate in Extractive Industries Transparency Initiative reporting requirements in all countries.</p>
1.5.4.1.	<p>The material terms for mineral exploration, development and production agreed between the operating company and government entities shall be freely and publicly accessible, with the exception of confidential business information, in the national language(s) of the country in which the mining project is located.</p> <ul style="list-style-type: none"> a. Where these terms are negotiated, rather than governed by law, the company shall make the relevant agreements, licenses or contracts freely and publicly accessible. b. Where these terms are governed by law, free, public access to the relevant statutory documentation is deemed sufficient to meet the IRMA requirement. 	L	<p>All material terms for mineral exploration, development and production are publicly accessible in Portuguese. Relevant statutory documentation is freely accessible to the public through the governmental web site.</p>
1.5.4.2.	<p>The beneficial ownership of the operating company shall be publicly accessible.</p>	L	<p>The operating company publicly discloses its beneficial owners. Relevant statutory documentation is freely accessible to the public through the governmental web site.</p>
1.5.5.1.	<p>CRITICAL The operating company shall develop, document and implement policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.</p>	L	<p>The operating company has developed, documented and implemented policies and procedures to prohibit bribery and corruption, not only for the Barro Alto employees but contractors and other third parties working for or with the company. The policy, which applies for all Anglo American sites, also sets standards:</p> <ul style="list-style-type: none"> • Describes the main risks of bribery and corruption for Anglo American; • Defines the consequences in case of non-compliance with the policy; • Identifies the main related guidelines for eliminating corruption at Anglo American; • Provides the basis for the respective Business Integrity Corruption Prevention Procedures. These Procedures provide more detailed guidance on how to identify a real or potential corruption situation and establish the controls that should be in place and the behavioral

			standards required to manage bribery and corruption risks in order to conduct business with integrity.
1.5.5.2.	<p>Procedures shall include:</p> <ul style="list-style-type: none"> a. A requirement to internally report and record any undue pecuniary or other advantage given to, or received from, public officials or the employees of business partners, directly or through third parties; and b. Disciplinary actions to be taken if cases of bribery or corruption are discovered. 	L	Anglo American sets the expected standards and behaviors, which guide the way Barro Alto do business. Policies are communicated and reinforced periodically to the employees and 3rd parties. Several policies and procedures are in place to manage issues regarding business integrity and application of disciplinary measures if needed.
1.5.5.3.	Relevant employees and contractors shall be trained in the application of the operating company's policy and procedures.		The operating company trains all relevant employees and contractors in the company's anti-corruption policies and procedures. However, during the interviews, gaps in the understanding of the scope and consequences of these requirements were noted.

Principle 2: Planning for Positive Legacies

RATING DESCRIPTION
Description of performance

	Fully meets
	Substantially meets
	Partially meets
	Does not meet
	Not relevant

Note on Chapter 2.1:

In October 2020, the IRMA Board approved changes in the way Chapter 2.1 was to be audited for existing mines.² The table below includes now shows where expectations are different for new versus existing mines. Existing mines are only required to meet a core set of requirements related to assessment of environmental and social risks (called CORE requirements), although existing mines have the option to be audited against the new mine requirements. If they have opted to do so, that will be reflected in the Basis for rating column. Existing mines are still required to have in place an environmental and social management system.

² For more information, see the IRMA Guidance Note on Chapter 2.1: <https://responsiblemining.net/wp-content/uploads/2021/07/Chapter-2.1-ESIA-Guidance-Final-2020.pdf>

Chapter 2.1—Environmental and Social Impact Assessment and Management

Basis for rating

2.1.1.1	An Environmental and Social Impact Assessment (ESIA), appropriate to the nature and scale of the proposed mining project and commensurate with the level of its environmental and social risks and impacts, shall be completed prior to the commencement of any site-disturbing operations associated with the project.	—	Barro Alto mine developed an environmental impact assessment according to the Brazilian regulations, which is a mandatory requirement to obtain the operation licenses and permits. The environmental impact study was prepared in 2000 by a third party, Brandt Meio Ambiente, the focus at that time was the environmental impact assessment of the project. There were not specific requirements to evaluate social impacts, however, Anglo American has implemented a stakeholders engagement plan based on a social risk assessment which has been updated periodically. Monitoring program for environmental and social aspects are performed.
2.1.1.2.	To enable a reasonable estimation of potential impacts related to the mining project, the ESIA process shall commence only after the project design has been sufficiently developed. Should the proposal be significantly revised a new assessment process shall be undertaken.	—	Evidence that detailed operations of the project and mine plan was developed before the environmental impact assessment allowing the organization to identify the potential impacts. Expansion projects zone 5 required a new environmental impact study and several other projects required to update the Environmental Impact Assessment and Environmental Control Programs (PCA). Even though initially a social impact assessment was not required by Brazilian regulations Anglo American Barro Alto conducted a social impact assessment to identify risks and their respective levels of social consequence classified in territorial scale, and, whenever possible, by community allowing the visualization of how each impact and how the set of impacts affect the population in each community. The results have been included in the Barro Alto mine social management plan and stakeholders' engagement plan.
2.1.1.3.	The ESIA shall be carried out in accordance with publicly available, documented procedures.	—	There is evidence that a public consultation was carried out to present and communicate the environmental impact assessment to interested parties as required by Brazilian regulations. Barro Alto mine follows the corporate procedures regarding community consultation process to develop new projects (expansions) and to discuss mitigation plans. However, there is no evidence of documented site-specific procedures to ensure timely feedback from the stakeholders.
2.1.2.1.	Prior to the implementation of the ESIA process the operating company shall ensure that there has been wide, public announcement of the project proposal and the associated ESIA process, and that reasonable and culturally appropriate efforts have been made to inform potentially affected and interested stakeholders in potentially affected communities about the proposed project.	—	There is evidence that a public consultation was carried out to present and communicate the environmental impact assessment to interested parties as required by Brazilian regulations. Several other meetings have been conducted with different stakeholders during different stages of the mine's development. However, from the minutes of meetings the approach has been more informative than consultative.
2.1.2.2.	Prior to the implementation of the ESIA process the operating company shall prepare a report and publish it on the operating company's external website, in the official national language(s) of the country in which the	—	Evidence that Barro Alto communicates Community outreach activities through bi-monthly newsletter as well as the complete 2015-2017 sustainability report were reviewed.

	<p>mining project is proposed to take place. The report shall provide:</p> <ol style="list-style-type: none"> A general description of the proposed project, including details on the proposed location, and nature and duration of the project and related activities; The preliminary identification of potential significant environmental and social impacts, and proposed actions to mitigate any negative impacts; A description of the main steps of the ESIA process that will be carried out, the estimated timeline and the range of opportunities for stakeholder participation in the process; and Contact details for the person or team responsible for management of the ESIA. 		<p>However, there is no evidence that project details or preliminary environmental impact assessment report were published and shared with the interested parties before the start up. At the time this was not a regulatory requirement.</p> <p>During the expansion projects more emphasis on communication with stakeholders was observed, however, these documents are not available on the Barro Alto website.</p>
2.1.3.1.	<p>CRITICAL (New Mines) The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.</p> <p>CRITICAL (Existing Mines) The operating company shall demonstrate that it has undertaken a comprehensive evaluation of potential environmental and social impacts associated with the mining operation.</p>	L	<p>Barro Alto carried out a complete environmental impact assessment to identify the potential environmental impacts of the project, during construction, operation and closing and an environmental control plan to mitigate those impacts is in place and reviewed periodically and approved by the environmental agency.</p> <p>A social impact assessment was not required at the time of the initiation of the project. Afterwards Anglo American Barro Alto conducted a social impact assessment to identify risks and their respective levels of social consequence classified in territorial scale, and, whenever possible, by community allowing the visualization of how each impact and how the set of impacts affect the population in a given community. The results have been included in the Barro Alto mine social management plan and stakeholder engagement plan.</p>
2.1.3.2.	<p>During scoping, the operating company shall identify stakeholders and rights holders (hereafter, collectively referred to as “stakeholders”) who may be interested in and/or affected by the proposed project.</p>	—	<p>In the initial environmental impact assessment, a socioeconomic characterization was performed, and formal mapping of the stakeholders and their interests and potential impacts of the project on them were not fully included. This was not a regulatory requirement at the time. Afterwards Barro Alto completed a map of the stakeholders identifying their interest and actual and potential impacts.</p>
2.1.3.3.	<p>Scoping shall include the consideration of:</p> <ol style="list-style-type: none"> Social impacts (including potential impacts on communities and workers) and environmental impacts (including potential impacts on wildlife, air, water, vegetation and soils) during all stages of the project lifecycle, from pre-construction through post-closure; Direct, indirect and cumulative impacts; and Potential impacts of extreme events. 	—	<p>Barro Alto carried out a complete Environmental Impact Assessment to identify the potential environmental impacts of the project, during construction, operation and closing and an Environmental Control Plan to mitigate those impacts is in place and reviewed periodically and approved by the environmental agencies and other governmental offices.</p> <p>Social impact assessment was not required at the time of the initiation of the project. Afterwards Anglo American Barro Alto conducted a social impact assessment to identify risks and their respective levels of social consequence classified in territorial scale, and, whenever possible, by community allowing the visualization of how each impact and how the set of impacts affect the</p>

			population in each community. The results have been included in the Barro Alto Mine social management plan and stakeholder engagement plan.
2.1.3.4	<p>Scoping shall result in the identification of:</p> <ul style="list-style-type: none"> a. Potentially significant environmental and social impacts of the proposed project; b. Alternative project designs to avoid significant adverse impacts; c. Other actions to mitigate identified adverse impacts; and d. Additional information and data needed to understand and assess the potential impacts. 	—	<p>Detail description and evaluation of potential environmental impacts and the mitigation plans and status available.</p> <p>A social impact assessment was not required at the time of the initiation of the project. Afterwards Anglo American Barro Alto conducted a social impact assessment to identify risks and their respective levels of social consequence classified in territorial scale, and, whenever possible, by community allowing the visualization of how each impact and how the set of impacts affect the population in each community. The results have been included in the Barro Alto mine social management plan and stakeholder engagement plan.</p>
2.1.4.1.	Baseline data describing the prevailing environmental, social, economic and political environment shall be collected at an appropriate level of detail to allow the assessment of the potential impacts of the proposed mining project.	—	Environmental base line data collected in the initial environmental impact assessment. Social Impact assessment was not required at the time of the project proposal; however, general information and data was collected as part of the environmental impact assessment, however it was only after the project started when detailed social data have been collected and risks and impacts evaluated.
2.1.4.2.	Additional studies shall be carried out as necessary to fulfill the information needs of the ESIA.	—	<p>Additional studies are consistently performed to evaluate environmental impacts and how the mitigation actions have been effective as predicted.</p> <p>Social impact assessment was not required at the time of the mine project proposal; however, general information and data was collected as part of the environmental impact assessment, and several new studies to collect social data information, evaluate social risks, and define mitigation action plans have been conducted over the time of the mine operations.</p>
2.1.5.1	<p>The operating company shall:</p> <ul style="list-style-type: none"> a. Predict in greater detail the characteristics of the potentially significant environmental and social impacts identified during scoping; b. Determine the significance of the predicted impacts; c. Evaluate options to mitigate predicted significant adverse impacts in line with the mitigation hierarchy, prioritizing the avoidance of impacts through consideration of alternative project designs; and d. Determine the relative importance of residual impacts (i.e., impacts that cannot be mitigated) and whether significant residual adverse impacts can be addressed to the satisfaction of affected or relevant stakeholders. 	—	<p>Barro Alto developed a comprehensive environmental impact assessment according to the Brazilian requirements now of the project proposal in 2000, covering a to d requirements.</p> <p>Social impact assessment was not required at the time of the mine project proposal, however, several new studies to collect social data information, evaluate social risks, and define mitigation action plans have been conducted over the time of the mine operations.</p>

2.1.6.1.	<p>The operating company shall prepare an ESIA report that includes, at minimum:</p> <ul style="list-style-type: none"> a. A description of the proposed mining project; b. Detailed description of the direct, indirect and cumulative impacts likely to result from the project, and identification of significant adverse impacts; c. Description of the alternatives considered to avoid and mitigate significant adverse impacts in line with the mitigation hierarchy, and the recommended measures to avoid or mitigate those impacts; d. A review of the public consultation process, the views and concerns expressed by stakeholders and how the concerns were taken into account; and e. Names and affiliations of ESIA authors and others involved in technical studies. 	—	<p>The environmental impact assessment used the terms of potential and actual impacts of the project following the methodology according to Brazilian regulations. Direct, indirect, and cumulative impacts were not terminology used at the time of the initial project proposal in 1999. However, there is a comprehensive identification and evaluation of environmental impacts and Barro Alto consistently updates and monitors the current impacts for potential cumulative effects and mitigation or corrective actions are defined in the Environmental Control Program (PCA).</p> <p>Social impact assessment was not required at the time of the mine project proposal, however, several new studies to collect social data information, evaluate social risks, and define mitigation action plans have been conducted over the time of the mine operations. However, the current consultation process with stakeholders is more informative than consultative. It is not fully clear how Barro Alto collects the consultation comments and how the concerns were considered.</p>
2.1.7.1.	<p>The operating company shall develop and maintain a system to manage environmental and social risks and impacts throughout the life of the mine.</p>	L	<p>Barro Alto developed an Environmental Control Program (PCA) to implement and track the mitigations actions considered in the environmental impact assessment. In addition, Barro Alto has an Operational Risk Management System (ORM), which aims to establish guidelines for the implementation and maintenance of the Operational Risk Management Process, including aspects of safety, occupational health, environment, social / community, legislation and regulations, operational, material damage and losses and business interruption, at Anglo American Brazil's Nickel units.</p> <p>The focus has been environmental impacts but there is evidence that in 2019 a socio-economic monitoring program started, in compliance with a new requirement linked to the operation license (Parecer Técnico NL/SLQA N° 056/2019) and Anglo American Social Way standard. Social team and resources have been dedicated to implementing a management system for social aspects.</p>
2.1.7.2	<p>An environmental and social management plan (or its equivalent) shall be developed that, at minimum:</p> <ul style="list-style-type: none"> a. Outlines the specific mitigation actions that will be carried out to address significant environmental and social impacts identified during and subsequent to the ESIA process; b. Assigns personnel responsible for implementation of various elements of the plan; and 	L	<p>Barro Alto has developed Baseline and Operational Risk Management Procedures and 25 programs and plans to address environmental and social risks.</p>

	c. Includes estimates for the resources needed to implement the plan.		
2.1.7.3.	The environmental and social management plan shall be implemented and revised or updated as necessary based on monitoring results or other information.	L	Barro Alto develops a detailed report in the 25 programs/plans, which is filed annually with the Environmental Agency (SEMAD), including the results of monitoring and updates when relevant. In addition, the company annually updates the Social Management Plan which contains the main social risks / impacts and their respective management mitigation measures.
2.1.8.1.	As part of the ESMS, the operating company shall establish a program to monitor: <ul style="list-style-type: none"> a. The significant environmental and social impacts identified during or after the ESIA process; and b. The effectiveness of mitigation measures implemented to address environmental and social impacts. 	L	The organization has developed and implemented plans to address the environmental, health and safety, and social impacts identified during the initial Environmental Impact Assessment and other later studies, in compliance with the Brazilian regulatory requirements and corporate expectations. Actions to mitigate / prevent social impacts / risks are monitored through the SE SUITE system and the results of the monitoring are reported monthly in multidisciplinary and leadership forums. Several monitoring programs in place including a) Waste generation; b) Hydric resources (quality and quantity); c) Recovery of degraded areas; d) closure plan; e) air quality; f) noise monitoring; g) erosion and geotechnical; h) socioeconomic indicators monitoring program.
2.1.8.2.	The monitoring program shall be designed and carried out by competent professionals.	L	Barro Alto has contracted with a professional firm, Tetra Tech, to coordinate the environmental control plan. All monitoring programs are designed and implemented by professionals. Vendors selection and evaluation process in place.
2.1.8.3.	If requested by relevant stakeholders, the operating company shall facilitate the independent monitoring of key impact indicators where this would not interfere with the safe operation of the project.		Monitoring results are publicly available annually through the environmental agency (SEMAD). Even though periodic meetings and communication channels are available for stakeholder requests, Barro Alto has not formally developed specific procedures or processes to allow stakeholders to carry out independent monitoring when requested and provide funding to enable affected stakeholders to hire experts.
2.1.9.1.	(New Mines) As part of the ESIA process, the operating company shall provide for timely and effective stakeholder and rights holder (hereafter collectively referred to as stakeholder) consultation, review and comment on: <ul style="list-style-type: none"> a. The issues and impacts to be considered in the proposed scope of the ESIA (see 2.1.3); b. Methodologies for the collection of environmental and social baseline data (see 2.1.4); c. The findings of environmental and social studies relevant to the conclusions and recommendations of the ESIA (see 2.1.5.1.a and b); d. Options and proposals to mitigate the potential impacts of the project (see 2.1.5.1.c); 		Barro Alto uses Socio-Economic Assessment Toolbox Toolkit for Socioeconomic Evaluation to evaluate socioeconomic conditions of the project influence area and collect opinions, concerns and expectations from communities. In 2016 several meetings were carried out to know the community perception of the Barro Alto activities and plan actions to address those concerns and expectations, monitoring implementation and evaluate results. 2018 Socio-Economic Assessment Toolbox Report includes results of the stakeholder consultation process. However, the approach during community meetings has been more informative than consultative and misunderstanding among the stakeholders regarding the consultation process was observed during the interviews.

	<p>e. Provisional conclusions and recommendations of the ESIA, prior to finalization (see 2.1.6.1); and</p> <p>f. The final conclusions and recommendations of the ESIA (see 2.1.6.1).</p> <p>(Existing Mines) The operating company shall consult with relevant stakeholders in the identification and evaluation of potential environmental and social impacts associated with the mine</p>		
2.1.9.2.	<p>(New Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the collection of data for the ESIA, and in the development of options to mitigate the potential impacts of the project during and subsequent to the ESIA process.</p> <p>(Existing Mines) The operating company shall encourage and facilitate stakeholder participation, where possible, in the development of options to mitigate the potential impacts of the mine.</p>	●	<p>Barro Alto developed a comprehensive Environmental Impact assessment according to the Brazilian requirements at the moment of the project proposal in 2000, covering a to d requirements.</p> <p>Regarding social aspects, Barro Alto applies the Socio-Economic Assessment Toolbox SEAT.</p> <p>This tool has been applied since 2005 with updates in 2008, 2011, 2015 and 2018 to develop and periodically update the social management plan. Even though periodic meetings with stakeholders have been conducted, opportunities to improve mechanisms of participation and consultation were observed, including misunderstanding regarding the participation process by key community stakeholders interviewed. Significant impact of Pandemic in the stakeholder engagement program.</p>
2.1.9.3.	The operating company shall provide for timely and effective stakeholder consultation, review and comment on the scope and design of the environmental and social monitoring program.	●	<p>Consultations are made through Socio-Economic Assessment Toolbox and the social management and engagement plans are reviewed annually (PES and PGS (Plano de Gestão Social) 2019 evidence). Impact management is constantly monitored through the SE SUITE system (evidence of the system print).</p> <p>The approach during community meetings has been more informative than consultative. A misunderstanding among the stakeholders regarding the consultation process was identified during the interviews.</p>
2.1.9.4.	The operating company shall encourage and facilitate stakeholder participation, where possible, in the implementation of the environmental and social monitoring program.	●	<p>Stakeholder participation is facilitated through established committees (Coexistence Committee and meetings with public authorities) including discussion of social action plan. Stakeholder meetings plan has been significantly impacted by pandemic. Only 2 meeting minutes were available. From interviews with stakeholders, it is not clear how they can participate in the design of monitoring program, either as observers, or enabled to carry out independent monitoring with their own experts.</p>
2.1.9.5.	The operating company shall record all stakeholder comments received in relation to ESIA scoping; implementation; ESIA findings, conclusions and recommendations; and the environmental and social monitoring program. The company shall record how it responded to stakeholder comments.	●	<p>Minutes from stakeholder meetings (including coexistence committee and governmental authorities) are maintained for follow-up. Grievances process in place to receive requests or claims from stakeholders, which are tracked until resolution. However, it is not clear how specifically comments regarding Environmental and Social Impact Assessment scoping, implementation, and recommendations are considered in the environmental and social programs.</p>
2.1.10.1.	(New Mines) The ESIA report and any supporting data and analyses shall be made publicly available. Detailed assessments of some issues and impacts may be	●	<p>Environmental studies for the licensing of the Barro Alto project were made publicly available to interested parties, through the specific Public Hearing of the project, held in 2001. Monitoring data is reported to the environmental</p>

	<p>reported as stand-alone documents, but the ESIA report shall review and present the results of the full analysis in an integrated manner.</p> <p>(Existing Mines) At minimum, a summary of the significant environmental and social impacts and risks associated with the mining operation shall be made public</p>		<p>agency annually. This data may be required by the public. In addition, periodic meetings with stakeholders are held. However, from interviews with community representatives it was not clear the mechanisms to access this documentation. Barro Alto website has limited information available. similar situation with the social impact studies.</p>
2.1.10.2.	<p>The operating company shall make publicly available an anonymized version of the ESIA record of stakeholder comments and its own responses, including how each comment was taken into account.</p>		<p>The company conducted the public consultation in accordance with the applicable Brazilian legislation in 2001. This does not provide for anonymous consultation and the obligation to take observations into consideration. Barro Alto states that the observations were considered, however it is no clear how Barro Alto evaluates, considers, or takes into account each comment made by the community or other stakeholders, not only for the first public consultation but for the amendments and updates of the Environmental and Social Impact Assessment. From interviews with community representatives, it was not clear the mechanisms for consultation.</p>
2.1.10.3.	<p>The environmental and social management plan shall be made available to stakeholders upon request.</p>		<p>Information on the social management plan was made available to interested parties through meetings of the "Coexistence Committee", meetings with public authorities and with the disclosure of the social report (Barro Alto website), which includes issues raised during the Socio-Economic Assessment Toolbox process and the social management plans. However, from interviews with key community representatives it was not clear the process to have access to these documents.</p>
2.1.10.4.	<p>Summary reports of the findings of the environmental and social monitoring program shall be made publicly available at least annually, and all data and methodologies related to the monitoring program shall be publicly available.</p>		<p>Results of the actions of the social programs were made available through the coexistence committee and meetings with public authorities. Barro Alto states that summary reports of the findings of the environmental and social monitoring program are made available to the public at least annually, and all data and methodologies related to the monitoring program must be available to the public through the environmental agency, which should make these reports available to the public. However, from interviews with stakeholders, particularly, and community representatives, it was not clear on the process to have access to these documents. There is limited information available on the Barro Alto website.</p>
2.1.10.5.	<p>(New Mines) The existence of publicly available ESIA and ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p> <p>(Existing Mines) The existence of publicly available ESMS information, and the means of accessing it, shall be publicized by appropriate means.</p>		<p>Barro Alto has developed its social plan based on corporate policies (Social Way - V2) and a social management plan is in place. Barro Alto coexistence committee (Comite de Convivencia) meetings as well as quarterly newsletters and radio programs have been the main communication media. However, from interviews with stakeholders, particularly community representatives, it was not clear the process to have access to these documents. There is limited information available on the Barro Alto website.</p>

Chapter 2.2—Free, Prior and Informed Consent (FPIC)


Basis for rating


	Chapter Not Relevant	<p>According to official data provided by the Brazilian government and publicly available information provided by Instituto Socioambiental (ISA), there are no indigenous communities under the Barro Alto mine influence area.</p> <p>The official consulted data were provided by the Brazilian Ministry of Indigenous Peoples through the Indigenous Information System available at http://sii.funai.gov.br/funai_sii/informacoes_indigenas/visao/visao_terras_indigenas.wsp.</p> <p>The Instituto Socioambiental (ISA) is an influential Brazilian Non-Governmental Organization that has worked with indigenous communities in Brazil since 1994. This Non-Governmental Organization provides the country's largest database of indigenous territories; based on this platform, we didn't find any indigenous territory under the influence of Barro Alto Mine. The platform is available at https://terrasindigenas.org.br.</p>
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Chapter 2.3—Obtaining Community Support and Delivering Benefits		Basis for rating
2.3.1.1.	<p>The operating company shall publicly commit to:</p> <ul style="list-style-type: none"> a. Maintaining or improving the health, social and economic wellbeing of affected communities; and b. Developing a mining project only if it gains and maintains broad community support. 	<p style="text-align: center;">L</p> <p>In Anglo American Social Way document provided, which principles are publicly available at the Anglo American website (https://socialway.angloamerican.com/), it is established a goal of working "with stakeholders affected by (Anglo American) activities to deliver a lasting positive contribution, to be a partner of choice for host governments and to be an employer of choice". In addition, there is a commitment to include in the social management plan of each Anglo American site socio-economic development actions. A number of documents were provided showing how Barro Alto is operationalizing this commitment, by prioritizing the following topics: Sports, leisure, tourism, arts, culture and heritage, capacity building, education and training, environment, health and well-being, among others. All external stakeholders interviewed, including neighbors and local public government, affirmed that the Barro Alto presence is positive for local communities, despite their mentioned potential improvements. Barro Alto also shared documents confirming donations during the Covid-19 pandemic to local communities and health care public units. They also provided courses and activities to improve the local social projects.</p>
2.3.2.1.	For new mines, the operating company shall demonstrate that it obtained broad community support from communities affected by the mining project, and that this support is being maintained.	<p style="text-align: center;">L</p> <p>Considering the interviews with the neighbors of the potential area to mine expansion (Area 5), they support the Barro Alto activities. The other neighbors also mentioned their approval of the mining activities in the Barro Alto.</p>
2.3.2.2.	For new mines, broad community support shall be determined through local democratic processes or governance mechanisms, or by another process or method agreed to by the company and an affected community (e.g., a referendum). Evidence of broad	<p style="text-align: center;">L</p> <p>The mine expansion area has been discussed with the local community and neighbors through meetings called "Convivial Meetings". Barro Alto staff presented the records of these meetings, while community representatives also mentioned these meetings in their interviews.</p> <p>In addition, stated external audiences have access to information about Barro Alto's activities and projects, such as local leaders responsible for social projects</p>

	<p>community support shall be considered credible if the process or method used to demonstrate support:</p> <ul style="list-style-type: none"> a. Occurred after the operating company carried out consultations with relevant stakeholders regarding potential impacts and benefits of the proposed mining project; b. Was transparent; c. Was free from coercion or manipulation; and d. Included the opportunity for meaningful input by all potentially affected community members, including women, vulnerable groups and marginalized members, prior to any decision or resolution. 		<p>in Barro Alto and the local government. Regarding potentially affected community members, including women, vulnerable and marginalized groups, the interviewers mentioned that these groups are being consulted and addressed in the mine's social plan.</p>
2.3.2.3.	<p>For existing mines, the operating company shall demonstrate that the mine has earned and is maintaining broad community support.</p>	L	<p>The Living Committee Statute is applicable to Barro Alto, Souzalândia, Neighbors and Santo Antônio da Laguna communities. In the Socio-Economic Assessment Toolbox (SEAT) Report the assessment of indicators related to broad community support is presented. In general, the broad community support indicators show acceptance from the assessed communities.</p> <p>During the interviews the local associations leaders, government and neighbors mentioned the approval of the mining presence and activities, including the social projects supported by Barro Alto mine. During the COVID-19 pandemic, the Barro Alto mine also supported the local health service to respond the sanitary emergencies locally.</p>
2.3.3.1.	<p>The operating company, in collaboration with affected communities and other relevant stakeholders (including workers and local government), shall develop a participatory planning process to guide a company's contributions to community development initiatives and benefits in affected communities.</p>	⊕	<p>According to the Sustainable Mining Plan, stakeholder consultation for collaborative actions for socioeconomic development is scheduled for 2022.</p> <p>Respondents confirmed that they are consulted and trained in the process of selecting social projects. However, local associations and non-governmental organizations do not have access to projects and long-term plans, which makes project planning and sustainability difficult.</p> <p>The Social Management Plan for the Barro Alto mine is being carried out, however, according to local leaders and the Barro Alto team, it is at a first stage, and the local community is not participating in designing the process until November 2021.</p>
2.3.3.2.	<p>The planning process shall be designed to ensure local participation, social inclusion (including both women and men, vulnerable groups and traditionally marginalized community members, e.g., children, youth, the elderly, or their representatives), good governance and transparency.</p>	L	<p>The company presents documents that show the process of local participation, with the inclusion of the local groups' representatives, including identified vulnerable groups, who participate in the governance structure through the "Comitê de Convivência" (Coexistence Committee) and are heard in decision-making on criteria for selecting projects and means of participation by local groups in projects that are relevant to meeting the demands of the communities surrounding the Barro Alto site.</p> <p>At the request of the local groups' representatives, the company replaced the training for the preparation and registration of projects from a remote format to a in person format. The aim of the training sessions is to help the applicants to</p>

			<p>prepare their projects properly, as well as working on issues related to financial sustainability, among other topics. After each cycle of training, applicants provide feedback on the training.</p> <p>It is worth noting that the Social Call for Projects prioritizes vulnerable groups such as youth, children and adolescents, the elderly, women, the black population, people with disabilities and LGBTQIA+. Agreements in force in 2023 include projects that work with socially vulnerable children/adolescents.</p> <p>Approved projects are announced via the application platform and an email is sent to all applicants. When requested, individualized feedback on the evaluation process is sent to the projects applicants that are not selected, including recommendations for revision and improvement of the project's items and compliance with the selection criteria. The company provides evidence of a face-to-face feedback meeting for the projects not selected with the APVDBA association for the Águia project not included in the 2022 call for projects. In the case of collective demands from the communities, these are presented to the "Comitê de Convivência" (Coexistence Committee) where the response or referral of the demand is presented. The company provides an example of the response given to this committee regarding the request for an increase in the value of social projects, (Ofício Resposta Comitê de Convivência Barro Alto Final 2023.04.13 (003)).</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Edital de Projetos Sociais de Níquel 2023_Publicado, page 9, item "7.3 Procedimento para avaliação e avaliação". • Barro Alto - Ata - Comitê de Convivência 13.06.23 (1), page 3, "7º ponto: Olhar em relação ao projeto águia". • Barro Alto - Ata - Comitê de Convivência 26.04.23 (1), page 4, "Pauta 04 – Espaço da comunidade". • Edital de Projetos Sociais de Níquel 2023_Publicado; page 6 and 7. • Evidência módulo da Prosas sobre sustentabilidade financeira e captação de recursos, "Aula2_Modulo2_SustentabilidadeFinanceira (3)". "VF_Relatório Capacitação AA 2022_M2_FINAL" slide 32. • Ata Barro Alto- SED • Público-alvo - Plataforma de Inscrição do edital de projetos sociais. • Registro de interação 12/05/2023. • Ofício Resposta Comitê de Convivência BA VFinal 2023.04.13 (003).
2.3.3.3.	If requested by the community and not provided by the appropriate public authorities, the operating company shall provide funding for mutually agreed upon experts to aid in the participatory process.	L	As noted in the previous item, (2.3.3.2) and in the documentation reviewed here, the company provides training to support and encourage the participation of local groups in the application and execution of projects that bring common benefits to the communities based on legitimate demands mapped out by the Comitê de Convivência (Coexistence Committee) in the selection and implementation of projects.

			<p>The company presents evidence that the training provided to local groups includes experts from a consulting firm specializing in private social investment called "Prosas", hired and paid for by Anglo American.</p> <p>Although no evidence was found in the available documentation that the consultancy firm was hired by the company at the request of community representatives or in a manner mutually agreed with the respective representatives, in the governance structure, where community representation is heard by participating in the committee, there are forms of claim that could lead the company to provide funding for specialists to support local groups, if requested.</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • Edital de Projetos Sociais de Níquel 2023_Publicado; page 6 and 7. • Aula2_Modulo2_SustentabilidadeFinanceira (3)"; "Aula3_Captação de Recursos (2)", slide 6. Plataforma Prosas: https://prosas.com.br/empresas (Prosas - Especialistas em projetos sociais). "VF_Relatório Capacitação AA 2022_M2_FINAL" slide 32. • Edital de Projetos Sociais de Níquel 2023_Publicado, page 9, item "7.3 Procedimento para avaliação e avaliação". • Barro Alto - Ata - Comitê de Convivência 13.06.23 (1), page 3, "7° ponto: Olhar em relação ao projeto água". • Barro Alto - Ata - Comitê de Convivência 26.04.23 (1), page 4, "Pauta 04 – Espaço da comunidade". • Ofício Resposta Comitê de Convivência BA VFinal 2023.04.13 (003). • Aula3_Captação de Recursos (2), slide 6. • Ata Barro Alto- SED (Socio Economic Development).
2.3.3.4.	<p>Efforts shall be made to develop:</p> <ol style="list-style-type: none"> Local procurement opportunities; Initiatives that benefit a broad spectrum of the community (e.g., women, men, children, youth, vulnerable and traditionally marginalized groups); and Mechanisms that can be self-sustaining after mine closure (including the building of community capacity to oversee and sustain any projects or initiatives agreed upon through negotiations). 		<p>As noted in items 2.3.3.2 and 2.3.3.3 and in the documentation available from the company relating to this item 2.3.3.4, there was evidence that the company has tools in its planning and management processes that provide initiatives that benefit a broad spectrum of the community, including the most vulnerable segments, who participate in the coexistence committee along with other community representatives from the areas where the Barro Alto unit is located.</p> <p>There is evidence that the company promotes the training of local suppliers as an incentive for local hiring and the establishment of suppliers in the region or municipalities in the Barro Alto area. The initiatives that stand out are: the supplier development program, which offers training through a partnership with Sebrae - the Brazilian Micro and Small Business Support Service; incentives for partner companies to hire and develop local labor and monitoring of local purchases through monthly reports from partner companies recording the volume of purchases and the respective proportion of purchases made locally; implementation of a free supplier registration platform aimed at simplifying the registration of new suppliers.</p> <p>It is noted from the information above that the company is making efforts towards local procurement opportunities and initiatives that benefit a broad</p>

			<p>spectrum of the community. However, no evidence was found of long-term actions that seek mechanisms that can be self-sustaining after the mine closes (including building community capacity to oversee and sustain any projects or initiatives agreed through negotiations) with a long-term reach that seeks to maintain a sustainable economy for the local reality after the mine closes.</p> <p>In this context, the operating company partially meets this item once it does two of the expected requirements (Procures some materials or services from local businesses; and Supports initiatives that benefit a broad spectrum of the community:</p> <p>Reviewed documents/related evidence:</p> <ul style="list-style-type: none"> • 200423_Proposta Capacitações Sebrae FINAL. • AngloAmerican Proposta Liderança Cívica. • Proposta Senac Bares e Restaurantes. • Aula2_Modulo2_SustentabilidadeFinanceira (3) • Aula3_Captação de Recursos (2), slide 6. • Público alvo - Plataforma de Inscrição do edital de projetos sociais. • PRO.NIQ.SUP.007, Page 4, item f. • GASTO LOCAL 2023 – CONSOLIDADO or “Spend local - Barro Alto 2023. BASE SPEND INDIRETO 2022. • Barro Alto - PPT - Comitê de Convivência 13.06.2023 • Barro Alto - Ata - Comitê de Convivência 26.04.23 (1), page 2, point 5 and 6. • 2023.05.25_Programas Ambientais_Dia 2, slide 23. • NI - Book de iniciativas Sustentáveis 2023 Divulgação. • Catalogo de Fornecedores Locais ACIN e ACIABA. • Fornecedores qualificados no SLP - BA e NI ate 25.05 • Catalogo de Fornecedores Locais ACIN e ACIABA. • Link Superbuy: https://www.superbuy.com.br/quem_somos • Print “Superbuy - Portal para os Fornecedores”.
2.3.3.5.	The planning process and any outcomes or decisions shall be documented and made publicly available.		<p>According to the Living Committee Statute, the meetings minutes (including discussed topics, explanations, definitions, and next steps shall be communicated to the communities.</p> <p>Considering all planning process and outcomes presented by Barro Alto, such as the financed social projects, social plan, and donations, not all activities are being publicized. In addition, there are several social activities being carried out and it is not clear to the community the scope and periodicity of all of them.</p> <p>The outcomes are made publicly available, through the Magazine "Diálogo", however, only involved communities receive periodic communications about the process and results.</p>

2.3.3.6.	In collaboration with the community, the operating company shall periodically monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on agreed upon indicators, and evaluate if changes need to be made to those mechanisms or agreements.	⊕	<p>Barro Alto implemented a management system that includes a monitoring tool (SE Suite). This tool allows the team to establish actions, monitor the implementation and its effectiveness. The implemented actions are also reviewed at meetings with community representatives.</p> <p>The evidence is specific with regard to indicators that assess the effectiveness of actions taken to bring benefits to the community (e.g., number of vulnerable people involved, people trained, value of investment, and measurement of learning goals, etc.).</p> <p>In this way, the Barro Alto mine has developed indicators to evaluate the effectiveness of any mechanisms or agreements developed to deliver community benefits; however, the local community is not collaborating to monitor the effectiveness of any mechanisms or agreements developed to deliver community benefits, based on interviews.</p>
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Chapter 2.4—Resettlement	Basis for rating
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2.4.1.1.	If there is the potential that a new mine (including associated facilities) or the expansion of an existing mine or associated facilities may require land acquisition that could result in the involuntary resettlement (for the remainder of this chapter, referred to simply as resettlement) of people, the operating company shall undertake an assessment process to evaluate the potential direct and indirect risks and impacts related to the physical and/or economic displacement of people.	L	During the meeting with the Barro Alto team responsible for the resettlement process, they presented the report regarding the assessment of potential risks and direct and indirect impacts related to the physical and/or economic displacement of people. This document contemplates the resettlement process that has already been carried out and is being finalized.
2.4.1.2.	<p>The assessment shall:</p> <ol style="list-style-type: none"> a. Be undertaken during the early stages of mining project planning; b. Include identification of alternative mining project designs to avoid, and if that is not possible, minimize the displacement of people; c. Identify and analyze the social, cultural, human rights, conflict, environmental and economic risks and impacts to displaced persons and host communities for each project design alternative, paying particular attention to potential impacts on women, children, the poor and vulnerable groups; and d. Identify measures to prevent and mitigate risks and impacts, and estimate the costs of implementing the measures. 	⊖	<p>The Mine has two areas of expansion that will result in the displacement of people, Area 5 and Area 6. The resettlement of people from Area 5 has taken place, while the resettlement for Area 6 is still in process. Evidence presented demonstrates:</p> <ol style="list-style-type: none"> a. That an assessment of risks associated with resettlement was undertaken as part of early stages for Area 5 and Area 6. b. Presentations provided clearly demonstrate alternative options considered to minimize the displacement of people. c. While a thorough analysis of community and host conditions is being carried out for Area 6, the same process was not applied to Area 5 d. Control measures and a budget have been prepared for Area 5 and Area 6.

2.4.1.3.	The assessment shall be undertaken by competent professionals with experience in resettlement related to large-scale development projects.	L	The resettlement assessment report presented by the Barro Alto mine team was prepared by a team with experience in similar projects.
2.4.1.4.	The operating company shall document decision-making regarding alternative mining project designs and efforts to minimize resettlement.	●	Evidence presented clearly demonstrates planning and design efforts to reduce resettlement for Area 6. According to interviews, this process was carried out for Area 5, however, thorough documentation of the process was not available.
2.4.1.5.	The assessment shall be made public, or, at minimum, be made available to potentially affected people and their advisors.	L	The assessment has been reported to affected families through the meetings of the Comitê de Convivência, as indicated in the minutes of these meetings. Additionally, resettlement actions have also been reported through Diálogo magazine. The interviewed settled family also mentioned access to information on the resettlement process and assessment.
2.4.2.1.	The operating company shall disclose relevant information and consult with potentially affected people and communities, including host communities, during: <ul style="list-style-type: none"> a. The assessment of displacement and resettlement risks and impacts, including the consideration of alternative mining project designs to avoid or minimize resettlement; a. The development of resettlement and livelihood options; and b. The development, implementation, monitoring and evaluation of a Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP). 	●	<p>According to the minutes of the Reuniões do Comitê de Convivência and the report shared by the BA mine team, the company has been disclosing information on the resettlement process with the affected families. During the interview with the resettled family, access and participation in the assessment of risks and impacts of displacement and resettlement, and in the development of all actions, was also mentioned.</p> <p>The list of stakeholders in this process does not appear to include community representative experts.</p>
2.4.2.2.	The operating company shall facilitate access, if desired by potentially affected people and communities, including host communities, to independent legal or other expert advice from the earliest stages of project design and assessment, through monitoring and evaluation of the resettlement process.	●	<p>There is no evidence regarding that Barro Alto mine has offered to facilitate access to independent legal or other expert advice for potentially affected stakeholders throughout the resettlement process.</p> <p>The mine provided evidence that shows they offered to the communities a third party company. However, the mine did not provide further evidence to further verify the independence of this third party company.</p>
2.4.2.3.	People from affected communities, including host communities, shall have access to an effective mechanism to raise and seek recourse for concerns or grievances related to displacement and resettlement.	L	According to the interviews conducted and the report presented by the Barro Alto team, host families and communities have easy and constant access to the mine to share concerns or grievances related to displacement and resettlement.
2.4.3.1.	When project-related displacement is deemed unavoidable, a census shall be carried out to collect appropriate socio-economic baseline data to identify the people who will be physically or economically displaced by the project and determine who will be eligible for compensation and assistance.	L	The document presented by the Barro Alto mine team presents results referring to the realization of a census with socioeconomic data and identification of people who were physically or economically displaced by the project.


2.4.3.2.	In the absence of host government procedures, the operating company shall establish compensation eligibility criteria and a cut-off date for eligibility. Information regarding the cut-off date shall be well documented, and disseminated along with eligibility information throughout the mining project area.	✘	There is no evidence that Barro Alto mine had proposed compensation eligibility criteria or a cut-off date for eligibility.
2.4.3.3.	<p>In the case of physical displacement, the operating company shall develop a Resettlement Action Plan. If the project involves economic displacement only, a Livelihood Restoration Plan shall be developed. In either case, these plans shall, at a minimum:</p> <ul style="list-style-type: none"> a. Describe how affected people will be involved in an ongoing process of consultation throughout the resettlement/livelihood restoration planning, implementation and monitoring phases; b. Describe the strategies to be undertaken to mitigate the negative impacts of displacement and improve or restore livelihoods and standards of living of displaced people, paying particular attention to the needs of women, the poor and vulnerable groups; c. Describe development-related opportunities and benefits for affected people and communities; d. Describe the methods used for valuing land and other assets; e. Establish the compensation framework (i.e., entitlements and rates of compensation for all categories of affected people, including host communities) in a transparent, consistent, and equitable manner; f. Include a budget and implementation schedule; and g. Be publicly available. 	●	<p>For Area 5, the Barro Alto mine team presented the Resettlement Action Plan (RAP) meeting sub-requirements a - f. The Resettlement Action Plan was not made publicly available as a document; however, the findings and outcomes of the Resettlement Action Plan were communicated to project affected people.</p> <p>A Resettlement Action Plan is being prepared for Area 6, and the mine team noted that they are committed to sharing it publicly in line with IRMA requirements.</p>
2.4.4.1.	<p>In all cases, when people are physically displaced as a result of the development or expansion of a mine or its associated facilities:</p> <ul style="list-style-type: none"> a. The operating company shall provide relocation assistance that is suited to the needs of each group of displaced peoples and is sufficient for them to improve or at least restore their standard of living at an alternative site; b. New resettlement sites built for displaced people shall offer improved living conditions; and 	L	<p>The report presented by the Barro Alto team, as well as the interview with a resettled family, provided evidence that physically displaced persons received relocation assistance tailored to the needs of each group of displaced persons. According to the data obtained, assistance was provided during all resettlement stages.</p>

	c. Displaced people's preferences with respect to relocating in pre-existing communities and groups shall be taken into consideration and existing social and cultural institutions of the displaced peoples and any host communities shall be respected.		
2.4.4.2.	In cases where physically displaced people have formal legal rights to the land or assets they occupy or use, or do not have formal legal rights but have a claim to land that is recognized or recognizable under national law: a. The operating company shall offer the choice of replacement property (land and assets) of at least equal value and characteristics, security of tenure, and advantages of location; and b. If cash compensation is appropriate and preferred by the affected people, compensation shall be sufficient to replace lost land and other assets at full replacement cost in local markets	L	No physically displaced persons who did not have formal legal rights to the land or assets they occupied or used were identified. According to the interviews with the displaced people and documents shared during meetings, during the resettlement process the affected people chose to receive properties rather than cash compensation. Barro Alto mining provided a replacement property of equal or higher value and security of tenure. The company was also providing equipment and suppliers for the people to provide similar conditions that they used to have before.
2.4.4.3.	In cases where physically displaced people have no recognizable legal right or claim to the land or assets they occupy or use, the operating company shall: a. Offer options for adequate housing with security of tenure; and b. Compensate for the loss of assets other than land at full replacement cost, provided that the people had been occupying the project area prior to the cut-off date for eligibility.	—	No physically displaced persons who did not have formal legal rights to the land or assets they occupied or used were identified.
2.4.5.1.	If project-related land acquisition or restrictions on land use result in economic displacement, regardless of whether or not the affected people are physically displaced, the operating company shall apply the following measures: a. When commercial structures are affected, the business owners shall be compensated for the cost of re-establishing commercial activities elsewhere, for lost net income during the period of transition, and for the costs of the transfer and reinstallation of the plant, machinery, or other equipment, and the employees shall be compensated for lost income; b. When affected people have legal rights or claims to land that are recognized or recognizable under national law, replacement property of equal or	L	According to information shared at a meeting by the Barro Alto team and an interview with the resettled family, in the case where there was economic displacement, commercial activities were also reestablished elsewhere, mainly associated with agricultural production.

	<p>greater value shall be provided, or, where appropriate, cash compensation at full replacement cost; and</p> <p>c. Economically displaced people who are without legally recognizable claims to land shall be compensated for lost assets other than land at full replacement cost.</p>		
2.4.5.2.	<p>All economically displaced people whose livelihoods or income levels are adversely affected shall be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living, and transitional support shall be provided based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living. Additionally:</p> <p>a. For people whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost shall be offered as a matter of priority;</p> <p>b. For people whose livelihoods are natural resource-based and where project-related restrictions on access apply, continued access to affected resources or access to alternative resources with at least equivalent livelihood-earning potential and accessibility shall be provided; and</p> <p>c. If circumstances prevent the operating company from providing land or similar resources as described above, alternative income earning opportunities shall be provided to restore livelihoods</p>	L	<p>According to information shared at a Barro Alto staff meeting and interview with the resettled family, in the event that economically displaced people had their livelihoods or income negatively affected, they were given resources, land and means for recovery, and improvement of income generation and living standards.</p>
2.4.6.1.	<p>In order to achieve IRMA 100, if a new project will require the displacement of indigenous peoples the operating company shall obtain the free, prior and informed consent (FPIC) of affected indigenous communities before proceeding with the resettlement and mine development (as per IRMA Chapter 2.2).</p>	—	<p>There is no indigenous community in the Barro Alto mine influence area.</p>
2.4.6.2.	<p>If a new mine will require the displacement of non-indigenous peoples, the operating company shall make a good faith effort to negotiate agreements with all households that will be physically or economically displaced by the mining project before proceeding with the resettlement, even if the company has the</p>	L	<p>According to the interviews with displaced people who were resettled, the resettlement process has developed in a transparent and fair way. The affected people have negotiated conditions to receive a property with a similar or higher value. In addition, they affirmed to have open and direct contact with the Barro Alto team responsible for resettlement, and the demands have been responded to as soon as possible.</p>

	legal means to acquire land or restrict land use without their consent.		In addition, during a meeting with the Barro Alto team, they presented the legal documents with the agreement with the affected people.
2.4.6.3.	<p>Prior to negotiating with affected people, the operating company shall provide or facilitate access to resources necessary to participate in an informed manner. This shall include, at minimum:</p> <ul style="list-style-type: none"> a. Copies of RAP and/or LRP; b. Details on what to expect at various stages of the resettlement or livelihood restoration process (e.g., when an offer will be made to them, how long they will have to respond, how to access the grievance mechanism if they wish to appeal property or asset valuations, legal procedures to be followed if negotiations fail); and c. Independent legal experts or others to ensure that affected people understand the content of any proposed agreement and associated information. 	●	For Area 5, there is evidence of continuous engagement with project affected people throughout the process, however, the process was not well documented, and the Resettlement Action Plan (RAP) was not shared in its entirety with project affected people. For Area 6, while the Resettlement Action Plan is in process, evidence demonstrates that the process is being undertaken in a manner that meets the requirements of the IRMA Standard.
2.4.6.4.	In cases where affected people reject compensation offers that meet the requirements of this chapter and, as a result, expropriation or other legal procedures are initiated, the operating company shall explore opportunities to collaborate with the responsible government agency, and, if permitted by the agency, play an active role in resettlement planning, implementation, and monitoring to mitigate the risk of impoverishment of those affected people.	—	There is no evidence that families rejected the compensation offered by the mine.
2.4.6.5.	Forced evictions shall not be carried except in accordance with law and international best practice, and the requirements of this chapter.	—	There is no evidence regarding forced evictions attributable to Barro Alto mine.
2.4.6.6.	The operating company shall take possession of acquired land and related assets only after compensation has been made available, and, where applicable, resettlement sites and moving allowances have been provided to the displaced people.	⊗	There is no evidence regarding when the Barro Alto mine took possession of acquired land and related assets considering the time when compensation was made available.
2.4.6.7.	The operating company shall document all transactions to acquire land rights, and all compensation measures and relocation activities.	L	The Barro Alto team presented during the meeting held in November 2021, the resettlement report with evidence of the land acquisition transactions and the relocation measures.
2.4.7.1.	CRITICAL The operating company shall establish and implement procedures to monitor and evaluate the implementation of a Resettlement Action Plan (RAP) or Livelihood Restoration Plan (LRP), and take corrective action as necessary until the provisions of	L	The Barro Alto team presented during the meeting held in November 2021, the Resettlement Action Plan (RAP) and the Livelihood Restoration Plan (LRP) carried out by an external team of experts.

	the RAP/LRP and the objectives of this chapter have been met.		
2.4.7.2.	Periodically, the operating company shall report to affected people and other relevant stakeholders on progress made toward full implementation of the RAP or LRP.	L	The assessment has been reported to affected families through the meetings of the Comitê de Convivência, as indicated in the minutes of these meetings. Additionally, resettlement actions have also been reported through Diálogo magazine. The interviewed settled family also mentioned access to information on the resettlement process and assessment.
2.4.7.3.	Where resettlement is deemed to pose a risk of significant adverse social impacts the operating company: <ul style="list-style-type: none"> a. Shall retain competent professionals to verify the operating company's monitoring information and provide advice on additional steps needed to achieve compliance with the requirements of this chapter; and b. Shall commission a completion audit that: <ul style="list-style-type: none"> i. Occurs after the company deems that its RAP/LRP has been fully and successfully implemented; ii. Is carried out by external resettlement experts; iii. Includes, at a minimum, a review of the mitigation measures implemented by the operating company, a comparison of implementation outcomes against the requirements of this chapter, and a determination as to whether the commitments made in the RAP/LRP have been delivered and the monitoring process can therefore be terminated; and iv. Is made available to affected people and their advisors. 	—	The resettlement promoted by Barro Alto mine does not pose a risk of significant adverse social impacts to affected people and communities.
2.4.8.1.	Where land acquisition and resettlement are the responsibility of the government, the operating company shall collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this chapter.	—	In Brazil the land acquisition and resettlement are not the responsibility of the government.
2.4.8.2.	The operating company shall identify government resettlement and compensation measures. If these measures do not meet the relevant requirements of this chapter, the operating company shall prepare a supplemental plan that, together with the documents	—	In Brazil the land acquisition and resettlement are not the responsibility of the government.

	<p>prepared by the responsible government agency, shall address the relevant requirements of this chapter. The company shall include in its supplemental plan, at a minimum:</p> <ol style="list-style-type: none"> Identification of affected people and impacts; A description of regulated activities, including the entitlements of physically and economically displaced people provided under applicable national laws and regulations; The supplemental measures to achieve the requirements of this chapter in a manner that is permitted by the responsible agency and an implementation schedule; and The financial and implementation responsibilities of the operating company in the execution of its supplemental plan. 		
<p>Chapter 2.5—Emergency Preparedness and Response</p>		<p>Basis for rating</p>	
<p>2.5.1.1.</p>	<p>CRITICAL All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in <i>United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining</i>.</p>		<p>There is evidence of consultation with community in terms of better evacuation routes, and potential emergency warning methods. Drills were carried out (transportation of people) with involvement of community members. There is evidence that the organization has implemented an ERP (Emergency Response Plan) considering the following points contained in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level:</p> <ul style="list-style-type: none"> Has provided information to concerned members of the community on the hazards involved with nearby industrial operations, and the measures taken to reduce these risks. This was done via community interaction and planning emergency evacuation for potentially impacted residents with special consideration to dam collapse. Has and continuously review, update, or establish emergency response plans for local areas via Emergency Response Team and community interactions. This included consultation with nearby inhabitants to consider potentially impacted people with mobility restrictions. Is in the early stages of local industry involvement in community awareness and emergency response planning. This is mainly due to the distances between the mine and other industries. During the assessment the organizations were consulted over hazardous material transportation and subcontractor activities. Those are mainly covered by Brazilian requirements. The organization has partially and is continuously integrating their emergency plans with local emergency response for the community to

			handle most probable types of emergencies Involve members of the local community.
2.5.1.2.	The operating company shall: e. Conduct an exercise to test the plan, with key participants describing how they would respond to a variety of different emergency scenarios, at least every 12 to 24 months; and f. Update the communications contacts of the emergency response plan at least annually.	L	The organization has a very good process. This included Dam 119 and other internal drills. There is a plan under implementation to improve the warning system for the community to the potential of Dam 119 failure. This was not yet tested.
2.5.2.1.	CRITICAL The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.	●	There is proof of community involvement in the design of the new measures to evacuate low laying areas, including characteristics of mobility of potentially impacted population. There is evidence of community participation in the drill (dam collapse). Drills with new system not yet drilled due to context – COVID-19.
2.5.3.1.	All operations related to the mining project shall be covered by a public liability accident insurance policy that provides financial insurance for unplanned accidental events.	L	From the documented information several activities are listed, and it is apparent they cover all areas/activities.
2.5.3.2.	The public liability accident insurance shall cover unplanned accidental events such as flood damage, landslides, subsidence, mine waste facility failures, major spills of process solutions, leaking tanks, or others.	●	Verification of insurance and renewal 01.96.9189377. All requirements are met with the exception that the policy explicitly excludes floods.
2.5.3.3.	The accident insurance coverage shall remain in force for as long as the operating company, or any successor, has legal responsibility for the property.	●	Insurance coverage remain in force for as long as the operating company, or any successor, has legal responsibility for the property according to Brazilian requirements. Policy expires every 365 days. There is no specific text in the policy regarding automatic renewal. The conformity to this requirement will need to be reviewed during a future assessment.
Chapter 2.6—Planning and Financing Reclamation and Closure		Basis for rating	
2.6.1.1.	The operating company shall guarantee that the cost of implementing reclamation for exploration activities related to the mining development will be met by the company.	●	The exploration activities follow the Brazilian regulations which only require mitigation actions. Current Brazilian regulations do not include requirements related to specific reclamation activities after exploration work is finished. According to the interviewees: <ul style="list-style-type: none"> The remediation actions are included in the "mitigation actions" part of the exploration authorization.

			<ul style="list-style-type: none"> The remediation actions (including those related to exploration) are included in the Mine Closure Plan. Section 8 Exploration Areas Closure of the Preliminary Mine Closure Plan includes a commitment to "ensuring the availability of the necessary resources in view of its environmental obligations, at all stages of its business". Section 8.3 Mitigation and Control Measures for Exploration Areas Recovery and Closure includes the following guidelines that "costs of recovery and closure of the exploration areas should be planned before starting the activities". Photo evidence was reviewed showing the restoration of completed exploration areas. Review of a sample surveying services agreement shows that the site places requirements on contractors for mitigating environmental impact (use of biodegradable drilling fluids). The contract document also references other Anglo procedures including the Safety, Health, and Environment Policy, and the Standard for Management of Hazardous Materials. However, there are no requirements within the Surveying Services Agreement for site remediation, other than capping and filling the drill holes.
2.6.1.2.	The operating company shall implement exploration-related reclamation in a timely manner.		The organization has developed a Reclamation Plan according to the Brazilian regulatory requirements and an annual report including the activities carried out during that year is prepared by a third-party. However, the scope of this study and report includes the main extraction operation but there is no reference to exploration activities. The remediation actions are included in the "mitigation actions" part of the exploration authorization. Photo evidence was provided showing examples of exploration and drilling locations that have been completed and returned to pre-exploration conditions.
2.6.1.3.	Any stakeholder complaints of incomplete or inadequate exploration reclamation, if not resolved by other means, shall be discussed and resolved through the operational-level grievance mechanism (see IRMA Chapter 1.4).	L	<p>No evidence of stakeholder complaints of incomplete or inadequate exploration reclamation was found. According to the Socio-Economic Assessment Toolbox Report. Anglo American has a grievance mechanism, which includes:</p> <ol style="list-style-type: none"> E-mail (faleconosco@angloamerican.com); Free telephone call (0800 941 7100); Face-to-face contact with Anglo American employee; Manifestations contained in magazines, newspapers, blogs or other media are also monitored and registered in the Fale Conosco (Talk to Us) for the proper explanations, clarifications and negotiations. <p>No evidence of stakeholder complaints of incomplete or inadequate exploration reclamation.</p>
2.6.2.1	CRITICAL Prior to the commencement of mine construction activities the operating company shall prepare a reclamation and closure plan that is compatible with protection of human health and the environment, and demonstrates how affected areas will be returned to a stable landscape with an agreed post-mining end use.	L	The organization has developed a reclamation plan following the Brazilian legal requirements and Anglo American guidelines. The plan requires it to be reviewed every 5 years. The last version is from 2016 and currently under review as planned.

2.6.2.2	<p>At a minimum, the reclamation and closure plan shall contain:</p> <ul style="list-style-type: none"> a. A general statement of purpose; b. Site location and background Information; c. A description of the entire facility, including individual site features; d. The role of the community in reviewing the reclamation and closure plan; e. Agreed-upon (after-ESIA) post-mining land use and facility use; f. Source and pathway characterization including geochemistry and hydrology to identify the potential discharge of pollutants during closure; g. Source mitigation program to prevent the degradation of water resources; h. Interim operations and maintenance, including process water management, water treatment, and mine site and waste site geotechnical stabilization; i. Plans for concurrent or progressive reclamation and revegetation, which should be employed wherever practicable; j. Earthwork: <ul style="list-style-type: none"> i. Stabilization and final topography of the reclaimed mine lands; ii. Storm water runoff/run-on management; iii. Topsoil salvage to the maximum extent practicable; iv. Topsoil storage in a manner that preserves its capability to support plant regeneration; k. Revegetation/Ecological Restoration: <ul style="list-style-type: none"> i. Plant material selection, prioritizing native species as appropriate for the agreed post-mine land use; ii. Quantitative revegetation standards with clear measures to be implemented if these standards are not met within a specified time; iii. A defined period, no longer than 10 years, when planned revegetation tasks shall be completed; iv. Measures for control of noxious weeds; 	L	<p>The organization has developed a Mine Closure Plan based on Brazilian regulatory requirements and taking in account other guidelines for Mine reclamation and closure, such as World Bank and ICMM (International Council on Mining and Metals).</p> <p>The plan covers all IRMA requirements and sub-requirements. The Plan is periodically reviewed and updated.</p>
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	<ul style="list-style-type: none"> v. Planned activities to restore natural habitats (as well as biodiversity, ecosystem services and other conservation values as per Chapter 4.6); l. Hazardous materials disposal; m. Facility demolition and disposal, if not used for other purposes; n. Long-term maintenance; o. Post-closure monitoring plan; p. The role of the community in long-term monitoring and maintenance (if any); and q. A schedule for all activities indicated in the plan. 		
2.6.2.3.	<p>The reclamation and closure plan shall include a detailed determination of the estimated costs of reclamation and closure, and post-closure, based on the assumption that reclamation and closure will be completed by a third party, using costs associated with the reclamation and closure plan as implemented by a regulatory agency. These costs shall include, at minimum:</p> <ul style="list-style-type: none"> a. Mobilization/demobilization; b. Engineering redesign, procurement, and construction management; c. Earthwork; d. Revegetation/Ecological Restoration; e. Disposal of hazardous materials; f. Facility demolition and disposal; g. Holding costs that would be incurred by the regulatory agency following a bankruptcy in the first two years before actual reclamation begins, including: <ul style="list-style-type: none"> i. Interim process water and site management; and ii. Short-term water treatment; h. Post-closure costs for: <ul style="list-style-type: none"> i. Long-term water treatment; and ii. Long-term monitoring and maintenance; i. Indirect Costs: <ul style="list-style-type: none"> i. Mobilization/demobilization; 	L	Detailed determination of actions and costs of reclamation and closure plan is included in the Plan and in the financial calculations which are updated semiannually.

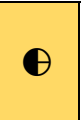

	<ul style="list-style-type: none"> ii. Engineering redesign, procurement and construction management; iii. Contractor overhead and profit; iv. Agency administration; v. Contingency; and j. Either: <ul style="list-style-type: none"> i. A multi-year inflation increase in the financial surety; or ii. An annual review and update of the financial surety. 		
2.6.2.4.	The operating company shall review and update the reclamation and closure plan and/or financial assurance when there is a significant change to the mine plan, but at least every 5 years, and at the request of stakeholders provide them with an interim reclamation progress report.	L	The mine closure plan is updated every three years and the financial provision for the closure is updated every six months, ensuring that all areas affected by the project are covered. Concerns and opinions of interested parties are included in the review through the socioeconomic assessment toolbox.
2.6.2.5.	<p>If not otherwise provided for through a regulatory process, prior to the commencement of the construction of the mine and prior to completing the final reclamation plan the operating company shall provide stakeholders with at least 60 days to comment on the reclamation plan. Additionally:</p> <ul style="list-style-type: none"> a. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and b. Prior to completing the final reclamation plan, the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to provide input to the operating company on the design and implementation of the plan and on the adequacy of the completion of reclamation activities prior to release of part or all of the financial surety. 	⊗	Even though stakeholders are considered for the elaboration of the closure plan, no formal process has been developed to allow comments or review by stakeholders after completion of the plan.
2.6.2.6.	CRITICAL The most recent version of the reclamation and mine closure plan, including the results of all reclamation and closure plan updates, shall be publicly available or available to stakeholders upon request.	L	The Mine Closure Plan is filed with the licensing agencies and can be accessed by any external stakeholder, and the company makes the same available upon request. The mine also makes the current version of the reclamation and mine closure plan available on its website at: https://brasil.angloamerican.com/pt-pt/sustentabilidade/documentos-tecnicos-sobre-nossos-projetos

2.6.3.1.	<p>Open pits shall be partially or completely backfilled if:</p> <ul style="list-style-type: none"> a. A pit lake is predicted to exceed the water quality criteria in IRMA Chapter 4.2; and b. The company and key stakeholders have agreed that backfilling would have socioeconomic and environmental benefits; and c. It is economically viable. 	L	<p>The deposit process in a pit fund (backfill) is carried out continuously, with the aim of reducing the impact and collaborating with the process of rehabilitation of the areas.</p> <p>Evidence including maps and pictures of the reclamation and backfill available.</p>
2.6.3.2.	<p>Underground mines shall be backfilled if:</p> <ul style="list-style-type: none"> a. Subsidence is predicted on lands not owned by the mining company; and b. If the mining method allows. 	—	Barro Alto is an open pit mine.
2.6.4.1.	<p>CRITICAL Financial surety instruments shall be in place for mine closure and post-closure.</p>	—	<p>In October 2022., IRMA revised this requirement such that the Certification Body must confirm that financial assurances (formerly financial surety instruments) exist for closure and post-closure.</p> <p>Not scored in accordance with IRMA guidance which states to not score this requirement (and 2.6.4.2 and .2.6.4.3) in countries without a state-hosted financial surety. Financial surety for full mining reclamation and closure is not available through a state-sponsored program in Brazil.</p> <p>ERM CVS reviewed additional documentation including the Anglo American plc Integrated Annual Report 2021, an Independent Auditor's Report prepared for Anglo American Nickel Brazil Ltda (2021), and a supporting Excel spreadsheet further explaining the values audited in the Brazil and corporate-level financials.</p> <p>The Anglo American Audit Committee concluded that "the estimation of environmental restoration and decommissioning liabilities is inherently uncertain, given the long time periods over which these expenditures will be incurred, and the potential for changes in regulatory frameworks and industry practices over time." In response to its consideration of this significant accounting issue "the Committee reviewed the update provided by management on estimates of environmental and decommissioning liabilities, which are based on the work of external consultants and internal experts. The Committee considered the changes in assumptions, including discount rates, and other drivers of movements in the amounts provided on the balance sheet and concluded that the provisions recorded as of 31 December 2021 appropriately reflected these updates."</p> <p>The Independent Auditors' Report (independent financial auditor) identified "provisions for environmental restoration and decommissioning" as a key audit matter in the 2021 Integrated Annual Report. The independent auditor stated that "the Group has provisions for environmental restoration and decommissioning of \$2,556 million as of 31 December 2021 (2020: \$2,953 million)." It further concluded that "Management reviews the environmental restoration and decommissioning obligations at each reporting period, using experts to provide support in its assessment where appropriate.</p>

			<p>This review incorporates the effects of any changes in local regulations, rehabilitation activities that have taken place during the year and management's anticipated approach to restoration and rehabilitation." The independent auditor "assessed management's process for the review of environmental restoration and decommissioning provisions and performed detailed testing in respect of the cost estimates." Further details of this analysis are available on page 167 of the 2021 Integrated Annual Report. The independent financial auditor concluded that "based on the procedures performed, we consider that the provisions related to environmental restoration and decommissioning obligations are consistent with the obligations associated with the operations and the related remediation plans to satisfy those obligations. Further, we consider the related disclosures in the financial statements to be appropriate."</p> <p>Additional decommissioning and restoration costing data was provided by Anglo American that indicated for the two sites within the Nickel group, Barro Alto and Codemin mines, R\$ 150 million (approximately US\$ 28.5 million) was determined to be the total cost for decommissioning and restoration. Anglo American Nickel Brazil Ltda. financial statements and independent financial auditor's report showed that the Nickel group had cash and cash equivalents of R\$ 95.6 million (approximately US\$ 18.2 million) as of December 31, 2021. Since within the Nickel group it was shown that there were insufficient cash and cash equivalents to satisfy an immediate closure liability, Anglo American has relied upon its Group level cash and cash equivalents to demonstrate "financial surety" to settle its closure obligations at Barro Alto without a guarantee being taken out for this specific operation.</p> <p>While financial assurance of closure costs has been independently established at the Group level, financial assurance for closure and post-closure liabilities has not been determined at the site level.</p>
2.6.4.2.	<p>Financial surety instruments shall be:</p> <ol style="list-style-type: none"> Independently guaranteed, reliable, and readily liquid; Reviewed by third-party analysts, using accepted accounting methods, at least every five years or when there is a significant change to the mine plan; In place before ground disturbance begins; and Sufficient to cover the reclamation and closure expenses for the period until the next financial surety review is completed. 	—	<p>In October 2022, IRMA revised this requirement replacing "financial surety instruments" with "financial assurances".</p> <p>Not scored in accordance with IRMA guidance which states to not score 2.6.4.1, 2.6.4.2 and .2.6.4.3 in countries without a state-hosted financial surety. Financial surety for full mining reclamation and closure is not available through a state-sponsored program in Brazil.</p> <p>Additional data provided by Anglo American, including independent auditor reports were reviewed. In the data provided, Anglo American has identified the value of "environmental rehabilitation trusts, cash and cash equivalents" as the means of determining the organization's ability to satisfy total closure provisions. Since there are currently no regulatory provisions for establishing environmental rehabilitation trusts or similar financial surety mechanisms in Brazil at this time, the organization has relied on its cash and cash equivalents to determine if it can satisfy the closure liability should it fall due immediately. Total closure provisions for the Nickel group were calculated to be US\$ 27 million. Additional decommissioning and restoration costing data was provided by Anglo American that indicated for the two sites within the Nickel group, Barro</p>

			<p>Alto and Codemin mines, R\$ 150 million (approximately US\$ 28.5 million) was the total cost for decommissioning and restoration. Anglo American Nickel Brazil Ltda. financial statements and independent auditor's report showed that the Nickel group had cash and cash equivalents of R\$ 95.6 million (approximately US\$ 18.2 million) as of December 31, 2021. Since within the Nickel group it was shown that there were insufficient cash and cash equivalents to satisfy an immediate closure liability, Anglo American has relied upon its Group level cash and cash equivalents to demonstrate financial surety to settle its closure obligations at Barro Alto without a guarantee being taken out for this specific operation.</p> <p>Independent third-party analysts, using accepted accounting methods, have considered the related disclosures in the Group level financial statements to be appropriate. However, no independent guarantee has been established at the site level to ensure liability for safe and effective reclamation and closure of the mine can be reliably met. Furthermore, independently audited financial statements for the two mines within the Nickel group, including Barro Alto, show that cash and cash equivalents are not sufficient to cover all immediate reclamation and closure liabilities.</p>
2.6.4.3.	Self-bonding or corporate guarantees shall not be used.	—	<p>The information provided by the site to establish financial assurance of its remediation and closure costs equates to a corporate financial test or balance sheet test, based on an evaluation of the assets and liabilities of the parent company and its ability to meet the total rehabilitation costs at the site level. As per IRMA Standard Guidance, this is considered like self-bonding or a corporate guarantee.</p> <p>Not scored in accordance with IRMA guidance which states to not score 2.6.4.1, 2.6.4.2 and .2.6.4.3 in countries without a state-hosted financial surety. Financial surety for full mining reclamation and closure is not available through a state-sponsored program in Brazil.</p>
2.6.4.4.	The results of all approved financial surety reviews, with the exception of confidential business information, shall be made available to stakeholders upon request.	⊗	Financial surety reviews have not been conducted.
2.6.4.5.	<p>Prior to the commencement of the construction of the mine, prior to any renewal of the financial surety, and prior to final release of the financial surety the operating company shall provide the public with at least 60 days to comment on the adequacy of the financial surety. Additionally:</p> <p>a. Where the company deems certain financial surety information to be confidential business information it shall make the data available to the IRMA auditor and satisfy the auditor that the grounds for confidentiality are reasonable. If certain information is not included for confidential</p>	⊗	<p>Updates to closing costs are carried out internally by the areas responsible. There is no formal process to allow the stakeholders to comment on the adequacy of the financial surety or financial assurance.</p>

	<p>reasons, the fact that the information has been withheld shall be disclosed along with the financial surety.</p> <p>b. If necessary, the operating company shall provide resources for capacity building and training to enable meaningful stakeholder engagement; and</p> <p>c. Prior to the beginning of closure reclamation activities the operating company shall provide affected communities and interested stakeholders with the opportunity to propose independent experts to review the financial surety.</p>		
2.6.4.6.	<p>The terms of the financial surety shall guarantee that the surety is not released until:</p> <p>a. Revegetation/ecological restoration and reclamation of mine and waste sites and have been shown to be effective and stable; and</p> <p>b. Public comment has been taken before partial or final surety release.</p>	⊗	There is no financial surety for mine closure plan.
2.6.5.1.	<p>Monitoring of closed mine facilities for geotechnical stability and routine maintenance is required in post-closure. The reclamation and closure plan shall include specifications for the post-closure monitoring and maintenance of all mine facilities, including, but not limited to:</p> <p>a. Inspection of surface (open pits) and underground mine workings;</p> <p>b. Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and</p> <p>c. Mechanisms for contingency and response planning and implementation.</p>	L	The closure plan encompasses the monitoring in all phases: pre, closing and post-closing; Inspection of surface (open pits); and Inspection and maintenance of mine waste facilities including effectiveness of cover and any seepage capture systems; and mechanisms for contingency and response planning and implementation.
2.6.5.2.	<p>Monitoring locations for surface and groundwater shall be sufficient to detect off-site contamination from all closed mine facilities, as well as at the points of compliance.</p>	L	Post-closure monitoring includes surface and groundwater monitoring points, respecting quality limits. Monitoring is planned to be carried out during the life of the project.
2.6.5.3.	<p>Water quality monitoring locations shall be sampled until IRMA Water Quality Criteria have been met for at least 5 years, with a minimum of 25 years of post-closure data. The 25-year minimum may be waived if ongoing water quality monitoring demonstrates and modeling predicts that no contamination of surface or ground waters is occurring or will occur, respectively.</p>	L	<p>Post-closure monitoring includes surface and groundwater monitoring points, respecting quality limits, post-closure monitoring meets the Brazilian water quality requirements.</p> <p>No mention of IRMA water quality requirements, which are not mandatory during the launch phase.</p>

2.6.5.4.	Biologic monitoring shall be included in post-closure monitoring if required to ensure there is no ongoing post-closure damage to aquatic and terrestrial resources.		The post-closure plan includes the requirements for monitoring the biotic environment, focused on terrestrial ecosystems. However, there is no mention of biologic monitoring of all relevant aquatic ecosystem components.
2.6.5.5.	If a pit lake is present, pit lake water quality shall be monitored, and if potentially harmful to people, wildlife, livestock, birds, or agricultural uses, adequate measures shall be taken to protect these organisms.	—	It does not apply because the purpose is for the pit to be filled by the pit bottom deposits, which is an ongoing activity. No open pit nor pit lake is predicted to form.
2.6.6.1.	Long-term water treatment shall not take place unless: <ul style="list-style-type: none"> a. All practicable efforts to implement best practice water and waste management methods to avoid long-term treatment have been made; and b. The operating company funds an engineering and risk assessment that: <ul style="list-style-type: none"> i. Is carried out by an independent third-party; ii. Evaluates the environmental and financial advantages/disadvantages and risks of long-term water treatment versus other mitigation methods; iii. Incorporates data on the failure rates of the proposed mitigation measures and water treatment mechanisms; iv. Determines that the contaminated water to be treated perpetually poses no significant risk to human health or to the livelihoods of communities if the discharge were to go untreated; and v. Includes consultations with stakeholders and their technical representatives during the design of the study, and discussion of findings with affected communities prior to mine construction or expansion. 	—	It does not apply since the water used by the project is recirculated internally and there is no need for a post-closing water treatment process.
2.6.6.2	If a decision is made to proceed with long-term water treatment, the operating company shall take all practicable efforts to minimize the volume of water to be treated.	—	No post-closure water treatment activities have been identified as necessary.
2.6.7.1.	The operating company shall provide sufficient financial surety for all long-term activities, including: mine closure and post-closure site monitoring, maintenance, and water treatment operations. Financial assurance shall guarantee that funds will be		No evidence that the operating company has financial surety instruments in place for mine closure and post-closure that are in a form that can be independently guaranteed, reliable, and readily liquid.





	available, irrespective of the operating company's finances at the time of mine closure or bankruptcy.		
2.6.7.2.	If long-term water treatment is required post-closure: a. The water treatment cost component of the post-closure financial surety shall be calculated conservatively, and cost calculations based on treatment technology proven to be effective under similar climatic conditions and at a similar scale as the proposed operation; and b. When mine construction commences, or whenever the commitment for long-term water treatment is initiated, sufficient funding shall be established in full for long-term water treatment and for conducting post-closure monitoring and maintenance for as long as IRMA Water Quality Criteria are predicted to be exceeded.	—	No post-closure water treatment activities have been identified as necessary.
2.6.7.3.	The post-closure financial surety shall be recalculated and reviewed by an independent analyst at the same time as the reclamation financial surety.	⊗	Financial provision costs are audited externally, and costs are reviewed semiannually based on the new areas affected by the project. However, no evidence was provided to verify the existence of a trust fund or other similar suitable interest accruing cash or equivalent long-term security that covers all costs associated with the long-term activities, including post-closure site monitoring and maintenance.
2.6.7.4.	Long-term Net Present Value (NPV) calculations utilized to estimate the value of any financial surety shall use conservative assumptions, including: a. A real interest rate of 3% or less; unless the entity holding the financial surety can document that a higher long-term real interest rate can be achieved; and b. NPV calculation will be carried out until the difference in the NPV between the last two years in the calculations is US \$10.00 or less (or its equivalent in other currencies).	⊗	There is no evidence that the operating company has financial surety and that the audit record includes the real interest rate and net present value calculations.

Principle 3: Social Responsibility—APPENDIX

RATING DESCRIPTION

L Fully meets

Description of performance

	Substantially meets
	Partially meets
	Does not meet
	Not relevant



Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.1.1.	The operating company shall adopt and implement human resources policies and procedures applicable to the mining project that set out its approach to managing workers in a manner that is consistent with the requirements of this chapter and national (i.e., host country) law.	<p>L</p> <p>Barro Alto developed policies and standards that establish the practices for workers' management. These policies include topics such as:</p> <ul style="list-style-type: none"> • Base salary administration: this standard establishes the rules for salary assignment and increases, looking for fair payments among grades. • disciplinary measures: sets the conduct standards expectations, any kind of discrimination, sexual harassment or any kind of threat are condemned. Establishes the disciplinary measures according to the fault severity. • Selection and recruitment set the expectation of transparency, integrity, attention and respect during selection and recruitment. Gives preference to internal appointments. <p>These standards mention the requirement of complying with national law. In addition, the interviewed employees and contractors mentioned to know these policies.</p>
3.1.2.1.	CRITICAL The operating company shall respect the rights of workers to freedom of association and collective bargaining.	<p>L</p> <p>Commitment expressed in the code of conduct for employees: "We are committed to the International Labor Organization's core labor rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero-tolerance approach to forced labor, child labor and unfair discrimination." This result was verified during the interviews carried out in November 2021.</p>
3.1.2.2.	Where national law substantially restricts workers' organizations, the operating company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The operating company shall not seek to influence or control these mechanisms.	<p>—</p> <p>In Brazil there is no restriction preventing the workers from forming workers' organization.</p>
3.1.2.3.	The operating company shall engage with workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.	<p>L</p> <p>Considering the Collective Agreement and all interviews, the company regularly meets with workers' representatives and workers' organizations; and negotiates in good faith with workers' representatives. All workers interviewed mentioned having been informed about this negotiation in a timely manner.</p>
3.1.2.4.	Workers' representatives shall have access to facilities needed to carry out their functions in the workplace. This includes access to designated non-work areas during organizing efforts for the purposes of communicating with workers, as well as accommodations for workers' representatives at fly-in/fly-out or other remotely located mine sites, where relevant.	<p>L</p> <p>An extract of the collective contract between Barro Alto and the workers' organization (WO) (Sindicato dos Trabalhadores nas Indústrias Extractivas de Barro Alto) was made available for review; this contract establishes that: (1) the workers' organization will have access to the Barro Alto working areas and are authorized to distribute information to employees; (2) the workers' organization will have access to salaries related information; (3) Barro Alto will pay the salary of 1 workers' organization representative.</p> <p>The union member reported having access to all necessary information and facilities; however, this request is unusual.</p>

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.2.5.	The operating company shall remain neutral in any legitimate unionizing or worker-organizing effort; shall not produce or distribute material meant to disparage legitimate trade unions; shall not establish or support a company union for the purpose of undermining legitimate worker representation; and shall not impose sanctions on workers' organizations participating in a legal strike.	L In the Code of Conduct, Barro Alto sets out a commitment to the International Labor Organization (ILO) fundamental labor rights in relation to free association and collective bargaining. Additionally, Brazilian law also requires compliance with this requirement. According to all workers interviewed, the operating company remains neutral in any legitimate effort to organize or organize workers and does not impose sanctions on workers' organizations participating in a legal strike.
3.1.2.6.	Upon employment, the operating company shall: <ul style="list-style-type: none"> a. Inform workers of their rights under national labor and employment law; b. Inform workers that they are free to join a workers' organization of their choosing without any negative consequences or retaliation from the operating company; c. If relevant, inform workers of their rights under any applicable collective agreement; and d. If relevant, provide workers with a copy of the collective bargaining agreement and the contact information for the appropriate trade union (or workers' organization) representative. 	L According to the justification presented, new employees participate in an 8-hour onboarding training that includes the following topics: company procedures, employment contract, HR policy, benefits, and collective agreement. According to the workers interviewed, they are informed about the collective bargaining agreement, they are free to join union organizations. In addition, there are frequent meetings between managers and their teams to present and discuss the collective bargaining agreement status and resolutions. They also receive copies of the collective bargaining agreement when it is signed by the union and the company.
3.1.2.7.	The operating company shall not discriminate or retaliate against workers who participate, or seek to participate, in legitimate workers' organizations or in a legal strike.	L According to the rationale provided and the employees and contractors interviewed, the company is complying with the legislation that is based on the International Labor Organization requirements. All workers interviewed confirmed that the operating company has not discouraged workers from electing workers' representatives, joining workers' organizations, or bargaining collectively, or retaliated against those who have participated in any of the above.
3.1.2.8.	Where the operating company is a party to a collective bargaining agreement with a workers' organization, the terms of the agreement shall be respected. Where such an agreement does not exist, or an agreement does not address specific requirements in this chapter, the operating company shall meet the relevant IRMA requirements.	L An extract of the collective contract between Barro Alto and the workers' organization (WO) (Sindicato dos Trabalhadores nas Indústrias Extractivas de Barro Alto) was made available for review; this contract establishes that: (1) the workers' organization will have access to the Barro Alto working areas and are authorized to distribute information to employees; (2) the workers' organization will have access to salaries related information; (3) Barro Alto will pay the salary of 1 workers' organization representative. Brazil has strong labor legislation that considers the existence of unions and the compliance of collective bargaining agreement. The workers interviewed confirmed the implementation of the agreements in the collective bargaining agreement/agreements with workers' representatives.

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.2.9.	The operating company shall not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations.	L According to rationale provided, "in Brazil, the collective bargaining is constitutionally guaranteed and through a complementary law. Brazil is signatory of International Labor Organization Standards and Barro Alto is complying with the negotiations with workers' organization ". Considering the workers interviewed and the human rights department responsible, the Barro Alto mine not make use of short-term contracts or other measures to undermine a collective bargaining agreement or worker organizing effort, or to avoid or reduce obligations to workers under applicable labor and social security laws and regulations.
3.1.2.10.	The operating company shall not hire replacement workers in order to prevent, undermine or break up a legal strike, support a lockout, or avoid negotiating in good faith. The company may, however, hire replacement workers to ensure that critical maintenance, health and safety, and environmental control measures are maintained during a legal strike.	L Considering all interviews, the company does not hire replacement workers to avoid, undermine or break a legal strike, support a lockout, or avoid negotiating in good faith. There was no mention of replacing workers.
3.1.3.1.	The operating company shall base employment relationships on the principles of equal opportunity and fair treatment, and shall not discriminate or make employment decisions on the basis of personal characteristics unrelated to inherent job requirements.	L The recruitment standard establishes non-discriminatory procedures ("all candidates and employees must be treated with transparency, integrity, attention and respect (...) recruitment processes will be opened for positions where an appointment is not applicable (...) any kind of privilege or discrimination by race, sex, social background or religion is allowed (...) priority will be given to candidates from local communities whenever possible." Barro Alto organized a committee to address this topic, an action plan was developed for 2020 that includes communication, training, external actions and committee analysis. Actions are directed to the following topics: <ul style="list-style-type: none"> • Gender • LGBT+ • Race • Disabled people, • Generations Interviews with workers, mainly vulnerable groups and focused on women, confirmed that there is no discrimination in the mine. They also reported that there has been a series of activities and actions promoted by the company with the aim of combating any type of discrimination among its workers.

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.3.2	<p>Exceptions to 3.1.3.1 may be made with respect to hiring and recruitment in the case of:</p> <ul style="list-style-type: none"> a. Targets or quotas mandated by law; b. Targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; or c. Operating company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible policies with explicit goals and justification for such targets. 	<p>The Barro Alto Mine fully meets requirement 3.1.3.1.</p>
3.1.3.3.	<p>CRITICAL The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.</p>	<p>Policy and code evidence show Barro Alto's commitment and it is possible to infer some procedures, e.g., Investigation is case there is a complaint. All employees interviewed are aware of cases of harassment complaints, where verification and referral procedures were carried out. Some mentioned cases of dismissal of employees due to harassment.</p> <p>However, female workers interviewed mentioned that there were still sexist comments that embarrass some and even some areas of the mine where there are no adequate availability of toilets and spaces for breastfeeding, making it difficult for women to work throughout the mine.</p>
3.1.4.1.	<p>Prior to implementing any collective dismissals, the operating company shall carry out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan shall be developed in consultation with workers, their organizations, and, where appropriate, the government. The plan shall be based on the principle of non-discrimination, and be implemented to reduce the adverse impacts of retrenchment on workers.</p>	<p>There has been no past or there is no current retrenchment of workers at the mining project.</p>





Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.4.2.	The operating company shall ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay, social security benefits, and pension contributions and benefits shall be paid on or before termination of the working relationship, or in accordance with a timeline agreed through a collective agreement. Payments shall be made directly to workers, or to appropriate institutions for the benefit of workers. Where payments are made for the benefit of workers, they shall be provided with evidence of such payments.	—
3.1.5.1.	<p>CRITICAL The operating company shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The mechanism, at minimum:</p> <ol style="list-style-type: none"> Shall involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution; Shall allow for anonymous complaints to be raised and addressed; Shall allow workers' representatives to be present, if requested by the aggrieved worker; and Shall not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. 	<p>Barro Alto developed a grievance mechanism that is communicated in the Code of Conduct - Your Voice. Employees, directors, suppliers, contractors, communities, authorities, among others, can use this mechanism. Your Voice is based on a confidential platform. Data introduced into Your Voice is treated in Convercent, a web-based tool to manage all alerts promptly. Evidence shows compliance with the requirements - any party is allowed to access the event status and if needed, the aggrieved worker may access to other remedies. High-level management (corporate) is involved as needed.</p> <p>All workers interviewed confirmed that they have knowledge of and access to grievance mechanisms and that they can be used anonymously.</p>
3.1.5.2.	The operating company shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.	<p>The Code of Conduct includes the relevant information about the grievance mechanism YourVoice. According to the rationale provided, Barro Alto communicates the Code of Conduct to new employees in the induction training and to existent employees through communication actions.</p> <p>Respondents mentioned being informed at contracting about grievance mechanisms. Newly hired employees also indicated knowing these complaint channels, as well as having access to these procedures during training, even those carried out virtually during the pandemic.</p>



Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.5.3.	The operating company shall maintain a record of grievances and the company's actions taken to respond to and/or resolve the issues.	L Events reported in YourVoice send alerts to Conversent, a web-based system, through which alerts are assigned to investigation teams locally. Conversent allows users to record all investigation steps and evidence collected, besides action plans to address issues and assign tasks. In addition, many workers interviewed reported knowing and/or participating in investigations into complaints.
3.1.6.1.	The operating company shall have documented disciplinary procedures (or their equivalent) that are made available to all workers.	 Barro Alto developed a Disciplinary Measures Standard, which establishes the level of disciplinary measures and the triggers to activate them; however, the procedure does not explain how the triggers and the measures relate. Although the workers interviewed demonstrated knowledge of the disciplinary measures, they did not know how to access the procedure. They were also unable to inform them of all the measures that could be adopted in each disciplinary case.
3.1.6.2.	The operating company shall not use corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation of workers during disciplinary actions.	L Barro Alto has is committed to labor rights and human rights, recognized worldwide. These are explicit in the HR Policy and in the Code of Conduct. Additionally, the disciplinary measures are established in the respective procedure, being verbal warning, written warning, temporary suspension and termination. All workers interviewed confirmed the measures mentioned in the HR Policy and in the Code of Conduct.
3.1.6.3.	The operating company shall keep records of all disciplinary actions taken.	 The audit team did not have access to the records of all disciplinary actions taken.
3.1.7.1.	The operating company shall document the ages of all workers.	L Anglo American and subcontractor workers work under the Consolidation of Labor Laws (CLT) regime, (Brazilian legislation relating to labor law and labor procedural law). In the context of local legislation, workers' personal data must be recorded by the employer and reported to the ministry of labor and the ministry of social security. Therefore, the record of the age of workers employed by the company is evidenced in the related labor documentation.
3.1.7.2.	CRITICAL Children (i.e., persons under the age of 18) shall not be hired to do hazardous work (e.g., working underground, or where there is exposure to hazardous substances).	L There are no workers under 18 years old working in the Barro Alto mine.
3.1.7.3.	CRITICAL The minimum age for non-hazardous work shall be 15, or the minimum age outlined in national law, whichever is higher.	L There are no workers under 18 years old working in the Barro Alto mine.

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.7.4.	When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical or mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labor authority, or if that is not possible, by the company itself.	— There are no children performing non-hazardous work at the Barro Alto mine.
3.1.7.5.	If the operating company discovers that a child under the minimum age outlined in 3.1.7.2 and 3.1.7.3 is performing hazardous or non-hazardous work: <ul style="list-style-type: none"> a. The child shall be removed immediately from his or her job; and b. Remediation procedures shall be developed and implemented that provide the child with support in his or her transition to legal work or schooling, and that take into consideration the welfare of the child and the financial situation of the child's family. 	— There are no children performing non-hazardous work at the Barro Alto mine.
3.1.7.6.	Where there is a high risk of child labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.	— According to the rationale provided, Barro Alto is committed to HR policy and those internationally recognized. In addition, Barro Alto does not allow its contractors and suppliers to use child labor, and their performance in relation to human rights is monitored according to their contracts. The documents provided by the Barro Alto team and the interviews with Barro Alto suppliers confirmed the HR policy and Barro Alto requirements for the site suppliers.
3.1.8.1.	CRITICAL The operating company shall not employ forced labor or participate in the trafficking of persons.	L According to the rationale provided, Barro Alto is committed to HR policy and those internationally recognized. According to the interviews carried out and evidence from the supplier's sector, all employees are regularly hired in compliance with Brazilian legislation.

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.8.2.	Where there is a high risk of forced or trafficked labor in the mine's supply chain, the operating company shall develop and implement procedures to monitor its suppliers to determine if forced labor or trafficked workers are being employed. If any cases are identified, the operating company shall ensure that appropriate steps are taken to remedy them. Where remedy is not possible, the operating company shall shift the project's supply chain over time to suppliers that can demonstrate that they are complying with this chapter.	—
3.1.9.1.	The operating company shall pay wages to workers that meet or exceed the higher of applicable legal minimum wages, wages agreed through collective wage agreements, or a living wage.	L The rationale provided mentions the Barro Alto commitment to compliance with legal requirements related to payment of minimum wages and total remuneration of workers. It is also mentioned that the base salaries are higher than the national minimum and comply with the agreed collective bargaining. According to the workers interviewed, the company pays wages to workers that meet or exceed the higher of the applicable legal minimum wages, wages agreed through collective bargaining agreements or minimum wage, although higher wages are paid to Anglo American employees compared to the contractors. This difference has increased inequality between these two groups of workers.
3.1.9.2.	Overtime hours shall be paid at a rate defined in a collective bargaining agreement or national law, and if neither exists, at a rate above the regular hourly wage.	L The payment of overtime hours is established in the collective contract; reportedly, it exceeds the national regulation. All workers interviewed confirm these payment terms. They also added that overtime is an exception at the Barro Alto mine, mainly due to the need for workers to rest and remain alert during their activities.
3.1.9.3.	All workers shall be provided with written and understandable information about wages (overtime rates, benefits, deductions and bonuses) before they enter employment, and for the pay period each time they are paid.	L According to the rationale provided, employees receive information about their wages and related details every month in advance. Interviewed workers have access to written and comprehensible information about wages before they enter employment and about the pay period each time they are paid. Newly hired workers also mentioned knowing this information.
3.1.9.4.	The operating company shall pay wages in a manner that is reasonable for workers (e.g., bank transfer, cash or check).	L According to the rationale provided, the employees agree on the way of payment in their work contract; the employee authorizes the credit of wages in a salary account indicated by Barro Alto. The interviewees also confirmed this information.

Chapter 3.1—Fair Labor and Terms of Work		Basis for rating
3.1.9.5.	<p>The operating company shall ensure that deductions from wages are not made for disciplinary purposes unless one of the following conditions exist:</p> <ol style="list-style-type: none"> Deductions from wages for disciplinary purposes are permitted by national law, and the law guarantees the procedural fairness of the disciplinary action; or Deductions from wages for disciplinary purposes are permitted in a freely negotiated collective bargaining agreement or arbitration award. 	<p>L</p> <p>According to all interviewed employees, contractors and Barro Alto staff, Barro Alto mine complies with national legislation regarding deductions from wages for disciplinary purposes. In addition, the interviewed workers did not mention any salary reduction due disciplinary issues.</p>
3.1.10.1.	<p>The operating company shall ensure that:</p> <ol style="list-style-type: none"> Regular working hours do not exceed eight hours per day, or 48 per week. Where workers are employed in shifts the 8-hour day and 48-hour week may be exceeded, provided that the average number of regular hours worked over a 3-week period does not exceed 8 hours per day and 48 hours per week; Workers are provided with at least 24 consecutive hours off in every 7-day period; and Overtime is consensual, and limited to 12 hours a week. Exceptions to 3.1.10.1.b and c shall be allowed at mines in remote locations if: <ol style="list-style-type: none"> A freely negotiated collective bargaining agreement is in force that allows variances to the rest and/or overtime hours above; and Through consultations with workers' representatives, a risk management process that includes a risk assessment for extended working hours is established to minimize the impact of longer working hours on the health, safety and welfare of workers. 	<p>L</p> <p>The working hours are established in the collective contract. There are 2 working systems:</p> <ul style="list-style-type: none"> Shifts - 12hours/day for 2 days (daytime) followed by 1 day rest, followed by 12hours/day for 2 days (nighttime) followed by 4 days' rest. Fixed - 12hours/day for 3 days (daytime) followed by 3 days' rest. <p>All workers interviewed demonstrated knowledge of the procedures and limitations regarding the overtime policy on the Barro Alto website. Workers also stated that overtime is not common and that they are properly paid and agreed upon.</p>
3.1.10.2.	<p>Where neither national law nor a collective bargaining agreement includes provisions for worker leave, the operating company shall, at minimum, provide:</p> <ol style="list-style-type: none"> An annual paid holiday of at least three working weeks per year, after achieving one year of service; and A maternity leave period of no less than 14 weeks. 	<p>—</p> <p>Brazilian law includes provisions that meet the criteria for this requirement.</p>

Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.1.1.	The operating company shall implement a health and safety management system for measuring and improving the mining project’s health and safety performance.	 <p>There are monitoring methodologies that were implemented, however it was observed that the process is still maturing and at times does not fully illustrate control effectiveness.</p>
3.2.2.1.	The operating company shall implement an ongoing, systematic health and safety risk assessment process that follows a recognized risk assessment methodology for industrial operations.	 <p>There is a method implemented; however, some hazards risk levels were not fully identified or are analyzed with many other hazards and controls of the same operation, making it challenging to assess the accurate risk level.</p>
3.2.2.2.	<p>The assessment process shall identify and assess the significance/consequence of the full range of potential hazards associated with the mining project, including those related to:</p> <ul style="list-style-type: none"> a. The design, construction and operation of the workplace, mining-related activities and processes, the physical stability of working areas, the organization of work, use of equipment and machinery, and waste and chemical management; b. All personnel, contractors, business partners, suppliers and visitors; c. Unwanted events; d. Routine and non-routine activities, products, procedures, and services; and e. Changes in duration, personnel, organization, processes, facilities, equipment, procedures, laws, standards, materials, products systems and services. 	 <p>Very good description of process, leading to a good risk assessment, with some opportunities in control effectiveness monitoring.</p> <p>Outsourced and contractor activities not completely considered, but there are other processes that will manage these considerations.</p>
3.2.2.3.	The operating company shall pay particular attention to identifying and assessing hazards to workers who may be especially susceptible or vulnerable to particular hazards.	 <p>There is a process to ensure that workers with specific characteristics are informed and restricted from working in areas that might increase their risk due to those characteristics.</p> <p>Risk analysis does not specifically consider special characteristics personnel for specific hazards consistently. However, there is a process to ensure that workers with specific characteristics are informed and restricted from working in areas that might increase their risk due to those characteristics. These considerations are triggered through other processes, such as inductions and HR.</p>




Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.2.4.	The operating company shall develop, implement and systematically update a risk management plan that prioritizes measures to eliminate significant hazards, and outlines additional controls to effectively minimize negative consequences and protect workers and others from remaining hazards.	 <p>Procedures describing logic for the implementation of risk controls were observed. The organization is implementing controls to critical and non-critical hazards. Still, it is maturing, some of those controls are showing variability in the effectiveness of risk reduction. Examples include, contractors working at height activities with variability in control implementation, Furnace tapping with tripping hazards, Machine protection and LOTOTO (Lock Out, Tag Out, Try Out) implementation.</p>
3.2.2.5.	<p>In particular, the operating company shall demonstrate that it has developed procedures and implemented measures to:</p> <ol style="list-style-type: none"> Ensure that the mine has electrical, mechanical and other equipment, including a communication system, to provide conditions for safe operation and a healthy working environment; Ensure that the mine is commissioned, operated, maintained and decommissioned in such a way that workers can perform the work assigned to them without endangering their safety and health or that of other persons; Maintain the stability of the ground in areas to which persons have access in the context of their work; If relevant, whenever practicable provide two exits from every underground workplace, each connected to separate means of egress to the surface; If relevant, ensure adequate ventilation for all underground workings to which access is permitted; Ensure a safe system of work and the protection of workers in zones susceptible to particular hazards; Prevent, detect and combat accumulations of hazardous gases and dusts, and the start and spread of fires and explosions; and Ensure that when there is potential high risk of harm to workers, operations are stopped and workers are evacuated to a safe location. 	 <p>Control implementation is being matured. Gaps were observed in some critical controls, but it is important to acknowledge that the organization has clear and consistent methods, implementation is continuing and that gaps detected were corrected.</p> <p>Control implementation gaps were observed in some of the critical controls and site level such as work of heights, lifting operations, logout tag out. These gaps were discussed with the personnel directly related to these controls and corrected on site.</p>

Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.3.1.	<p>Workers shall be informed of their rights to:</p> <ul style="list-style-type: none"> a. Report accidents, dangerous occurrences and hazards to the employer and to the competent authority; b. Request and obtain, where there is cause for concern on safety and health grounds, inspections and investigations to be conducted by the employer and the competent authority; c. Know and be informed of workplace hazards that may affect their safety or health; d. Obtain information relevant to their safety or health, held by the employer or the competent authority; e. Remove themselves from any location at the mine when circumstances arise that appear, with reasonable justification, to pose a serious danger to their safety or health; and f. Collectively select safety and health representatives. 	<p>There is proof that the organization has actively communicated the requirements of 3.2.3.1. This was collected via interviews with several workers.</p>
3.2.3.2.	<p>In all cases a worker attempting to exercise any of the rights referred to in 3.2.3.1 in good faith shall be protected from reprisals of any sort.</p>	<p>Observed documents establishes stop work authority but does not provide any assurance of protection to the worker exercising this right. During interviews, workers felt confident that this could be exercised.</p>
3.2.3.3.	<p>The operating company shall develop systems to effectively communicate with, and enable input from the workforce on matters relating to occupational health and safety.</p>	<p>Workers interviewed did provide assurance of its requirements. Communications from workers including ideas and stop work events.</p>

Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.3.4.	<p>The operating company shall develop and implement a formal process involving workers' representatives and company management to ensure effective worker consultation and participation in matters relating to occupational health and safety including:</p> <ul style="list-style-type: none"> a. Health and safety hazard identification and assessment; b. Design and implementation of workplace monitoring and worker health surveillance programs; c. Development of strategies to prevent or mitigate risks to workers through the health and safety risk assessments or workplace and workers' health surveillance; and d. Development of appropriate assistance and programs to support worker health and safety, including worker mental health. 	<p>Observed documents lack some consistency in demonstrating worker representative's participation in risk assessment, health program, etc. During interviews, according to operators and supervision there is consultation using field tools for risk assessment. Maturity in some areas is needed.</p>
3.2.3.5.	<p>The operating company shall provide workers' health and safety representatives with the opportunity to:</p> <ul style="list-style-type: none"> a. Participate in inspections and investigations conducted by the employer and by the competent authority at the workplace; b. Monitor and investigate safety and health matters; c. Have recourse to advisers and independent experts; and d. Receive timely notice of accidents and dangerous occurrences. 	<p>Workers can participate in incident investigations. There is no specific guidance about access to advisers or independent experts.</p> <p>The process to access and investigate health matters is also unclear. Effective communication of incidents and accidents were verified in the field. CIPA is a government mandated safety workers representative group made of common workers that participate in safety and health matters.</p>
3.2.3.6.	<p>Visitors and other third parties accessing the mining premises shall receive an occupational health and safety briefing, and be provided with relevant protective equipment for areas of the mine site that or associated facilities that they will be entering.</p>	<p>There are mechanisms to ensure that visitors get their basic personal protective equipment (PPE). There is evidence that this is happening to specific hazards such as hazardous gases or high temperatures.</p>

Chapter 3.2—Occupational Health and Safety

Basis for rating

3.2.4.1.	<p>CRITICAL (a and b) The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground. 		<p>The organization does substantially meet with all the applicable requirements in this point in documented terms and in programs, however implementation is still progressing, and variability was observed in the field.</p> <p>Workers are informed of the hazards associated with their work, the health risks involved and relevant preventive and protective measures.</p> <p>The organization provides and maintains at no cost to workers suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health. Provides workers with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>Provides at no cost to workers, training / education and retraining programs and comprehensible instructions on the work assigned.</p> <p>Provides in almost all occasions with adequate supervision and control, however supervision effectiveness and ratio (operator / supervisor & considering risk) were observed to have some variability due to several factors, including, competence, ratio and impact of COVID-19.</p>
3.2.4.2.	<p>If the risk assessment process reveals unique occupational health and safety risks for certain groups of workers (e.g., pregnant women, children, HIV-positive, etc.) the operating company shall ensure that additional protective measures are taken, and trainings and health promotion programs are available to support the health and safety of those workers.</p>		<p>Procedures do not consistently provide assurance of requirements of 3.2.4.2. for all groups, however pregnancy is clearly protected and when supervisors detect or are communicated actions including reassignment of worker takes place.</p>
3.2.4.3.	<p>The operating company shall provide workers with clean toilet, washing and locker facilities (commensurate with the number and gender of staff employed), potable drinking water, and where applicable, sanitary facilities for food storage and preparation. Any accommodations provided by the operating company shall be clean, safe, and meet the basic needs of the workers.</p>		<p>There is no documented analysis of the number and type of facilities by employee. During field visit it was observed the lack of restrooms in some activities such as drilling where women and men are present.</p>




Chapter 3.2—Occupational Health and Safety

Basis for rating

- 3.2.4.4. The operating company shall ensure that workers are provided with compensation for work-related injuries and illnesses as follows:
- a. In countries where workers' compensation is not provided through government schemes or a collective bargaining agreement:
 - i. The operating company shall compensate workers for work-related injuries or illnesses at a rate that, at minimum, covers medical expenses and wages during the recovery and rehabilitation period;
 - ii. If a worker is not able to return to work due to the severity of the work-related injury or illness, the operating company shall compensate for lost earnings until the worker qualifies for an adequate pension (i.e., 2/3 or more of the salary they would otherwise normally receive if healthy and working); or
 - iii. [flag] If an occupational illness manifests after a worker has retired, the operating company or its corporate owner shall, at minimum, compensate the worker for medical expenses, unless the operating company or its corporate owner can establish that the occupational illness was not connected to the worker's employment at the mining project.
 - b. In countries that do not provide for worker rehabilitation as part of their workers' compensation schemes, the operating company shall ensure that workers have free or affordable access to rehabilitation programs to facilitate an expeditious return to work; and
 - c. Where a worker dies as a result of a work-related injury or disease, the operating company shall, at minimum, provide to spouses and dependent children benefits to cover funeral expenses and transportation of the worker's body, if appropriate, as well as compensation that is equal to or greater than three months' salary of the deceased worker.

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The organization line with government requirements, cover incidents and accidents costs, rehabilitation costs, and insurance in case of death.

Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.5.1.	The operating company and workers' representatives on a joint health and safety committee, or its equivalent, shall perform regular inspections of the working environment to identify the various hazards to which the workers may be exposed, and to evaluate the effectiveness of occupational health and safety controls and protective measures.	 <p>Inspections are being performed, however, the quality of the verification of the controls have variability, allowing some controls not to be fully effective.</p>
3.2.5.2.	<p>The operating company shall carry out workplace monitoring and worker health surveillance to measure exposures and evaluate the effectiveness of controls as follows:</p> <ol style="list-style-type: none"> Workplace monitoring and worker health surveillance shall be designed and conducted by certified industrial hygienists or other competent professionals; Health surveillance shall be carried out in a manner that protects the right to confidentiality of medical information, and is not used in a manner prejudicial to workers' interests; Samples collected for workplace monitoring and health surveillance purposes shall be analyzed in an ISO/IEC 17025 certified or nationally accredited laboratory; Sample results shall be compared against national occupational exposure limits (OELs) and/or biological exposure indices (BEIs), if they exist, or OELs/BEIs developed by the American Conference of Governmental Industrial Hygienists (ACGIH); and If an OEL/BEI is exceeded, the affected worker(s) shall be informed immediately, and controls shall be reviewed and revised in a timely manner to ensure that future exposure levels remain within safe limits. 	 <p>The organization is performing out workplace monitoring and worker health surveillance considering:</p> <ol style="list-style-type: none"> Workplace monitoring and worker health surveillance is being designed and conducted by certified industrial hygienists. Health surveillance is being carried out in a manner that protects the right to confidentiality of medical information. Samples collected for workplace monitoring and health surveillance purposes are analyzed in Brazilian certified laboratory; Sample results shall be compared against national occupational exposure limits (OELs). If an OEL/BEI is exceeded, the affected worker(s) is informed, and controls are reviewed and revised. <p>However, several improvements point to the program are visible such as area monitoring, dust monitoring in some areas, heat stress and vibration. Not all the above-mentioned information is consistently exposed to all workers and in the management review in a comprehensive manner.</p>
3.2.5.3.	Controls, protective measures, health risk assessments, risk management plans, and training and educational materials shall be updated as necessary based on inspection and monitoring results.	 <p>Controls, protective measures, health risk assessments, risk management plans, and training and educational materials are updated based on inspection and monitoring results, however, quality of the information does not consistently reflect true control effectiveness.</p>

Chapter 3.2—Occupational Health and Safety		Basis for rating
3.2.5.4.	The operating company shall ensure that all workplace injuries, fatalities, accidents and dangerous occurrences, as defined by national laws or regulations, are documented, reported to the competent authority, investigated and that appropriate remedial action is taken.	L The organization is ensuring that all workplace injuries, fatalities, and accidents are documented, reported to the competent authority, investigated and that remedial actions are taken. However, there is an opportunity to improve near miss reporting related to critical controls.
3.2.6.1.	The operating company shall maintain accurate records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities and dangerous occurrences collected by the company and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, shall be available to workers' health and safety representatives.	L The organization is maintaining records of health and safety risk assessments; workplace monitoring and workers' health surveillance results; and data related to occupational injuries, diseases, accidents, fatalities collected by the organization and submitted to competent authorities. This information, except for data protected for medical confidentiality reasons, is available to workers' health and safety representatives.
3.2.6.2.	The operating company shall establish a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data shall be retained for a minimum of 30 years, and responsible custodians shall be assigned to oversee the health data management system.	L The operating company has established a data management system that enables worker health data to be readily located and retrieved, and data protected by medical confidentiality to be securely stored. Data is retained in accordance with Br. Requirements.
3.2.6.3.	The operating company shall allow workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.	L The operation company allows workers access to their personal information regarding accidents, dangerous occurrences, inspections, investigations and remedial actions, health surveillance and medical examinations.

Chapter 3.3—Community Health and Safety

Basis for rating

<p>3.3.1.1. CRITICAL The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads; c. Operational accidents; d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6); f. Mining-related effects on community demographics, including in-migration of mine workers and others; g. Mining-related impacts on availability of services; h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project. 		<p>Based on the assessment performed the organization has methods for risk evaluation considering community impacts. However not all potential impacts are being documented.</p> <p>In terms of health the scoping exercise was not performed and documented to reflect risks and opportunities including SARS-Cov-2 from external parties to the mine site and communities.</p>
<p>3.3.1.2. Scoping shall include an examination of risks and impacts that may occur throughout the mine lifecycle (e.g., construction, operation, reclamation, mine closure and post-closure).</p>		<p>From conversations with Health personnel the assessment from mine life cycle were not communicated or investigated from the health perspective, including but not limited to topography and implication on health vectors, personnel, etc.</p>
<p>3.3.1.3. Scoping shall include consideration of the differential impacts of mining activities on vulnerable groups or susceptible members of affected communities.</p>		<p>From conversations with Health personnel the assessment from mine life cycle were not communicated or investigated from the health perspective, furthermore, consideration of personnel with preexisting conditions due to mine related activities and COVID-19 were not considered in the risk to be included in the risk profile.</p>

Chapter 3.3—Community Health and Safety		Basis for rating
3.3.2.1.	<p>The operating company shall carry out an assessment of risks and impacts to:</p> <ul style="list-style-type: none"> a. Predict the nature, magnitude, extent and duration of the potential risks and impacts identified during scoping; b. Evaluate the significance of each impact, to determine whether it is acceptable, requires mitigation, or is unacceptable. 	<p>From conversations with health personnel the assessment was not complete, an assessment is being carried out and will include these considerations.</p>
3.3.3.1.	<p>The operating company shall document and implement a community health and safety risk management plan that includes:</p> <ul style="list-style-type: none"> a. Actions to be taken to mitigate the significant risks and impacts identified during its risk and impact assessment; and b. Monitoring that will be conducted to ensure that measures to prevent or mitigate impacts remain effective. 	<p>From the interviews performed the organization has shown a strong commitment to support all efforts related to identified risks.</p>
3.3.3.2.	<p>Mitigation measures shall prioritize the avoidance of risks and impacts over minimization and compensation.</p>	<p>The organization has implemented a method to identify, and controls hazards to health, however, since not all were identified, there could be potential gaps to the application of controls.</p>
3.3.3.3.	<p>The community health and safety risk management plan shall be updated, as necessary, based on the results of risk and impact monitoring.</p>	<p>From all documents attached the organization has the methods to update the community health and safety risk management plan. However, during this second stage, it was observed that some risk assessments do not contemplate all the risks emerging from contractors to the communities, including transportation of hazardous substances, health factors.</p>

Chapter 3.3—Community Health and Safety

Basis for rating

- 3.3.4.1. If the operating company's risk and impact assessment or other information indicates that there is a significant risk of community exposure to HIV/AIDS, tuberculosis, malaria or another emerging infectious disease related to mining activities, the operating company shall develop, adopt and implement policies, business practices, and targeted initiatives:
- a. In partnership with public health agencies, workers' organizations and other relevant stakeholders, create and fund initiatives to educate affected and vulnerable communities about these infections and modes of prevention of them, commensurate with the risks posed by mining;
 - b. Operate in an open and transparent manner and be willing to share best practice for the prevention and treatment of these diseases with workers' organizations (e.g., trade unions), other companies, civil society organizations and policymakers; and
 - c. Make information publicly available on its infectious disease mitigation program.



The Centers for Disease Control and Prevention mention Brazil as Malaria endemic. Furthermore, any mining project with international visitors poses a risk of infectious diseases for those countries and communities.

At the time of the assessment, the mine did not have a risk assessment available to demonstrate conformance to this requirement.

Chapter 3.3—Community Health and Safety

Basis for rating

- 3.3.4.2. If the assessment demonstrates a significant risk of community exposure to HIV/AIDS, tuberculosis or malaria from mining-related activities, the following prevention and mitigation strategies shall be applied, as appropriate:
- a. In relation to HIV/AIDS, the operating company shall, at minimum:
 - i. Provide free, voluntary and confidential HIV testing and counseling for all mine workers and employees;
 - ii. Provide HIV/AIDS treatment for workers and employees where it cannot reasonably be assumed that this will be provided in an effective manner by public or private insurance schemes at an affordable rate;
 - iii. Provide access for contractors to education and other preventative programs, and to work with the operating company's or facility's contracting companies or others to identify ways for contract workers to access affordable treatment; and
 - iv. Work with public health authorities, communities, workers' organizations and other stakeholders towards ensuring universal access to treatment for dependents of mine workers/employees and affected community members.
 - b. In relation to tuberculosis, the operating company shall, at minimum, provide free and voluntary testing for mine workers/employees where it is not reasonably likely to be provided by public or private health programs at an affordable rate.
 - c. In relation to malaria, the operating company shall, at minimum:
 - i. Develop a vector control plan;
 - ii. Ensure that company facilities are not breeding environments for malaria-carrying mosquitoes; and
 - iii. Provide protection from infection by malaria-carrying mosquitoes in company facilities and any company-provided housing.



There is a risk of HIV and malaria according to Centers for Disease Control and Prevention and World Health Organization, other web documents and reports; however, the organization states that there is no risk of HIV. Emerging viruses are not considered a risk to or from the mining project and related activities. At the time of the assessment, the mine did not have a risk assessment available to demonstrate conformance to this requirement.

Chapter 3.3—Community Health and Safety		Basis for rating
<p>3.3.5.1. The operating company shall collaborate with relevant community members and stakeholders, including workers who live in affected communities and individuals or representatives of vulnerable groups, in:</p> <ul style="list-style-type: none"> a. Scoping of community health and safety risks and impacts related to mining; b. Assessment of significant community health and safety risks and impacts related to mining; c. Development of prevention or mitigation strategies; d. Collection of any data needed to inform the health risk and impact assessment process; and e. Design and implementation of community health and safety monitoring programs. 		<p>The organization has implemented processes to/for:</p> <ul style="list-style-type: none"> • Scoping and assessment of significant community health and safety risks and impacts related to mining; however, does not consider all risks from contractors, visitors. • Development of prevention or mitigation strategies has been implemented for existing identified risk; however, it needs to be completed when risk assessment is deemed as complete. <p>There is no standardized collection method of data to inform the health impact assessment process, such as coordination with local health professionals or institutions to assess impact in community health. Examples include dust, noise, and transmissible diseases.</p>
<p>3.3.6.1. The operating company shall make information on community health and safety risks and impacts and monitoring results publicly available.</p>		<p>The operating company does not make information on community health and safety risks and impacts and monitoring results publicly available.</p>

Chapter 3.4—Mining and Conflict-Affected or High-Risk Areas

Basis for rating


Chapter not assessed

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IRMA provided guidance for participating sites and auditors that during the launch phase of the IRMA standard this chapter should be assessed with information provided to IRMA to inform the next revision; however, the chapter did not have to be scored by auditors

Chapter 3.5—Security Arrangements

Basis for rating

3.5.1.1.	<p>The operating company shall adopt and make public a policy acknowledging a commitment to respect human rights in its efforts to maintain the safety and security of its mining project; and a commitment that it will not provide support to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force.</p>		<p>From the documents reviewed I was unable to see a commitment (web or similar) to make this policy public. Due to commitments to comply with requirements and in line with Brazilian requirements. The organization complies with the intent of the policy.</p>
3.5.1.2.	<p>CRITICAL The operating company shall have a policy and procedures in place regarding the use of force and firearms that align with the best practices expressed in UN Basic Principles on the Use of Force and Firearms. At minimum, the company's procedures shall require that:</p> <ul style="list-style-type: none"> a. Security personnel take all reasonable steps to exercise restraint and utilize non-violent means before resorting to the use of force; b. If force is used it shall not exceed what is strictly necessary, and shall be proportionate to the threat and appropriate to the situation; and c. Firearms shall only be used for the purpose of self-defense or the defense of others if there is an imminent threat of death or serious injury. 	<p>L</p>	<p>In the reviewed documents there are explicit recommendations and guidance to security forces (private) regarding points a, b, and c.</p>
3.5.1.3.	<p>If private security is used in relation to the mining project, the operating company shall have a signed contract with private security providers that at minimum:</p> <ul style="list-style-type: none"> a. Sets out agreed on principles that are consistent with the Voluntary Principles on Security and Human Rights and the operating company's procedures on the use of force and firearms; b. Delineates respective duties and obligations with respect to the provision of security in and around the mining project and, if relevant, along transport routes; and c. Outlines required training for security personnel. 	<p>L</p>	<p>From the reviewed contract the requirement has been met.</p>

Chapter 3.5—Security Arrangements		Basis for rating
3.5.1.4.	If public security forces are used to provide security to the mining project and/or transport routes, the operating company shall make a good faith effort to sign a Memorandum of Understanding (MoU) or similar agreement with public security providers that includes similar provisions to those in 3.5.1.3.	—
3.5.2.1.	The operating company shall assess security risks and potential human rights impacts that may arise from security arrangements. Assessments of security-related risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in mining-related activities, security arrangements, or in the operating environment.	L
3.5.2.2.	Assessments, which may be scaled to the size of the company and severity of security risks and potential human rights impacts, shall: <ul style="list-style-type: none"> a. Follow a credible process/methodology; b. Be carried out and documented by competent professionals; and c. Draw on credible information obtained from a range of perspectives, including men, women, children (or their representatives) and other vulnerable groups, relevant stakeholders and expert advice. 	⊕
3.5.2.3.	The scope of the security risk assessment shall include, but need not be limited to: <ul style="list-style-type: none"> a. Identification of security risks to the company, workers and communities, paying particular attention to risks to women, children and other vulnerable groups; b. Analysis of the political and security context in the host country context (e.g., the human rights records of the government and public and private security forces; adherence to the rule of law; corruption); c. Analysis of current and potential conflicts or violence in the host country and affected communities; and d. Risks associated with equipment transfers. 	⊗

Chapter 3.5—Security Arrangements		Basis for rating
3.5.2.4.	The operating company shall develop and implement a risk management plan that includes actions to be taken to prevent or mitigate identified risks, and monitoring that will be conducted to ensure that mitigation measures are effective.	 <p>From conversation with security representatives, it was clear that there are processes in place.</p>
3.5.2.5.	If the security risk assessment reveals the potential for conflicts between mine security providers and affected community members or workers, then the operating company shall collaborate with communities and/or workers to develop mitigation strategies that are culturally appropriate and that take into consideration the needs of women, children and other vulnerable groups. If specific risks to human rights are identified in the assessment, the mitigation strategies shall conform with requirements in IRMA Chapter 1.3.	 <p>Considerations and culturally appropriate tactics are in place and consistently considered. There are no specific risks to human rights identified in the assessment, however, the organization has implemented culturally sensitive strategies.</p>
3.5.3.1.	The operating company shall develop and implement due diligence procedures to prevent the hiring of company security personnel and private security providers who have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	 <p>The organization has developed and implemented in compliance with Brazilian requirements, a due diligence procedure to prevent the hiring of company security personnel and private security providers who have been convicted in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.</p>
3.5.3.2.	The operating company shall make a good faith effort to determine if public security personnel providing security to the mine have been convicted of or credibly implicated in the infringement of human rights, breaches of international humanitarian law or the use of excessive force.	 <p>The mine does not make use of public security services.</p>
3.5.4.1.	Prior to deployment of company or private security personnel, the operating company shall provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with particular reference to vulnerable groups, and the company's policy on the appropriate use of force and firearms. Initial training and refresher courses shall be mandatory for all operating company personnel involved in security, and for private security contractors that have not received equivalent training from their employers.	 <p>The organization requires that security providers provide training that incorporates, at minimum, information related to ethical conduct and respect for the human rights of mine workers and affected communities, with reference to vulnerable groups, and the company's policy on the appropriate use of force. Initial training and refresher courses are mandatory for all personnel involved in security, and for private security contractors.</p>

Chapter 3.5—Security Arrangements		Basis for rating
3.5.4.2.	If public security forces are to be used, the operating company shall determine if public security personnel are provided with training on human rights and the appropriate use of force and firearms. If this training is not occurring, the company shall offer to facilitate training for public security personnel that provide mine-related security.	— The mine does not make use of public security services.
3.5.5.1.	The operating company shall: <ul style="list-style-type: none"> a. Develop and implement systems for documenting and investigating security incidents, including those involving impacts on human rights or the use of force; b. Take appropriate actions, including disciplinary measures, to prevent and deter abusive or unlawful acts by security personnel and acts that contravene the company's policies on rules of engagement, the use of force and firearms, human rights, and other relevant policies; c. Take appropriate actions to mitigate and provide remediation for human rights impacts (as per IRMA Chapter 1.3), injuries or fatalities caused by security providers; d. Report security incidents, including any credible allegations of human rights abuses by private or public security providers, to the competent authorities and national human rights institutions, and cooperate in any investigations or proceedings; e. Provide medical assistance to all injured persons, including offenders; and f. Ensure the safety of victims and those filing security-related allegations. 	L From conversations with representatives and a documented sample at the site this process is implemented. The organization does fully meet this requirement and there are tangible processes to ensure compliance with them.
3.5.5.2.	In the event of security-related incidents that result in injuries, fatalities or alleged human rights impacts on community members or workers, the company shall provide communities and/or workers with information on the incidents and any investigations that are underway, and shall consult with communities and/or workers to develop strategies to prevent the recurrence of similar incidents.	⊕ The organization marked it as not relevant, stating that there are no human right impacts however, there was a security event with alleged human right impact. A threat was made to a Barro Alto employee and security forces apprehended the person. There is no documentation regarding the disclosure, analysis of such incidents. Interviews performed provided insight into this process. There is a process, but it was not used in past incidents (or no proof of).

Chapter 3.5—Security Arrangements		Basis for rating
3.5.6.1.	If requested by a representative community structure, the operating company shall offer a briefing for community stakeholders on the company's procedures on the use of force and firearms.	L There are established processes that if requested by a representative community structure, the operating company will offer a briefing for community stakeholders on the company's procedures on the use of force and the policy on the use of firearms.
3.5.6.2.	The operating company shall consult regularly with stakeholders, including host governments and affected communities, about the impact of their security arrangements on those communities; and shall report to stakeholders annually on the company's security arrangements and its efforts to manage security in a manner that respects human rights.	 There are not documented information of regular consultations specifically about the impact of security arrangements on communities; as well as reports to stakeholders on the company's security arrangements and its efforts to manage security in a manner that respects human rights. However, from interviews there was a perception from community that there were no concerns from the community around security arrangements. Interviews with security representatives showed specific considerations on security arrangements considering community involvement.
3.5.6.3.	Stakeholders shall have access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to mine security.	L The organization has processes implemented to provide stakeholders with access to and be informed about a mechanism to raise and seek recourse for concerns or grievances related to all mine aspects including mine security concerns.
3.5.6.4.	If public security forces are providing security for any aspect of the mining project, the operating company shall encourage host governments to permit making security arrangements, such as the purpose and nature of public security, transparent and accessible to the public, subject to any overriding safety and security concerns.	— The mine does not make use of public security services, and security forces do not provide services dedicated to the organization.

Chapter 3.6—Artisanal and Small-Scale Mining

Basis for rating

Chapter Not Relevant

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In December 2021, the auditors visited and interviewed several stakeholders from the public sector of Barro Alto, residents of the municipality, local leaders, local media workers, local associations and social organizations, as well as suppliers and neighbors of the Mine. According to all those interviewed, there is no artisanal or small-scale mining in the municipality and in the region where the municipality is located. The same was verified in the documentation provided by the mine team and the interviews carried out with managers, workers, and contractors.

Additionally, the auditors toured the mine operations and the surrounding area, and evidence of artisanal or small-scale mining was not observed.

Chapter 3.7—Cultural Heritage

Basis for rating

3.7.1.1. Screening, assessment and the development and implementation of mitigation measures and procedures related to the management of cultural heritage shall be carried out by competent professionals.

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In Brazil, all activities related to the protection of cultural heritage are subject to specific licensing under responsibility of a federal institution for the cultural heritage protection, IPHAN (Institute of National Historical and Artistic Heritage) in compliance with Brazilian legislation.

In this context, all studies prior to any project intervention must be submitted for approval by the Institute of National Historical and Artistic Heritage, as well as the rescue and protection measures and the technical team responsible for the work. The activities are carried out by specialist consultants, duly accredited by the Institute of National Historical and Artistic Heritage.

The documentation presented by Anglo American indicates that the previous procedures for the screening, evaluation, development and implementation of mitigation measures and procedures related to the management of cultural heritage have been carried out and approved by Institute of National Historical and Artistic Heritage and the CVs of the responsible team comply with all required technical qualification.

The Cultural Heritage Management Team provided documentation and presentation regarding the Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.

Chapter 3.7—Cultural Heritage

Basis for rating

3.7.1.2. Screening, assessment and the development of mitigation measures and procedures related to the management of cultural heritage shall include consultations with relevant stakeholders.

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In the procedures for the preparation of the diagnosis in the screening phase of cultural heritage, interviews are carried out with several stakeholders and the whole process is monitored by Institute of National Historical and Artistic Heritage, which is the federal institution for the protection of cultural heritage in the country.

After the conclusion of the studies, it is mandatory to implement a Heritage Education Program that aims to share with the community about the identified and protected content and reveal the historical and cultural aspects of the region occupation, reinforcing the appreciation of cultural heritage with the community.

The document presented by Anglo American provides evidence of the study's results, including the methodology indicating that the historical and ethno-historical surveys include interviews, audiovisual records and bibliographic survey about the regional history and culture. Data collection was carried out through open and semi-structured interviews, recorded in field notebooks and recorders, accompanied by photographic and audiovisual records. Altogether there are approximately 6,000 photographs, 40 hours of filming and 110 interviewees.

The Cultural Heritage Management Team was interviewed and provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.

Chapter 3.7—Cultural Heritage	Basis for rating
<p>3.7.1.3. Cultural heritage assessments, management plans and procedures shall be made available upon request to community stakeholders and other stakeholders who have been engaged with the mine site on cultural heritage issues.</p>	<p style="text-align: center;">L</p> <p>After the conclusion of the studies, Institute of National Historical and Artistic Heritage defines that it is mandatory to implement a Heritage Education Program that aims to share with the community about the identified and protected content and reveal the historical and cultural aspects of the region occupation, reinforcing the appreciation of cultural heritage with the community.</p> <p>The Anglo American documentation indicates that the measures related to the management of Cultural Heritage are in accordance with Institute of National Historical and Artistic Heritage requirements and that the methodology of Heritage Education was discussed with the Secretary of Education of Barro Alto and agreed on the best way of dissemination and the target audience.</p> <p>The activities of the management program have been carried out in annual stages in accordance with the needs currently presented as defined in Work Plans approved annually by Institute of National Historical and Artistic Heritage. Reports and documents produced by Anglo American are filed with environmental agencies and can be consulted by all stakeholders. In addition, the company makes these reports available to all interested parties if requested.</p> <p>The Cultural Heritage Management Team also provided documentation and presentation regarding the archaeological heritage and Heritage Education Program in place to disclosure of the archaeological findings in the area.</p>
<p>3.7.2.1. Prior to the development of a new mine, or when there are significant changes to mining-related activities, the operating company shall undertake a screening process to identify risks and potential impacts to replicable, non-replicable and critical cultural heritage from the proposed mining-related activities.</p>	<p style="text-align: center;">L</p> <p>In Brazil, all activities related to the protection of cultural heritage are subject to specific licensing under responsibility of a federal institution for the cultural heritage protection, IPHAN (Institute of National Historical and Artistic Heritage) in compliance with Brazilian legislation.</p> <p>In this context, all studies prior to any project intervention must be submitted for approval by the Institute of National Historical and Artistic Heritage, as well as the rescue and protection measures and the technical team responsible for the work.</p> <p>The documentation presented by AA (Anglo American) indicates that the previous procedures for the screening, evaluation, development and implementation of mitigation measures and procedures related to the management of cultural heritage have been carried out and approved by Institute of National Historical and Artistic Heritage.</p> <p>However, there is no evidence of Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p> <p>The Cultural Heritage Management Team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p>

Chapter 3.7—Cultural Heritage	Basis for rating
<p>3.7.2.2. If the screening indicates the potential for replicable, non-replicable or critical cultural heritage to be encountered during mining-related activities, the operating company shall assess the nature and scale of the potential impacts and propose mitigation measures to avoid, minimize, restore or compensate for adverse impacts. Mitigation measures shall be consistent with the requirements below (see criteria 3.7.3, 3.7.4, 3.7.5 and 3.7.6), based on the type of cultural heritage likely to be affected.</p>	<p style="text-align: center;">L</p> <p>The documentation presented by Anglo American indicates that the previous procedures for the screening, evaluation, development and implementation of mitigation measures and procedures related to the rescue protection and management of cultural heritage have been carried out and approved by Institute of National Historical and Artistic Heritage.</p> <p>The Cultural Heritage Management Team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p>
<p>3.7.3.1. When tangible replicable cultural heritage that is not critical is encountered during mining-related activities the operating company shall apply mitigation measures that favor avoidance. Where avoidance is not feasible, the following mitigation hierarchy shall apply:</p> <ol style="list-style-type: none"> a. Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes needed to support it; b. Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; c. Where restoring the functionality of the cultural heritage in a different location is not feasible, permanently remove historical and archeological artifacts and structures; and d. Where affected communities are using the tangible cultural heritage for long-standing cultural purposes compensate for loss of that tangible cultural heritage. 	<p style="text-align: center;">L</p> <p>As it is a mandatory procedure under Brazilian law, all the requirements of item 3.7.3.1 are met by the activities implemented by Anglo American in all areas of intervention before the installation of the mine and its facilities and access, etc. The same legislation determines the procedures and steps to be followed for the rescue of assets and other recovery and protection actions.</p> <p>The document presented by the Anglo American, as well as the rationale indicated in the self-assessment page, addresses the cultural heritage in general and regional terms and brings evidence about the archaeological heritage related to the area directly affected by the project.</p> <p>The Cultural Heritage team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p>
<p>3.7.3.2. All mitigation work involving tangible replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.</p>	<p style="text-align: center;">L</p> <p>The documentation presented by Anglo American indicates that the activities are carried out by specialist consultants, duly accredited by Institute of National Historical and Artistic Heritage.</p> <p>The CVs of the responsible team comply with all required technical qualification.</p>

Chapter 3.7—Cultural Heritage		Basis for rating
3.7.4.1.	<p>The operating company shall not remove any tangible nonreplicable cultural heritage, unless all of the following conditions are met:</p> <ul style="list-style-type: none"> a. The overall benefits of the mining project conclusively outweigh the anticipated cultural heritage loss from removal; and b. Any removal of cultural heritage is conducted using the best available technique. 	<p>As it is a mandatory procedure under Brazilian law, all the requirements of item 3.7.4.1 are met by the activities implemented by Anglo American in all areas of intervention before the installation of the mine and its facilities and access, etc. The same legislation determines the procedures and steps to be followed for the rescue of assets and other recovery and protection actions.</p> <p>The methodology adopted and approved by Institute of National Historical and Artistic Heritage meets international standards and, when there is a need to remove some non-replicable element, this is done with the best available techniques.</p> <p>The document presented by the Anglo American, as well as the rationale indicated in the self-assessment page, addresses the cultural heritage in general and regional terms and brings evidence about the archaeological heritage related to the area directly affected by the project.</p> <p>The Cultural Heritage Management Team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p>
3.7.4.2.	<p>All mitigation work involving tangible non-replicable cultural heritage shall be carried out and documented by competent professionals, using internationally recognized practices for the protection of cultural heritage.</p>	<p>The documentation presented by Anglo American indicates that the activities are carried out by specialist consultants, duly accredited by Institute of National Historical and Artistic Heritage.</p> <p>The CVs of the responsible team comply with all required technical qualification.</p>

Chapter 3.7—Cultural Heritage

Basis for rating

<p>3.7.5.1. Except under exceptional circumstances, the operating company shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the operating company shall:</p> <ul style="list-style-type: none"> a. Retain external experts to assist in the assessment and protection of critical cultural heritage, and use internationally recognized practices for the protection of cultural heritage; and b. Collaborate with affected communities to negotiate measures to protect critical cultural heritage and provide equitable outcomes for affected communities, and document the mutually accepted negotiation process and outcomes. (Note: Where impacts may occur to indigenous peoples' critical cultural heritage, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples). 	<p>L</p>	<p>As it is a mandatory procedure under Brazilian law, all the requirements of item 3.7.5.1 are met by the activities implemented by Anglo American in all areas of intervention before the installation of the mine and its facilities and access, etc.</p> <p>The same legislation determines the procedures and steps to be followed for the rescue of assets and other recovery and protection actions when necessary.</p> <p>The methodology adopted and approved by IPHAN meets international standards and, when there is a need to remove some non-replicable element, this is done with the best available techniques.</p> <p>There is no impact on indigenous peoples' critical cultural heritage in the Barro Alto project area.</p> <p>The document presented by Anglo American, as well as the rationale indicated in the self-assessment page, addresses the cultural heritage in general and regional terms and brings evidence about the archaeological heritage related to the area directly affected by the project.</p> <p>The Cultural Heritage Management Team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p>
<p>3.7.5.2. When a new mine is proposed within a legally protected cultural heritage area, including areas proposed by host governments for such designation, or a legally defined protected area buffer zone, the operating company shall:</p> <ul style="list-style-type: none"> a. Comply with the requirement 3.7.5.1; b. Comply with the protected area's management plan; c. Consult with agencies or bodies responsible for protected area governance and management, local communities and other key stakeholders on the proposed mining project; and d. Implement additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. 	<p>L</p>	<p>Brazilian law defines all the procedures necessary to protect the existing cultural, historical and archaeological heritage and the procedures necessary for the sorting, prospecting, redemption and permanent custody of the rescued assets.</p> <p>The documents presented by Anglo American indicate that activities related to Archeology and Cultural Heritage are only carried out after approval and compliance with all Institute of National Historical and Artistic Heritage requirements. In relation to the management of the Cultural and Archaeological Heritage of Barro Alto, all requirements were met as determined by Institute of National Historical and Artistic Heritage, which issued a consent document attesting the compliance of the actions carried out by the Anglo American, which includes the execution of a preventive archeology program.</p> <p>The Cultural Heritage Management Team provided documentation and presentation regarding the archaeological heritage, with Institute of National Historical and Artistic Heritage approval for the release of intervention areas after authorization of studies such as the issuance of ordinances or letters defining requests for approval of studies and release of areas.</p> <p>Anglo American's procedures for managing cultural heritage are applicable to any area of expansion of the project and follow Brazilian legislation and the company's own performance standards, in line with IRMA requirements.</p>

Chapter 3.7—Cultural Heritage		Basis for rating
3.7.5.3.	<p>IRMA will not certify new mines that are developed in or that adversely affect the following protected areas if those areas were designated to protect cultural values (See also Chapter 4.6).</p> <ul style="list-style-type: none"> • World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; • International Union for Conservation of Nature (IUCN) protected area management categories I-III; • Core areas of UNESCO biosphere reserves. 	<p>—</p> <p>Anglo American presents the map of Barro Alto assets area of influence. There are no areas that demand the application of the requirement of this item 3.7.5.3. related to the International Union for Conservation of Nature or other biodiversity protected areas.</p>
3.7.5.4.	<p>An existing mine located entirely or partially in a protected area listed in 3.7.5.3 shall demonstrate that:</p> <ol style="list-style-type: none"> The mine was developed prior to the area's official designation; Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the cultural values for which the area was designated or recognized; and The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. 	<p>Information from the document presented by Anglo American indicates that a Cultural Heritage Management and Preventive Archeology Program in the company's area of operation was presented to IPHAN in 2014 with the aim of managing the existing cultural heritage in the mining company's area of operation in the municipality of Barro Alto.</p> <p>Anglo American presents the map of the Barro Alto assets area of influence where there are no areas related to the IUCN or other biodiversity protected area.</p> <p>Anglo American informs that in the research carried out in the speleological databases (CANIE / CECAV and National Cave Registry / SBE), no cavities registered in the region were found. However, no evidence of these studies was found in the available documentation.</p> <p>During the Stage II interviews, the Cultural Heritage Management Team provided documentation that evidenced the speleological studies carried out in the Barro Alto areas.</p>
3.7.5.5.	<p>To safeguard irreplaceable cultural heritage and respect indigenous peoples' right to self-determination, the operating company shall not carry out new exploration or develop new mines in areas where indigenous peoples are known to live in voluntary isolation.</p>	<p>L</p> <p>Anglo American informs that no indigenous lands were identified near the area where the project was installed.</p> <p>Anglo American informs that, in consultation with the records of FUNAI (Fundação Nacional do Índio) responsible for indigenous peoples in Brazil, no indigenous lands were identified in the municipality of Barro Alto, registered on the institution's website.</p> <p>Among the documents presented there is a link to the FUNAI website indicating that there are no indigenous lands in the municipality of Barro Alto.</p>

Chapter 3.7—Cultural Heritage		Basis for rating
3.7.6.1.	Where the operating company proposes to use the intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes, the company shall inform these communities of their rights under national and international law, of the scope and nature of the proposed commercial development, and of the potential consequences of such development.	— There are no documents informing the Anglo American use or intention to use of intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes. As there is no information that Anglo American wants to use commercially intangible cultural heritage elements, there is no evidence that the company has defined any procedure for informing these communities of their rights under national and international law, the scope and nature of the proposed business development, and the possible consequences of this development. During the Stage II interviews, the Cultural Heritage Management Team did not provide documentation that evidenced any procedure for informing communities of their rights on the commercial use of the intangible cultural heritage.
3.7.6.2.	The operating company shall not proceed with such commercialization unless it: <ul style="list-style-type: none"> a. Collaborates with affected communities using a good faith negotiation process that results in a documented outcome; and b. Provides for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with local customs and traditions. 	— There are no documents informing the Anglo American use or intention to use of intangible cultural heritage, including knowledge, innovations or practices of local communities for commercial purposes. As there is no information that Anglo American wants to use commercially intangible cultural heritage elements, there is no evidence that the company has defined any procedure for informing these communities of their rights under national and international law, the scope and nature of the proposed business development, and the possible consequences of this development. During the Stage II interviews, the Cultural Heritage Management Team did not provide documentation that evidenced any procedure for informing communities of their rights on the commercial use of the intangible cultural heritage.
3.7.6.3.	Where the operating company proposes to use indigenous peoples' cultural heritage for commercial uses, negotiation shall take place through the Free, Prior and Informed Consent process outlined in IRMA Chapter 2.2 unless otherwise specified by the indigenous peoples.	— There is no cultural heritage of indigenous peoples in the Barro Alto project area.

Chapter 3.7—Cultural Heritage		Basis for rating
3.7.7.1.	A cultural heritage management plan or its equivalent shall be developed that outlines the actions and mitigation measures to be implemented to protect cultural heritage.	<p>L</p> <p>The evaluation of this item was based on other documents previously made available by Anglo American that present the management actions of cultural and archaeological heritage and the procedures for IPHAN monitoring as the Programa de Resgate e Valorização do Patrimônio Natural, Histórico e Cultural BARRO ALTO – GO MARÇO 2020.pdf and Relatório dos Bens Culturais do Município de Barro Alto.pdf. In these documents there is evidence that in relation to the management of the Cultural and Archaeological Heritage of Barro Alto, all requirements were met as determined by Institute of National Historical and Artistic Heritage, which issued a consent document attesting the compliance of the actions carried out by Anglo American.</p> <p>The activities of the management program have been carried out in annual stages in accordance with the needs currently presented as defined in Work Plans approved annually by Institute of National Historical and Artistic Heritage.</p>
3.7.7.2.	<p>If a new or existing mine is in an area where cultural heritage is expected to be found, the operating company shall develop procedures for:</p> <ol style="list-style-type: none"> Managing chance finds, including, at minimum, a requirement that employees or contractors shall not further disturb any chance find until an evaluation by competent professionals is made and actions consistent with the requirements of this chapter are developed; Managing potential impacts to Allowing continued access to cultural sites, subject to consultations with affected communities and overriding health, safety, and security considerations; and If the mining project affects indigenous peoples' cultural heritage, the operating company shall collaborate with indigenous peoples to determine procedures related to the sharing of information related to cultural heritage. 	<p>L</p> <p>Anglo American informs that the Heritage Education Program contemplates the company team that works in the mining area with a training for the Identification of archaeological material. The training is given by the archaeologist, technical responsible consultant who supports Anglo American's management of the cultural heritage. In this way, the company's employees were instructed to follow some steps in case they found any archaeological vestiges during their work, namely:</p> <ol style="list-style-type: none"> Never remove archaeological objects from a site. If you find archaeological objects, keep them in the same place and contact your superior who will inform the Anglo American Environment Sector. If possible, collect the geographic coordinates of the material location, with a GPS, and send the information to the Environment Sector. The Environment Sector will report the discovery to the archeology team to carry out proper research. Immediately stop any soil-moving activity in the area where archaeological material has been identified. Soil removal, earthmoving, excavation, soil preparation for reforestation or other activities that move the soil and destroy archaeological vestiges in the area should not be carried out until the authorization of the Archeology team. <p>During the Stage II interviews with Anglo American Cultural Heritage Management Team, the company has presented documents that show the methodology applied to the training.</p>

Chapter 3.7—Cultural Heritage	Basis for rating
<p>3.7.7.3. The operating company shall ensure that relevant employees receive training with respect to cultural awareness, cultural heritage site recognition and care, and company procedures for cultural heritage management.</p>	<p style="text-align: center;">L</p> <p>The report available by Anglo American informs that the team of managers of the Archaeological and Cultural Heritage held a lecture involving the members of the company's Social Communication, Environment and Health and Safety teams, as well as representatives of the Coexistence Committee of the Barro Alto community.</p> <p>The objective was to present results of studies on cultural heritage to key people on the company's management team.</p> <p>During the interview with the Anglo American cultural heritage management team, evidence of the training carried out with workers and key people in the management of the site was presented.</p>

Principle 4: Environmental Responsibility–APPENDIX

RATING DESCRIPTION
Description of performance

L	Fully meets
●	Substantially meets
⊕	Partially meets
⊗	Does not meet
—	Not relevant

Chapter 4.1—Waste and Materials Management

Basis for rating

4.1.1.1.	The operating company shall develop a policy for managing waste materials and mine waste facilities in a manner that eliminates, if practicable, and otherwise minimizes risks to human health, safety, the environment and communities.	L	The organization has adopted and implemented the corporate waste management policy, endorsed by the site's management team.
4.1.1.2.	<p>The operating company shall demonstrate its commitment to the effective implementation of the policy by, at minimum:</p> <ol style="list-style-type: none"> Having the policy approved by senior management and endorsed at the Director/Governance level of the company; Having a process in place to ensure that relevant employees understand the policy to a degree appropriate to their level of responsibility and function, and that they have the competencies necessary to fulfill their responsibilities; Having procedures and/or protocols in place to implement the policy; and Allocating a sufficient budget to enable the effective implementation of the policy. 		<p>The waste management policy is approved by senior management and endorsed at the director/governance level, and it has been communicated to all employees, including contractors, assigned roles and responsibilities, and set procedures to implement it and dedicate resources.</p> <p>This policy is transmitted through training and annual refreshers. In addition, there are several procedures in place to facilitate the understanding of the policy. An approved budget for waste management is available and reviewed annually.</p>
4.1.2.1.	<p>The operating company shall:</p> <ol style="list-style-type: none"> Identify all materials, substances and wastes (other than mine wastes) associated with the mining project that have the potential to cause impacts on human health, safety, the environment or communities; and Document and implement procedures for the safe transport, handling, storage and disposal of those materials, substances and wastes. 	L	<p>Materials & waste:</p> <ol style="list-style-type: none"> Chemicals, materials, and wastes have been identified as having the potential to cause impacts on human health, safety, the environment or communities. Waste Management Plan/Standard Operating Procedures communicated to personnel through mandatory refresher training, every year. <p>In the field, recycling is implemented, though not totally consistent, and housekeeping is not up to standard. Explosives packaging is baled rather than burned, the latter being the industry's safest practice. Compression could cause a reaction. Nonetheless, all packaging is said to be thoroughly inspected before baling. Even though the goals are met, the amount of slag remains too high.</p>
4.1.3.1.	The operating company shall identify all existing and/or proposed mine waste facilities that have the potential to be associated with waste discharges or incidents, including catastrophic failures, that could lead to impacts on human health, safety, the environment or communities.	L	The evidence presented includes information to show that the site has identified existing mine waste facilities with potential to be associated with waste discharges or incidents. None deemed catastrophic by third party assessment, as verified by regulators.

Chapter 4.1—Waste and Materials Management

Basis for rating

4.1.3.2.




The operating company shall perform a detailed characterization for each mine waste facility that has associated chemical risks. Characterization shall include:

- a. A detailed description of the facility that includes geology, hydrogeology and hydrology, climate change projections, and all potential sources of mining impacted water (MIW);
- b. Source material characterization using industry best practice to determine potential for acid rock drainage (ARD) or metals leaching (ML). This shall include:
 - i. Analysis of petrology, mineralogy, and mineralization;
 - ii. Identification of geochemical test units;
 - iii. Estimation of an appropriate number of samples for each geochemical test unit; and
 - iv. Performance of comprehensive geochemical testing on all samples from each geochemical test unit.
- c. A conceptual model that describes what is known about release, transport and fate of contaminants and includes all sources, pathways and receptors for each facility;
- d. Water balance and chemistry mass balance models for each facility; and
- e. Identification of contaminants of concern for the facility/source materials, and the potential resources at risk from those contaminants.

L

Mine waste:

- a. Report indicated in point b with detailed description. Inventory of waste deposits in report # T21013-002-RE.v3 of Tec3, dated March 2021.
- b. Characterization carried out by independent lab (Merieux), analyzing a composite sample, not individually tested due to proven homogenization of the stockpiles. No hazardous chemical risks identified in analyses, no heavy metals or hazardous chemicals detected, thus suitable for reuse as fertilizer (MgSiO₄). Sampling methodology according to international standards. The organization is preparing a report with the characterization - chemical composition of inert waste. Not available yet.
- c. Conceptual model reviewed found to be comprehensive.
- d. Water balance: "Balanço Hídrico - Out_2021_Rev0"
- e. ID of contaminants: analysis results show no hazardous materials present.

Chapter 4.1—Waste and Materials Management		Basis for rating
<p>4.1.3.3. The operating company shall identify the potential physical risks related to tailings storage facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment or communities. Evaluations shall be informed by the following:</p> <ul style="list-style-type: none"> a. Detailed engineering reports, including site investigations, seepage and stability analyses; b. Independent technical review (See criteria 4.1.6) c. Facility classification based on risk level or consequence of a failure, and size of the structure/impoundment; d. Descriptions of facility design criteria; e. Design report(s); f. Short-term and long-term placement plans and schedule for tailings and waste rock or other facilities subject to stability concerns; g. Master tailings placement plan (based on life of mine); h. Internal and external inspection reports and audits, including, if applicable, an annual dam safety inspection report; i. Facility water balances (See also 4.1.3.2.d); and j. Dam breach inundation (if applicable) and waste rock dump runout analyses. 		<p>The company has evaluated the potential physical risks related to facilities and all other mine waste facilities where the potential exists for catastrophic failure resulting in impacts on human health, safety, the environment, or communities. There are no tailings storage facilities. There are waste rock piles that were evaluated by a third party, including location alternatives; however, the report is not yet available.</p> <p>Independent review demonstrated that mining waste (waste rock and slag piles) facilities were not identified as high consequence to pose risks.</p>
<p>4.1.3.4. Facility characterizations shall be updated periodically to inform waste management and reclamation decisions throughout the mine life cycle.</p>		<p>Characterization carried out by independent lab (Merieux). No chemical risks identified in analyses, no heavy metals or hazardous chemicals detected, thus deemed suitable for fertilizer by the lab.</p> <p>Currently working with environmental authorities to establish a protocol (not completed yet) to proceed on characterization methodology and frequency.</p>
<p>4.1.3.5. Use of predictive tools and models for mine waste facility characterization shall be consistent with current industry best practice, and shall be continually revised and updated over the life of the mine as site characterization data and operational monitoring data are collected.</p>		<p>Documents submitted provided evidence of conformity to requirement to use predictive tools and models for mine waste facility characterization and continually revise, updated over the life of the mine as site characterization data and operational monitoring data are collected.</p> <p>Document review included is Safety evaluation of Stability Analysis for Esteril (waste rock) deposits, 2017. Note, doc. submitted with comments to modify/update in 2018.</p>

Chapter 4.1—Waste and Materials Management	Basis for rating
<p>4.1.4.1. CRITICAL A risk-based approach to mine waste assessment and management shall be implemented that includes:</p> <ol style="list-style-type: none"> Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the project conception and planning phase of the mine life cycle; A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment and communities early in the life cycle; Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and Documented risk assessment reports, updated when risks assessments are revised (as per 4.1.4.1.c). 	<p>A risk-based approach to mine waste self-assessment and management was carried out, that included:</p> <ul style="list-style-type: none"> Identification of potential chemical risks and physical risks during the project conception and planning phase of the mine life cycle was completed. Chemical analyses performed by an independent official laboratory. A rigorous self- risk assessment was carried out to evaluate the potential impacts of mine waste facilities on EHS and communities early in the life cycle. However, analysis of samples was made on composites, not facility specific. Updating of risk assessments is done every two years, over the course of the facility's life cycle and is included in the waste management plan. Documented risk assessment reports are updated when risks assessments are revised every two years. Third party assessments of waste rock dumps and slag piles were carried out but reports not available at this time, no current information available.

L

Chapter 4.1—Waste and Materials Management

Basis for rating

- 4.1.4.2. The operating company shall carry out and document an alternatives assessment to inform mine waste facility siting and selection of waste management practices. The assessment shall:
- Identify minimum specifications and performance objectives for facility performance throughout the mine life cycle, including mine closure objectives and post-closure land and water uses;
 - Identify possible alternatives for siting and managing mine wastes, avoiding a priori judgements about the alternatives;
 - Carry out a screening or “fatal flaw” analysis to eliminate alternatives that fail to meet minimum specifications;
 - Assess remaining alternatives using a rigorous, transparent decision-making tool such as Multiple Accounts Analysis (MAA) or its equivalent, which takes into account environmental, technical, socio-economic and project economics considerations, inclusive of risk levels and hazard evaluations, associated with each alternative;
 - Include a sensitivity analysis to reduce potential that biases will influence the selection of final site locations and waste management practices; and
- Be repeated, as necessary, throughout the mine life cycle (e.g., if there is a mine expansion or a lease extension that will affect mine waste management).

There was no detailed and comparable information ref. 4.1.4.2.a, for alternatives assessment with reference to potential environmental impacts and benefits of different options. Identification of performance objectives, describing how the facility is expected to perform throughout the entire life cycle, including the long-term mine closure objectives and post-closure land use was not evidenced.

Additional evidence provided by the mine shows that fatal flaw analysis has been conducted. Alternative assessments and modelling have been carried out, while using the best management practices, according to the documentation presented, including air quality management, water management, risk assessments, noise & vibration management, waste and waste rock & slag piles assessments and greenhouse gas management, that were evidenced by the analysis and assessment reports. However, the third-party assessment report was not available. Risk assessments were practiced by the company (self-assessments). In general, procedures are designed to meet Brazilian regulations, not exactly IRMA requirements.

During the time of the onsite assessment the Adaptive Management Plan was under development. Section 13 Plano de Gestao Adaptativa of the Programa Recursos Hidricos V3 (Water Management Plan) includes planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project are included in the Water Management Plan and includes trigger levels (TARP).

In 2015 Anglo American has a target of achieving an 8% improvement in energy use and a 22% saving in greenhouse gas emissions by 2020, against our projected 'business as usual' (BAU) consumption and Barro Alto was included as one of the operations for the program. The goal was achieved globally but no evidence of Barro Alto contribution to that reduction.

Corporate long-term strategy and policies were defined with a commitment to improving energy efficiency by 30% and reducing greenhouse gas emissions by 30% by 2030 (vs. 2016 baselines) and carbon neutrality across operations by 2040. The operating company has no evidence that greenhouse gas emissions from the mining project have decreased since the program started.

2019 Climate change and Energy Plan was developed but no specific targets and metrics defined.

Chapter 4.1—Waste and Materials Management

Basis for rating

4.1.5.1. **CRITICAL** Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).

L

All the projects, design criteria and risk management of the waste facilities (waste and slag dumps) are in line with the best practices such as the LOP (Large Open Pit Project), International Council on Mining and Metals guidelines, the Anglo American Technical Standards 401 and 602, the International Organization for Standardization and local legislations and standards. They are the best available practices (BAP)/best available technologies (BAT) available in the mining industry. (See evidence: Technical Standard).

The Risk Analysis and Management are explained in Ground Control Plan (RL-B250-50000_rev1). Chapter 4 details how the Operational Risk Management is applied in Barro Alto waste facilities. See Ground Control Plan folder.

The structures are rated using the Waste Dump and Stockpile Stability Rating and Hazard Class that classifies the design criteria applicable (See GCP folder), evidence: RL-B250-50000_rev1 Chapter 6) and they all have a Failure Mode and Effects Analysis (Chapter 4).

The Engineer of Record is appointed for all the structures and regular safety inspections are being done (Safety audit folder). The inspections include a compilation and evaluation of internal reports as well as any monitoring data.

As a second line review there is the Geotechnical Review Board and the Technical Review Panel that assesses whether best practices are being applied and points all the possible issues are pointed and the actions are scheduled in order of priority (GRB folder).

As a third line review the Technical and Sustainability Group audits the structures to certify that the Technical Standards are being applied in the Business Unit (safety audit/T&S folder).

Every year, in line with what is required by Brazilian law, all the geotechnical monitoring is summarized in a document (Programa de Monitoramento Geotecnico e Processos Erosivos) in order to prove to the local regulators that all the best available practices are being applied.

Chapter 4.1—Waste and Materials Management		Basis for rating
4.1.5.2.	<p>Mitigation of chemical risks related to mine waste facilities shall align with the mitigation hierarchy as follows:</p> <ol style="list-style-type: none"> Priority shall be given to source control measures to prevent generation of contaminants; Where source control measures are not practicable or effective, migration control measures shall be implemented to prevent or minimize the movement of contaminants to where they can cause harm; and If necessary, MIW shall be captured and treated to remove contaminants before water is returned to the environment or used for other purposes. 	<p>Mine Waste has been declared non-hazardous by a third-party lab. Done by accredited Merieux lab No. 229227/2018-0.</p> <ul style="list-style-type: none"> Waste rock material does not generate acid drainage. Slag analysis done every 2 years. These waste materials are routinely monitored for safe storage. There are no tailing storage facilities.
4.1.5.3.	<p>For high-consequence rated mine waste facilities, a critical controls framework shall be developed that aligns with a generally accepted industry framework, such as, for example, the process outlined in Mining Association of Canada's Tailings Management Guide.</p>	<p>The mine has not identified any waste facilities as high consequence.</p>
4.1.5.4.	<p>Mine waste management strategies shall be developed in an interdisciplinary and interdepartmental manner and be informed by site-specific characteristics, modeling and other relevant information.</p>	<p>Mine waste management strategies have been developed in an interdisciplinary and interdepartmental manner though not informed by site-specific characteristics, modeling and other relevant information.</p> <ul style="list-style-type: none"> There is evidence of slag analysis conducted every 2 years. However, for chemical risks, the analysis of the slag is based on composite samples and not of each facility, not facility-specific source material characterization, developed facility-specific conceptual models and water and chemistry mass balances.
4.1.5.5.	<p>The operating company shall develop an Operation, Maintenance and Surveillance (OMS) manual (or its equivalent) aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility, that includes:</p> <ol style="list-style-type: none"> An operations plan that documents practices that will be used to transport and contain wastes, and, if applicable, effluents, residues, and process waters, including recycling of process waters; A documented maintenance program that includes routine, predictive and event-driven maintenance to ensure that all relevant parameters (e.g., all civil, mechanical, electrical and instrumentation components of a mine waste 	<p>The company has an operation, maintenance, and surveillance manual, aligned with the performance objectives, risk management strategies, critical controls and closure plan for the facility</p> <p>It has an operations plan documenting practices for transport and containment of wastes, effluents, residues and recycling of process waters.</p> <p>It has a documented maintenance program with routine, predictive and event-driven maintenance including all instrumentation components of a mine waste facility in compliance with company standards, local regulations, and sound operating practices.</p> <p>The water management plan includes water recycling, The process is closed loop.</p>

<p>facility) are maintained in accordance with performance criteria, company standards, host country law and sound operating practices;</p> <ul style="list-style-type: none"> c. A surveillance program that addresses surveillance needs associated with the risk management plan and critical controls management, and includes inspection and monitoring of the operation, physical and chemical integrity and stability, and safety of mine waste facilities, and a qualitative and quantitative comparison of actual to expected behavior of each facility; d. Documentation of facility-specific performance measures as indicators of effectiveness of mine waste management actions; and e. Documentation of risk controls and critical controls (see also 4.1.5.3), associated performance criteria and indicators, and descriptions of pre-defined actions to be taken if performance criteria are not met or control is lost. 		
<p>4.1.5.6. CRITICAL On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5); b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3); c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and d. Inform the management review to facilitate continual improvement (see 4.1.5.8). 		<p>The company presented a characterization manual describing operations and projections (CARACTERIZAÇÃO DO EMPREENDIMENTO). Not exactly an OMS Manual.</p> <p>The company follows national standards (Br norm NBR 10004:2004) for waste management and exceeds conformance but not necessarily IRMA requirements.</p> <p>Waste profile: 2.6 kTM waste, 81.88% to recycling; 18.12% landfilled (for mine waste). 99% slag internal landfill, 1% reused. October peak of destination due to accumulation of previous months caused by limited transportation (pandemic). Report to authorities every March.</p> <ul style="list-style-type: none"> a. Performance objectives met, b. RA & controls effectively, c. Updates reported, d. Management informed.
<p>4.1.5.7. The OMS manual shall be updated and new or revised risk and critical control strategies implemented if information reveals that mine waste facilities are not being effectively operated or maintained in a manner that protects human health and safety, and prevents or otherwise minimizes harm to the environment and communities.</p>	<p>L</p>	<p>From documentation review and interviews, evidence was observed that Barro Alto evaluates the performance of mine waste facilities and develops and implements revised risk and control strategies and updates procedures when issues of ineffective performance or maintenance of mine waste facilities become known.</p>

Chapter 4.1—Waste and Materials Management		Basis for rating
4.1.5.8.	<p>The operating company shall implement an annual management review to facilitate continual improvement of tailings storage facilities and all other mine waste facilities where the potential exists for contamination or catastrophic failure that could impact human health, safety, the environment or communities. The review shall:</p> <ol style="list-style-type: none"> Align with the steps outlined in the Mining Association of Canada’s Tailings Management Protocol or a similar framework; and Be documented, and the results reported to an accountable executive officer. 	<p>No tailings from this process. Slope stability of work faces, and waste rock dumps is covered under procedure in progress. No slope stability procedure available for slag stockpiles. For slope stability there is an evaluation underway, reviewed in 4.BT Talude de Mina e Pilha.v003; this standard operating procedure has not been finalized. According to a note used as evidence, ICG is carried out in the waste dumps. The slag deposits are inspected monthly, and a monthly assessment of their evolution is completed. In addition to being monitored systematically, a brief PowerPoint is presented as evidence. The Management Review includes this topic as highly relevant.</p>
4.1.6.1.	<p>The siting and design or re-design of tailings storage facilities and other relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle.</p>	<p>—</p> <p>There are no tailings from these processes. There are waste rock deposits and slag piles (characterized as solid magnesium salt). The siting and design or re-design of relevant mine waste facilities, and the selection and modification of strategies to manage chemical and physical risks associated with those facilities shall be informed by independent reviews throughout the mine life cycle. Risk assessment of waste piles is done daily, and it has been determined that they do not pose risk of catastrophic failure, therefore this clause is not relevant. There was an independent (third party assessment) done but the report has not been delivered.</p>
4.1.6.2.	<p>Reviews shall be carried out by independent review bodies, which may be composed of a single reviewer or several individuals. At high-risk mine waste facilities, a panel of three or more subject matter experts shall comprise the independent review body.</p>	<p>—</p> <p>There are no tailings from these processes. There are waste rock deposits and slag piles. A self-risk assessment of waste piles is done daily, and it has been determined that they do not pose a risk of catastrophic failure. An independent review has been carried out, but the report has not been delivered.</p>
4.1.6.3.	<p>Independent reviewers shall be objective, third-party, competent professionals.</p>	<p>—</p> <p>There are no tailings from the company's processes, and no mine waste facilities that pose a risk of contamination or catastrophic failure that could impact human health, safety, the environment, or communities, as per self-assessments. However, an independent review, although carried out, has not delivered their report.</p>
4.1.6.4.	<p>Independent review bodies shall report to the operation's general manager and an accountable executive officer of the operating company or its corporate owner.</p>	<p>—</p> <p>There are no tailings from the company's processes, and no mine waste facilities that pose a risk of contamination or catastrophic failure that could impact human health, safety, the environment, or communities, as per self-assessments. However, an independent review, although carried out, has not delivered their report.</p>

Chapter 4.1—Waste and Materials Management		Basis for rating
4.1.6.5.	The operating company shall develop and implement an action plan in response to commentary, advice or recommendations from an independent review, document a rationale for any advice or recommendations that will not be implemented, and track progress of the plan's implementation. All of this information shall be made available to IRMA auditors.	— The company has developed an action plan and is implementing same in response to advice or recommendations from an independent review, but it is still incipient because the report has not been yet delivered.
4.1.7.1.	Stakeholders shall be consulted during the screening and assessment of mine waste facility siting and management alternatives (see 4.1.4.2), and prior to the finalization of the design of the facilities.	⊕ No neighboring communities. The nearest one, Souzalandia is 10 km away. Public consultation done. See ESIA Projeto BA, Vol III, dated Nov. 2000, by Knight-Piesold. New locations were not subject to public consultation according to local regulations. However, the consultation with stakeholders has been rather informative and these subjects are not found in most cases. No evidence of stakeholders beyond internal consultation during the need to develop new waste facilities.
4.1.7.2.	Emergency preparedness plans or emergency action plans related to catastrophic failure of mine waste facilities shall be discussed and prepared in consultation with potentially affected communities and workers and/or workers' representatives, and in collaboration with first responders and relevant government agencies. (See also IRMA Chapter 2.5).	⊕ The Barro Alto mine has disclosed and practiced catastrophic mine waste emergency scenarios with community and gov agencies. These are preventative measures due to the recent catastrophic emergency in the country, however the Barro Alto mine has no risk of catastrophic failure of mine waste facilities. The plan was not created in collaboration with communities; however, the community was involved in communicating the plan and a drill was practiced with the community.
4.1.7.3.	Emergency and evacuation drills (desktop and live) related to catastrophic failure of mine waste facilities shall be held on a regular basis. (See also IRMA Chapter 2.5).	⊖ The plan is new, and the drill has been practiced once with communities. There are plans to routinely perform drills, but they were not yet agreed nor communicated with the communities, and not all possible emergencies have been drilled.
4.1.7.4.	If requested by stakeholders, the operating company shall report to stakeholders on mine waste facility management actions, monitoring and surveillance results, independent reviews and the effectiveness of management strategies.	L Through the Plano de Convivencia the site addresses issues with stakeholders. There have been a few requests for community improvement, and a couple of complaints regarding noise, although the city is 10 km away from the mine works; these complaints were from a farmhouse located 4 km away. The site reports to the regulatory agency monthly, then an annual summary. The regulators make the information public. In the company's local webpage, there is a Procedimento para Resolução de Conflitos Sociais (procedure to resolve social conflicts, open to stakeholders to present their concerns and/or comments. The company also has a Sustainability Program that assists local communities, "Comunidades sustentáveis", providing support (advice and financial) for small businesses & crafts.

Chapter 4.1—Waste and Materials Management		Basis for rating
4.1.8.1. CRITICAL At the present time, mine sites using riverine, submarine and lake disposal of mine waste materials will not be assessed by IRMA.	—	No riverine disposal.

Chapter 4.2—Water Management		Basis for rating
4.2.1.1.	The operating company shall identify water users, water rights holders and other stakeholders that may potentially affect or be affected by its mine water management practices.	L The Water Management Plan for Hydrological Resources (PGRH) current 2020 version has provisions to address all the IRMA requirements for water rights holders, users without water rights and stakeholders who may potentially affect or be affected by mine water management practices.
4.2.1.2.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify current and potential future uses of water at the local and regional level that may be affected by the mine's water management practices.	L The 2020 version of the PGRH (PROGRAMA DE GESTÃO DE RECURSOS HÍDRICOS) identifies current and potential future uses of water at the local and regional level that may be affected by the mine; and conducted research to identify current and potential future uses of water at the local and regional level that may be affected by the mine, including TARP (trigger action response plan).
4.2.1.3.	The operating company shall conduct its own research and collaborate with relevant stakeholders to identify and address shared water challenges and opportunities at the local and regional levels, and shall take steps to contribute positively to local and regional water stewardship outcomes.	L Forum minutes, actions, plans, and follow up were deployed but suspended due to limitations of gathering during pandemic peak but reinitiated in October 2021 and continues.
4.2.2.1.	The operating company shall gather baseline or background data to reliably determine: <ul style="list-style-type: none"> a. The seasonal and temporal variability in: <ul style="list-style-type: none"> i. The physical, chemical and biological conditions of surface waters, natural seeps/springs and groundwater that may be affected by the mining project; ii. Water quantity (i.e., flows and levels of surface waters, natural seeps/springs and groundwater) that may be affected by the mining project; and b. Sources of contamination and changes in water quantity or quality that are unrelated to the mining project. 	L Documents reviewed, including Water Balance dated October 2021, including information addressing points a and b. Water Accounting Framework (WAF) methodology of the Australian Mining Council applied to develop water balance.

Chapter 4.2—Water Management	Basis for rating
<p>4.2.2.2. The operating company shall carry out a scoping process that includes collaboration with relevant stakeholders, to identify potentially significant impacts that the mining project may have on water quantity and quality, and current and potential future water uses. The scoping process shall include evaluation of:</p> <ul style="list-style-type: none"> a. The mining-related chemicals, wastes, facilities and activities that may pose a risk to water quality; and b. The mine's use of water, and any mining activities that may affect water quantity. 	<p>Mining materials & water quality:</p> <ul style="list-style-type: none"> a. There is very limited use of hazardous chemicals and or materials. Main one is Sodium Hypochlorite used for water sanitation, followed by Lime. Storage is safe and has reasonable secondary containment to prevent reaching water streams. Updates of the previously reviewed documents show no variations in water quality/quantity. Water quality analyses are reported monthly to regulators, and they are made public. <p>Process water is closed loop, only make up water is drawn from Los Patos River, below permitted quantities (in agreement with relevant stakeholders). However, there is no evidence of stakeholders' participation in the monitoring program. No issues detected on mine water use. Acid mine drainage potential is negligible. Analyses reviewed.</p> <ul style="list-style-type: none"> b. The mine's use of water, and any mining activities that may affect water quantity is evaluated.
<p>4.2.2.3. Where potential significant impacts on water quantity or quality, or current and future water uses have been identified, the operating company shall carry out the following additional analyses to further predict and quantify the potential impacts:</p> <ul style="list-style-type: none"> a. Development of a conceptual site model (CSM) to estimate the potential for mine-related contamination to affect water resources; b. Development of a numeric mine site water balance model to predict impacts that might occur at different surface water flow/groundwater level conditions (e.g., low, average and high flows/levels); c. If relevant, development of other numerical models (e.g., hydrogeochemical/hydrogeological) to further predict or quantify potential mining-related impacts on water resources; and d. Prediction of whether water treatment will be required to mitigate impacts on water quality during operations and mine closure/post-closure. 	<p>Potential impacts on water quality:</p> <ul style="list-style-type: none"> a. Conceptual site model developed b. Latest water balance reviewed (Balanço Hídrico - Out_2021_Rev0). Various scenarios. No issues. c. Hydrogeochemical/ hydrogeological predictive model and predictive tools used. d. No water treatment required during operations and mine closure and post closure according to evaluation mentioned.
<p>4.2.2.4. Use of predictive tools and models shall be consistent with current industry best practices, and shall be continually revised and updated over the life of the mine as operational monitoring and other relevant data are collected.</p>	<p>Hydro models referred to USGS modelling tools using software such as Modflow NWT version 23011.</p> <p>Latest water balance reviewed (Balanço Hídrico - Out_2021_Rev0). No issues.</p>

Chapter 4.2—Water Management	Basis for rating
<p>4.2.3.1. The operating company, in collaboration with relevant stakeholders, shall evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices. Options shall be evaluated in a manner that aligns with the mitigation hierarchy.</p>	<p>Water Management Plan includes the appropriate TARP (Trigger Action Response Plan) to evaluate options to mitigate predicted significant adverse impacts on water quantity and quality, and current and potential future water uses that may be affected by the mine's water management practices.</p> <p>Plano de Convivencia (action plans posted in Dialogo, a community magazine) addresses communication with stakeholders. There is a toll-free number for inquiries and/or comments.</p>
<p>4.2.3.2. If a surface water or groundwater mixing zone is proposed as a mitigation strategy:</p> <ul style="list-style-type: none"> a. A risk assessment shall be carried out to identify, evaluate and document risks to human health, local economies and aquatic life from use of the proposed mixing zone, including, for surface water mixing zones, an evaluation of whether there are specific contaminants in point source discharges, such as certain metals, that could accumulate in sediment and affect aquatic life; and b. If any significant risks are identified, the operating company shall develop mitigation measures to protect human health, aquatic life and local economies including, at minimum: <ul style="list-style-type: none"> i. Surface water or groundwater mixing zones are as small as practicable; ii. Water in a surface water mixing zone is not lethal to aquatic life; iii. A surface water mixing zone does not interfere with the passage of migratory fish; iv. Surface water or groundwater mixing zones do not interfere with a pre-mine use of water for irrigation, livestock or drinking water, unless that use can be adequately provided for by the operating company through another source of similar or better quality and volume, and that this substitution is agreed to by all potentially affected water users; and v. Point source discharges into a surface water mixing zone match the local hydrograph for surface water flows to the extent practicable. 	<p>No mixing, most water is recycled in closed loop, only some make up water added from river (to compensate for evaporation).</p>

Chapter 4.2—Water Management	Basis for rating
<p>4.2.3.3. Waters affected by the mining project shall be maintained at a quality that enables safe use for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2). In particular, the operating company shall demonstrate that contaminants measured at points of compliance are:</p> <ul style="list-style-type: none"> a. Being maintained at baseline or background levels; or b. Being maintained at levels that are protective of the identified uses of those waters (See IRMA Water Quality Criteria by End Use Tables 4.2.a to 4.2.h, which correspond to particular end uses). 	<p>L</p> <p>ITS is the macro plan to address Water Management Plan for Hydrological Resources (Programa de Gestao de Recursos Hidricos Anglo American, 2020).</p> <ul style="list-style-type: none"> a. Waters are being maintained at baseline as per independent lab results. b. Waters maintained within levels safe for environment and human uses and are protective of the identified uses of those waters.
<p>4.2.3.4. Unless agreed by potentially affected stakeholders, water resources affected by mining activities shall be maintained at quantities that enable continued use of those resources for current purposes and for the potential future uses identified in collaboration with relevant stakeholders (see 4.2.1.2).</p>	<p>L</p> <p>Updated document PGRH 2020 addresses all issues related to quantitative monitoring of the Water Management Plan for Hydrological Resources and indicates that volumes are being maintained.</p>

Chapter 4.2—Water Management

Basis for rating

4.2.4.1. **CRITICAL (a through e)** The operating company shall develop and document a program to monitor changes in water quantity and quality. As part of the program the operating company shall:

- a. Establish a sufficient number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of surface waters, natural springs/seeps and groundwater (hereafter referred to as water characteristics);
- b. Sample on a frequent enough basis to account for seasonal fluctuations, storm events and extreme events that may cause changes in water characteristics;
- c. Establish trigger levels and/or other indicators to provide early warning of negative changes in water characteristics;
- d. Sample the quality and record the quantity of mine-affected waters destined for re-use by non-mining entities;
- e. Use credible methods and appropriate equipment to reliably detect changes in water characteristics; and
- f. Use accredited laboratories capable of detecting contaminants at levels below the values in the IRMA Water Quality Criteria by End-Use Tables.

L

The monitoring program covers changes in water quantity and quality; it is communicated to stakeholders, including authorities and the community, and posted on the company's local webpage.

- a. The program has an adequate number of monitoring locations at appropriate sites to provide reliable data on changes to water quantity and the physical, chemical and biological conditions of all relevant bodies of water that could be affected by the company's operations.
- b. Seasonal fluctuations, storm events and extreme events are considered in the Water Management Program.
- c. Regarding inclusion of TARP (trigger action response plan), CPERMAR includes these trigger points in their procedures.
- d. Quality & quantity data recorded for mine-affected waters destined for re-use by non-mining entities;
- e. The analytical instrumentation and methods are appropriate;
- f. Laboratories subcontracted are accredited at levels below the IRMA reference values.



4.2.4.2. Samples shall be analyzed for all parameters that have a reasonable potential to adversely affect identified current and future water uses. Where baseline or background monitoring, source characterization, modeling, and other site-specific information indicate no reasonable potential for a parameter to exceed the baseline/background values or numeric criteria in the IRMA Water Quality Criteria by End-Use Tables (depending on the approach used in 4.2.3.3), those parameters need not be measured on a regular basis.

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Water Management Plan for Hydrological Resources reviewed, 2020 version as indicated. However, water quality standards are referred to Brazilian regulations, not IRMA criteria.

Chapter 4.2—Water Management	Basis for rating
<p>4.2.4.3. The operating company shall actively solicit stakeholders from affected communities to participate in water monitoring and to review and provide feedback on the water monitoring program:</p> <ul style="list-style-type: none"> a. Participation may involve the use of independent experts selected by the community; and b. If requested by community stakeholders, costs related to participation in monitoring and review of the monitoring program shall be covered in full or in part by the company, and a mutually acceptable agreement for covering costs shall be developed. 	<p>The Community Engagement Program provides for monitoring and feedback follow-up. Statute of community engagement committee completed, plus the Dialogo (community disclosure periodical) as the Plano de Convivencia (Plan for Coexistence), which offers the option to present inquiries and opinions regarding the monitoring plans.</p> <p>Monitoring plans and results are submitted to the environmental agency by law and made public. However, there is no evidence of participation of stakeholders in water monitoring.</p> <ul style="list-style-type: none"> a. No evidence of independent experts used. b. The company covered all costs. <p>In the event of community protests or picketing, a survey campaign to interview people is scheduled with the participation of the demonstrators in the event there is a protest.</p>
<p>4.2.4.4. CRITICAL The operating company shall develop and implement an adaptive management plan for water that:</p> <ul style="list-style-type: none"> a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion. 	<p>During the time of the onsite assessment the Adaptive Management Plan was under development. Section 13 Plano de Gestao Adaptativa of the Programa Recursos Hidricos V3 (Water Management Plan) includes planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project are included in the Water Management Plan and includes trigger levels (TARP).</p> <p>Further evidence of the completion of planned monitoring improvements and the effectiveness of related controls is still required.</p>
<p>4.2.4.5. Annually or more frequently if necessary (e.g., due to changes in operational or environmental factors), the operating company shall review and evaluate the effectiveness of adaptive management actions, and, as necessary, revise the plan to improve water management outcomes.</p>	<p>Adaptive Management Plan was under review during the onsite assessment.</p>
<p>4.2.4.6. Community stakeholders shall be provided with the opportunity to review adaptive management plans and participate in revising the plans.</p>	<p>Adaptive Management Plan was under review during onsite assessment; therefore, it could not be confirmed if community stakeholders are provided with the opportunity to review the plan,</p>

Chapter 4.2—Water Management		Basis for rating
4.2.5.1.	<p>The operating company shall publish baseline or background data on water quantity and quality, and the following water data shall be published annually, or at a frequency agreed by stakeholders from affected communities:</p> <ul style="list-style-type: none"> a. Monitoring data for surface water and groundwater points of compliance; and b. Monitoring data for water quantity (i.e., flows and levels of surface waters, springs/seeps and groundwater), and the volume of water discharged and extracted/pumped for mining operations. 	<p>Baseline and background data on water quantity and quality is submitted to the environmental agency, that makes it public.</p> <p>Reporting to regulators is mandatory, that in turn, makes it available to all stakeholders (Plano de Convivencia). Anglo American also opens a Round Table that was deployed, but then suspended due to the pandemic. Committees have been reinstated in October 2021.</p> <ul style="list-style-type: none"> a. Surface & groundwater are included, all in compliance. b. Monitoring data included is comprehensive.
4.2.5.2.	<p>The operating company shall develop and implement effective procedures for rapidly communicating with relevant stakeholders in the event that there are changes in water quantity or quality that pose an imminent threat to human health or safety, or commercial or natural resources.</p>	<p>Emergency plan is integrated and contains events occurring with water bodies. Anglo American has reviewed the reservoir's Emergency Action Plan including specific actions related to changes in water resources.</p>
4.2.5.3.	<p>The operating company shall discuss water management strategies, performance and adaptive management issues with relevant stakeholders on an annual basis or more frequently if requested by stakeholders.</p>	<p>The project has an Engagement Plan with Communities that aims to open participatory dialogue, communication and dissemination of results of socio-environmental monitoring results. Plan accomplished. Adaptive plan not completed or implemented.</p>

Chapter 4.3—Air Quality		Basis for rating
4.3.1.1.	The operating company shall carry out air quality screening to determine if there may be significant air quality impacts associated with its operations.	L Air quality screening and management plan completed.
4.3.1.2.	During screening, or as part of a separate data gathering effort, the operating company shall establish the baseline air quality in the mining project area.	L Baseline air quality in the mining project area established by the company. Sampling/monitoring/modeling carried out to confirm that baseline air quality has been established.
4.3.1.3.	If screening or other credible information indicates that air emissions from mining-related activities may adversely impact human health, quality of life or the environment, the operating company shall undertake an assessment to predict and evaluate the significance of the potential impacts.	L Assessment to predict and evaluate the significance of the potential impacts carried out.
4.3.1.4.	The assessment shall include the use of air quality modeling and monitoring consistent with widely accepted and documented methodologies to estimate the concentrations, transport and dispersion of mining-related air contaminants.	 Quality modeling study executed 2021. The current information is limited to the Area 5 expansion project, not the total area of activities.
4.3.2.1.	CRITICAL If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.	 The facility has determined that there are no significant potential impacts on air quality but have a have an air quality management plan. However, during the audit, we observed an event of visible air emission from the coal plant, which is not considered as significant by the plant. Air quality data did not reflect the visual evidence event observed (air emissions from furnaces & from carbon pulverizing process).
4.3.2.2.	Air quality management strategies and plans shall be implemented and updated, as necessary, over the mine life.	L The air quality and air emissions programs were updated and submitted to the environmental agency for approval in 2019. Mitigation action strategies are included in the plan.
4.3.3.1.	The operating company shall monitor and document ambient air quality and dust associated with the mining project by using personnel trained in air quality monitoring.	L Ambient air quality and dust associated with the mining project are monitored. Personnel included 2 environmental engineers and an environmental technician, with documented competence. The organization declares that the monitoring program is performed by an accredited laboratory and the results annually reported to the state environmental agency.

Chapter 4.3—Air Quality	Basis for rating
<p>4.3.3.2. Ambient air quality and dust monitoring locations shall be situated around the mine site, related operations and transportation routes and the surrounding environment such that they provide a representative sampling of air quality sufficient to demonstrate compliance or non-compliance with the air quality and dust criteria in 4.3.4.3, and detect air quality and dust impacts on affected communities and the environment. Where modeling is required (see 4.3.1.4) air monitoring locations shall be informed by the air quality modeling results.</p>	<p>Air modeling completed. The air dispersion study considered 3 scenarios (years 2019-2023-2025), for PTS, PM2.5, PM10, NOx, SOx, and CO. CO2 not included. The modelling covers area 5, not all areas.</p>
<p>4.3.4.1. New mines and existing mines shall comply with the European Union’s Air Quality Standards (EU Standards) as amended to its latest form (See Table 4.3, below) at the boundaries of the mine site and transportation routes, and/or mitigate exceedances as follows:</p> <ul style="list-style-type: none"> a. If a mine is located in an air shed where baseline air quality conditions meet EU Standards, but emissions from mining-related activities cause an exceedance of one or more parameters, the operating company shall demonstrate that it is making incremental reductions in those emissions, and within five years demonstrate compliance with the EU Standards; or b. If a mine is located in an air shed where baseline air quality is already degraded below EU Standards, the operating company shall demonstrate that emissions from mining-related activities do not exceed EU Standards, and make incremental improvements to the air quality in the air shed that are at least equivalent to the mining project’s emissions. 	<p>Air quality parameters under compliance with Brazilian regulations and complied with IRMA requirements.</p> <ul style="list-style-type: none"> a. Not Applicable b. Mine does not exceed EU standards.

Chapter 4.3—Air Quality		Basis for rating
4.3.4.2.	<p>As an alternative to 4.3.4.1, the operating company may undertake a risk-based approach to protecting air quality as follows:</p> <ul style="list-style-type: none"> a. New and existing mines shall comply with host country air quality standards at a minimum, and where no host country standard exists mines shall demonstrate compliance with a credible international best practice standard; b. Where compliance is met for host country standards but the mine experiences a residual risk related to its air emissions, then more stringent international best practice standards shall apply; c. Where compliance is met for international best practice standards and a mine still experiences a residual risk from its air emissions, then the mine shall set more stringent self-designed limits, and implement additional mitigation measures to meet those limits; and d. For all air-emissions-related risks, the mine shall demonstrate that it is making incremental reductions in emissions, through a multi-year phased plan with defined timelines. 	<p>The air quality parameters for 2019 followed the Brazilian requirements. However, there is no information regarding previous years or trend analysis.</p> <ul style="list-style-type: none"> a. Brazilian regulations met and EU limits as well. b. Compliance is met for Brazil standards and the mine does not experience a residual risk related to its air emissions. c. New monitoring, advanced equipment installed. d. Multi-year scenarios evaluated (see Air dispersion study considering 3 scenarios (years 2019-2023-2025), for PTS, PM2.5, PM10, NOx, SOx, and CO). CO2 not included.
4.3.4.3.	<p>Dust deposition from mining-related activities shall not exceed 350 mg/m²/day, measured as an annual average. An exception to 4.3.4.3 may be made if demonstrating compliance is not reasonably possible through ordinary monitoring methods. In such cases the operating company shall utilize best available practices to minimize dust contamination.</p>	<p>Dust deposition sampling has not been implemented yet.</p>
4.3.5.1.	<p>The operating company shall ensure that its air quality management plan and compliance information is up-to-date and publicly available, or made available to stakeholders upon request.</p>	<p>The organization delivers periodic reports to the environmental agency and are available to the public (otherwise they are not allowed to operate). The agency makes the document public, available to all stakeholders.</p>

Chapter 4.4—Noise and Vibration		Basis for rating
4.4.1.1.	The operating company shall carry out screening to determine if there may be significant impacts on offsite human noise receptors from the mining project's noise and/or vibration. Screening is required at all new mines, and also at existing mines if there is a proposed change to the mine plan that is likely to result in a new source of noise or vibration or an increase in existing noise or vibration levels.	— The nearest human receptor was located about 4 km from the site. Effect radius 800 meters for noise, 300 m for vibration. In compliance 98.4% of the time. No changes proposed for new sources or changes of noise/vibration due to significant distance to noise receptors.
4.4.1.2.	If screening identifies potential human receptors of noise from mining-related activities, then the operating company shall document baseline ambient noise levels at both the nearest and relevant offsite noise receptors.	— The nearest human receptor is 4 km from the mine. Baseline measured in 2008.
4.4.2.1.	If screening or other credible information indicates that there are residential, institutional or educational noise receptors that could be affected by noise from mining-related activities, then the operating company shall demonstrate that mining-related noise does not exceed a maximum one-hour LAeq (dBA) of 55 dBA during the hours of 07:00 to 22:00 (i.e., day) and 45 dBA at other times (i.e., night) at the nearest offsite noise receptor. These hours may be adjusted if the operating company can justify that alternative hours are necessary and/or appropriate because of local, cultural or social norms.	— Noise & vibration monitoring show levels referred to Brazilian regulations, more stringent than IRMA's. Consistent compliance in 2021. Regarding hours of blasting, about 40% exceeded time limits, however the effect radius is 800 m for noise & 300 m for vibration, while the nearest receptor is 4 km away.
4.4.2.2.	The following exceptions to 4.4.2.1 apply: a. If baseline ambient noise levels exceed 55 dBA (day) and/or 45 dBA (night), then noise levels shall not exceed 3 dB above baseline as measured at relevant offsite noise receptors; and/or b. During periods of blasting, the dBA levels may be exceeded, as long as the other requirements in 4.4.2.4 are met.	— Baseline ambient noise: a. Brazilian standards are more restrictive, and the mine complies. Nonetheless, the nearest receptor is 4 km away, thus Not Applicable. b. Not Applicable
4.4.2.3.	If screening or other credible information indicates that there are only industrial or commercial receptors that may be affected by noise from mining-related activities, then noise measured at the mine boundary or nearest industrial or commercial receptor shall not exceed 70 dBA.	— From monitoring data, 70 dBA noise has not been exceeding at or beyond boundaries. The nearest receptor is 4 km away, thus not relevant.

Chapter 4.4—Noise and Vibration		Basis for rating
4.4.2.4.	<p>If screening or other credible information indicates that noise or vibration from blasting activities may impact human noise receptors, then blasting operations at mines shall be undertaken as follows:</p> <ol style="list-style-type: none"> A maximum level for air blast overpressure of 115 dB (Lin Peak) shall be exceeded on no more than 5 % of blasts over a 12-month period; Blasting shall only occur during the hours of 09:00 to 17:00, on traditionally normal working days; and Ground vibration (peak particle velocity) shall neither exceed 5 mm/second on 9 out of 10 consecutive blasts, nor exceed 10 mm/second at any time. 	<p>Noise/vibration from blasting:</p> <ol style="list-style-type: none"> Not Applicable (see above) Although hours of blasting were about 40% out of range in 2021, receptors are too far away (4 km), thus it is Not Applicable. Nonetheless, the mine has adjusted hours for better compliance. Not Applicable
4.4.2.5.	<p>Mines may undertake blasting outside of the time restraints in 4.4.2.4.b when the operating company can demonstrate one or more of the following:</p> <ol style="list-style-type: none"> There are no nearby human noise receptors that will be impacted by blasting noise or vibration; Alternative hours are necessary and/or appropriate because of local, cultural or social norms; and/or Potentially affected human receptors have given voluntary approval for the expanded blasting hours. 	<p>Blasting hours:</p> <ol style="list-style-type: none"> Nearest receptor: 4 km Not Applicable Not Applicable
4.4.2.6.	<p>If a credible, supported complaint is made to the operating company that noise or vibration is adversely impacting human noise receptors, then the operating company shall consult with affected stakeholders to develop mitigation strategies or other proposed actions to resolve the complaint. Where complaints are not resolved then other options, including noise monitoring and the implementation of additional mitigation measures, shall be considered.</p>	<p>Although the nearest noise receptor is 4 km away, Anglo American Barro Alto has consulted with possible stakeholders where only two have expressed minor effects from noise. Blasting hours were adjusted.</p>
4.4.2.7.	<p>All noise- and vibration-related complaints and their outcomes shall be documented.</p>	<p>All noise- and vibration-related complaints and their outcomes are documented.</p>

Chapter 4.4—Noise and Vibration	Basis for rating
<p>4.4.3.1. When stakeholders make a noise-related complaint, the operating company shall provide relevant noise data and information to them. Otherwise, noise data and information shall be made available to stakeholders upon request.</p>	<p style="text-align: center;">L</p> <p>Two noise complaints (none for vibration) recorded were addressed with an action plan and followed up in agreement with the community (Plano de Convivencia). Blasting times adjusted.</p>



Chapter 4.5—Greenhouse Gas Emissions

Basis for rating

- 4.5.1.1. **CRITICAL** The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:
- Identifying and measuring greenhouse gas emissions from the mining project;
 - Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project;
 - Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and
 - Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions.

- The organization has implemented a program to measure and report greenhouse gas emissions since 2011. There is a corporate commitment and goal to achieve neutral mines in 2040 and 30% reduction in greenhouse gas emissions and 30% improving energy efficiency in 2030, based on 2016 baseline. Corporate milestone included 20% reduction in greenhouse gas and an 8% reduction in energy consumption by 2020.
- The site has a program to measure and report greenhouse gas emissions. The current goal is 30% to 2030 for all (Energy, CO2 and Greenhouse Gases), where 2016 baseline is 1,043,677.9 mt.
 - Monthly monitoring per business unit; Policy and plan not signed locally because Anglo American Barro Alto must accept it as a corporate mandate.
 - New commitment (in Portuguese) 2018; 2021 reviewed; same 30% reduction for all parameters (starting from 2016 baseline of 1,043,677.9 mt).
 - CO2 same, energy same. A third-party audit was performed and published. Calculations made through consumption (electricity all hydros; fuels all local, so factors are consistent).
 - Started with "Enablon" - program used for Scope I & now all being transferred to Isometrix. Data transfer to be completed at the end of 2021.
 - Use ANP Factors (local), as established by Ministry of Energy.
 - Will use PV (scope2) & Eolic starting Jan 2022.
 - GLP to be substituted for H2 Scope 1). Under test, to commence end of 2022. Some energy efficiency applied, but no energy audit to prioritize.
 - Targets set by the Corporation; the site cannot alter unless totally justified.
 - Policy reviewed by Corporate every 5 years or sooner if needed; endorsed by the site.
 - In September 2019 Barro Alto as part of Brazil Nickel operations defined a 5Y Sustainable plan. This plan includes greenhouse emissions reduction and energy efficiency improvement (part 3.9 Energy and Climate Change). Several projects with impact in energy efficiency and emissions reduction have been identified. However, it is not clear the expected impact on these aspects (Energy and Greenhouse Gases) to reach the corporate goal of 30% greenhouse gas reduction and energy efficiency in 2030 or if there are other specific targets for Barro Alto.
 - Metrics and Milestones to measure achievement have not been defined yet.

Chapter 4.5—Greenhouse Gas Emissions		Basis for rating
4.5.2.1.	The operating company shall comply with emissions quantification methods described in a widely accepted reporting standard, such as the Greenhouse Gas Protocol Corporate Standard or the Global Reporting Initiative's GRI 305 emissions reporting standard.	L The company complies with the quantification methods, plus corporate owner's greenhouse gas policy and programs are publicly available through corporate website and reports, metrics and audits are posted. Policy and greenhouse gas information are available in local language and with specific information regarding Barro Alto achievement.
4.5.3.1.	The greenhouse gas policy shall be underpinned by a plan that details the actions that will be taken to achieve the targets set out in the policy.	L The following documents constitute and support the air emissions plan of the company: <ul style="list-style-type: none"> • R24490 - ANG001 - Energy and Greenhouse Gas Deep-dive Methodology Overview • R26100 - ANG001 - BA Opp Review Info Reqmts • R26103 - ANG001 – Barro Alto Energy & greenhouse gas review & scope
4.5.3.2.	The operating company shall demonstrate progress toward its greenhouse gas reduction targets.	L Within the Healthy Environment pillar of the Anglo American Sustainable Mining Plan, it has a goal of reducing GHG (greenhouse gas) emissions by 30% by 2030, with 2016 as the baseline, and operating neutral mines by 2040. Evidence: "Get to know our Sustainable Mining Plan – ENG". In an effort to fulfill the defined public commitments, the Barro Alto unit has operated with renewable electricity since January 2022. Since then, this initiative has made Scope 2 equal to zero. Furthermore, it is worth mentioning that this initiative prevented almost 60 ktCO ₂ eq from being emitted from electricity during 2022. As alternatives to reduce Scope 1 emissions, the use of eucalyptus biomass as a self-reducing agent in the calcination process is evaluated. This alternative, which is still in the research and development phase, has great potential to reduce emissions from the metallurgical coal that is currently used. Finally, as published in the Climate Change Report (attached), the efforts of Barro Alto and other websites contributed to the Anglo American Group reducing its scope 1 and 2 emissions by 21%, compared to 2019. Evidence: climate-change-report-2022 (1), page 5, 9, 24). Evidence pasta: "energia renovável".
4.5.3.3.	The operating company shall demonstrate that it has investigated greenhouse gas reduction strategies, and shall document the results of its investigations.	⊕ The 2019 initiatives and projects evaluation/investigation to reduce greenhouse gas emissions, including cost benefit analyses and feasibility studies, are under development, not completed yet (dated July 2021). Due to the COVID-19 constrains delays in this plan are expected. The document mentions that a work session was planned for September 2019 by the Climate Change Group's discipline led to set up the individual targets for energy and emissions.

Chapter 4.5—Greenhouse Gas Emissions		Basis for rating
4.5.4.1.	The greenhouse gas policy shall be publicly available.	 <p>Corporate owner's greenhouse gas policy and programs are publicly available through corporate website and reports, metrics and audits are posted. Policy and greenhouse gas information are available in the local language and with specific information regarding Barro Alto achievements "https://brasil.angloamerican.com/pt-pt/sustentabilidade/meio-ambiente" However specific information for Barro Alto, its policy, metrics, projects, or achievements, is not publicly available in the local language. No evidence that this has been part of communication with communities or other stakeholders besides environmental agency reporting requirements.</p>
4.5.4.2.	On an annual basis, the operating company or its corporate owner shall: <ul style="list-style-type: none"> a. Disclosure to IRMA auditors an accounting of its greenhouse gas emissions from the mining project; achievement of and/or progress towards mine-site-level greenhouse gas reduction targets; and efforts taken to reduce emissions from the mining project and mining-related activities; and b. Publicly report on mine-site-level or corporate-level greenhouse gas emissions, progress towards greenhouse gas reduction targets and efforts taken to reduce emissions. 	 <p>Reporting: Barro Alto reports annually its greenhouse gas emissions at corporate level and discloses its emissions inventory through the Brazilian public greenhouse gas emissions register.</p> <ul style="list-style-type: none"> a. Greenhouse gas disclosed. b. Several projects are underway to reduce greenhouse gas emissions, however no substitute for the use of coal as fuel for the kiln has been found. Reportedly, wood was tried but did not produce desirable results.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

4.6.1.1.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, implementation of mitigation measures, and monitoring shall be carried out and documented by competent professionals using appropriate methodologies.	L	All the biodiversity studies, and ecological services, assessment, planning and monitoring are carried out and documented by competent professionals. Regarding mitigation and monitoring measures, the provisions are included in the Environmental Control Programs - PCA. Hiring processes for activities related to the management of fauna and flora are in progress. A management plan for protected areas and a master plan for the recovery of degraded areas are also being prepared, with proposals for maintaining biodiversity, creating ecological corridors and environmental conservation. The elaboration and execution of these activities is being carried out by competent professionals from different associated areas, in addition to the direct involvement with the Federal University (UFG) and other research institutions (Embrapa Cerrados), aiming at technical cooperation in the associated themes. CVs, Contract between Anglo & Agroflor LTDA for environmental and social studies. Bio excerpt of diversity monitoring program, agreement between Anglo American and Universidade Federal de Goiás and with Embrapa.
4.6.1.2.	Biodiversity, ecosystem services and protected areas screening, assessment, management planning, and the development of mitigation and monitoring plans shall include consultations with stakeholders, including, where relevant, affected communities and external experts.		For the progress of activities, as well as the environmental licensing process, specific technical studies were carried out, including the assessment of environmental impacts, proposals for mitigating measures, diagnoses of the physical, biotic, and socioeconomic environments. Consultation with stakeholders has been made in compliance with the Brazilian regulations. Evidence of these meetings is available. However, the consultation process is limited, and many times included among other topics such as Environmental Education Program, which in essence does not constitute a consultation. Meetings have been more informative in nature than consultative.
4.6.1.3.	Biodiversity, ecosystem services and protected areas impact assessments, management plans and monitoring data shall be publicly available, or made available to stakeholders upon request.		Access to "https://www.meioambiente.go.gov.br website was provided, and information is publicly available (e.g., links to website, locations of public facilities where copies are available). However, from interviews with different stakeholders they were not aware that this information is available and how to access it. Even though some documents are available in Anglo-American web site this information is not well organized and not easy to find.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas	Basis for rating
<p>4.6.2.1. CRITICAL New and existing mines shall carry out screening or an equivalent process to establish a preliminary understanding of the impacts on or risks to biodiversity, ecosystem services and protected areas from past and proposed mining-related activities.</p>	<p>L</p> <p>The mine environmental impact assessment and amendments included a preliminary screening of potential impacts on biodiversity, and ecosystem services from past and proposed mining-related activities. These studies have been conducted by competent professionals and following the consultation process according to Brazilian regulations.</p> <p>However, limited evidence of records of stakeholder participation in consultations related to this screening is available.</p> <p>Even though a public consultation was performed as part of the environmental impact study as required by Brazilian law and other meetings with the community have been held to understand needs and expectations, the process is very general and no specific outcomes from these meetings related to risks to biodiversity, ecosystems services from past or proposed mining-related activities were identified.</p>
<p>4.6.2.2. Screening shall include identification and documentation of:</p> <ul style="list-style-type: none"> a. Boundaries of legally protected areas in the mine's actual or proposed area of influence, and the conservation values being protected in those areas; b. Boundaries of Key Biodiversity Areas (KBA) in the mine's actual or proposed area of influence, the important biodiversity values within those areas and the ecological processes and habitats supporting those values; c. Areas of modified habitat, natural habitat and critical habitat within the mine's proposed or actual area of influence, and the important biodiversity values (e.g., threatened and endangered species) present in the critical habitat areas; and d. Natural ecosystems or processes within the mine's proposed or actual area of influence that may or do provide provisioning, regulating, cultural and supporting ecosystem services. 	<p>M</p> <p>Preliminary screening of the potential impacts on Biodiversity and ecosystem services has been conducted, particularly as part of the environmental impact assessments (initial and expansions). However, not all IRMA requirements have been considered or are under an early stage of development.</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

- 4.6.3.1. When screening identifies protected areas or areas of potentially important global, national or local biodiversity or ecosystem services that have been or may be affected by mining-related activities (e.g., KBAs, critical habitat, threatened or endangered species), the operating company shall carry out an impact assessment that includes:
- Establishment of baseline conditions of biodiversity, ecosystem services and, if relevant, conservation values (i.e., in protected areas) within the mine's proposed or actual area of influence;
 - Identification of potentially significant direct, indirect and cumulative impacts of past and proposed mining-related activities on biodiversity, ecosystem services and, if relevant, on the conservation values of protected areas throughout the mine's lifecycle;
 - Evaluation of options to avoid potentially significant adverse impacts on biodiversity, ecosystem services and conservation values of protected areas, prioritizing avoidance of impacts on important biodiversity values and priority ecosystem services; evaluation of options to minimize potential impacts; evaluation of options to provide restoration for potential and actual impacts; and evaluation of options to offset significant residual impacts (see 4.6.4.1 and 4.6.4.2); and
 - Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services.

Information indicated that progress of mining activities, specific laws and requirements from the competent environmental agencies are being followed. The environmental impact assessment (EIA) includes aspects of the physical, biotic and socioeconomic means, environmental diagnoses and the proposal of mitigating and compensatory measures. In addition, environmental control programs, projects to recover degraded areas and environmental compensation projects are planned. The environmental control programs were recently updated, as well as internal procedures related to other related activities. In addition, the project follows the provisions of the sustainable mining plan, with continuous assessments of environmental improvement processes. need to confirm completed scope and results of Screening process. Identification and evaluation of opportunities for partnerships and additional conservation actions that could enhance the long-term sustainable management of protected areas and/or biodiversity and ecosystem services is in development.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

- 4.6.4.1. **CRITICAL** Mitigation measures for new mines shall:
- a. Follow the mitigation hierarchy of:
 - i. Prioritizing the avoidance of impacts on important biodiversity values and priority ecosystem services and the ecological processes and habitats necessary to support them;
 - ii. Where impacts are not avoidable, minimizing impacts to the extent possible;
 - iii. Restoring biodiversity, ecosystem services and the ecological processes and habitats that support them; and
 - iv. As a last resort, offsetting the residual impacts.
 - b. Prioritize avoidance of impacts on important biodiversity values and priority ecosystem services early in the project development process;
 - c. Be designed and implemented to deliver at least no net loss, and preferably a net gain in important biodiversity values, and the ecological processes that support those values, on an appropriate geographic scale and in a manner that will be self-sustaining after mine closure.

L

Several studies have been conducted, including the initial environmental impact study assessments, and continuous monitoring and evaluation of actual impacts.

A hierarchical mitigation approach has been applied based on the assessment of potential and actual environmental impacts, as well as mitigating measures. For the expansion of mining activities, specific legislation and requirements of the competent environmental agencies are followed. The environmental impact assessment (EIA) includes aspects of the physical, biotic and socioeconomic environment, environmental diagnoses and the proposition of compensatory measures. In addition, environmental control programs, projects for the recovery of degraded areas and environmental compensation projects are foreseen. Additional conservation actions are implemented if necessary, according to the monitoring program and follow up studies to enhance biodiversity and ecosystem services.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

4.6.4.2.	<p>At existing mines:</p> <ul style="list-style-type: none"> a. Where past adverse impacts on important biodiversity values and priority ecosystem services have been identified, the operating company shall design and implement onsite restoration strategies, and also, through consultation with stakeholders, design and implement additional conservation actions to support the enhancement of important biodiversity values and/or priority ecosystem services on an appropriate geographic scale; and b. If there is the potential for new impacts on important biodiversity values or priority ecosystem services (e.g., as a result of mine expansions, etc.), the operating company shall follow the mitigation hierarchy, prioritizing the avoidance of impacts on important biodiversity values or priority ecosystem services, but where residual impacts remain, shall apply offsets commensurate to the scale of the additional (new) impacts. 	<p>Evidence presented about licensed activity and operation of an existing mine, appears to be completed, i.e., technical environmental studies related to the licensing process and assessment of impacts, mitigating and compensatory measures. Comprehensive review and update of the biodiversity programs with the support of 3rd parties specialized in the topics including University is under implementation to identify important biodiversity values. Management plans include restoration activities related to past impacts, and additional conservation actions aimed at enhancing the values.</p> <p>Even though a public consultation was performed as part of the environmental impact study as required by Brazilian law and other meetings with the community have been held to understand needs and expectations, the process is very general and no specific outcomes from these meetings related to risks to biodiversity, ecosystems services from past or proposed mining-related activities were identified.</p>
4.6.4.3.	<p>Offsetting, if required, shall be done in a manner that aligns with international best practice.</p>	<p>According to information provided, plans for how offsets projects will be carried out and managed has been submitted to the competent environmental agency, awaiting analysis, environmental compensation project for interventions in areas of native vegetation and areas of permanent preservation (APP).</p>

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

Basis for rating

4.6.4.4. The operating company shall develop and implement a biodiversity management plan or equivalent that:

- a. Outlines specific objectives (e.g., no net loss/net gain, no additional loss) with measurable conservation outcomes, timelines, locations and activities that will be implemented to avoid, minimize, restore, enhance and, if necessary, offset adverse impacts on biodiversity and ecosystem services;
- b. Identifies key indicators, and ensures that there is an adequate baseline for the indicators to enable measurement of the effectiveness of mitigation activities over time;
- c. Provides a budget and financing plan to ensure that funding is available for effective mitigation.



The operating company has developed and implemented a biodiversity management plan, including objectives, locations, activities to be implemented, but not all the IRMA requirements have been considered. For example: a) the biodiversity plan, objectives and indicators are focused on terrestrial ecosystems (Percentage of area recovered versus percentage of degraded area; and extension (ha) of planting / revegetation area, and Surface remodeling); b) the management plan is focus on restoration of ecological processes and the sustainability of ecosystems, but no mention of "net gain" possibilities; c) Limited participation of the stakeholders in the plan.

4.6.4.5. Biodiversity management shall include a process for updating or adapting the management plan if new information relating to biodiversity or ecosystem services becomes available during the mine lifecycle.



The operating company has in place a process for updating or adapting the different environmental programs, including compensation, monitoring, and recovery programs (Programa de compensação ambiental, Programa de recuperação de áreas degradadas and monitoring plan). However, not all the elements required by IRMA in Biodiversity management plan have been covered in these programs. A management plan for protected areas and the master plan for the recovery of degraded areas is currently under preparation.





4.6.5.1. An operating company shall not carry out new exploration or develop new mines in any legally protected area unless the applicable criteria in the remainder of this chapter are met, and additionally the company:

- a. Demonstrates that the proposed development in such areas is legally permitted;
- b. Consults with protected area sponsors, managers and relevant stakeholders on the proposed project;
- c. Conducts mining-related activities in a manner consistent with protected
- d. Implements additional conservation actions or programs to promote and enhance the conservation aims and/or effective management of the area.



The information provided indicates that the operation company is not mining in protected areas.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas		Basis for rating
4.6.5.2.	<p>An operating company shall not carry out new mining-related activities in the following protected areas unless they meet 4.6.5.1.a through d, and an assessment, carried out or peer-reviewed by a reputable conservation organization and/or academic institution, demonstrates that mining-related activities will not damage the integrity of the special values for which the area was designated or recognized.</p> <ul style="list-style-type: none"> • International Union for Conservation of Nature (IUCN) protected area management category IV protected areas; • Ramsar sites that are not IUCN protected area management categories I-III; and • Buffer zones of UNESCO biosphere reserves. 	— The information provided indicates that the operation company is not mining in protected areas.
4.6.5.3.	<p>CRITICAL IRMA will not certify new mines that are developed in or that adversely affect the following protected areas:</p> <ul style="list-style-type: none"> • World Heritage Sites, and areas on a State Party's official Tentative List for World Heritage Site Inscription; • IUCN protected area management categories I-III; • Core areas of UNESCO biosphere reserves. 	— The information provided indicates that the operation company is not mining in protected areas.
4.6.5.4.	<p>CRITICAL An existing mine located entirely or partially in a protected area listed in 4.6.5.3 shall demonstrate that:</p> <ol style="list-style-type: none"> a. The mine was developed prior to the area's official designation; b. Management plans have been developed and are being implemented to ensure that activities during the remaining mine lifecycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized; and c. The operating company collaborates with relevant management authorities to integrate the mine's management strategies into the protected area's management plan. 	— The information provided indicates that the operation company is not mining in protected areas.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas		Basis for rating
4.6.6.1.	The operating company shall develop and implement a program to monitor the implementation of its protected areas and/or biodiversity and ecosystem services management plan(s) throughout the mine lifecycle.	 According to the information provided, the protected areas management plan is being prepared. Organization has a partnership with the Federal University of Goiás (UFG), for monitoring wildlife. Additionally, environmental compensation projects are being analyzed with the competent Environmental Agency.
4.6.6.2.	Monitoring of key biodiversity or other indicators shall occur with sufficient detail and frequency to enable evaluation of the effectiveness of mitigation strategies and progress toward the objectives of at least no net loss or net gain in biodiversity and ecosystem services over time.	 The current monitoring plan and indicators occur in compliance with the agencies agreements and as proposed in the EIAs (environmental impact assessments). However, new indicators and frequency in the biodiversity monitoring program has been proposed and are under evaluation. According to the information provided, the protected areas management plan is being prepared. Organization has a partnership with the Federal University of Goiás (UFG), for monitoring wildlife. Additionally, environmental compensation projects are being analyzed with the competent Environmental Agency.
4.6.6.3.	If monitoring reveals that the operating company's protected areas and/or biodiversity and ecosystem services objectives are not being achieved as expected, the operating company shall define and implement timely and effective corrective action in consultation with relevant stakeholders.	 Impact assessments and proposals for mitigating measures are conducted during the environmental licensing process. The actions proposed in the environmental control programs are followed up and periodically reported to the competent environmental agency. In case of deviations from expectations corrective actions are proposed and implemented. However, there is limited evidence that relevant stakeholders are consulted in the development of these corrective actions.
4.6.6.4.	The findings of monitoring programs shall be subject to independent review.	 The organization manages and follows up implemented environmental programs. 3rd party companies specialized in the topics conduct periodic reviews and reports in relation to the monitoring programs. However, there are opportunities to improve the "independent" review to prevent potential conflicts of interest. In some cases, the same company in charge of the monitoring program is the company that performs the verification.

Chapter 4.7—Cyanide Management		Basis for rating
Chapter Not Relevant	—	Cyanide is not used in any of the mine's ore processing activities.

Chapter 4.8—Mercury Management		Basis for rating
Chapter Not Relevant	—	The mine does not use thermal processes to treat any material containing mercury.

Appendix B – Corrective Action Plan

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
1.2	Community and Stakeholder Engagement	1.2.2.	Engagement Processes	1.2.2.2.	The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by: a. Providing relevant information to stakeholders in a timely manner; b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders; c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation; d. Soliciting feedback from stakeholders on issues relevant to them; and e. Providing stakeholders with feedback on how the company has taken their input into account.	Substantially Meets	Identify the gap to meet the requirement.
2.5	Emergency Preparedness and Response	2.5.1.	Emergency Response Plan	2.5.1.1.	All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.	Substantially Meets	Include the emergency response plan on the agenda of meetings with the Coexistence Committee. Insert a fixed agenda to involve stakeholders in risk assessment, in addition to applying "Reaction Assessment" to receive feedback from interested parties.

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
2.5	Emergency Preparedness and Response	2.5.2.	Community and Worker Consultation	2.5.2.1.	The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.	Substantially Meets	Go through scheduled exercises (affected by the impacts of the pandemic), maintaining community involvement.
3.1	Fair Labor and Terms of Work Requirements	3.1.3.	Non-Discrimination and Equal Opportunity	3.1.3.3.	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.	Substantially Meets	Strengthen the "your voice" reporting channel to combat sexist actions. Promote the Womine group, active in the process of raising awareness about gender inequalities. Maintain the Women's Development Program (PDM). Implement breastfeeding rooms and more women's bathrooms in operational areas.

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
3.2	Occupational Health and Safety	3.2.4.	Measures to Protect Workers	3.2.4.1.	<p>The operating company shall implement measures to protect the safety and health of workers including:</p> <ul style="list-style-type: none"> a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures; b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means; c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities; d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned; e. Providing adequate supervision and control on each shift; and f. If relevant, establishing a system to identify and track at any time the probable 	Substantially Meets	<p>Increase training so that variability does not occur. Ensure that VCs (behavior checks) are carried out so that colleagues are also alert to everyone's behavior. Demonstrate the adherence dashboard, with leadership present on the field.</p>

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
					locations of all persons who are underground.		
3.3	Community Health and Safety	3.3.1.	Health and Safety Risk and Impact Scoping	3.3.1.1.	The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered: a. General mining operations; b. Operation of mine-related equipment or vehicles on public roads; c. Operational accidents; d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1); e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);	Substantially Meets	Document all potential impacts in the risk assessment, including the context of epidemics and pandemics.

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
					<p>f. Mining-related effects on community demographics, including in-migration of mine workers and others;</p> <p>g. Mining-related impacts on availability of services;</p> <p>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</p> <p>i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.</p>		
4.1	Waste and Materials Management	4.1.5.	Mitigation of Risks and Management of Mine Waste Management Facilities	4.1.5.6.	<p>On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <p>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);</p> <p>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);</p> <p>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and</p> <p>d. Inform the management</p>	Substantially Meets	Present the ground control plan - GCP (ground control plan), where monthly reports are made on the physical conditions and risks associated with all structures.

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
					review to facilitate continual improvement (see 4.1.5.8).		
4.2	Water Management	4.2.4.	Monitoring and Adaptive Management	4.2.4.4.	The operating company shall develop and implement an adaptive management plan for water that: a. Outlines planned actions to mitigate predicted impacts on current and future uses of water and natural resources from changes in surface water and groundwater quality and quantity related to the mining project; and b. Specifies adaptive management actions that will occur if certain outcomes (e.g., specific impacts), indicators, thresholds or trigger levels are reached, and timelines for their completion.	Substantially Meets	Review the Water Resources Management Program, presenting a chapter for the adaptive management plan.
4.3	Air Quality	4.3.2.	Air Quality Management Plan	4.3.2.1.	If significant potential impacts on air quality are identified, the operating company shall develop, maintain and implement an air quality management plan that documents measures to avoid, and where that is not possible, minimize adverse impacts on air quality.	Substantially Meets	Present the Atmospheric Emissions Program that shows the monitoring of the chimneys and the results are in compliance. At the same time, we are implementing an online chimney monitoring system expected to be implemented in Dec/24.

Chapter Number	Topic	Criteria Number	Criteria Name	Requirement Number	Requirement Text	Rating	Next Steps
4.5	Greenhouse Gas Emissions	4.5.1.	Greenhouse Gas Policy	4.5.1.1.	<p>The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:</p> <ul style="list-style-type: none"> a. Identifying and measuring greenhouse gas emissions from the mining project; b. Identifying energy efficiency and greenhouse gas reduction opportunities across the mining project; c. Setting meaningful and achievable targets for reductions in absolute greenhouse gas emissions at the mine site level or on a corporate-wide basis; and d. Reviewing the policy at least every five years and revising as needed, such as if there are significant changes to mining-related activities, new technologies become available, or there are newly identified opportunities for reductions. 	Substantially Meets	Define an action plan for climate change within the Sustainable Mining Plan and agree with the Anglo American Group. Furthermore, calculate how much the Barro Alto unit will directly contribute to this objective.

Endnotes

¹ <https://tools.responsiblemining.net/self-assess/>

² All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version (IRMA Certification Body Requirements, v.1.0) is available at: https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

³ See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

⁴ See IRMA Certification Body Requirements, v.1.0, p 32. https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf

⁵ IRMA website: “Complaints and Feedback.” <https://responsiblemining.net/what-you-can-do/complaints-and-feedback/>

⁶ IRMA Issues Resolution System Procedure. Version 1.0. January 2020. https://responsiblemining.net/wp-content/uploads/2020/03/IRMA-Issues-Resolution-System_2020.pdf