Initiative for Responsible Mining Assurance

IRMA SURVEILLANCE ASSESSMENT PUBLIC SUMMARY REPORT

MINE

Minas-Rios

OPERATING COMPANY

Anglo American Brazil

COUNTRY OF OPERATION

Brazil

20 JANUARY 2026

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 Minas-Rio and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

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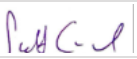
Audit Details

Name of Mine:	Minas-Rio
Operating Company:	Anglo American Brazil
Mine Owner:	Anglo American Brazil
Country of Operation:	Brazil
Mined Material(s):	Iron Ore
# Employees / contractors:	2,050 employees and 12,941 contractors at the time of audit
IRMA audit webpage:	https://responsiblemining.net/minas-rio
Audit Type:	Surveillance Audit
Audit Dates:	Stage 1 audit: 10-17 June 2025 Stage 2 audit: 07-10 July 2025
Audit Firm:	SCS Global Services
Audit Team:	Lead Auditor (1), Social Auditor (2), Health and Safety Auditor (1), Environmental Auditors (2), Support team members (2)
Audit Firm Declaration:	✓ 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) considered within the scope of the Surveillance audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. ✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.
Scope of Audit:	The scope includes iron ore extraction and production, waste storage, and associated maintenance and ancillary services at Anglo American's Minas-Rio Mine, Brazil
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
IRMA Achievement Level:	IRMA 75
Achievement Decision Date:	07 February 2024
Achievement Valid Until:	06 February 2027 (contingent continuous compliance with the IRMA independent audit processes)
Authorized Representative:	Scott Coye-Huhn, Vice-President, EBC Division
Representative Signature:	
IRMA Reference Number:	IRMA-STD-SCS-002-V-00002

1. Mine Site Overview

1.1. Overview of Location

Anglo American's (Anglo) Minas-Rio iron ore mining operation in Minas Gerais is located northeast of the city of Belo Horizonte, within the municipalities of Conceição do Mato Dentro and Alvorada de Minas, in the state of Minas Gerais, Brazil (Figure 1).

Figure 1: Illustrative, global location of the site

Minas Gerais means "General Mines", a name given due to the region's extensive mining history dating back to the colonial period. Rock wall paintings and archaeological remains found in caves at the Ferrugem Ridge Natural Monument (Monumento Natural Serra da Ferrugem) (Figure 2) indicate that this area has been inhabited since around 5,000 BC.

Gold finds in the late 1700s first attracted settlers to the region, primarily Portuguese colonists and enslaved Africans. The historical significance of mining in the colonial period is reflected in local demographics and in the names of historic mining towns such as Alvorada de Minas (Dawn of Mines) and Diamantina. As its name suggests, Diamantina was a center of diamond mining and is preserved today as a UNESCO World Heritage Site for its unique Brazilian Baroque architecture. Mining remains a significant mainstay of the local economy. Minas-Rio is one of several mines in Minas Gerais contributing to Brazil's position as a global leader in iron ore production.

The Minas-Rio operation is located in the Espinhaço mountain range, an area commonly referred to as the "Brazilian Highlands", with elevations ranging from 1,100 to 1,700 meters above sea level. The Espinhaço Range is part of the transitional zone between the Atlantic Forest biome and the Cerrado Grassland biome, both globally recognized as biodiversity conservation priorities. In addition to mining and mineral processing, the rural highlands provide a source of clean water, food provisioning (subsistence and small-scale agriculture and grazing), timber (domestic fuelwood and charcoal), recreation, and biodiversity and

ecosystem services conservation. Important conservation areas with high biodiversity include the Ferrugem Ridge Natural Monument, established in 2007 by the Minas Rio Mine as part of the licensing process for the Sapo Mine expansion project, and the Salão de Pedras Municipal Park. These conservation areas are classified as protecting ecological significance, including a diversity of wildlife species, such as birds, reptiles, amphibians, insects, fish, and mammals, many of which are endemic to the region (Figure 2).

The region has a mild climate, with the warmest months from January to March (average 25°C/77°F), the coldest months from June to August (average 20°C/68°F). The rainy season

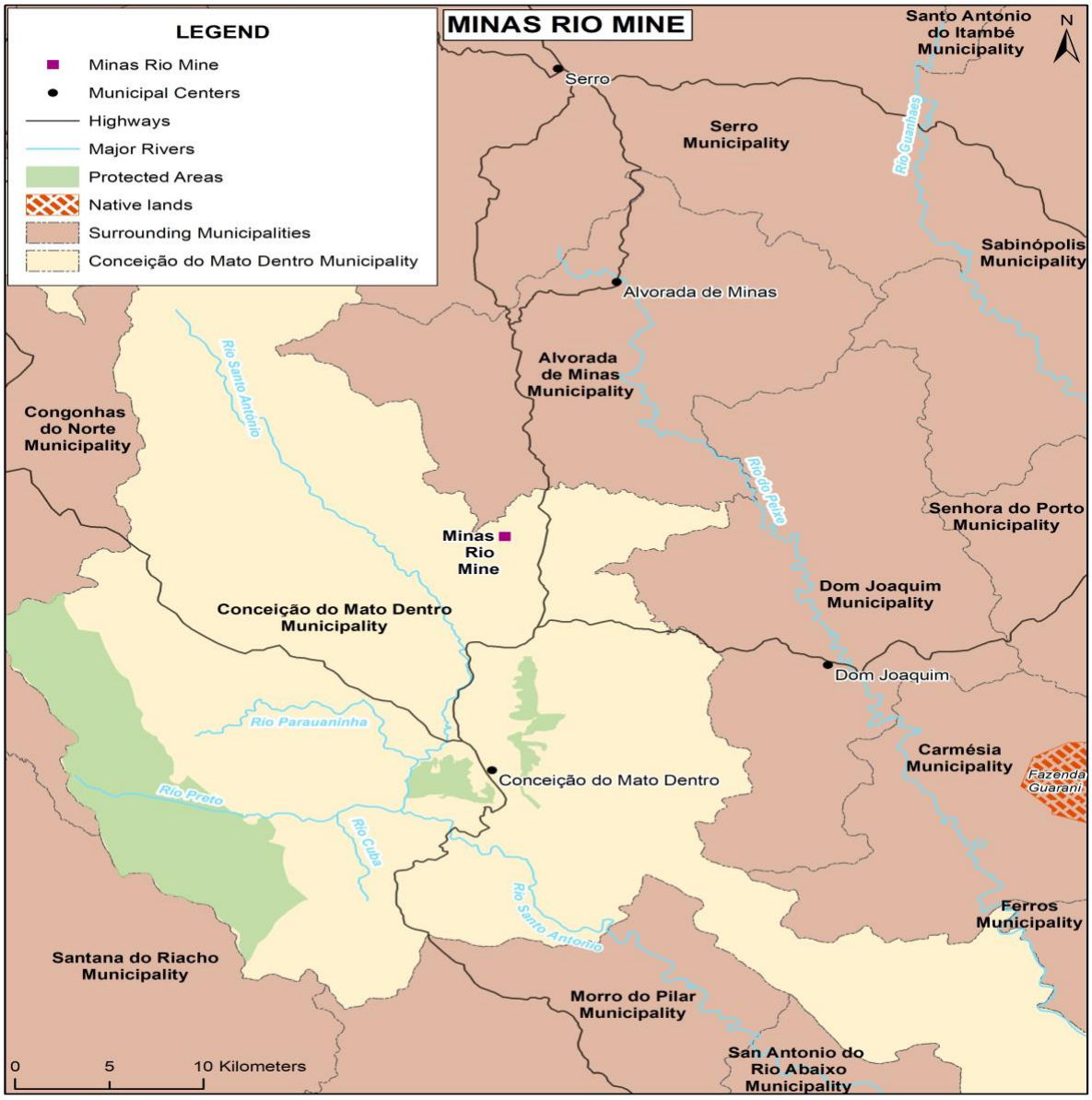


Figure 2: Illustrative, regional map of the site

runs from October to March, peaking in December (average 250 mm of rainfall), while the dry season extends from April to September, with the driest month being July (average 13 mm).

The Minas-Rio mine concession covers an area around MG-010 road within the Santo Antônio River watershed. Surface water and groundwater in the vicinity of the mine flow from upland areas to lowland areas, either to the west (towards the Santo Antônio River), or east and northeast towards the Peixe River, a tributary of the Santo Antônio River (Figure 2).

The Santo Antônio River watershed, widely known for its waterfalls, including Tabuleiro Falls, a popular tourist destination, is the main source of public water supply for the city of Conceição do Mato Dentro. This city (population 24,254) lies south of the mine concession, while Serro (population 22,550) lies to the north, and they are both the primary urban centers in the area. Smaller urban centers include Dom Joaquim and Alvorada de Minas, with populations of 5,051 and 4,322, respectively, followed in size by the rural communities of Sapo, Cabeceira do Turco, Turco, São José da Ilha, Gondó, Córregos, Taporoco, Arrudas, Itapanhoacanga, Água Quente, Passa Sete, Beco and São José do Jassém (Figure 3).

Between 2018 and 2021, Minas-Rio facilitated resettlement of some residents from the communities to the east of the mine (Sapo, Turco, Cabeceira do Turco, and Beco) to an urban neighborhood of Conceição do Mato Dentro (Jardim Bougainville) or to rural resettlements in Congonhas do Norte (Fazenda Alves Simão and Lavrinha), as well as other locations selected by the resettled families.

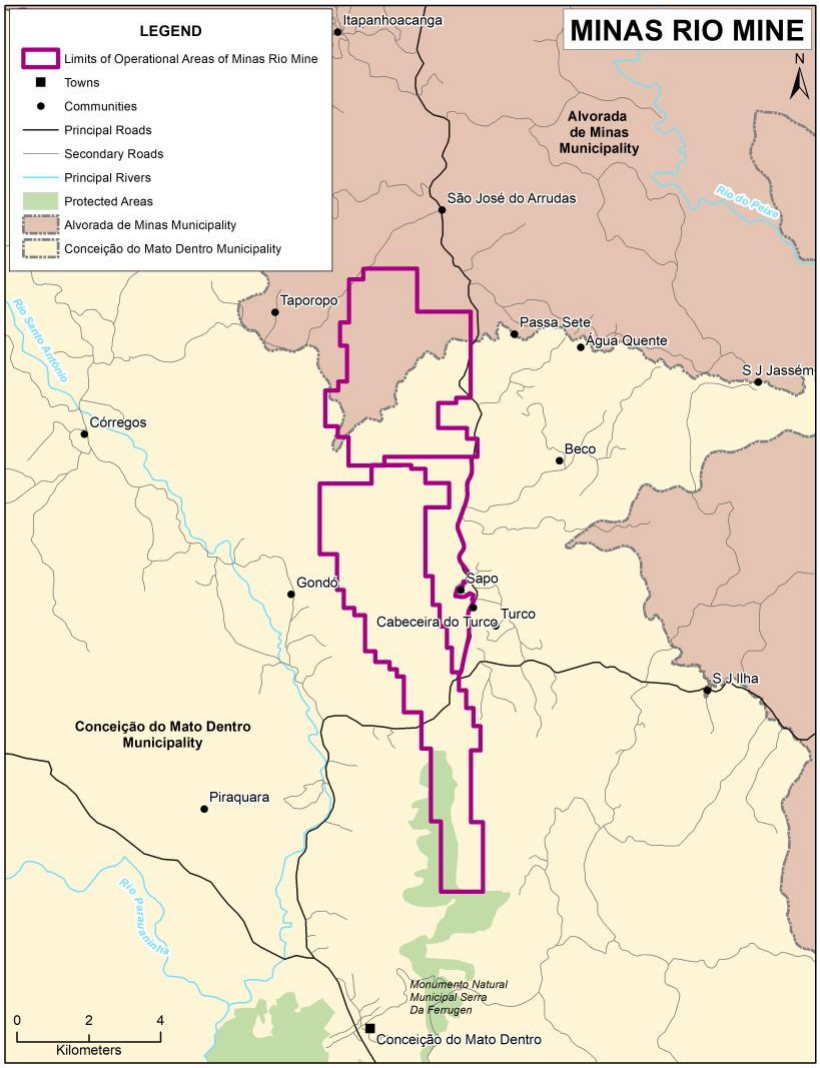


Figure 3: Mine infrastructure, surrounding communities, and waterways

Resettlement at Minas-Rio follows both voluntary and involuntary processes, some already completed, others ongoing or planned. Past initiatives include the Land Negotiation Program, completed in 2014, which acquired properties in the Sapo Mine Expansion Project's directly affected area and relocated about 46 families and the Optional Negotiation Program, launched in 2017, which offered voluntary relocation to residents in nearby communities and later expanded to cover additional areas.

More recently, in December 2024, the company signed an agreement for the Self-Rescue Zone Resettlement Program, which will relocate families living near the Minas-Rio tailings dam to areas that have sufficient time to evacuate in case of a dam or dike failure at the mine. Implementation is planned for 2025–2028, through a participatory process involving communities, local authorities, the Public Prosecutor's Office, and the Independent Technical Advisory Group for Dam-Affected Communities (named NACAB). This group monitors company plans, programs, and actions that may affect communities, while promoting broad and informed participation of community members. It also supports engagement by advising thirteen communities affected by the Sapo Mine expansion. The right to such advisory services is protected under Federal Law 23.795 of January 15, 2021, which guarantees technical assistance to populations affected by dams. In parallel, a voluntary resettlement plan is being developed for around 60 families in Gondó, near the western slope of the mine.

The municipalities of Conceição do Mato Dentro, Serro, and Dom Joaquim are home to 18 formally recognized quilombola communities, according to Brazil's Ministry of Development and Social Assistance, Family and Fight Against Hunger and the Fundação Cultural Palmares, a federal agency dedicated to preserving and promoting Afro-Brazilian culture and heritage. Quilombolas are descendants of enslaved Africans who escaped, migrated to remote areas, and formed independent communities during the colonial period. Recognized as tribal peoples under Article 1(1)(a) of ILO Convention No. 169, ratified by Brazil in 2002 (Decree No. 143/2003), they maintain distinct cultural identities, traditions, and historical continuity, preserving elements of traditional lifestyles that reflect their African ancestral roots and cultural resilience.

The most recent Environmental and Social Impact Assessments (ESIAs) for the Sapo Mine expansion (2015) and the Second Raising of the Minas-Rio Tailings Dam (2024) concluded there were no significant direct impacts on formally recognized quilombola communities. However, during this surveillance audit, on-site observations and stakeholder interviews indicated that some affected community families maintain elements of traditional lifestyles that could be considered part of quilombola identity. These families live in communities that are at the early stages of a self-identification process as quilombola. The company and the State Public Prosecutor's Office of Minas Gerais are monitoring these efforts, including commissioning an independent third-party assessment to update the survey of affected communities. This assessment is scheduled for completion in September 2025.

Subsistence agriculture and animal rearing and grazing are practiced in the communities around the mine. The region is known for its production of artisan cheese known as Queijo do Serro. Other economic activities include mining, cultural tourism, and eco-tourism. Alvorada de Minas and Conceição do Mato Dentro have cultural heritage assets listed by Brazil's National Institute of Historical and Artistic Heritage (IPHAN). These assets are recognized as national historical heritage and are included in the Monumental Program that helps to restore and preserve cultural heritage, besides being important destinations for tourists.

Historically, rural residents near the mine have used springs and streams without formal water permits. Household wells are rare, and when present, they often lack permits. The company has installed licensed supply wells in communities such as Turco, Sapo, Cabeceira do Turco, Gondó and Água Quente. Water extraction from the Peixe River in Dom Joaquim is also licensed, with a required base flow of 10 m^3/s to protect downstream users; pumping is automatically turned off in the dry season when flows naturally drop below this threshold. Mine groundwater extraction does not tap the shallow aquifers used by nearby communities.

All cities and communities around the mine have access to electricity and water, though some lack internet, paved roads, or adequate sanitation.

1.2. Overview of Operation

Anglo American purchased the Minas-Rio mine operation from its previous owner, Minerações e Metálicos S.A. (MMX) in 2008. The facility's current license to operate was obtained in October 2014 and, as of 2024, produces approximately 24 million tons of iron ore per year.

Mining operations at Minas-Rio commence with comprehensive site preparation, which includes conducting flora, fauna, and archaeological surveys, obtaining appropriate permits, vegetation clearing, and the systematic salvaging of topsoil. Flora, fauna and archaeological rescues are performed as necessary. The removed topsoil is carefully stockpiled for future use in rehabilitation and reclamation activities. Subsequently, overburden (non-ore material) is removed and strategically relocated to engineered waste rock storage facilities. These facilities are designed to ensure geotechnical stability, minimize environmental impacts, and manage potential acid rock drainage (ARD) through rigorous material characterization.

Once the primary iron ore body has been exposed, the ore is broken up and extracted using controlled drilling and blasting techniques. The resulting fragmented material, commonly referred to as 'shot rock', is then transported via large-capacity haul trucks to the primary crushing unit, where its grain size is significantly reduced to facilitate downstream processing.

The crushed and classified ore is then transferred to the beneficiation plant. Here, it undergoes a series of mineral processing steps, including grinding, flotation and concentrate thickening.

This wet iron ore concentrate is then transported through a 529 km long slurry pipeline to the dedicated iron ore handling and shipping facilities situated at the Port of Açu in Rio de Janeiro state. It is important to note that, for the specific scope of this audit, the slurry pipeline and the port facilities are excluded.

Water management is a critical and integrated component of the Minas-Rio operation, encompassing a comprehensive system for abstraction, utilization, treatment, and discharge.

The primary water sources necessary for the mine's operations, which include ore processing, iron ore slurry transportation via pipeline, dust suppression on haul roads and stockpiles, and human consumption, are obtained from licensed sources. These sources comprise direct abstraction from the Peixe River, reuse of water from the tailings management facility, groundwater extraction wells (subject to continuous monitoring to prevent aquifer depletion or undue impacts on groundwater levels), and pit dewatering. All water withdrawals are conducted in compliance with relevant water use permits.

Furthermore, the operation implements a robust system for collecting and managing other water sources, such as stormwater runoff (controlled through engineered drainage systems to prevent contamination) and internally generated wastewater (including industrial process water and sanitary effluents). These waters are directed to dedicated Wastewater Treatment Plants (WWTPs), where they undergo treatment processes (e.g., physical-chemical, and where applicable, biological treatment) to meet specified quality standards.

The highest priority is given to the reuse of treated water. This reclaimed water is primarily utilized within the industrial processes, for dust control, thereby minimizing the demand for freshwater abstraction and promoting overall water efficiency. The primary activities of iron ore mining and processing for the Minas-Rio operation are conducted within the municipality of Conceição do Mato Dentro, Minas Gerais. Tailings, which are the finely ground, sand-like material remaining after the valuable iron ore minerals have been extracted from the ore, are disposed of as slurry in the Tailings Storage Facility (TSF). This

critical infrastructure is largely situated in the adjacent municipality of Alvorada de Minas, located north of the main mine operation.

The Minas-Rio TSF is owned, managed, and operated by Anglo American as an integral component of the overall mine operation. It consists of six (6) primary dam and dike structures: the Main Dam and Dikes 1, 3, 6A, 6B, and 8. All these structures are located within the mine area.

The facility is designed, constructed, and operated in accordance with Brazilian dam safety regulations (ANM Resolution 13/2019) and aligned with the Global Industry Standard on Tailings Management (GISTM). Measures include engineering controls, instrumentation, geotechnical monitoring, independent reviews, emergency preparedness, and management systems for sewage and water.

The TSF is monitored 24 hours a day at the Geotechnical Monitoring Center, including visual, geotechnical, and climate measurements. Emergency sirens are installed along the stream outfall from the tailings dam within the self-rescue zone to alert potentially affected communities (Água Quente, Passa Sete, São José de Jassém, Dom Joaquim, Goiabeiras, and Santa Rita do Rio do Peixe) of a dam failure or other events impacting water sources downstream of the mine. The self-rescue zone is the downstream area potentially affected by a failure of the TSF, where studies have determined there is insufficient time for authorities to intervene and communities must act independently. All residents must be familiar with escape routes and the location of the nearest muster stations for self-rescue.

The TSF was commissioned in 2014 and only has a couple of years left of capacity. There are ongoing plans for the next TSF raise and ongoing construction of a Tailings Filter Plant, scheduled to be operational in 2026, which will extend its lifespan to align with the current life of mine, projected to 2073 (GISTM Disclosure Report: Minas-Rio Tailings Storage Facility, August 2024). The environmental licensing process for the TSF raise is ongoing.

On December 2, 2024, Anglo American announced the completion of the transaction to acquire high-grade iron ore resources from mining operations of Vale, located in the Serra da Serpentina region of Brazil. This strategic acquisition aims to expand the mineral base of Anglo American's Minas-Rio operation in Minas Gerais, which the company will continue to own, manage, and operate, including any future development or expansion phases. Currently, Anglo American is assessing the best technical, socio-environmental, and logistical approaches for the integration and development of the new asset, with the necessary environmental licensing applications expected to be submitted only after 2030, following the completion of detailed feasibility studies.

In April 2025, the Minas-Rio project employed a total of 2,050 direct employees, of which 20% were female and 80% male, reflecting continuous efforts to increase gender diversity in the industry. Additionally, there were 12,941 contractors, of whom 64% had long-term contracts and 36% were seasonal contractors. The number of employees fluctuates due to expansion projects and the seasonality of activities, with some of the workforce operating in locations external to the mine.

will

1.2.1. Scope of activities and facilities included in audit

The scope of this IRMA Surveillance Assessment covers the physical areas within Anglo American’s Minas-Rio Mine concession and related, including:

Extraction and Processing Infrastructure:

- Open-pit iron ore extraction
- Crushing, screening, and processing facilities

- Conveyor systems
- Pressing, concentration, and reagent plant
- Vertical ball mill
- Mechanical flotation
- Pulp storage tank

Waste and Tailings Management:

- Waste and refuse piles
- Tailings containment structures (dam, dikes, and ponds)
- Sediment and water control dams
- Surplus material disposal areas
- Sanitary landfill
- Recycling center

Water and Wastewater Systems:

- Water collection and supply system (including new infrastructure)
- Water treatment plant
- Wastewater treatment plants
- Groundwater extraction wells

Energy, Fuel, and Explosives Handling:

- Fuel handling and storage areas
- Gas stations
- Explosives magazine

Support and Auxiliary Infrastructure:

- Iron ore slurry pumping station (before the slurry enters the pipeline)
- Vehicle and equipment maintenance facilities
- Operations buildings and control rooms
- Discharge control installations
- Monitoring stations (socioeconomic, air, water, biodiversity, etc.)
- Offices, administrative buildings, and training center
- Warehouses and workshops
- Security guard house and concierge
- Cafeterias and restaurant
- Locker rooms and bathrooms
- Outpatient clinic
- Science Station Research station
- Laboratory
- Bus station
- Access and service roads
- Transportation routes
- Emergency preparedness locations

Environmental Receptors and Communities:

- Surface and groundwater hydrology
- Biodiversity and ecological services

- Mine site and community infrastructure
- Community socioeconomic conditions
- Cultural and archaeological

The scope of the surveillance audit was determined by site-level risks, impacts, and vulnerabilities identified during the initial assessment, as well as findings from the initial audit and additional information gathered by SCS in accordance with Section 9.6 of the IRMA Certification Body Requirements (Version 2.1). The primary objective of this audit was to assess developments and changes that have occurred since the last full onsite audit, in 2022. Accordingly, the audit focused on records, observations, and testimonies covering the period from 2022 to the present. This scope includes, but is not limited to:

- Records of complaints submitted by stakeholders and workers between 2022 and 2025;
- Occupational health and safety records, including incidents, injuries, accidents, and fatalities;
- Changes to the mine's operational plans or the surrounding operating environment;
- Shifts in local governance, evolving stakeholder interests, company and site-level responsibilities, supplier dynamics, and legal compliance status;
- Updates to the management of risks and vulnerabilities based on new assessments, revisions to the mine's operational plan, or monitoring results;
- Stakeholder input received during or after the previous audit, including formal requests to participate in the audit process; and
- Information from public sources, including online reports, media coverage, or legal proceedings relevant to the site's performance against IRMA standards.

The requirements applicable to this Surveillance audit considered:

- Compliance with Chapter 1.1, including any changes in legislation or regulations since the last assessment;
- Status of conformity with all critical IRMA Standard requirements and the implementation of corrective actions identified during the initial audit;
- Requirements for which stakeholder concerns have been raised regarding the site's performance since the prior audit;
- Areas identified by auditors, the company, or stakeholders as high-risk if not properly managed;
- Chapters previously deemed not applicable, these chapters will be fully audited if deemed as relevant;
- Criteria that require further stakeholder input, as identified in the initial audit report; and
- Other areas or activities associated with the mining project and most critical to the health, safety, and well-being of people and the environment.

1.2.2. Activities or facilities excluded from scope of audit

The nearby Serpentina mine project, expected to begin the licensing process around 2030, along with the slurry Pump-Station and Pipeline, and the Port of Açu, are not included in the IRMA Surveillance Audit scope.

The Minas-Rio pipeline consists of a main line stretching 529 km, made of high-strength carbon steel pipes. It includes two pumping stations, located in Conceição do Mato Dentro and Santo Antônio do Grama, which are approximately 243 km apart by road, as well as a

valve station located in Tombos, Minas Gerais. In addition, the system features 10 pressure-monitoring stations along the route.

The iron ore transportation begins at the beneficiation plant area in Alvorada de Minas, where the ore slurry is pumped using high-pressure piston pumps. The process is supported by two pump stations and takes approximately six (6) days to move the material from one end to the other at an average speed of 6 km/h. The slurry is transported with 68% solids, with operating pressures of 18 MPa at the outlet of Pump Station 1 (EB1) and 20 MPa at Pump Station 2 (EB2). The valve station adjusts the pressure of the pumping system to ensure that the slurry reaches the Port of Açu terminal at the appropriate flow rate. EB2 is located in Santo Antônio do Grama, one of the intermediate stations along the pipeline route.

The slurry pipeline and both pump stations operate independently of the Minas-Rio mine site's operational unit, cross two states, and hold environmental and operational licenses that are not linked to the Minas-Rio mine license. Furthermore, the filtration and port logistics facilities at Porto do Açu are independently licensed and operate under a governance structure shared between Anglo (filtration) and Ferroport (port operations). Accordingly, the slurry pipeline, Pump Station 1 (EB1), Pump Station 2 (EB2), and the associated filtration and port facilities are not included in the scope of this audit.

1.2.3. Limitations of audit

No limitations were identified during the audit. All areas required for assessment were accessible to the audit team, and all necessary documentation and stakeholder interviews were provided without restriction. No safety risks or other constraints impeded the ability to evaluate compliance with the audit criteria.

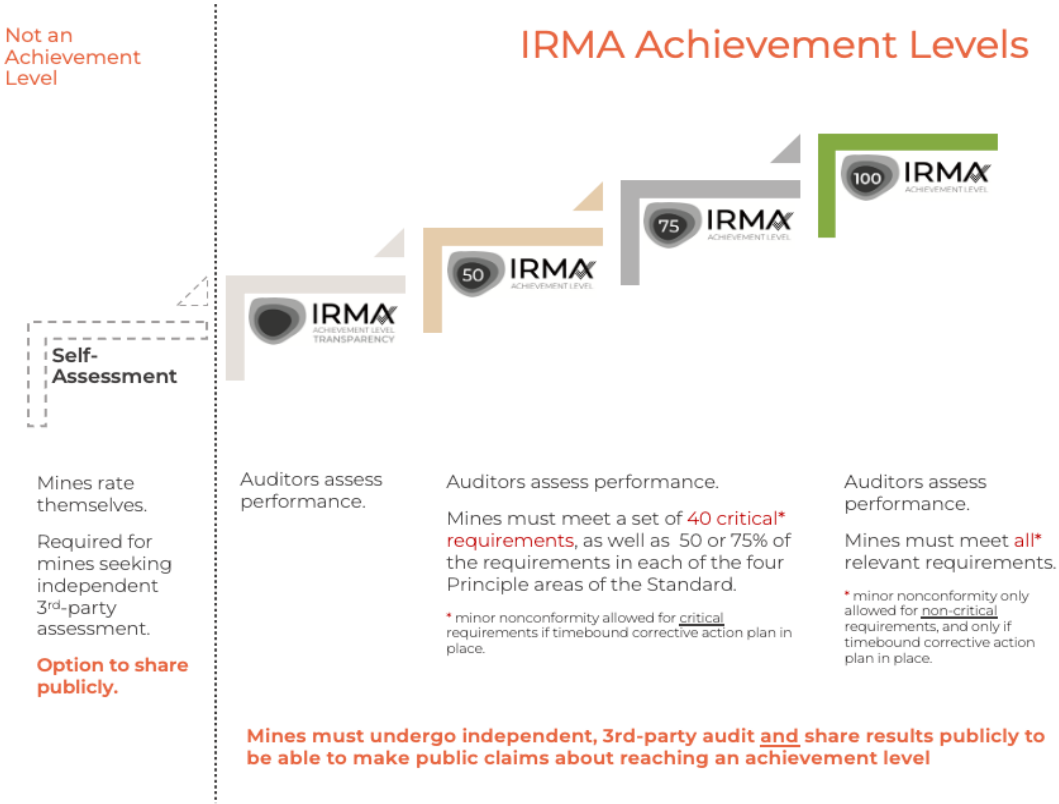
2. Mine Site Assessment Process

2.1. Overview of IRMA Process

There are three (3) primary types of assessment in the IRMA process: a full audit (including the initial audit and subsequent renewal audits), where the mine site is assessed against all relevant IRMA requirements; a surveillance audit, typically conducted 12-18 months after the initial audit, and special audits which are conducted in addition to the normal cycle of audits to assess progress on corrective actions, review significant changes to operations, or follow up on grievances or incidents.

This audit report reflects the outcomes of the surveillance audit. Surveillance audits are intended to be abbreviated audits conducted midway through the certification cycle to verify continued conformity of critical requirements, progress on completing corrective actions, and any focus areas identified by the audit firm. In addition, the audit considers feedback from stakeholders since the previous audit and material changes to operations, personnel, management systems, or the surrounding environment to determine if changes have affected the site's ability to continue to deliver achieved performance scores.

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.



2.1.1. 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 approved certification bodies using 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.

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

IRMA surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the most recent full audit (e.g., initial audit or renewal audit) does not need to be re-established. Typically, surveillance audits are intended to allow the audit firm, who has issued a public verification of performance, to assess the site's ongoing status, review any incidents, confirm regulatory compliance, and review progress on corrective actions to verify that no changes have occurred that would materially affect the site's ability to maintain the achievement level.

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

IRMA stakeholders who wish to file a complaint related to the mine site assessment process may submit feedback on the IRMA website. Details on the complaints process can be found in IRMA's Issues Resolution Procedure which can be accessed from the main IRMA website.

2.2. Surveillance Audit Process

The surveillance audit process includes a desktop review by the audit firm and an on-site audit by the audit firm. The on-site audit can include a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, documentation review, and visits to operational areas, surrounding area, and other locations, including surrounding communities.

2.3. Stakeholder Engagement

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

2.3.1. Written comments/inquiries

Stakeholders were notified of the audit in June 2025, more than 30 days prior to the audit date. Inquiries and feedback were received primarily from individuals living in communities affected by the mine and from local NGOs, mostly environmental organizations. All interviewees were engaged either in person or virtually, depending on their preference. No feedback was obtained from stakeholders who chose not to participate despite outreach efforts.

Outreach was conducted through multiple communication channels, including the SCS website feedback page, WhatsApp, posters placed in community centers within the affected areas, and through company engagement mechanisms.

The audit team also conducted direct outreach to a broad range of institutional and civil society stakeholders at various levels. This included national-level government agencies and NGOs; regional entities such as the Public Prosecutor's Office of Minas Gerais State, university researchers, and state social and environmental institutes and foundations; and local organizations, including civil defense, the Independent Technical Advisory Group, local NGOs, and health agencies.

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.

Executive Manager Mine Operations	Environmental Engineer (2)
Integration and Sustainability Manager	Senior Geotechnician
Senior Social Performance Analyst	Geotechnical Consultant
Senior Community Relationship Analyst	Geotechnical (3)
Social Performance Analyst	Senior Emergency Engineer
Social Performance Coordinator	Emergency Coordinator
Community Relationship (2)	Corporate Security Analyst
Resettlement Specialist	Compliance and Business Integrity Coordinator
Senior Environmental Engineer	Operational Control Specialist

2.3.3. Workers/Contractors

On-site interviews were conducted from July 7 to July 10, 2025, with both permanent and contract employees. The interviews involved a total of 65 workers and contractors through one-on-one and small group interviews. Of the 65 interviewees, 33 were employees (5 females, 28 males) and 32 were contractors (11 females, and 21 males). The participants represented a diverse cross-section of workers, varying in roles, gender, age, years of service, and type of work responsibilities across the key operational areas of the mining operation. Worker union representatives were also included.

The interviewees represented multiple departments and were selected to ensure diversity in age, gender, experience, work groups, shifts, and responsibilities, including operational, administrative, worker health and safety, and security. Topics discussed included working conditions, with a focus on women and vulnerable groups, grievance mechanisms, freedom of association, health and safety, and more.

Interviews were held at various onsite locations, such as conference rooms, offices, operational areas, industrial plant, warehouse, maintenance areas, water treatment station, wastewater treatment station, security guard house, outpatient clinic, and outdoors, ensuring both safety and worker privacy. Importantly, worker interviews were conducted without company management present. Supervisory staff were interviewed individually but did not participate in group sessions to avoid influencing employee responses.

Meeting Type	Total Number of Attendees
Group interview, workers	Group A: 3 (3 males) Group B: 2 (2 males) Group C: 2 (2 males) Group D: 3 (3 males) Group E: 4 (4 males) Group F: 3 (3 males) Group G: 4 (4 males) Group H: 3 (3 males) Group I: 2 (2 females)
Group interview, contractors	Group J: 2 (2 males) Group K: 2 (2 males) Group L: 2 (2 males) Group M: 2 (2 males) Group N: 4 (4 males) Group O: 4 (4 females) Group P: 2 (2 males) Group Q: 2 (1 male, 1 female) Group R: 2 (2 females) Group S: 2 (2 males)
Individual interview, worker	7 (4 males, 3 females)
Individual interview, contractor	8 (4 males, 4 females)

2.3.4. Government Agencies

Online interviews were conducted with the following public sector institutions during July 2025.

Government Institution	Location	Total Number of Attendees
Conceição do Mato Dentro Civil Defense	online	1 male
Alvorada de Minas Civil Defense	online	1 male

2.3.5. Participating Communities and NGOs

Interviews were conducted with external community stakeholders from June to July 2025, including four online meetings. The community interviews involved a total of 23 interviewees,

11 males and 12 females, and included a cross-section of members including men, women, elderly, and vulnerable groups where possible; and key community leaders, civil society organizations, and other stakeholders.

To ensure confidentiality, interviewees were informed about the measures in place to protect confidentiality of their identities and comments. All interview data was anonymized, and access to the information was restricted to the audit team, ensuring that no personal or sensitive details could be traced back to specific individuals.

Community Name	Location of Meeting	Total Number of Attendees
Itapanhoacanga	online	1 female
Conceição do Mato Dentro	online	1 male
Alvorada de Minas	online	1 male
Jardim Bouganville	Stakeholder residence	2 (1 male, 1 female)
Conceição do Mato Dentro	Stakeholder residence	1 female
Beco, local community leader	Stakeholder residence	1 male
São José da Ilha, local community leader	Stakeholder residence	1 male
São José da Ilha	Public medical clinic	1 female
Dom Joaquim – NGO Rio do Peixe	Local cafeteria	1 female
Buraco – NGO Quilombo Vivo	NACAB office	1 female
Passa Sete	Stakeholder residence	4 (2 females, 2 males)
São José do Jassém, Community leaders	NACAB office	6 (4 females, 2 males)
Independent Technical Advisory Group (NACAB)	online	2 males

2.4. Summary of Mine Facilities Visited

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

	Operational areas	- **extraction and processing infrastructure:** open-pit iron ore extraction; crushing, screening, and processing facilities; conveyor systems; pressing, concentration, and reagent plant; vertical ball mill; mechanical flotation; and pulp storage tank. - **waste and tailings management:** waste and refuse piles; sanitary landfill, recycling areas, waste rock disposal areas, tailings containment structures (dam, dikes, and ponds); sediment and water control dikes; and surplus material disposal areas. - **water and wastewater systems**: water collection and supply system (including new infrastructure); pump station on the Peixe River and pipeline, groundwater extraction wells, water treatment plant; wastewater treatment plants; discharge and treatment systems at the TSF dam and dikes. - **energy, fuel, and explosives handling**: fuel handling and storage areas. - **support and auxiliary infrastructure:** iron ore slurry pumping station (before the slurry enters the pipeline); vehicle and equipment maintenance facilities; warehouse; security guard house and concierge; locker rooms; outpatient clinic; laboratory; operations buildings; and control rooms.
	Non-operational areas visited	Science Station, emergency preparedness and response infrastructure (sirens)
	Surrounding Communities	Communities visited include: Conceição do Mato Dentro (including the resettled neighborhood Jardim Bouganville), Beco, São José da Ilha, Passa Sete, Dom Joaquim, and São José do Jassém.

3. Summary of General Scope Items

General information regarding the site's ongoing performance is summarized in this section. Summary information related to specific chapters is provided in Section 4.0.

The surveillance assessment concluded that the site continues to maintain the basic systems identified in the initial audit, with some being expanded, such as the development of an Adaptive Water Management Plan and the legal compliance tracking system. While no material noncompliance events or major incidents were identified, some gaps remain, particularly in relation to stakeholder consultation and engagement process. These areas will require continued attention in future audits to ensure sustained achievement of the previously assigned performance level.

3.1. General operational status

3.1.1. General outcome of compliance monitoring/audits

The company monitors legal and regulatory compliance through the Qualifica management system, which tracks applicable legislation, permits, and licenses, and issues reminders to responsible personnel. The system generates periodic compliance reports, such as the 2025 Legal Requirement – Evaluation Report, which classifies obligations as compliant, non-compliant, or not evaluated. Most obligations were reported as compliant, with corrective actions in place for those identified as non-compliant.

According to the company management, the compliance tracking system also undergoes periodic on-site audits, the most recent of which was completed in July 2022. For 2025, a follow-up audit is currently underway and has not yet been finalized.

3.1.2. Regulatory inspections, violations, enforcement actions

No documentation or records were identified indicating the occurrence of regulatory inspections, violations, or enforcement actions in recent years. The absence of such information was consistent across the documents reviewed and was also confirmed through interviews with relevant stakeholders, who did not report recent inspections or enforcement activities related to the operation.

3.1.3. Lawsuits and other external legal, non-regulatory actions

The audit did not identify any documentation or records indicating the existence of lawsuits or other external legal, non-regulatory proceedings involving the company. Information reviewed, along with discussions held with relevant stakeholders, consistently indicated that no such cases are currently ongoing.

3.1.4. Summary of major events, health and safety incidents, and performance records

The site provided evidence indicating that since 2022 there have been no fatalities, major operational disruptions, or labor strikes. Interviews conducted with stakeholders corroborated the absence of such events. The company has established multiple measures to protect workers' health and safety, including procedures for risk identification, PPE management, emergency response, and medical care, which were generally observed to be

implemented in practice. Some opportunities for improvement were identified, such as limited worker awareness of certain occupational health and safety documents; however, no major incidents were reported during the audit period.

In addition to health and safety performance, the audit also reviewed recent environmental events that could pose potential implications for both worker and community health, particularly those related to water quality and site hydrology. According to management interviews, suspended solids results are typically below 10mg/L, compared to the regulatory limit of 100mg/L, as turbidity at the site is associated with colloidal particles. Reviewed evidence and interviews indicate that in January and February of 2024, high precipitation required discharge through the TSF dam and dikes spillways to maintain pools at safe levels. This period of intentional spillway discharges resulted in elevated concentrations of iron (Fe), manganese (Mn) and suspended solids (turbidity above 200 NTU), iron oxide staining of rocks in the riverbed immediately downstream of the TSF dam and some dikes, and increased sediment transport in downstream channels. The information reviewed indicates increased sediment mobilization and transport during this period, but no evidence of downstream sediment deposition.

Mine staff reported that during this period of intense rainfall, there was a regional increase in surface water flows and sediment transport in streams not associated with the mine, which may have increased sediment transport in the Peixe River. The excess flow and elevated Fe, Mn, and suspended solids were reduced by March 2024. This period of high flows and associated impacts to water quality were registered in the site's incident reporting system, which triggered corrective actions (e.g., improvements in flocculant systems).

Although the incident did not result in long-term environmental impacts (water quality returned to baseline conditions), it can be classified as a significant environmental event given the short-term water quality exceedances and potential implications for downstream users. At the same time, consistent with the company's risk matrix, the event was classified as Level 2 – Low/Minor, reflecting that the observed conditions are typical of regional streams during the rainy season and did not cause lasting impacts.

3.2. Stakeholder considerations

3.2.1. Stakeholder feedback/complaints received by site since prior audit

The company maintains a Grievance Register (2022–2025) that records all interactions with community members, including inquiries, complaints, and formal grievances. The register classifies grievances by category, business unit (Corporate, IOB, and Nickel), resolution status (extended deadline, unresolved, resolved), communication channels used, key complaints and historical trends, main contractors mentioned, key communities submitting grievances, and statistics on unresolved cases by business directorate.

Records indicate that 1,427 interactions were logged in 2022, 1,460 in 2023, 1,915 in 2024, and 435 between January and April 2025. A summary of grievances submitted to the company during this period indicates that the main concerns were related to house maintenance, property negotiations, and water resources.

Grievances marked as closed in the register indicate that the company disseminates relevant information to stakeholders using a variety of engagement formats that are culturally appropriate, accessible, and timely. These formats include dialogue groups, in-person interactions, phone calls, welcome meetings, WhatsApp groups, the Anglo American – Minas Rio Community platform, virtual messages, mine visits, environmental monitoring sessions, Extra Dialogue events, podcasts, Diálogo magazine, community radio, and a Contact Us

channel. All complaints receive a registration protocol number, which is provided to the complainant to enable tracking of their case.

The Social Communication Program – Activity Reports for 2023 and 2024 (Anglo American, March 2024 and March 2025, respectively), as well as the Contact Us Training List 2023 (no date) and Contact Us Training Evidence 2023, indicate that the company provides periodic onboarding training for employees and contractors covering company values and fundamental safety, environmental, and social management principles. In 2024, a total of 11,234 workers were trained (516 employees and 10,716 contractors).

Despite the existence of a structured grievance management system and extensive communication channels, interviews with a sample of stakeholders, including workers, contractors, and community members, indicated varying levels of satisfaction with its implementation. Some interviewees, mainly community members, cited inadequate responses, low confidence in the mechanism, and delays in case resolution, indicating gaps between the system's design and its perceived effectiveness.

3.2.2. Stakeholder feedback/complaints received by auditors or IRMA since prior audit

No stakeholder feedback or complaints were received by auditors since prior audit.

3.3. Summary of Material Operational or Administrative Changes at Site Since the Previous Audit

Since the previous audit, the most significant operational change has been the construction of new processing facilities to filter tailings and deposit them in a dry stack tailings storage area. In addition, the company has advanced early-stage planning for the Serra Serpentina project, although it has not yet entered the licensing phase. No material administrative changes, such as changes in ownership, management, or corporate restructuring, were identified during this surveillance audit.

3.4. Site-Specific Issues Identified for Follow-Up Review in Previous Audit

No site-specific issues were identified for follow-up review in the previous audit.

3.5. Progress on Previous Corrective Actions

Since the last audit, the company has made progress in implementing corrective actions across critical requirements, with some requiring additional time for full adaptation, particularly in resettlement and mine waste management. Improvements were observed in critical requirements 1.4.1.1, 2.6.2.6, 3.1.2.1 and 3.3.1.1, demonstrating improvement in Complaints and Grievance Mechanism, Reclamation and Closure Planning, Workers' Organizations and Agreements, and Health and Safety Risk and Impact Scoping and Monitoring.

Requirement #	1.2.2.2, Engagement Processes
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The evidence includes copies of 47 meeting minutes, from Minute No. 42 (February 2017) to Minute No. 95 (December 2021) of the Coexistence Committee, and a Socioeconomic Aspects Monitoring Program Report (March 2022), indicating that the company has an open dialogue with stakeholders, including: a. Providing relevant information in a timely manner; and b. Participation by site management and subject-matter experts in the meetings with stakeholders; and c. Engaging in a manner that is respectful and free from manipulation. Complementary evidence indicates that the company is: d. Soliciting feedback from stakeholders through annual stakeholder surveys as part of the Socioeconomic Aspects Monitoring Program (2022) and feedback forms on the company's meetings (Face-to-face Meeting Minutes (2022); and e. Providing stakeholders with feedback on how the company has taken their input into account, such as public reports on delaying a blast and on the installation of water treatment systems that the company sent to the stakeholders in response to their requests (Report on Blast Cancellation, 2022, and Report on Water Treatment Systems, 2023). Interviews are needed during the surveillance audit (community) to confirm the company solicits feedback on issues relevant to community stakeholders and provides them with feedback on how their input is considered.
Planned Corrective Action(s) from previous report	Auditors should interview stakeholders during the surveillance audit.
Comments on Progress	The company has updated the Coexistence Program (Anglo American, most recent version May 2025), a Stakeholder Engagement Plan – Business Unit Iron Ore Brazil S/A, a Community Relations (Anglo American, most recent version October 2024), as well as manuals and procedures, including the Anglo American Social Way - Section 3A Stakeholder Engagement Toolkit (Anglo American, September 2022), that combined with meeting minutes and interactions with stakeholders (2023 - 2025), which are part of the Coexistence Program, provide information to confirm that the company has developed a process for two-way dialogue and meaningful engagement, as detailed below: a. provision of relevant information in a timely manner: relevant details are shared with stakeholders using various engagement strategies, including dialogue groups, in-person interactions, phone calls, welcome meetings, WhatsApp groups and the Anglo American – Minas Rio Community, virtual

messaging, mine visits, environmental monitoring sessions, Extra Dialogue forums, podcasts, the Diálogo magazine, radio programs, and a Contact Us platform (i.e., 34 of the 435 grievances logged from January until March 2025 were marked as closed by the end of the April) as documented in the log of interactions with community members (Grievance Register 2021 - 2025) and also indicated by a sample of stakeholders interviewed, and the Diálogo Extra – Comunidades newsletter (June 2024) provided information to the Gondó community regarding water quality results from systems operated by the company.

b. participation of company personnel and subject-matter experts in engagement: as demonstrated in the engagement activities led by the Community Relations team, which includes one coordinator and 14 analysts working across defined territories (i.e., meeting minutes from February 27, 2025, document a session in the community of Topôroco, Alvorada de Minas, involving two community relations analysts, one coordinator, one environmental analyst, nine community representatives, three Independent Technical Advisory representatives, and one public official to discuss results of water quality monitoring), and also indicated by a sample of stakeholders interviewed.

c. engagement in a manner that is respectful and free from manipulation, interference, coercion, or intimidation: the Anglo American Social Way Toolkit outlines the company's commitment to respectful and inclusive engagement. It emphasizes that engagement with affected stakeholders must be open, meaningful, and free from manipulation, coercion, or intimidation, with a particular focus on including vulnerable and marginalized groups.

d. soliciting feedback from stakeholders on relevant issues: as demonstrated by stakeholder feedback solicited through satisfaction surveys such as the São José Arrudas Satisfaction Survey (Anglo American, July 2024) and the Jassém Satisfaction Survey (Anglo American, June 2023), as well as through the ongoing logging of grievances and engagement activities documented in the Grievance Register (2021–2025), and also indicated by a sample of stakeholders interviewed.

e. providing feedback to stakeholders on how their input has been considered: as demonstrated in a meeting on February 27, 2025, in the community of Topôroco, where the company presented water monitoring results in direct response to a previously raised concern from community members. During the same meeting, additional feedback was solicited, and new community requests regarding water quality monitoring were documented.

While the evidence confirms that the company has made efforts to strengthen its engagement processes, stakeholder feedback on the effectiveness of these efforts was mixed. Some interviewees acknowledged improvements, while others expressed dissatisfaction, particularly in relation to:

c. engaging during both voluntary and involuntary resettlement processes in a manner that is free from interference and coercion, as some community stakeholders expressed the view that communication related to resettlement planning and implementation, including for households located within the tailings dam self-rescue zone and those involved in voluntary resettlement processes, has not always been perceived as open or inclusive, as there was a perception among these stakeholders of pressure to accept the proposed resettlement terms and conditions, limiting space for negotiation or dialogue; and

e. providing feedback on how the company has taken their input into account, as some stakeholders noted that, in relation to certain Technical Notes issued by the Independent Technical Advisory body, the company provided formal acknowledgment of receipt but did not offer sufficient information on how the

	recommendations informed company procedures or related mitigation measures.

Requirement #	1.4.1.1, Access to Operational-Level Complaints and Grievance Mechanism
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The evidence, Records from the grievance system Fale Conosco (2021), Radio Announcements (2019), Coexistence Program (2017 to 2021), and a Satisfaction Survey (2021) indicate that stakeholders, including affected community members and rights holders have access to an operational-level grievance mechanism. The evidence does not include meeting minutes or a guide for applying the operational-level grievance tool Fale Conosco (Contact Us). Interviews with a sample of stakeholders indicate that community members recognize the communication methods to contact the mine, but that response is not always satisfactory.
Planned Corrective Action(s) from previous report	Present the dissemination mechanisms for the company's grievance channel, including minutes of coexistence committee meetings, radio advertisements, the Dialogue magazine, among others. Reinforce the Fale Conosco operational procedure and its updates, in addition to presenting the results of the mechanism's satisfaction survey.
Comments on Progress	The evidence reviewed includes the Contact Us System Procedure (Anglo American, Version 04, September 2022), which applies to both external stakeholders, such as community members, and internal stakeholders, including workers and contractors. The procedure defines the process flows and responsibilities for receiving, registering, forwarding, evaluating, resolving, and responding to grievances submitted through the Contact Us system. This system is the company’s stakeholder grievance management platform, particularly for workers, contractors, and communities located near operational areas. Stakeholders can submit grievances via telephone (toll-free), email, online form, face-to-face interactions, social media, press, text messages, or WhatsApp messages sent to employees. The evidence indicates that the company has implemented an operational system to record, track, resolve, respond to, and close grievances and complaints from stakeholders, including employees and community members. A sample of stakeholders from communities, including those in potentially affected areas, as well as workers, both employees and contractors, were interviewed and indicated awareness of the grievance mechanism, including an understanding of how to file a grievance and the option to do so anonymously if desired.

Requirement #	2.5.1.1, Emergency Response Plan
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The company provided emergency response plans for the tailings dam facility (Emergency Plan for the Tailings Dam, 2019), and the processing facilities (Emergency Plan for the Conceição de Mato Dentro area, 2021). The emergency plans align with all the guidelines set forth in the APELL methodology. During the site visit, personnel showed themselves to be prepared in case of other emergencies, although no documental evidence (written procedure) was provided. The evidence did not include emergency plans for all operations related to the mining project.
Planned Corrective Action(s) from previous report	Share the emergency response procedure and emergency response plan for all Minas-rio operations.
Comments on Progress	The evidence reviewed includes: - Emergency Response Plan Procedure for the Mine, Power Plant, EB-01 Dam and Other Support Facilities (Anglo American, December 2024), - Emergency Response Plan Procedure for the Tailing Dam - Serra do Sapo Mine (Anglo American and WSP, March 2025), - Emergency Response Plan Procedure for the four sediment containment dikes (No. 2, 3, 4 and 5) (Anglo American, 2025), - Procedure for Drawing Up the Emergency Response Plan (Anglo American, January 2023), and - Reports documenting the evaluation of emergency drills for the tailings dam (H&P, April 12, 2025), and indicates that the company has developed emergency response plans aligned with the guidelines set forth in the United Nations Environment Programme Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining guidelines. The plans include contact information for rescue organizations (e.g., municipal fire departments, churches, schools, hospitals, retail stores) as well as crisis communication procedures. Supplemental evidence reviewed includes records of annual meetings with stakeholders (Anglo American and H&P, 2024 and 2025), which indicate that orientation seminars involving communities within the self-rescue and secondary rescue zones, municipal authorities, civil defense, and other relevant parties are held annually. The documents follow Brazilian legislation, which requires procedures to be maintained separately for different facilities (dams, dikes, and other infrastructure). According to interviews with key staff, supported by a review of a database conducted during the on-site audit, vulnerability assessments of potentially affected community members (considering age, mobility, family composition, and communication access), including those located in the dam's secondary security zone as defined by Brazilian legislation, are also documented and provided to the civil defense. This was confirmed in interviews with civil defense teams. Records of the most recent review and update of the plans confirm periodic revision in line with APELL guidelines. Documentation of training sessions and drills conducted on May 4, 2024, and April 12, 2025, shows participation from workers and contractors involved in tailings dam

	emergency scenarios, local emergency agencies, and communities, including those in the secondary security zone. Interviews with a sample of community members, workers, contractors, company managers, emergency response personnel, and civil defense teams confirm the company's cooperation with local communities and government agencies in its emergency preparedness and response efforts. This includes interviews with a sample of potentially affected downstream community members, who indicated familiarity with the company's emergency plans and procedures, including escape route signage and designated muster points. The evidence, supported by interviews with workers and contractors, does not indicate that the latest emergency drill includes participation of a representative sample of workers, which may limit the overall workforce's ability to respond effectively in an actual emergency.

Requirement #	2.5.2.1, Community and Worker Consultation
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The company provided as evidence several documents including the 3rd Simulation Exercise Potential Situation of a TSF Failure (October 2020), Emergency Action Plan for Mining Dams (PAEBM) (2019), an emergency notification flow chart, and internal emergency drill (2021) roster disclosing emergency scenarios (i.e., for a TSF incident) with participation of key community stakeholders, government agencies and workers. Engagement activities with stakeholders resulted in recommendations such as more community signage, alternative meeting points, and numbered meeting points. The evidence also indicates that there is a low participation rate for some communities and that additional outreach is recommended. The audit team will confirm during the surveillance audit through interviews with stakeholders if the recommendations were considered in the plan updates.
Planned Corrective Action(s) from previous report	The functionality test is being carried out, as scheduled. The report must present the adherence of the signs to the project and any improvements identified to be incorporated into the process. The promotion of stakeholder participation continues, as progress is made in 2022, where we had important participation from external stakeholders and members of civil defense.
Comments on Progress	The evidence reviewed includes the Procedure for Drawing Up the Emergency Response Plan (Anglo American, January 2023), which in Section 5 states that plan development involved members of the Minas-Rio multidisciplinary team. Supporting evidence includes drill evaluation reports (Anglo American and H&P, 2023-2025), a 2024 methodological note on measuring siren sound, and attendance records from 2023-2025, which indicate implementation of measures to mobilize potentially affected stakeholders, including door-to-door invitations, posters, and banners. The four Emergency Response Plan Procedures for the site (Anglo American, updated between 2024 and 2025) indicate that the company has identified the tailings dam's self-rescue and secondary security zones, affected communities, muster points, meeting

	points, and escape routes to support evacuation planning. External drills were conducted jointly by the company and the independent consultant H&P, with participation from employees, some residents in the dam's zone of influence, public agencies (Civil Defense, Military Police, Fire Department, Municipal Guard), and other mine contractors. Records include escape routes, participant numbers, and comparisons of estimated tailings wave arrival times versus participant arrival times at muster points. The 2024 methodological note indicates that siren sound levels were measured at four (4) locations in the self-rescue zone. One drill evaluation report (Anglo American and H&P, 2024) records 206 participants in total, of which 21 were community members. Three (3) internal emergency drill evaluation reports (Anglo American, 2025) indicate that drills are conducted by specific areas rather than site-wide. Siren volume was reported as low by participants, and the company has initiated corrective actions. Interviews with a sample of affected community members and workers indicated that downstream communities had been consulted and worker representatives engaged in emergency planning. Interviewees demonstrated awareness of emergency procedures and fire brigade roles, and reported that their feedback had been incorporated into the emergency plan and exercises. The evidence and interviews indicate the company has developed emergency preparedness and response plans in collaboration with worker representatives, workers and some potentially affected community members, and considered their feedback. The company has also included the participation of some potentially affected community stakeholders and workers in emergency drill exercises. The evidence does not confirm that all potentially affected communities, including those outside the self-rescue zone (e.g., Dom Joaquim), were consulted during the development of the 2024 Emergency Response Plan or that their input was incorporated. Interviews also confirmed the lack of representative participation of the site workforce in emergency drills.

Requirement #	2.6.2.6, Reclamation and Closure Planning
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The Preliminary Mine Closure Plan (PMCP) (2019) is available at Anglo American's web site. The evidence does not indicate if the PMCP is made available to stakeholders upon request.
Planned Corrective Action(s) from previous report	The Mine Closure Plan is available on the website (Minas-Rio Mine Closure Plan) https://brasil.angloamerican.com/pt-pt/sustainability/documentos-tecnicos-sobre-nossos-projetos To request the document, it is possible to request it through Anglo American communication channels. The telephone is free and operates from Monday to Friday, from 8 am to 7 pm.
Comments on Progress	The most recent Mine Closure Plan (Anglo American, June 2021, 95 pages) is available at Anglo American's website (link: https://brasil.angloamerican.com/pt-pt/sustentabilidade/documentos-tecnicos-sobre-nossos-projetos).

	Interviews with company personnel indicate the company would provide the Mine Closure Plan to stakeholders upon request. This rating has been raised to fully meets at the surveillance audit.

Requirement #	3.1.2.1, Workers' Organizations and Agreements
Requirement	The operating company shall respect the rights of workers to freedom of association and collective bargaining.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The evidence includes the Code of Conduct (2020), the Collective Bargaining Agreement between the worker's association and the company (2020), and human resources policies and procedures. The evidence does not indicate the implementation of the policies. Workers from associations did not attend the opening and closure meetings, nor were present during interviews to confirm the freedom of association-related collective bargaining. The on-site interviews did not include workers' representatives and company representatives, which will be interviewed in the surveillance audit.
Planned Corrective Action(s) from previous report	Demonstrate mechanisms for implementing human resources policies. Strengthen the guarantee of freedom of negotiation for association workers, in addition to maintaining invitations to participate in audit processes. Show the emails with the status of the negotiations that are sent to all employees.
Comments on Progress	The evidence reviewed includes Anglo American's Code of Conduct (April 20, 2022), which affirms the company's commitment to respecting internationally recognized labor rights. The Code explicitly recognizes the right of workers to freely associate and to participate in collective bargaining through unions or other representative organizations. It also states that contractors and suppliers are expected to align with the same principles outlined in the Code of Conduct. Additionally, a minute from the 2024-2025 Collective Bargaining Agreement Assembly (Metabase Itabira Union, November 8, 2024) indicates that direct workers participated in the voting process to approve the Collective Bargaining Agreement signed by Anglo American and workers' representatives, and subsequently registered by the National Ministry of Labor in September 1, 2024 valid until August 31, 2025. This process included the presentation of new clauses and resulted in a 62.5% approval rate (Extra Connection: Approval of the 2024/2025 Collective Labor Agreement of Conceição do Mato Dentro, Anglo American, November 8, 2024). The evidence is supported by interviews with a sample of workers, including employees and contractors, indicates that the company respects their freedom of association and collective bargaining without interference or retaliation. This rating has been raised to fully meets at the surveillance audit.

Requirement #	3.3.1.1, Health and Safety Risk and Impact Scoping
Requirement	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); 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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The company carried out a scoping exercise as indicated by their Environmental Impact Assessments (EIAs) from the year 2007 and 2015, in which the company identified significant potential risks and impacts to community health and safety from mining-related activities. The sources of potential risks and impacts to community health and/or safety included: a. General mining operations (Chapter 6); b. Operation of mine-related equipment or vehicles on public roads (p. 908); c. Operational accidents (Chapter 8.4); d. Failure of structural elements such as tailings dams and waste rock storage facilities were identified in Memorandum on Consequence Classification of Failure of the Tailings Dam (May 2023) and Ground Control Plan (2020, Chapter 6.2); more details on structural elements can be found in IRMA Chapter 4.1; e. Mining-related impacts on priority ecosystem services (Chapter 6.3.2); more details on ecosystem services can be found in IRMA Chapter 4.6; f. Mining-related effects on community demographics, including in-migration of mine workers and others (Chapter 6.3.3); g. Mining-related impacts on the availability of services (Chapter 6.3.3); and h. Hazardous materials and substances that may be released as a result of mining-related activities (Chapter 6), more details on chemical classification of waste and mine-related contaminants can be found in IRMA Chapter 4.1. The evidence does not include: 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. Interviews are needed during the surveillance audit to confirm that the mine has consulted communities relating to issues (a) through (i) relating to potential risks to community health or safety.
Planned Corrective Action(s) from previous report	Present a study related to communicable diseases, shared annually with SUPRAM in accordance with licensing conditions.

	Present a study prepared for the AASW 4C in 2022 (Health Impact Assessment Scope Definition Report). Check whether it will be deepened in 2025.
Comments on Progress	The evidence reviewed includes interviews with key personnel, as well as multiple assessments conducted for the Minas-Rio project and its expansion, indicating that the company has carried out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities at all project stages. These include: - the initial Environmental and Social Impact Assessment (ESIA) for the Minas-Rio project (Brandt Ambiente Ltda., 2007), - the ESIA for the Mina do Sapo expansion (Ferreira Rocha, 2015), - the ESIA for the second raising of the tailings dam Minas-Rio system (WSP, September 2024), - the Social and Human Rights Impact and Risk Assessment (SHIRA) Methodology and risk matrix (Anglo American, 2023, 2024, 2025), - several Workplace Risk Assessments (WRAC): mine site, social, pipeline, and ore processing (Anglo American 2022–2023), - the Biodiversity Management Plan (Anglo American, 2025), - the Anglo American Social Way - Section 4C Community Health and Safety Management Toolkit (Anglo American, September 2022), aligned with IFC Performance Standard 4, - Minas-Rio Social Management Plan (Anglo American, 2024), and - the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Anglo American, April 2025). The evidence indicates the company undertakes scoping exercises on a regular basis and in response to planned expansions to identify potential impacts to community health and safety from the following mining-related activities: a. general mining operations, including dust, noise, odor, and vibrations from blasting activities, which may cause structural collapse of buildings due to vibrations, and property damage; b. operating mining-related equipment or vehicles on public roads, which may cause collisions with other users of the roads, property damage, and environmental impacts on the community (noise, particulate matter); c. operational accidents that may cause fire, explosions, or contamination with potential sources, including transportation of dangerous goods (e.g., fuels, gasoline, diesel, caustic soda, explosives, and pressurized liquids); d. failure of structural elements, such as the failure of the tailings dam or other structures, which may impact the health, safety, and livelihood of people, the environment, including cultural heritage, property, and infrastructure and services; e. mining-related impacts on priority ecosystem services such as water; f. mining-related effects on community demographics due to the resettlement process and influx of migrant workers; g. mining-related impacts on the availability of services due to mine's use of water resources (stakeholders' perception on decrease in volume, scarcity, and quality of water in the region) and in-migration of workers, which increases the strain on infrastructure and public services; h. hazardous materials and substances, which may cause environmental impacts, such as on soil and water resources, as well as social impacts, on community health due to leaking contaminants from the tailings dam, processing plant, and pipelines; and i. increased prevalence of waterborne, water-based, water-related, and vector-borne diseases, as well as communicable and sexually transmitted diseases

	(e.g., HIV/AIDS, tuberculosis, malaria, and Ebola virus disease) that may occur as a result of the mining project. This rating has been raised to fully meets at the surveillance audit.

Requirement #	4.2.4.1, Monitoring and Adaptive Management
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The evidence (Water Resources Management Program, 2021, and Environmental Control Plan Expansion of the Sapo Mine – Water Resources Management Plan, 2018) indicates the company has a very robust and well-established monitoring program. Surface water and groundwater samples are collected, and conditions monitored (i.e., elevation, withdrawal, flow) from about 135 stations at locations on and off the mine site every day/three days per week/monthly/quarterly/ and/or biannually. The evidence indicates that results are evaluated on an ongoing basis. Based upon a review of a sample of the evidence, the company has: (a) established a sufficient number of monitoring points, (b) samples frequently to characterize seasonal variation in water elevation/flow as well as potential influences from mining on water resource quality and quantity, (c) reviews results of each monitoring event to assess change, (d) no evidence was provided to verify re-use of water by non-mining entities occurs (i.e., livestock), (e) the company utilizes industry best practices and methods to credibly detect changes in water characteristics as confirmed through interviews during the site visit, and (f) no evidence if analysis is conducted at lab capable of low method detection limits. The evidence does not include a map under 4.2.4.1 (a) detailing the area of influence and adequacy of monitoring points, or specific trigger levels. Interviews are needed during the surveillance audit to determine the stakeholders' view on the adequacy of the number of monitors and monitoring locations.

Planned Corrective Action(s) from previous report	To highlight the occurrence of water reuse by non-mining entities, in addition to presenting the analysis of laboratories capable of detecting contaminants at levels below the values. Include a map, detailing the area of influence and suitability of monitoring points, or specific trigger levels.
Comments on Progress	The evidence reviewed includes: - A Water Resource Management Program (Senai, March 2024), which is a sample of an annual compliance report. It presents the implementation of the company's Water Resources Monitoring Program, including maps of monitoring points and analysis of precipitation, hydrological (water quantity), hydrogeological, and water quality trends based on monitoring data. It also contains an adaptive water management plan (Chapter 7), describes stakeholder engagement efforts and outcomes, and indicates the existence of a rapid communication plan. - A Technical Report on the Monitoring of Dispersed Users (Senai, March 2024), also a sample of an annual compliance report. It presents evidence of dispersed user monitoring, including water quality monitoring in the communities of Água Quente, Cabeceira do Turco, Beco, São Sebastião do Bom Sucesso, Gondo, and Buritis. The report includes an impact assessment to determine whether cumulative impacts have increased, new impacts have emerged, or any impacts remain unmitigated. A map of surface and groundwater quality monitoring points in these communities is provided (Figure 1). - An Analytical Methodology Report (Merieux NutriSciences, no date), which outlines the analysis methods and quantification limits for parameters in groundwater, surface water, and treated water analysis. - Screenshots of water management systems: HydrometCloud, a system of folders with water quality and quantity data, SIGRHI dashboard showing trending turbidity with regulatory limits. - A flow chart describing a trigger action response plan (TARP) to systematically identify early warning trigger levels for water quality and actions is presented. Evidence of recent implementation of the TARP system is presented for July 2025 for monitoring locations, including the responsible person, corrective action and date. - Quantitative Monitoring Report of Surface Water, Groundwater and Sediments of Water Bodies (SENAI, February 2022), related to the Dam Break Emergency Plan, which presents water quality, sediment quality (metals) and bioaccumulation of metals in ichtiofauna monitoring data (metals) in streams downstream of the mine, which also receive contributions from other watershed users. The results indicate surface water quality exceedances (Al, Cu, Fe, Mn, E. Coli, Sulfides, Turbidity, Zn), groundwater exceedances (Fe, Va), sediments (unregulated, but elevated values for Fe, Al, Mn, Mg, Ti, Ba, which are also elevated in baseline soil values), fish (Pb, Cr). The evidence indicates the company has developed and documented a program to monitor changes in water quantity and quality as described below: a. the Water Resource Management Program (Senai, March 2024) includes maps (Figures 3-7) showing about 95 monitoring points upstream and downstream of the project for surface water and groundwater quality and quantity and at sanitary effluent control points and indicating monitoring locations cover points of compliance. The program describes changes made to the monitoring program since June 2021, noting that 29 groundwater level monitoring points were decommissioned due to operational reasons. The report also details other additions, removals, and modifications to the monitoring program (Table 39). The Technical Report on the Monitoring of Dispersed Users (Senai, March 2024) also includes a map of community surface and groundwater quality monitoring points at 13 points. An annual compliance

report for the Dewatering Permit Conditions (Anglo American, March 2025) and a sample of a monthly spreadsheet containing abstraction volumes (Monthly well report, Anglo American, April 2025) document the monthly water pumped by each of their wells for mine dewatering and indicate that the company monitors water abstraction.

b. the Water Resource Management Program (Senai, March 2024) includes seasonal precipitation trends using data dating back to 1941, hydrological (flow) data from the Sapo and Ferrugem mountain areas and the Dom Joaquim region dating back to 1945, while hydrogeological characterization based on piezometers in these areas is based on data collected since 2007, indicating the company has established baseline parameters for water quantity and seasonal precipitation. A presentation of historical flow and water quality monitoring data (e.g., iron and manganese) of the full range of observed daily flow, including flows above Q90%, shows a close correlation. Iron and manganese concentrations increase with higher flows. They are key elements in the local soil formation. In addition, the 2024 program states that monitoring frequencies include daily precipitation measurements, flow monitoring three (3) times per week, monthly monitoring of groundwater levels, surface water quality monitoring monthly at project-influenced points and quarterly at reference points, semi-annual groundwater quality sampling during dry and rainy seasons, monthly effluent monitoring, and monthly monitoring related to community water. Continuous flow meters connected by the satellite to the Geotechnical Monitoring Center were observed during the field visit. The Water Resource Management Program includes an analysis of water quantity and quality in correlation to dry and wet seasons, indicating the company has identified clear seasonal trends in their sampling, indicating the monitoring frequency is adequate to capture seasonality. The seasonality of flows from the TSF and mine are attenuated by the dams and dikes, so a single storm event does not result in an uncontrolled release of water to streams. While the company does not have specific procedures for sampling during or after abnormal or extreme weather events, interviews with relevant staff in July 2025 indicate that the company monitors turbidity at least three (3) times per week and increases in-field water quality measurements during the peaks of the rainy season, when increased discharge is necessary, as turbidity increases and is correlated to Fe and Mn concentrations.

c. Chapter 7 of the Water Resource Management Program (Senai, March 2024) outlines the company's adaptive water management plan, which includes analyzing monitoring results to inform updates to the monitoring plan, with the aim of first preventing, then minimizing, and finally treating and controlling impacts. A flowchart for adaptive management (Figure 81) shows that in the event of environmental incidents, the company will develop action plans and implement corrective and preventive measures. The analysis and review of monitoring data are documented in the Water Resource Management Program (Chapter 4 - Results and Discussion). Interviews with mine staff and field inspection in July 2025 provided evidence of modification of water management to reduce concentrations of suspended sediments, Fe and Mn concentration in the discharge to the streams below dams and dikes (flocculant and precipitation techniques), particularly after exceptional discharges in January 2024 that resulted in Fe precipitation staining on rocks in stream channels. A new TARP system (implemented in June/July 2025), establishing trigger levels, responsible parties and corrective actions were established based on water quality exceedances. Since pre-mining baseline concentrations of Fe and Mn in springs and streams are above regulatory limits, exceedances do not necessarily trigger an immediate action unless a management committee classifies the data as an emergency. The company has developed an early warning system with water quality trigger levels (implemented in June/July 2025) that requires review by mine staff, referral to an emergency committee if deemed a potential incident, and action by that

	committee, including communication and involvement of potentially affected communities. d. Generally, the mine-affected water that is discharged from dams and dikes is not used for potable water. However, this water is used by livestock which drink from the streams, which is a non-mining activity. The mine has a water quality monitoring program in the streams downstream of the dikes and dams, results are communicated with community members (see evidence in 4.2.1.2). e. For surface water, groundwater, and effluents, the Water Resource Management Program (Senai, March 2024) indicates that the company uses established, scientifically recognized methods for water sampling, consistent with Ordinance GM/MS No. 888 of May 4, 2021, and Brazilian Standard ABNT NBR 15847:2010, which establish procedures for water monitoring. Sampling is carried out by a qualified third party, the SENAI FIEMG Innovation and Technology Center. Interviews with key personnel indicated that in-situ parameter measurements are conducted in the field, parameters with short holding times are analyzed in Belo Horizonte, and metals with longer holding times are analyzed in São Paulo. The evidence indicated that water samples are collected and managed following Brazilian and international standards - including container types, preservation techniques, and holding times. f. The Analytical Methodology Report (Merieux NutriSciences, no date) indicates that the laboratory conducting water quality analysis is capable of detecting contaminants at levels below those specified in the IRMA Water Quality Criteria by End-Use Tables. Water Quality reports contained in Technical Notes on the Disclosure of Analytical Results and the Quality of Drinking Water Produced and Distributed (Anglo American, June 2024) indicate that Merieux NutriSciences has an ISO/IEC 17025 accreditation. The evidence does not include details or documentation to confirm: c. the company has developed quantitative triggers for immediate emergency action. Currently, such action requires an emergency committee decision, which may delay response.

Requirement #	4.2.4.4, Monitoring and Adaptive Management
Requirement	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.
Critical	Yes
Rating from previous report	Substantially Meets
Justification from previous report	The evidence, Environmental Control Plan (PCA) Expansion of the Sapo Mine, and interviews with the company officials and community members, indicate the company has monitoring plans and mitigation management actions based upon triggers for surface water flow at the mine site. The evidence indicates the company has developed adaptive management practices for water-related impacts, discussing with communities the plans for relocating water sources. The outlined practices have been shared with affected communities.

	The evidence does not include a procedure that outlines trigger thresholds, indicators, and timelines, including how potential impacts are to be managed or mitigated.
Planned Corrective Action(s) from previous report	Review the Water Resources Management Program, including a chapter for the adaptive management plan (4.2.4.2).
Comments on Progress	The evidence reviewed includes a sample of the company's Water Resource Management Program Annual Implementation Report (Senai, March 2024), which outlines activities and performance related to water management. It also includes the company's Critical Risks and Controls Book (Anglo American, Rev. 37, last updated December 24, 2024), which identifies suspended sediment and water scarcity as key risks. For these two risks, the company has developed bow tie risk analyses for suspended sediment (Anglo American, Rev. 5, no date) and water scarcity (Anglo American, Rev. 3, no date), each accompanied by Critical Controls Checklists - one for diminishing natural water resources (Anglo American, Rev. 3, July 2019) and one for the loss of sediment containment (Anglo American, Rev. 3, July 2019). The evidence also includes samples of completed Critical Control Inspection Reports (Anglo American, February 26, 2025), intended to verify implementation of the identified controls. a. The Water Resource Management Program Annual Implementation Report (Senai, March 2024, 197 pages) outlines ongoing water management activities and mitigation measures. These include: - Monitoring and analysis of surface water, groundwater, and treated effluent quality and quantity, with comparisons to precipitation data and background values. - Sediment quality monitoring in receptor streams downstream of dams and dikes. - Hydrobiological monitoring (e.g. phytoplankton and zooplankton richness, aquatic macroinvertebrate communities) downstream of dams and dikes. - Use of water treatment systems with no direct discharge of untreated effluents to natural waterbodies. There are small infiltration systems at some of the satellite wastewater treatment plants and an infiltration lagoon at the non-hazardous waste landfill. - Construction and maintenance of dams and dikes to collect potentially sediment-laden stormwater run-off and regulate water flow; their effectiveness is evaluated through turbidity (suspended sediment) concentrations in natural streams downstream of dams and dikes. - Automatic shut-off of the Peixe River water abstraction system, if water level reaches the minimum level as defined by regulator, 10m3/s. - Recycling of about 7% of process water from the TSF to reduce intake from the Peixe River. Further, the Critical Risks and Controls Book (Anglo American, Rev. 37, December 2024) identifies sedimentation and water scarcity as key risks. Related bow tie analyses (Anglo American, undated) and critical control checklists (Rev. 3, July 2019) outline preventive measures for mitigating impacts from excavation, land clearing, operational failures, and water abstraction/discharge. These include erosion control, maintenance of water systems, and residual flow monitoring. b. Chapter 7 of the Water Resource Management Program describes an adaptive water management approach. It outlines how monitoring data inform updates to mitigation measures and provides a flowchart (Figure 81) illustrating a process of incident identification, development of action plans, and implementation of corrective and preventive measures. Chapter 4

documents the analysis of monitoring data, including exceedances (e.g., oil and grease at ETE System B in February 2023) and discussion of root causes.

The bow tie risk analyses and critical control checklists also include reactive or mitigative controls such as reducing or halting water abstraction, community notification in case of expected high discharge in spillways from dams and dikes, implementation of sedimentation control projects, degraded area recovery programs, and investigation and reporting of exceedances.

Trigger action response plans (TARPs) provided for the Peixe river, where the company abstracts surface water, as well as for groundwater abstraction wells, site dikes, and the TSF, describe specific water quantity thresholds for each facility as along with predefined actions and responsibilities for water quantity.

The company also provided evidence that quantitative TARPs for the dikes were developed in 2021. These TARPs are subject to daily monitoring routines and deviation management processes led by the Environmental team. At the Peixe River abstraction point, threshold enforcement is automated, triggering shutdown of the pumping system when limits are exceeded.

The company has recently (June/July 2025) developed specific trigger levels for relevant quality parameters at each monitoring location taking into account the baseline values, an early warning level of 80% of the legal limit, and 3 more trigger levels based on legal limits, IRMA livestock, and IRMA aquatic resources quality limits; which documents exceedances, responsible parties actions taken, timelines, and review of mitigation action efficiency.

Interviews with key personnel confirm that the existing adaptive management plan is implemented at the operational level, with recent improvements in systematic record keeping of corrective actions and effectiveness review still in its early phases. The company evaluates water quality and quantity values that reach trigger levels, and implements mitigation measures that can at least partially control water characteristics (e.g., sediment barriers and electric sediment flocculation in front of the TSF dam, chemical flocculation in the spillways). If mitigation measures are insufficient and water quality or quantity parameters are considered potentially harmful to workers, communities or the environment, the issue is escalated to a management committee to decide whether it constitutes an incident or emergency. An interview with mine staff (July 2025) indicated that this decision-making process may delay response times and early warnings, particularly in cases of repeated exceedances of Fe, and Mn above regulatory limits, considering the region background. According to this interview, exceedances of water quality parameters or low flows are not usually considered incidents and do not generally trigger communication with the management committee, but are used to calibrate existing mitigation actions and test new mitigation techniques.

The evidence indicates that the company has:

a. developed and implemented actions to mitigate predicted impacts on water quality and quantity; and

b. established an adaptive water management framework to respond to actual impacts on water resources, including the development of TARPs that define trigger levels and corresponding predefined adaptive management actions.

The evidence does not include documentation to confirm that the predefined emergency or **adaptive** management actions have been developed in response to the early warning thresholds and trigger levels defined, as required by sub-requirement (b). Preventive actions related to water quality results were implemented from April 2025 onward and are documented, including evidence of corrective measures supported by meeting minutes, internal communications, and email records.

3.6. Notable Performance Improvements

The surveillance audit identified several performance developments since the initial audit. These include:

- The company has implemented the integrated Qualifica system to support monitoring of legal obligations and follow-up on corrective actions.
- Contractor oversight and transparency measures have been enhanced, and supplier and contractor management has been expanded through updated procedures and monitoring systems.
- Operational and technological changes in wastewater management at the TSF dam and dikes to improve the water quality and ensure baseflows in the receiving streams.
- Replacement of an additive in the processing plant that reduces the odor impacts from the TSF.
- Enhanced and automated traffic control system within the mining area.
- Assistance in providing a supply of potable water to some of the communities from wells, and water trucks when necessary.
- Resettlement of communities outside the tailings dam break self-rescue zone.
- Improvements in community health and safety scoping processes and in security arrangements.

These are described in more detail by chapter in the next section.

3.7 Concerns Related to Continued Maintenance of Achievement Level

Auditors identified concerns in some areas that could threaten the continued maintenance of the site's current achievement level of IRMA 75; these include incomplete stakeholder engagement in resettlement and water management, unresolved corrective actions, and methodological gaps in human rights due diligence. Some occupational health and safety indicators also show an upward trend in incidents. These factors could present a potential risk to the site in maintaining its previously awarded IRMA 75 level of achievement if not addressed and monitored through ongoing management and audit processes. However, the outcome of this surveillance audit does not indicate a risk that would warrant suspension of the certificate at this time.

4. General Performance by IRMA Standard Principle and Chapter

Because the surveillance audit is limited in scope, this audit did not include assessment of every requirement in every chapter. An overview of current performance from the surveillance audit for each chapter that was audited (partially or wholly) is provided in the following subsections.

4.1. Principle 1: Business Integrity

During the previous audit, this principal received an overall score of 79%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 1.1—Legal Compliance

For this surveillance audit, all requirements under this chapter were reassessed in accordance with Section 9.6 of the IRMA Certification Body Requirements (Version 2.1). Since the initial audit, the company has transitioned from a predominantly manual monitoring approach to the integrated Qualifica system, enabling automated tracking of legislative changes, classification of obligations, and follow-up of corrective actions. Contractor oversight processes and transparency measures have also been strengthened. However, one instance was identified in which a legal non-compliance was not integrated into formal compliance processes or addressed in a timely manner, and, as in the previous audit, some corrective actions remain overdue.

Chapter 1.2—Community and Stakeholder Engagement

For this surveillance audit, five requirements of this chapter were reassessed. The audit team verified that the company has recently revised engagement systems in place, such as the Coexistence Program and its associated Coexistence Committee, established in 2017 as part of commitments to secure the Preliminary Installation License. The committee operated until 2021, when it was discontinued following disputes over the electoral process for renewing its representation. In May 2025, the Coexistence Program was revised to include dialogue mechanisms such as the committee, dialogue groups, and informal forums. However, this revision was not subject to stakeholder consultation, representing a gap in engagement practice.

The Independent Technical Advisory (NACAB) body remains an important mechanism for community engagement, issuing technical notes when it identifies collective rather than individual complaints. However, not all feedback provided through these notes is formally addressed, and there is no clear feedback to stakeholders on how the company has considered or acted upon the advisory body's recommendations.

In addition, the ongoing resettlement processes, specifically the involuntary resettlement of communities in the tailings dam self-rescue zone and the voluntary resettlement of the Gondó community, require heightened attention from the company to ensure that agreements are negotiated and implemented in ways that respect the rights of affected parties throughout all stages of resettlement.

Progress on the critical requirement 1.2.2.2, which was rated as substantially met, is summarized in Section 3.5.

Overall, the company's performance in this chapter has been downgraded since the initial audit, reflecting gaps in engagement practices and the handling of critical community processes.

Chapter 1.3—Human Rights Due Diligence

For this surveillance audit, eleven requirements of this chapter were reassessed. The findings indicate that the company's human rights risk and impact assessment process is largely guided by the Anglo American Social Way Toolkit (September 2022), which defines "risk" as what affects the business and "impacts" as what affects stakeholders. According to the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct (OECD, 2018), the concept of risk from a human rights perspective takes an outward-looking approach, referring to the likelihood of adverse impacts on people, the environment, and society caused by, contributed to, or directly linked to business operations. The guidance further notes that some operations, business activities, products, or services are inherently high-risk because they are likely to cause, contribute to, or be directly linked to adverse impacts on Responsible Business Conduct issues. The current Social Way framework does not fully incorporate this perspective, representing a methodological gap that needs to be addressed.

A significant change since the initial audit is that, as a result of the company's mining activities in the region, new resettlement processes became necessary in 2023, including an involuntary resettlement program for communities located in the tailings dam self-rescue zone and a voluntary resettlement program for the Gondó community. These communities face potential human rights impacts before, during, and after the resettlement processes.

Three (3) critical requirements were assessed during this surveillance audit. A drop in performance rating was noted for one of them, 1.3.3.3. More information can be found in Table 5-2.

Chapter 1.4—Complaints Mechanism/Access to Remedy

For this surveillance audit, six (6) requirements of this chapter were reassessed. As in the initial audit, findings indicate that the company has operational-level complaints and grievance mechanisms in place at the mine, intended to provide accessible and effective means for communities and affected individuals to raise and resolve issues related to mining activities. However, during the surveillance audit, some stakeholders, particularly resettled community members, expressed dissatisfaction regarding how grievances have been handled. These gaps indicate the company's existing mechanisms are not yet fully aligned with the purpose of providing effective and timely resolution of submitted complaints.

Progress on the critical requirement 1.4.1.1, which was rated as fully met, is summarized in Section 3.5.

Chapter 1.5—Revenue and Payments Transparency

For this surveillance audit, two requirements of this chapter were reassessed. As in the initial audit, findings indicate that the company continues to work toward implementing policies and procedures that prohibit bribery and other forms of corruption by employees and contractors. No significant changes were observed in the company's approach or performance in this area since the initial audit.

4.2 Principle 2: Planning for Positive Legacies

During the previous audit, this principal received an overall score of 78%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 2.1—Environmental and Social Impact Assessment and Management

For this surveillance audit, seven (7) requirements of this chapter were reassessed. As in the initial audit, findings indicate that the company continues to work toward scoping processes to identify potentially significant environmental and socioeconomic impacts; however, stakeholder engagement in all phases, outside of ESIA-related consultation meetings, is not yet fully established. No significant changes were observed in the company's approach or performance in this area since the initial audit.

Chapter 2.2—Free, Prior and Informed Consent

Chapter Not Relevant. Minas-Rio is an existing mine, and the evidence reviewed included the company's Environmental and Social Impact Assessments (ESIA) (2007, 2015, and 2024), as well as government data on Indigenous and traditional rights-holder communities in the area surrounding the mine. According to Fundação Cultural Palmares, a Brazilian government agency dedicated to preserving and promoting Afro-Brazilian culture and heritage, there are eighteen (18) quilombola communities in the municipalities near the mining project. The ESIAs conducted for the mine evaluated potential environmental impacts, including physical, biotic, and social variables. Within the scope of the Sapo Mine Expansion 2015 ESIA and the Second Raising of the Minas-Rio Tailings Dam 2024 ESIA, the company assessed potential impacts on the formally recognized quilombola communities and concluded that there were no significant impacts from the mining operations. The initial IRMA audit determined that these quilombola communities were not impacted by the mine, and consequently, this chapter was deemed Not Relevant.

During this surveillance audit, on-site observations and interviews with company personnel, community members, local NGOs, and government agencies indicated that some affected community families maintain elements of traditional lifestyles, which could be considered part of the characteristics of quilombola identity. The communities where these families reside are in the early stages of a self-identification process as quilombola communities. A study commissioned by the State Public Prosecutor's Office identified the presence of traits associated with traditionality; however, it did not find evidence that a formal self-identification process had yet been initiated by the communities themselves.

Separately, a new assessment was commissioned exclusively by Anglo American to update information on affected communities that maintain elements of quilombola lifestyles. This study, which is scheduled for completion by September 2025, is independent of the Public Prosecutor's Office and, according to the information available, its preliminary results do not indicate a change in the current scenario.

Given that the self-identification process is at an early stage, it would be premature to determine, during this surveillance audit, that this chapter should be considered relevant. According to information provided by a local stakeholder, prematurely declaring the chapter relevant at this time could disrupt the process by requiring a level of organization and representation that they do not yet possess.

Chapter 2.3—Community Support and Benefits

For this surveillance audit, only one requirement of this chapter was reassessed. As in the initial audit, findings indicate that the company continues to work toward developing support for communities; however, this support is not yet fully established. No significant changes were observed in the company's approach or performance in this area since the initial audit.

Chapter 2.4—Resettlement

For this surveillance audit, five (5) requirements of this chapter were reassessed. As in the initial audit, findings indicate that the company continues to work toward meeting the objectives of this chapter. Since the initial audit, a significant change has been the initiation of a new resettlement process in 2023, including an involuntary resettlement program for the communities of Água Quente, Passa Sete, and São José do Jassém, located in the tailings dam self-rescue zone, and a voluntary resettlement program for the Gondó community. The development of the involuntary resettlement plan was carried out through a participatory process involving affected communities, the mining company, the Public Prosecutor's Office of the State of Minas Gerais, local authorities, and the Independent Technical Advisory Group (NACAB). This represents an advance in the engagement process for resettlement, particularly active participation by all communities within the self-rescue zone, but some gaps remain, as identified in the findings. The voluntary resettlement plan for the Gondó community, because affected by noise and dust, is still under development.

It is important to note that the company is undergoing a new licensing process for the raising of the tailings dams, and, if approved, a new resettlement plan will need to be developed for additional affected communities, such as Arrudas, as these community members have not participated in the development of the 2024 Resettlement Plan.

One critical requirement, 2.4.7.1, was assessed during this surveillance audit, and a drop in performance rating was noted. More information can be found in Table 5-2.

Chapter 2.5—Emergency Preparedness and Response

For this surveillance audit, the two (2) critical requirements of this chapter were reassessed. As in the initial audit, findings indicate that the company has developed an APELL-aligned, integrated, site-wide emergency response plan. No significant changes were observed in the company's approach or performance in this area since the initial audit.

Progress on the critical requirements 2.5.1.1 and 2.5.2.1, which were rated as substantially met, is summarized in Section 3.5.

Chapter 2.6—Planning/Financing Reclamation & Closure

For this surveillance audit, three (3) requirements of this chapter were reassessed. As in the initial audit, the national context remains unchanged: while Brazil offers a mechanism to establish partial financial surety through the federal government, it does not fully address all reclamation and closure liabilities. Findings indicate that the company would provide the Mine Closure Plan to stakeholders upon request; however, no evidence was provided to confirm stakeholder consultation on the plan or on post-mining land use. No significant changes were observed in the company's approach or performance in this area since the initial audit.

Two (2) critical requirements were assessed during this surveillance audit. Progress on the critical requirement 2.6.2.6, which was rated as fully met, is summarized in Section 3.5.

4.3 Principle 3: Social Responsibility

During the previous audit, this principal received an overall score of 97%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 3.1—Fair Labor and Terms of Work

For this surveillance audit, eleven requirements from this chapter were reassessed. The company continues to demonstrate effective implementation of fair labor practices within its operations. It has expanded its approach beyond internal compliance to include supplier and contractor management, supported by the Group Contractor Performance Procedure (January 2023) and the Contractor Performance Management system (August 2023), which strengthen verification processes and compliance requirements. However, as in the initial audit, there is still no documented risk assessment or structured monitoring program for suppliers, and no evidence of supply chain due diligence reports or monitoring records to verify the absence of child, forced, or trafficked labor.

Progress on the critical requirement 3.1.2.1, which was rated as fully met, is summarized in Section 3.5.

Chapter 3.2—Occupational Health and Safety

For this surveillance audit, one requirement of this chapter was reassessed, including two (2) critical sub-requirements. Findings include a general perception among workers that the company prioritizes occupational health and safety (OHS), as well as evidence of OHS processes being integrated into operational activities. However, the company's Safety Performance 1a. Safety & Health Slides (Anglo American, July 2024–June 2025), which include both leading and lagging indicators, such as total reported incident frequency rate (TRIFR), first aid cases, medical treatment cases, first incidents, and high-potential incidents, show that TRIFR has ranged from 0 to 2.87 over the past 12 months, with cumulative values of 1.32 (2023), 1.37 (2024), and 1.66 (2025). These figures indicate a slight increase in accident rates that needs to be addressed.

One critical requirement, 3.2.4.1, was assessed during this surveillance audit, and a drop in performance rating was noted. More information can be found in Table 5-2.

Chapter 3.3—Community Health and Safety

For this surveillance audit, four (4) requirements of this chapter were reassessed. Two (2) were deemed not relevant, based on public health monitoring data indicating no significant risk of community exposure to HIV/AIDS, tuberculosis, malaria, or other emerging infectious diseases related to mining activities. Findings indicate that the company has improved its scoping exercise to identify potential risks and impacts to community health and safety, and continues to monitor and update this exercise periodically in order to implement appropriate preventive and mitigative actions. However, it was noted that some stakeholders, including community members, are not fully aware of the actions being taken by the company to address potential health and safety impacts (e.g., water quality streams, traffic, dust, noise odors), which are not publicly available, and have expressed concerns regarding the adequacy of the mitigation measures implemented.

Progress on the critical requirement 3.3.1.1, which was rated as fully met, is summarized in Section 3.5.

Chapter 3.4—Conflict-Affected and High-Risk Areas

This chapter was considered not relevant during the initial audit; however, recent IRMA guidance clarifies that requirement 3.4.1.1 cannot be rated as not relevant for any site, and it was therefore assessed for the surveillance audit. Findings indicated that the mining project is not located in a conflict-affected area and that the company does not procure minerals from external sources located outside the project site. As a result, the remainder of the chapter was deemed not relevant.

Chapter 3.5—Security Arrangements

For this surveillance audit, four (4) requirements of this chapter were reassessed. One requirement concerning public security forces providing security for certain aspects of the mining project, which had been considered not relevant during the initial audit, was assessed in this audit. Improvements were observed in the company's approach and performance in this area since the initial audit.

Chapter 3.6—Artisanal and Small-Scale Mining

Chapter Not Relevant.

Chapter 3.7—Cultural Heritage

Chapter not assessed for this surveillance audit.

4.4 Principle 4: Environmental Responsibility

During the previous audit, this principal received an overall score of 83%. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

Chapter 4.1—Waste and Materials Management

For this surveillance audit, seven (7) requirements from this chapter were reassessed. The company continues to demonstrate effective implementation of structured monitoring systems, risk identification and mitigation measures, and safety protocols for mine waste facilities. These include continuous geotechnical monitoring, with real-time instrumentation at the Geotechnical Monitoring Center, routine geotechnical inspections, and annual emergency response simulations related to the tailings dam, conducted in coordination with nearby communities.

The Minas-Rio TSF is managed in accordance with applicable Brazilian dam safety regulations, including ANM Resolution 13/2019, and incorporates practices aligned with the Global Industry Standard on Tailings Management (GISTM). As part of its governance framework, the facility undergoes periodic external geotechnical reviews and audits, including a third-party Safety Inspection Report issued by WSP in March 2025. This report classified the structure as low risk with high potential associated damage, in accordance with ANM Resolution 95/2022. These external assessments contribute to oversight of the facility and inform monitoring and management activities.

As part of the second expansion phase of PDE North, scheduled to begin in 2026, the company is constructing a Tailings Filter Facility to enable filtration of wet tailings and dry stacking of approximately 85% of total tailings.

However, consistent with findings from the initial audit, the evidence does not indicate that affected communities were consulted on alternatives or design decisions for new mine waste facilities with potential for catastrophic failure, including the North Waste Rock Pile (PDE North) and its expansions. In addition, while performance evaluation and management review processes exist for the TSF and PDE North, the evidence does not indicate that these processes are applied comprehensively or systematically across all mine waste facilities, including their associated expansions, as required under Requirement 4.1.5.6.

As in the initial audit, the company continues to meet risk management requirements, but has not fully addressed stakeholder consultation gaps identified previously.

Four (4) critical requirements were assessed during this surveillance audit. A drop in performance rating was noted for two (2) of them, 4.1.5.1 and 4.1.5.6. More information can be found in Table 5-2.

Chapter 4.2—Water Management

For this surveillance audit, eight (8) requirements of this chapter were reassessed. Findings indicate that the company has implemented new measures to manage water resources and address certain water quality and quantity issues through adaptive management including improved treatment and flow mitigation for discharges to natural streams, the provision of alternative water sources such as wells and trucked water to more communities affected by elevated levels of iron and manganese, which are common in the region, and the risk of turbidity in streams impacted by the TSF and mining areas, the addition of abstraction well water for communities supply systems, and implementation of a new system that includes trigger levels, responsible parties and referral to a management committee for emergency situations. However, gaps in the identification of all potentially affected community stakeholders, robust consultation and engagement on mitigation of water resource impacts, particularly natural water-bodies, are still present.

Progress on the critical requirements 4.2.4.1 and 4.2.4.4, which were rated as substantially met, is summarized in Section 3.5.

Chapter 4.3—Air Quality

For this surveillance audit, two (2) requirements of this chapter were reassessed. Findings indicate that the company continues to implement air quality management systems, including impact assessments and a site-wide Air Quality Management Plan. The plan includes monitoring emissions, applying preventive controls such as watering trucks on unpaved roads, revegetation, equipment maintenance, and enclosures, and responding to dust-related grievances. Real-time air quality data is shared with the environmental agency, and monitoring results are publicly reported online. Annual reports confirm the plan's implementation and report only limited exceedances of air quality standards, some associated with regional forest fires unrelated to mining activities. Improvements were observed in the company’s approach and performance in this area since the initial audit.

Chapter 4.4—Noise and Vibration

Chapter not assessed for this surveillance audit.

Chapter 4.5—Greenhouse Gas Emissions

For this surveillance audit, the company’s climate-related commitments and practices were reassessed. The company has a corporate Climate Change Policy (2024) that outlines

commitments to measure Scope 1 and 2 GHG emissions, identify mitigation opportunities following the hierarchy (avoid, reduce, substitute, compensate), and set corporate-level reduction targets. Evidence confirms annual emissions reporting and a target to reduce GHG emissions by 30% by 2030.

Compared to the initial audit, the company continues to maintain a corporate climate change policy that addresses key requirements. The policy also indicates that operational targets are reviewed every five (5) years or following material changes, in line with the GHG Protocol. However, the policy itself lacks a defined process for periodic review and revision, as required by this chapter.

One critical requirement, 4.5.1.1, was assessed during this surveillance audit, and a drop in performance rating was noted. More information can be found in Table 5-2.

Chapter 4.6—Biodiversity, Ecosystem Services and Protected Areas

For this surveillance audit, seven (7) requirements of this chapter were reassessed. Of the four critical requirements reviewed, two remain fully met and two have been reclassified as not relevant, as the mine is not located within the protected-area categories to which those requirements apply. While the Ferrugem Ridge Natural Monument is located near the mining concession, its presence does not bring the mine under any of the protected-area categories cited in those provisions for IRMA applicability.

Findings indicate that the company expands its understanding of the biodiversity and ecosystem service-related impacts of its mining activities and formulates restoration strategies and conservation actions aligned with the mitigation hierarchy for biodiversity matters and in collaboration with relevant scientific parties. The mining plan reduces impacts to the native forests to the west of the mine pit by limiting intervention; drainage is directed primarily to the east, and no mine infrastructure is located in the drainage basin. Residual impacts to biodiversity are compensated through offsets within nearby native forests, commensurate with the size of the impacts under Anglo American's corporate-level biodiversity standards. Revegetation at the mine site is currently primarily implemented to control erosion, and not to restore biodiversity, since a second phase of mining will require excavation to deeper iron ore formation and a larger pit, The company keeps communication channels open to gather stakeholders' input relating to biodiversity, ecosystem services, and protected areas.

Chapter 4.7—Cyanide Management

Chapter Not Relevant.

Chapter 4.8—Mercury Management

Chapter Not Relevant.

5. 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.

During the surveillance audit, the current status of critical requirements was reviewed by auditors. This review included assessing progress of corrective actions for all critical requirements that were not fully met as well as changes to site operations that impact the performance of all critical requirements. Improvements were observed in critical requirements 1.4.1.1, 2.6.2.6, and 3.3.1.1, demonstrating positive movement on certain issues. However, ratings for other critical requirements declined (1.3.3.3, 2.4.7.1, 3.2.4.1, 4.1.5.1, 4.1.5.6, 4.5.1.1), indicating that while there has been progress in addressing some corrective actions, sustained attention is needed to ensure consistent improvement across all critical areas.

5.1. Summary of Site Performance Changes in Critical Requirements

A snapshot of achievement against the critical requirements, as determined by the auditors during this surveillance audit, is provided below. Details on the requirement and rationale by the auditors are provided in Section 3.5 under the relevant chapter and in Section 6.1, focusing on gaps that were identified for corrective action.

Table 5-1 Review of Ratings for Each Critical Requirement

Requirement #	Previous Rating	Current Rating	Comment from Auditor
		Business Integrity	
1.1.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.2.2.2.	Substantially Meets	Substantially Meets	Corrective action plan on track. See progress report in Section 3.5 and outstanding actions described in Section 6.1.
1.3.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.3.2.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Requirement #	Previous Rating	Current Rating	Comment from Auditor
1.3.3.3.	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
1.4.1.1.	Substantially Meets	Fully Meets	Effective correction action. See progress report in Section 3.5.
1.5.5.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
		Planning for Positive Legacies	
2.1.3.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.2.2.2	Not Relevant	Not Relevant	Not Relevant.
2.4.7.1	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
2.5.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track. See progress report in Section 3.5 and outstanding actions described in Section 6.1.
2.5.2.1	Substantially Meets	Substantially Meets	Corrective action plan on track. See progress report in Section 3.5 and outstanding actions described in Section 6.1.
2.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.2.6	Substantially Meets	Fully Meets	See progress report in Section 3.5
2.6.4.1	Not Scored	Not Scored	Not scored per IRMA guidance.
		Social Responsibility	
3.1.2.1	Substantially Meets	Fully Meets	See progress report in Section 3.5

Requirement #	Previous Rating	Current Rating	Comment from Auditor
3.1.3.3	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.5.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.3	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.2.4.1.a, b	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
3.3.1.1	Substantially Meets	Fully Meets	See progress report in Section 3.5
3.4.2.1	Not Relevant	Not Relevant	Not Relevant.
3.5.1.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
Environmental Responsibility			
4.1.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.5.1	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
4.1.5.6	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
4.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

Requirement #	Previous Rating	Current Rating	Comment from Auditor
4.2.4.1.a-e	Substantially Meets	Substantially Meets	Corrective action plan on track. See progress report in Section 3.5 and outstanding actions described in Section 6.1.
4.2.4.4	Substantially Meets	Substantially Meets	Corrective action plan on track. See progress report in Section 3.5 and outstanding actions described in Section 6.1.
4.3.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.5.1.1	Fully Meets	Substantially Meets	The recent audit indicates a change in performance. See progress report in Section 3.5 and requirement-specific information in Appendix A.
4.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.5.3	Fully Meets	Not Relevant	Not Relevant. Evidence reviewed in this assessment indicates that the mine is not located within any of the protected area categories listed in this requirement.
4.6.5.4	Not Relevant	Not Relevant	Not Relevant.
4.7.7.1	Not Relevant	Not Relevant	Not Relevant.
4.8.2.3	Not Relevant	Not Relevant	Not Relevant.
4.8.2.2	Not Relevant	Not Relevant	Not Relevant.

The following table shows critical requirements that were previously rated fully met but have been determined to be substantially met because of the surveillance audit:

Table 5-2 Summary of Critical Requirements with Downgraded Ratings

Requirement #	Surveillance audit justification
1.3.3.3 Critical. Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall:	The evidence reviewed includes the Social and Human Rights Impact Risk Assessment Tool (SHIRA) (Anglo American, April 2025). Interviews with key mine personnel indicate that actions to mitigate key human rights are underway, with

Requirement #	Surveillance audit justification
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.	oversight by a Human Rights Coordination corporate team. Interviews with affected community members indicate that these actions were not developed in collaboration with rights holders. Some individuals reported that the remedies implemented in relation to previous voluntary and involuntary resettlement processes (where households have already been relocated to new houses) were not culturally appropriate and have not been fully accepted in practice (e.g., impacts on community and neighborhood relationships, disruption of traditional festivities and religious activities, mental health distress, among other social impacts). The evidence reviewed indicates: a. the SHIRA tool identified that the company is "causing" 19 human rights impacts, including issues related to the resettlement process (such as extended length of the process and delay in issuance of land tenure certificates), environmental impacts (noise, dust and vibration), and interference with the affected communities' dynamics, among others; a.i. the company has developed and implemented recommendations and mitigation actions to cease these impacts, as indicated in the Blasting and Vibration Monitoring Program (Anglo American, March 2024), which specifically addresses impacts such as noise, dust and vibrations caused by blasting, and in a spreadsheet that documents responses provided to community members who submitted grievances related to some of those impacts caused by the mine (BI Consolidated 2022-2023) (Anglo American, no date) indicating that the company has changed activities that caused the grievance; a.ii. mitigation strategies and remediation measures were developed and implemented for these impacts, including monitoring noise and vibration to ensure levels remained within legal limits near affected communities, as indicated in monitoring reports for 2024, and supporting community members who submitted grievances related to some of those impacts caused by the mine (BI Consolidated 2022-2023) (Anglo American, no date); b. the SHIRA tool identified that the company is "contributing to" eight (8) human rights impacts, for which mitigation and remediation actions were developed and implemented, such as providing water trucks and maintenance to water wells for affected communities and monitoring water sources that have experienced reduced flow, as outlined in the 2025 SHIRA, mitigation controls; c. the SHIRA tool identified that the company is "directly linked to" 15 (fifteen) human rights impacts, and

Requirement #	Surveillance audit justification
	mitigation and remediation actions were developed and implemented, such as supply chain monitoring and a review of suppliers' agreement, as indicated in a revised supplier agreement template (no date) and in the Corporate Security Management Procedure (Anglo American, August 2022); and d. the company cooperates with judicial or state-based investigations or processes related to actual human rights impacts, as indicated in the Mediation Agreement signed with the Public Prosecutor's Office of the State of Minas Gerais in November 2024 regarding the Resettlement Plan for the tailings dam self-rescue zone. The evidence does not indicate that: a.ii. all mitigation/remediation measures were implemented or planned to be implemented in collaboration with affected rights holders, nor that these processes were timely and culturally appropriate. Stakeholder perceptions of potential ongoing or residual impacts will require further verification during subsequent audits.
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 the RAP/LRP and the objectives of this chapter have been met.	The evidence reviewed includes the Resettlement Action Plan (RAP) for the Sapo, Turco, Cabeceira do Turco and Beco Communities - Minas Rio System (ERM, December 2018), prepared by independent consultants commissioned by the company, which outlines a three-year long program, named the Program for the Productive Restructuring of Economic Activities, to support the restoration of livelihoods of those affected by land acquisition (Chapter 9). The 2018 RAP also describes the formation of the Coexistence Committee, established in 2017, comprising 14 members from resettled communities and Anglo American representatives, which facilitates dialogue on the resettlement process. The RAP further details the required qualifications of company personnel involved in RAP monitoring. Complementary evidence reviewed includes the Assessment of the Implementation of the Optional Negotiation Program (ERM, December 2024), which evaluates the RAP's implementation from June 2019 to September 2024. The report outlines the methodology used for monitoring and evaluation and summarizes the findings of monitoring campaigns conducted from October 2020 to August 2024 (Table 5.2, page 43). All monitoring campaigns revealed outstanding issues requiring follow-up. Action plans and corrective measures for two (2) sampled campaigns (2022 and 2025) were reviewed and indicate that the company implemented corrective actions in response to identified gaps in meeting livelihood restoration objectives. The evidence reviewed also includes the Resettlement Plan for the tailings dam self-rescue zone (Água Quente, Passa Sete, and São José do Jassém

Requirement #	Surveillance audit justification
	communities) (November 2024), which was developed in 2023 and 2024 through a participatory process involving communities, and includes procedures to monitor and evaluate its implementation (Sections 2.7 and 2.8). Since this resettlement process began being implemented less than six (6) months ago, its implementation was not assessed under this requirement. Interviews with key personnel and community members indicated that the Coexistence Committee operated until 2021, when it was discontinued following disputes over the electoral process for renewing its representation. According to some interviewees, including a sample of those resettled, consultations conducted by the company's employees do not always fulfill expectations related to resettlement implementation, income restoration, and community development, including needed corrective actions. While the evidence indicates the company has systems in place to monitor and evaluate the implementation of the 2018 RAP, stakeholders expressed that the implementation of the RAP and dialogue spaces do not always align with their expectations. The evidence, supported by interviews, indicates a partial non-alignment with the International Finance Corporation (IFC) Performance Standard 5 on Land Acquisition and Involuntary Resettlement (Community Engagement 10.), in conjunction with elements of Performance Standard 1 regarding stakeholder engagement, which require meaningful consultation and informed participation.
3.2.4.1 Critical. The operating company shall implement measures to protect the safety and health of workers including: 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	The evidence reviewed includes a set of the company's internal standard procedures and compliance records relevant to each sub-requirement, complemented by information gathered through interviews and on-site observations, and indicates that the company has implemented measures to protect the safety and health of workers, as follows: a. informing workers of the hazards associated with their work and the health risks and applicable control measures, as indicated in: the Procedure for Getting Used to Occupational Health and Safety (OHS) (PRO.MRJ.SSO.306, Anglo American, Revision 01, March 2020), which establishes that managers are responsible for ensuring that new employees are instructed on the critical risks in their area of work (section 4.1); the Procedure for Drawing up the Task Risk Analysis (PRO.BRA.GIR.003, Anglo American, Revision 04, August 2018, July 2022), which establishes mechanisms to inform the workers on particular hazards and the control measures to safely execute tasks, screenshots of OHS training actions carried out in 2024; an unfilled

Requirement #	Surveillance audit justification
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.	form titled Analysis of Safe Work, which provides fields for describing the task to be performed and its steps, the Personal Protective Equipment (PPE) needed, the critical risks and applicable controls, and monitoring of compliance with the safety measures; and a spreadsheet titled List of Critical Risks of Iron Ore Brazil (Anglo American, 2025), which displays the occupational and safety risk factors and levels involving the personnel of each department by sub-processes. On-site observations and interviews with workers, including contractors, indicate that most of them are regularly informed about labor risks and control measures through operational procedures, daily safety talks, safety briefings, signage, and supervision by designated personnel. b. providing suitable protective equipment and clothing, as supported by: the PPE and Uniforms Procedure (PRO.MRJ.SSO.042, Anglo American, Revision 04, September 2021), which outlines the company's responsibility to provide PPE free of charge, appropriate to the risk, in perfect condition and working order to the workers when collective protection measures are technically unfeasible or do not offer complete protection and other circumstances; the PPE Management Procedure (PRO.BAL.SEG.016, Revision 08, April 2025), intended to establish the administrative mechanisms to ensure that workers receive PPE and uniforms appropriate for their functions and work areas; records of delivery of PPE to workers (June 16 2025 to July 17 2025) and, the PPE portfolio (Anglo American, no date) consisting of a catalog of all PPE items including a description, applicability and maintenance and care instructions for each. On-site observations and interviews with a sample of workers, including contractors, generally supported the implementation of these procedures. c. providing workers who have suffered an injury or illness with first aid and prompt transportation to appropriate medical facilities in case needed, as detailed in: the Procedure for Medical Care in Post-Incident Situations at Anglo American Sites (PRO.BRA.SSO.166, Anglo American, Revision 00, November 2024) applicable to all company's sites in Brazil, which establishes guidelines and procedures for medical care in situations where human health or the physical integrity of exposed persons may result in damage as a consequence of incidents; the Emergency Report Plan Procedure for the Mine Plan, EB-01 and other Support Facilities in Conceição do Mato Dentro (PRO.MRJ.SSO.023, Revision 04, December 2024), which comprises the responsibilities, emergency response structure, identification of scenarios, response procedures, and mechanisms for plan implementation; and a chart with pictures of and references to three (3) ambulance vehicles equipped and supplied with

Requirement #	Surveillance audit justification
	medical materials to assist victims. The company's outpatient clinic is properly licensed and provided 4,727 services in 2024, mostly to contractors, as indicated by the Health Program Activities Report January to December 2024 (Anglo American, March 2025), in section 2.5.1. On-site observations and interviews with workers, including contractors, confirmed that the company has established an emergency radio communication network and maintains medical facilities equipped with ambulances, supplies, and trained personnel. d. providing, at no cost to workers, training programs and understandable instructions on OHS matters and assigned work, as indicated on a screenshot of OHS training actions conducted in 2024, covering topics such as ergonomic risks in remote work, fatigue risks, injury agents and mechanisms, and risks specific to mining operations, as well as four (4) completed attendance forms and certificates from third-party OHS training sessions held in 2025, covering mining safety, work at heights, behavioral safety, and mobile lifting platforms, with participation ranging from 3 to 40 workers. e. providing adequate supervision and control, as indicated in the Procedure for Drawing up the Task Risk Analysis (PRO.BRA.GIR.003, Anglo American, Revision 04, August 2018, July 2022), which states that supervisors are responsible for ensuring the safe and efficient execution of tasks by their team, ensuring compliance with operating instructions, risk analysis and mitigation, application of safety guidelines, and the search for process improvements (section 4.5 Leaders, Coordinators, Supervisors, Executing Leader). Further evidence includes inspection reports from May 2025 across various operational areas (such as explosive magazines, assembly yards, and grinding units), which record both good practices and opportunities for improvement, indicating active supervisory oversight. Interviews with workers consistently indicated that supervisors are regularly overseeing work areas. The evidence, including on-site observations and interviews, generally indicated consistent implementation of measures to protect the safety and health of workers. Some observations and interviews indicated the company does not yet fully implement measures to protect the health and safety of workers, in regards to: a. informing all workers, in a comprehensible manner (including through signage), of the hazards associated with their work, the health risks, and relevant preventive and protective measures, as a sample of workers interviewed in some areas (e.g., the Beneficiation Plant, the Primary Crushing and the Wastewater Treatment

Requirement #	Surveillance audit justification
	Plant) were not familiar with key OHS documents, including hazard identification and risk assessments, emergency plans, facility-specific emergency scenarios, and the company's List of Critical Risks; or were unclear about appropriate emergency response procedures.
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).	IRMA's notes on the requirement reference international guidelines from ANCOLD, the Canadian Dam Association, the European Commission, and the Mine Environment Neutral Drainage (MEND) program as benchmarks for Best Available Practices (BAP) and Best Available Technologies (BAT) for mine waste facility design and risk mitigation. The evidence reviewed includes the Mining Dam Risk Management Process (Anglo American, December 2024) for the TSF and its associated water and sediment containment facilities; the Sterile Pile North (PDE North) Quarterly Safety Review (Tec3, February 2025); the Monthly Geotechnical Report for PDE North and Expansions 1 and 2 (Anglo American, March 2025); an Inspection Form for PDE Expansion 1 (Anglo American, March 28, 2025); the Weekly Follow-Up of the Rain Plan 25–26 (Anglo American, April–May 2025); and the PDE North Expansion 2 Design Basis Report (Anglo American, November 2024). The 2024 Mining Dam Risk Management Process outlines a comprehensive risk management framework that aligns with widely accepted methods for determining risk levels and appropriate mitigation strategies. The approach includes the use of risk baselines, risk matrices, Bow Tie analysis, failure event trees, Failure Modes and Effects Analyses, As Low As Reasonably Practicable principles, and Trigger Action Response Plans (TARPs). This framework is applied to both the TSF and the associated water and sediment management structures. For the TSF, the company applies BAT in its design and construction approach, using the downstream dam construction method, which is recognized internationally as one of the safest available designs for tailings storage. The governance system described in Table 7-1 of the 2024 Mining Dam Risk Management Process includes corporate policies, defined roles and responsibilities, and adherence to national standards (Resolution 95 ANM/2022, Law 23.291, NBR 13.028), the Anglo American Standard for Mineral Waste Facilities and Water Management Structures (Anglo American, December 2021), and the Global Industry Standard on Tailings Management (GISTM). Sections 7.2–7.4 detail how design basis, quality assurance, monitoring, emergency planning, and documentation requirements align with BAP. Table 7-2 establishes minimum design criteria consistent with BAT. A GISTM Disclosure Report (Anglo American, August 2024) indicates that the TSF

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	meets 74 of 77 requirements, with 3 deemed not applicable. The Sterile Pile North (PDE North) Quarterly Safety Review (Tec3, February 2025) states that the company follows the corporate level Mineral Residue Facilities and Water Management Structures Standard (Anglo American, December 2021) regarding minimum safety requirements for the management of mineral waste storage structures, and has appointed an Engineer of Record (EoR), who performs quarterly safety reviews, annual audits, and provides technical oversight. The review describes a comprehensive geotechnical monitoring system (piezometers, water level indicators, topographic prisms, InSAR data, surface markers, flow meters), which aligns with internationally recognized BAT by supporting early detection of geotechnical or hydrological risks. The EoR also evaluates conformance of actual construction to design parameters (e.g., slope geometry, drainage) and provides technical recommendations, including follow-up on corrective actions. The Monthly Geotechnical Report (March 2025) shows that an interdisciplinary team conducts monthly assessments of the facility's performance, including review of anomalies and their criticality, corrective action plans, review of stability analyses, and verification of adherence to geometric design criteria. Visual inspections identify potential surface issues such as cracks, slumping, or water leakage, and are supported by documented inspection forms (e.g., for PDE Expansion 1, dated March 28, 2025). Photographic evidence shows implementation of erosion-control and stability-enhancing measures such as slope revegetation. The Weekly Follow-Up of Rain Plan 25–26 (Week 18: 26/04–02/05) demonstrates operational controls consistent with BAP, such as stormwater management, sediment removal, culvert maintenance, and drainage improvements based on rainfall forecasts. Meeting minutes from two (2) public consultations regarding the second raising of the tailings dam (Anglo American, March 18 and April 4, 2025) indicate that the company is constructing a tailings filtration plant, expected to be commissioned in early 2026. The plant will dewater tailings for placement in the planned PDE North Expansion 2 facility using dry stacking methods, reducing TSF deposition by approximately 85% and lowering water consumption. Dry stacking is recognized internationally as a BAT for tailings management due to its enhanced stability and reduced risk profile in some geographical areas. This planned transition aligns with GISTM, CDA, and the European Union guidance. The evidence indicates that the company applies recognized BAT and BAP in the design and management of the TSF and the PDE North waste rock

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	facility, including downstream construction, compliance with national standards and GISTM, independent EoR oversight, comprehensive geotechnical monitoring, and the planned transition to filtered tailings. The evidence does not include a Design Basis Report or equivalent documentation for the existing TSF. The Design Basis Report provided for the PDE North Expansion 2 covers only the expansion area and not the existing TSF, even though the expansion forms part of the broader TSF system as it will receive filtered tailings. As a result, the evidence does not indicate how BAT and BAP were defined or applied in the original design of the existing TSF facilities.
4.1.5.6 Critical. On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: 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)	The evidence reviewed includes the Tailings Dam Operation Manual (Anglo American, March 2024), a sample of a Biannual Report for a Technical Safety Audit and Regular Safety Inspection of the 1st semester of 2024 (WSP, March 2024), and samples of Regular Safety Inspection Reports (WSP, August 2024 and March 2025) for the tailings dam for the 2nd semester of 2024 and 1st semester of 2025, samples of a Technical Report on the Sterile Pile North (PDE North) Quarterly Safety Review (Tec3, February 2025), of a monthly Geotechnical Report for PDE North and Expansions 1 and 2 (Anglo American, March 2025), an Inspection form of the PDE Expansion 1 (Anglo American, March 28, 2025), and a Weekly Follow-Up of the Rain Plan 25–26 (Anglo American, April 2025). These are complemented by the Program for Monitoring and Update of the Risk Chart for PDE North (Tec3, July 2016), the Control Level Update for PDE North Expansion 1 (Tec3, April 2023), and the Operating Manual for the Filtered Tailings Disposal at PDE North Expansion 2 (Tec3, November 2024). The Deviance Accountability Report (Tech3, November 2024) was also provided as evidence of management review alignment. This document, however, only covers PDE North Expansion 2 and primarily addresses deviations between design and as-built conditions after the first construction phase. It does not indicate a comprehensive performance evaluation or management review processes for other mine waste facilities, including the tailings storage facility (TSF). Additionally, the company references industry guidance, such as the Guide to the Management of Tailings Facilities (Mining Association of Canada, October 2017), to support alignment with good international practices. a. For the PDE North, the Geotechnical Report for PDE North and Expansions 1 and 2 (Anglo American, March 2025) and the Technical Report on the Sterile Pile North (PDE North) Quarterly Safety Review (Tec3, February 2025) include regular visual inspections, comparison of constructed works to design specifications, and slope stability analyses. The Engineer of Record (EoR) from

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	third-party Tec3 supports the review of facility performance by comparing monitoring data to defined criteria: water level gauges and piezometers are assessed against specified normal operating levels, while displacement trends from topographic prisms are monitored and interpreted in conjunction with daily precipitation data. This monitoring approach is supported by the Monitoring and Update of the Risk Chart for PDE North (Tec3, July 2016), which defines clear instrument-specific trigger values and assigns a four-tiered classification (Normal, Attention, Warning, Emergency) that guides operational responses. The Control Level Update for PDE North Expansion 1 (Tec3, April 2023) confirms continued application and refinement of this framework, updating the inventory of instruments and adjusting trigger thresholds based on new data. These controls are extended to future phases of the facility, as detailed in the Operating Manual for the Filtered Tailings Disposal at PDE North Expansion 2 (Tec3, November 2024), which prescribes monitoring routines, control levels, and inspection procedures for the filtered tailings system. For the tailings storage facility, the Tailings Dam Operation Manual (Anglo American, March 2024) documents the company's performance measures and measurable indicators for the TSF. Regular Safety Inspection Reports (WSP, March and August 2024 and March 2025) demonstrate that inspections are conducted by the external Engineer of Record every six (6) months. These inspections include on-site evaluations of dam structures, analysis of monitoring data from instrumentation such as weather stations, reservoir level sensors, piezometers, prisms, inclinometers, tassometers, and pressure plates, and assessments of hydrological, geological, and geotechnical conditions. According to these reports, the company conducts internal inspections every two (2) weeks to check for operational and structural issues, with anomalies documented and tracked using photographs and follow-up status, and compiles monthly operational safety reports based on field observations and results from instrumentation monitoring, including geotechnical and hydraulic assessments. In addition, the company has established an external audit and inspection routine that includes annual audits, semiannual audits such as Regular Independent Safety Review, and quarterly inspections conducted by the Engineer of Record (EoR), in addition to compliance with Global Industry Standard on Tailings Management (GISTM) requirements for the TSF. b. The Geotechnical Report for PDE North and Expansions 1 and 2 (Anglo American, March 2025) and the Technical Report on the Sterile Pile North (PDE North) Quarterly Safety Review (Tec3, February 2025) present the company's evaluation of the effectiveness of

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	risk management measures and critical controls. The geotechnical reports include reviews of anomalies, their criticality, responsible parties, and deadlines for corrective action. The EoR from third-party Tec3 provides technical recommendations based on monitoring data and visual assessments and tracks the implementation of corrective measures. The Weekly Follow-up of the Rain Plan 25–26 (Week 18: 26/04–02/05, Anglo American, no date) demonstrates a proactive approach to managing stormwater-related risks through inspection, maintenance, and construction of drainage infrastructure, which serves as a critical control for surface water impacts (see 4.2.4.4). The Monitoring and Update of the Risk Chart for PDE North (Tec3, July 2016) establishes the framework that connects monitoring data to defined stability risk levels and corresponding responses. The Control Level Update for PDE North Expansion 1 (Tec3, April 2023) and Operating Manual for the Filtered Tailings Disposal at PDE North Expansion 2 (Tec3, November 2024) show how this framework is maintained and adjusted over time, ensuring critical controls remain effective under changing site conditions and monitoring results. During the on-site audit and interviews with key technical personnel, it was verified that the technical team conducts and records formal inspections on a biweekly basis in the tailings storage facility area, and that the geotechnical team conducts monthly inspections of the waste rock storage facilities. For the tailings storage facility, according to the biannual Regular Safety Inspection Reports (WSP, March and August 2024 and March 2025) the risk management framework includes a formal anomaly tracking spreadsheet named Tailings Dam Anomaly Control, which consolidates the date the anomaly was identified, its description and criticality, the corrective action required, the person responsible, and the completion deadline. Biannual safety inspections by WSP result in updated recommendation lists, with each recommendation assigned a priority level and tracked until completion. The broader dam safety audit program is described in the Dam Audit Process (Anglo American, January 2022) and the Mining Dam Risk Management Plan (PGRBM) (Anglo American, December 2024). Implementation of this program is further supported by a Quarterly Safety Review for Q1 2025 (WSP, May 2025). This program includes periodic audits by external and internal parties, annual compliance and operability audits, and review by a technical review panel. c. The Control Level Update (2023) presents revisions to the instrument thresholds and spatial coverage of the PDE North's monitoring systems as site conditions evolve. The Tailings Dam Operation Manual (Anglo American, Rev. 10, March 2024) documents revisions made over time, indicating that updates are usually

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	monthly on the basis of information gained through the surveillance and monitoring of the dam. The PGRBM (Anglo American, Version C, December 2024) has been updated in November 2022 and December 2024. The company notes that, for tailings storage facilities, the GISTM is considered the primary framework guiding dam safety and risk management, superseding other industry guidelines such as those of the Canadian Dam Association (CDA). d. During the audit, the Geotechnical Monitoring Center, which operates 24 hours per day, was observed. The evidence indicates that anomalies identified during performance inspections of disposal structures, including the TSF and the waste rock storage facilities, are recorded and managed through the Geo Inspector platform, where action plans are defined and formally approved by managers. In addition to the review and closure of corrective actions within the system, periodic meetings are held with the technical team and management to evaluate facility performance. The TSF is also subject to regular audits by the EoR under the GISTM framework, indicating that information from inspections and monitoring activities is communicated to management to support continual improvement. The evidence indicates that the company has developed and implemented a structured process to assess whether the TSF and the PDE North facility meet their performance objectives (a); that performance data are used to evaluate and manage the effectiveness of control measures (b); that the TSF OMS and relevant components of the PDE North monitoring program, including instrumentation and critical controls, are periodically reviewed and updated (c); and that the results of these performance evaluations are incorporated into the management review process (d). The evidence does not indicate that the company has implemented a comprehensive and systematic performance evaluation and management review process that covers all mine waste facilities, including the TSF, the PDE North waste rock facility, and their associated expansions (PDE North Expansion 1 and Expansion 2). While some performance evaluation and review activities are carried out for TSF and PDE North, the evidence does not provide details to confirm that these processes are consistently or comprehensively applied across all relevant facilities.
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: a. Identifying and measuring greenhouse gas emissions from the mining project;	The evidence reviewed includes a corporate Climate Change Policy (Anglo American, December 2024) (also available at: https://www.angloamerican.com/~/media/Files/A/Anglo-American-Group-v9/PLC/sustainability/approach-and-policies/environment/climate-change-policy-2024.pdf), which outlines the company's approach to addressing

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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.	its own climate impact and addressing challenges arising from climate change. The policy: a. commits the company to identifying and measuring Scope 1 and 2 Greenhouse Gases (GHG) emissions and publishing emissions data in accordance with the Energy & GHG Emissions Management Standard. This is supported by an inventory of total emissions by source from 2016 to 2024 (IOB Total Emissions per Source, Anglo American, no date) and for 2024 only (Total Emissions per Source - 2024, Anglo American, no date), indicating the company measures emissions on an annual basis. b. states the company will identify energy efficiency and GHG reduction opportunities, following the mitigation hierarchy (avoid, reduce, substitute, compensate). c. describes the company's commitment to setting meaningful and achievable GHG reduction targets, including corporate-level carbon neutrality goals. A Sustainable Mining Plan (Anglo American, no date), which is publicly available on the company's website, as well as interviews with relevant staff, indicate the company has set a corporate target to reduce greenhouse gas emissions (t/CO2) by 30% by 2030. d. notes that operational emission reduction targets will be reviewed every five (5) years, particularly in response to material portfolio changes (e.g., divestments or closures), or as specified by the GHG Protocol. The evidence does not include details to confirm that the Climate Change Policy itself is subject to review and revision at least every five (5) years, or in response to significant changes in mining-related activities, newly available technologies, or newly identified opportunities for further emissions reductions, as required.

6. Next Steps

6.1 Corrective Action Plans

All critical requirements were reviewed during the surveillance audit to assess progress on corrective actions proposed following the initial audit. These requirements, along with the initial audit finding, the proposed corrective action, and the outcome of this audit, are summarized in Section 3.5 of this report. Additionally, auditors determined during the surveillance audit that some critical requirements ratings should be reduced from fully meets to substantially meets. These requirements are summarized in Table 5-2.

At a minimum, all critical requirements that are not fully met must be included in a revised corrective action plan that identifies the site's intended measures for resolving gaps. Progress against this plan will be assessed during the next audit. Per IRMA protocols, one of the criteria that must be met for the site to maintain their current achievement level is to successfully complete these corrective actions and be verified as fully meeting the requirement at the time of the renewal audit, which must be completed within 36 months of the publication of the initial audit.

This plan is provided as Appendix A.

6.2 Timing of Future Audits

In the IRMA system, a surveillance audit is a mid-point between full audits. The next required activity will be a renewal audit, which must be completed within 36 months of the publication date for the previous full audit.

No issues were identified that require verification before the renewal audit.

6.3. Focus Areas for Next Audit

Since the initial audit, a significant change has been the initiation of new resettlement processes in 2023, including involuntary and voluntary resettlement programs, with some advances in participatory engagement but also remaining gaps.

Another major development is the construction of new processing facilities to filter tailings and deposit them in a dry stack tailings facility, marking a substantial shift in waste management practices.

Looking ahead, the licensing process for raising the tailings dam may require additional resettlement plans, representing a priority area for future audits, particularly regarding stakeholder participation, documentation, and follow-up on existing gaps.

The Serpentina project may broaden the scope of the upcoming audit, and this will be assessed during the audit planning stages.

APPENDIX A – Revised Corrective Action Plan

Chap #	Topic	Req. #	Requirement Text	Rating	Action Plan
1.2	Community and Stakeholder Engagement	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	Substantially Meets	Strengthen the perception of openness, respect, and inclusion in stakeholder engagement processes, with a special focus on voluntary and involuntary resettlement situations. Hold at least three thematic community meetings on resettlement by the second half of 2026, with the participation of company representatives, technical experts, and independent mediators. Document and disseminate the outcomes of these meetings, including how community feedback was considered in decisions and adjustments to plans. Use existing channels (Coexistence Committee, WhatsApp groups, face-to-face meetings, newsletters) to increase transparency and ensure feedback to the communities involved. These actions will take place at least twice a year. Record the demands arising from the community meetings of the Coexistence Program and monitor the status of feedback in the respective communities. Individual demands are monitored through records in the Contact Us system and internal control by the Community Relations team,

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			company has taken their input into account.		ensuring that the responses provided are consistent with the questions raised. Begin reviewing resettlement engagement procedures in the first quarter of 2026, focusing on the inclusion of vulnerable groups and expanding the space for negotiation.
1.3	Human Rights Due Diligence	1.3.3.3.	Responding to actual human rights impacts related to the mining project: a. If the operating company determines that it has caused an actual human rights impact, the company shall: 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	Substantially Meets	Strengthen strategies to mitigate and remedy impacts on human rights, ensuring that they are designed and implemented based on participatory methodologies that incorporate the perceptions of affected rights holders. These processes should be timely, inclusive, and culturally appropriate, ensuring respect for local social practices and traditions. To achieve this goal, internal and external actions will be developed to consolidate the integration of human rights issues into Anglo American's organizational culture, promoting responsible governance, meaningful stakeholder engagement, and alignment with the UN Guiding Principles on Business and Human Rights: 1. Human rights awareness training for Anglo American teams. Forecast: Q1.2026 Objectives: Raise awareness among teams and train focal points on human rights as a strategic axis for risk management and sustainability, aligning internal practices with Anglo American's global commitments and integrating initiatives to strengthen the corporate agenda. 2. Analysis of existing research and new opportunities to understand the perceptions of affected rights

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			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.		holders, with a view to improving SHIRA's prevention and mitigation strategies. Forecast: Q3.2026 Objective: Ensure that the results of participatory processes map and connect dialogue practices with affected rights holders, considering impact prevention and mitigation processes. 3. Assess the feasibility of revising the "stakeholder consultation" stage in the SHIRA methodology, ensuring alignment with best practices and Social Way assumptions. Forecast: Q3.2026 Objective: The "consultation" stage should consider alternatives for including perceptions of impacts and contributions to mitigation measures, ensuring transparency and continuous improvement. 4. Work in partnership with SHIRA to implement listening, participation, and mitigation actions with relocated people, integrating best practices for the engagement cycle. Deadline: Q4.2026 Objective: To evaluate robust models for relationships with relocated people through integrated actions that promote effective dialogue, qualified participation, and impact mitigation, ensuring transparent and continuously improving processes.
2.4	Resettlement	2.4.7.1	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	Substantially Meets	By the end of 2026, carry out at least two procedural audit campaigns during the implementation phase of the Resettlement Plan. The verification will be performed by a specialized, external, and independent consulting firm and will promote free and informed consultation with the relocated persons. The social control and expectation listening

Chap #	Topic	Req. #	Requirement Text	Rating	Action Plan
			necessary until the provisions of the RAP/LRP and the objectives of this chapter have been met.		process will consist of (i) interviews with stakeholders, (ii) feedback to the community on the audit results, and (iii) community presentation of the corrective action plan, followed by (iv) feedback to the community on the results of the action plan implemented. Disclose to the resettled public active in the Productive Restructuring Program, by the end of 2026, the semi-annual results of the monitoring campaigns of socioeconomic aspects, highlighting (i) the behavior of the indicators, (ii) the causal relationship between the PAR actions and the results obtained, (iii) the stakeholders' assessment of their satisfaction with the resettlement process. The process of free, prior, and informed consultation for monitoring the restoration of livelihoods and ways of life will engage the engagement forums in their different spaces and audiences - Reference Groups of relocated people, Women's Groups, Elderly Groups, and Community Meetings. By the end of 2026, publicize Anglo American's communication channels, such as the Contact Us mechanism, to strengthen active listening and response to community demands, following the deadlines set for feedback and public record of the measures adopted.
2.5	Emergency Preparedness and Response	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,	Substantially Meets	Ensure that all operations related to the Minas-Rio project have updated emergency response plans that are documented and aligned with APELL guidelines, with broad participation from internal and external stakeholders.

Chap #	Topic	Req. #	Requirement Text	Rating	Action Plan
			Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.		Consolidate, by the first half of 2027, the emergency response plans for all operational units of the project, ensuring that they are formally documented, reviewed, and available for consultation. Conduct, by the end of 2026, at least two emergency drills with the participation of a representative sample of workers, contractors, and potentially affected communities, focusing on different risk scenarios. Develop an annual schedule of integrated simulations, with direct and outsourced labor participation in critical areas. Publish evaluation reports for each simulation, with performance analysis, lessons learned, and an action plan for corrections, ensuring feedback on response plans.
2.5	Emergency Preparedness and Response	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	Strengthen the representation and effective participation of all potentially affected communities and the workforce in the review and simulation processes of Emergency Response Plans. To this end, listening workshops will be held with communities located inside and outside the self-rescue zone, such as Dom Joaquim, with the aim of reviewing existing plans and incorporating suggestions related to escape routes, meeting points, and communication strategies. In addition, workforce participation in simulations will be expanded, ensuring the presence of workers and contractors from different shifts and operational areas. Actions will include conducting integrated simulations focused on different scenarios,

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					promoting greater preparedness and engagement of internal and external audiences. The contributions collected will be systematized and incorporated into updates to the response plans, with the results disclosed through public reports and community bulletins. Communication with communities with a lower history of participation will also be reinforced, using local communication channels and direct engagement strategies.
3.2	Occupational Health and Safety	3.2.4.1.	The operating company shall implement measures to protect the safety and health of workers including: 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	Substantially Meets	Until the next audit, monitor implementation and evaluate opportunities for improvement in the Safety Health Plan process, focusing on expanding the coverage of occupational health and safety training and emergency awareness actions. Reinforce mandatory OSH training with employees and contractors, linked to the HR schedule, with records filed and certificates issued. Revisit and adjust the orientation training material (company entry training). Create and share an emergency booklet with employees, containing emergency contacts. For Personal Protective Equipment (PPE), a management dashboard is being developed to monitor and alert when PPE expires/needs to be replaced. This alert will be issued automatically to all managers, informing them of the need to replace the PPE of their respective subordinates. Additionally, an internal audit will be implemented focused on PPE management and should be in place by the date of the next audit.

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			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.		
4.1	Waste and Materials Management	4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies (BAT) and best available/applicable practices (BAP).	Substantially Meets	Present the Design Basis Report (DBR) for PDER North Expansion at the next audit.

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4.1	Waste and Materials Management	4.1.5.6.	On a regular basis, the operating company shall evaluate the performance of mine waste facilities to: 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).	Substantially Meets	Present the performance evaluation and management review processes for TSF and Tailings Stack by the next audit. Present Anglo American's TSF compliance with GISTM.
4.2	Water Management	4.2.4.1.	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	Substantially Meets	Continue with the current water monitoring programs in order to maintain full compliance with requirement 4. 2.4.1, ensuring 100% coverage of the areas under the influence of the project with validated monitoring points and sampling frequency representative of seasonal and extreme events, whose analyses shall be performed by accredited laboratories capable of detecting contaminants at levels below the IRMA Water Quality Criteria values. The actions taken in situations where early warning levels are triggered will be documented and

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			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		integrated into an environmental management system, with evidence of compliance with response times for emergency situations involving environmental damage, in accordance with applicable legislation. The annual water resources report will be issued with the consolidation of monitoring results, including results, comparisons with standards, and recommendations for improvements in management.

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			IRMA Water Quality Criteria by End-Use Tables.		
4.2	Water 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	By December 2026, expand the record of evidence on adaptive water management fully aligned with requirement 4.2.4.4, including the application of trigger levels for both quantitative and qualitative aspects of water, flow of activities, and definition of actions with responsible parties and deadlines for managing and mitigating potential impacts, with the integration of these elements into a digital environmental management system. The plan shall contain the response actions defined for any critical level identified, according to the deadlines established for each level, with systematic recording of preventive and corrective actions. It will be possible to view the records of the action plans in an appropriate response time, the actions performed in accordance with schedules, and the effectiveness of the measures implemented, based on the results of environmental monitoring. A consolidated annual report on the results of environmental monitoring will be issued, documenting the actions taken and recommendations for improvements in management.
4.5	Greenhouse Gas Emissions	4.5.1.1	The operating company or its corporate owner shall develop and maintain a greenhouse gas or equivalent policy that commits the company to:	Substantially Meets	By December 2026, publish an Anglo American Group Carbon Transition Plan, with a formal timeline and defined triggers, and publish it in Portuguese on the Anglo American Brazil website. The operating unit should monitor discussions and developments related to Federal Law No. 15,042/2024, which establishes the Brazilian

Chap #	Topic	Req. #	Requirement Text	Rating	Action Plan
			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.		Greenhouse Gas Emissions Trading System (SBCE), in order to create local emission reduction targets by 2030. Finally, the unit will continue to guarantee the Gold Seal in the Brazilian GHG Protocol Program (PBGHGP). This seal, which is the highest rating in the PBGHGP, guarantees that the unit has undergone third-party verification of its GHG inventories, which reinforces the transparency, reliability, and integrity of the data.