



## **Sustainability Report 2025**

*- Recycling builds our future -*



# TABLE OF CONTENTS

<b>ABOUT THIS REPORT</b>	<b>02</b>
The sustainability agenda and our material topics	02
<b>MESSAGE FROM THE CEO</b>	<b>04</b>
<b>MESSAGE FROM THE BOARD</b>	<b>04</b>
<b>OUR 2025 HIGHLIGHTS</b>	<b>05</b>
<b>ABOUT US</b>	<b>06</b>
Who we are	06
The role of recycling in a context of change and evolution	10
Our strategic commitments	11
Our company in 2025	14
<b>OUR GOVERNANCE</b>	<b>17</b>
Corporate governance	18
Ethics and integrity	20
Risk management	22
Information security	22
<b>OUR ENVIRONMENTAL RESPONSIBILITY</b>	<b>23</b>
Waste generation and disposal	24
Greenhouse gases and air pollution	30
Energy efficiency and clean energy matrix	31
Water and effluent management	33
<b>OUR PEOPLE AND OUR COMMUNITY</b>	<b>34</b>
Human and labor rights	35
Occupational safety	38
Employee health and well-being	41
Employee development	42
Diversity and equity	44
Stakeholder engagement	46
Community relations	48
<b>GRI SUMMARY</b>	<b>51</b>
<b>CREDITS</b>	<b>57</b>



## ABOUT THIS REPORT

*Our report is structured around priority material topics, with each chapter presenting the progress of the strategic objectives considered most relevant to Guarulhos Sucatas in 2025.*

[GRI 2-3] This is the second Sustainability Report prepared and published by *Guarulhos Sucatas*, reinforcing our commitment to transparency and the ongoing disclosure of our sustainable practices. Compared to the previous reporting cycle, this report seeks to highlight, in a structured manner, the progress achieved throughout 2025.

The period covered by this report spans January through December 2025, with publication on an annual basis. The information presented here does not include specific financial data. As a limited liability company, the company keeps such information internal, including its financial statements and reports.

[GRI 2-2] This Sustainability Report fully covers the operations of *Guarulhos Comércio de Sucatas Ltda.*, including its headquarters and its operational units located in Guarulhos, SP, and Itaquaquecetuba, SP.

[GRI 2-5; 2-14] The Advisory Board of *Guarulhos Sucatas* participates directly in the process of preparing, reviewing, and validating the information presented in this report, ensuring the consistency and strategic alignment of the content. To date, the report has not been submitted for independent external verification.

**For questions or requests for additional information, please contact us at:**



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## The sustainability agenda and our material issues

[GRI 2-14; 3-1; 3-2; 3-3] Sustainability is integrated into our business strategy and guides our long-term actions, contributing to the company's sustainability and the creation of value for society and the environment. Our purpose remains the central driver of our decisions:

***To make the world more sustainable through recycling.***

***To prosper, to promote general well-being and to be a benchmark, inspiring other companies and people to do their part as well.***

The organization's material topics are recorded in our materiality matrix, developed by listening to our key stakeholders – partners, employees, customers, and suppliers – selected based on their relevance and direct interaction with operations.

The process of identifying, analyzing, and prioritizing material issues was conducted in 2023, in the context of establishing the ESG Committee and the initial structuring of the company's sustainability agenda. This process considered both stakeholders' perceptions of the issues' relevance and the assessment of the significance of economic, environmental, and social impacts on the business, including financial risks, impacts, and opportunities. This process demonstrates the incorporation of the concept of double materiality in the identification and prioritization of issues. The issues remain consistent with the organization's current reality, and there was no need to revise the matrix during this period.

**The prioritized material topics are:**

- CORPORATE GOVERNANCE
- ETHICS AND INTEGRITY
- INFORMATION SECURITY
- RISK MANAGEMENT
- WASTE GENERATION AND DISPOSAL
- GREENHOUSE GASES AND AIR POLLUTION
- ENERGY EFFICIENCY AND CLEAN ENERGY MATRIX
- WATER AND EFFLUENT MANAGEMENT
- HUMAN AND LABOR RIGHTS
- OCCUPATIONAL SAFETY
- EMPLOYEE HEALTH AND WELL-BEING
- EMPLOYEE DEVELOPMENT
- DIVERSITY AND EQUITY
- STAKEHOLDER ENGAGEMENT
- COMMUNITY RELATIONS

These priority themes guide the definition of our sustainability strategy. Based on the materiality matrix and internal analyses conducted through workshops and benchmark studies, in 2024 the Board established the Sustainability Guidelines and their strategic objectives.

Based on these guidelines, an Action Plan for the 2024–2025 cycle was developed, which is monitored by the ESG Committee to ensure the implementation of initiatives and the consistent advancement of strategic priorities.

This report is organized around material topics, with content presented across chapters addressing governance, environmental responsibility, people management and community relations. In each chapter, we highlight the strategic objectives that have shown the most progress in 2025.



## MESSAGE FROM THE CEO



**Rafael Barros**

[GRI 2-22] In 2025, *Guarulhos Sucatas* reached a new level of maturity. Since the publication of our first Sustainability Report, when we presented our vision of sustainability and our purpose on the market, we have entered a new phase, with greater depth and a stronger focus on what truly sustains our growth.

Throughout this cycle, **we have consolidated our role as urban miners: a company dedicated to the recovery, transformation, and maximization of value from materials already present in the urban environment.** The city is now one of the world's largest sources of raw materials. In a landscape marked by natural resource scarcity, regulatory pressure on traditional mining, and climate urgency, recycling is no longer an alternative, it is a central part of the solution. The use of recycled steel in electric furnaces can reduce emissions by up to 74%\* and significantly decrease the consumption of virgin raw materials. This is where we operate: supplying high-quality recycled feedstock to the steel industry and expanding solutions to other industries, such as the automotive and cement sectors.

In 2025, we made a clear strategic decision: to strengthen our foundation before accelerating. We consciously reduced volume to prioritize efficiency, quality, and value creation. We aligned people, technology, and processes and maximized the returns on investments made in previous years.

The result was consistent: we improved our profitability margin and strengthened the company's financial health. This enables us to grow with greater structure, competitiveness, and discipline.

**We maintained a high recycling and recovery rate, reaching 90.95%**, and continued to invest in solutions that increase diversion from landfills, enhance material recovery, and improve our processes: a new vehicle decontamination station, a new RDF (Refuse-Derived Fuel) shredder, and new routes for raw material substitution in the industry. These are steps that strengthen our technical position and expand our contribution to more efficient production chains.

We have also made **progress in governance**, with the appointment of an independent external board member, our adherence to the *UN Global Compact*, and active participation in national and international strategic forums, in addition to advancing institutional and sectoral initiatives that strengthen recycling in Brazil. Internally, we began implementing new management systems, structured our Integrated Training Agenda, reduced operational accidents, and expanded initiatives focused on the health and well-being of our team. We remain close to our community, have maintained our social projects, and continue to work collaboratively with our recycling partners, because we understand that the sector's development is a collective effort. For us, sustainability is daily practice.

I see 2025 as a foundational year. It was the period during which we got our house in order for a new cycle of growth: more solid, more structured, and better prepared for market challenges.

We believe in recycling not only as an economic activity but as a strategic driver of industrial transformation. We remain committed to consistently generating economic, environmental, and social value and to leading by example toward the future we advocate for and know is drawing ever closer. We invite you to explore our 2025 Sustainability Report, in which we present, in detail, the progress of our results in relation to our strategic sustainability goals.

\*Source: Position Paper on Green Steel (2025), published by the Bureau of International Recycling.

## MESSAGE FROM THE BOARD

[GRI 2-22] The year 2025 marked an important evolution in the governance of our family-owned company. With the addition of an independent external board member, we broadened the diversity of strategic perspectives and strengthened our commitment to technical, structured, and long-term-oriented decisions.

At the end of 2025, we began developing our strategic plan for the next five years, which culminated in the definition of our:

**2030 Ambition: "To be the leading reference in innovative solutions for materials recycling and recovery, with sustainable practices, solid growth, and strong economic value creation."**

This ambition reaffirms our conviction that sustainability and financial performance are not parallel agendas, but complementary dimensions of the same strategy. The plan established clear goals for the period, including achieving a 95% recycling and revaluation rate by 2030.

The Board will continue to actively monitor economic, environmental, and social indicators, ensuring that *Guarulhos* moves forward with discipline, responsibility, and a vision for the future, strengthening its position as a technical and institutional leader in the recycling sector.



# OUR 2025 HIGHLIGHTS

## OUR GOVERNANCE

Achieved an EBITDA margin of  
**13.14 %**  
even amid margin pressure

Appointment of an independent  
**external board member** to the Board

Recertification to  
**ISO 9001 and ISO 14001** standards  
at the Headquarters Recycling Facility

Adherence to the **UN Global Compact**



## OUR ENVIRONMENTAL RESPONSIBILITY

**90.95 %**  
of processed materials diverted from  
landfills and incorporated into the circular  
economy

**110,574.57**  
**metric tons of CO2e avoided\***  
as a result of steel recycling activities.

\*Calculation based on the BIR (Bureau of International Recycling, Report on the Environmental Benefits of Recycling, 2016.)

Over  
**R\$6.7 million**  
**invested** in equipments for environmental  
and technological solutions



## OUR PEOPLE AND OUR COMMUNITY

Reduction in  
**15.50 %** the annual operational  
accident rate

Over  
**21 hours**  
of training per employee

**42 %** of women in  
leadership positions

Expansion of health benefits  
offered to employees

**R\$581,000**  
**invested** in social projects\*

\*Not including additional projects supported through incentive laws.



# ABOUT US

## Who we are

[GRI 2-1] **Guarulhos Comércio de Sucatas Ltda.** is a limited liability company with three operational units: two metal recycling facilities – the **Recycling Facility Headquarters in Guarulhos, São Paulo**, and the **Recycling Facility in Itaquaquetuba, São Paulo**, as well as a **Recovery Facility**, also located in **Guarulhos, São Paulo**.

The company's operations are concentrated in Brazil, with export activities to countries such as Thailand, Belgium, India, Pakistan, Nigeria, southern China (Hong Kong), and the United Arab Emirates.

[GRI 2-6] With over 45 years of experience, *Guarulhos Sucatas* is positioned at the heart of the circular economy, connecting the city, recycling partners, and industry in the supply of recycled materials. Operating in a global context marked by scarcity of natural resources, pressure for decarbonization, and growing urbanization, we position ourselves as **RECYCLERS**, operating in the field of **urban mining** – a company dedicated to the recovery, transformation, and maximization of value from materials already present in the urban environment.

Unlike traditional mining, recycling significantly reduces the use of natural resources, energy consumption, and emissions associated with industrial production. Steel and other metals can be recycled repeatedly without losing their properties, making them central elements for more circular, resilient, and sustainable production models.



Headquarters Facility



Itaquaquetuba Facility




Recovery Facility



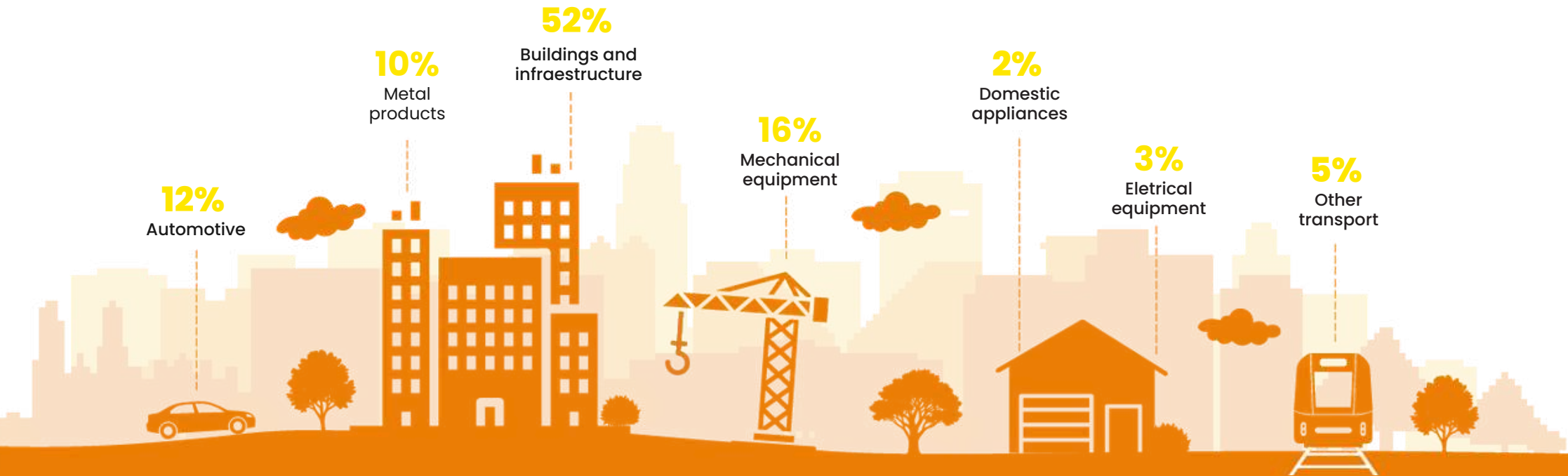
## GLOBAL STEEL USE BY SECTOR

Source: 2025 World Steel in figures – World Steel Association. The data above refer to 2024, representing 1,742 million tons worldwide.



**Learn more:**

**Urban mining** is the concept that defines the recovery of metals and other materials from existing stocks in the urban environment – such as buildings, vehicles, equipment, and industrial and post-consumer waste – replacing the extraction of natural resources. By treating the city as a continuous source of raw materials, urban mining reduces environmental impacts, emissions, and energy consumption, while enabling the circular economy and strengthening the security of the material supply for industry.



## Operating Model

We operate in the collection, processing, upgrading, and recovery of recyclable materials, transforming ferrous scrap – both pre- and post-consumer – into **high-quality recycled inputs** for the steel and foundry industries.

Our operations feature recycling plants equipped with modern technologies, such as balers, shears, and shredders, which ensure high operational efficiency and quality control of the processed materials.

In addition to recovering ferrous metals, our primary focus, we also recover materials attached to the objects and structures we collect. At our Recovery Facility, we recover non-ferrous metals, plastics, and lightweight waste intended for co-processing, sending these materials to recyclers or consumer industries, such as cement plants.

In addition to supplying recycled materials, we also operate in reverse logistics, offering recycling credits to companies and industries and contributing to compliance with public policies and sectoral commitments.

We maintain annual relationships with approximately 1,000 active suppliers, including waste-generating industries, waste picker cooperatives, small recycling yards, logistics operators and auctioneers of obsolete vehicles and goods. These partners play an essential role in the circular economy, connecting the generation of materials in cities to their reintegration into the production chain.



## Our Circularity



## CIRCULAR ECONOMY SOLUTIONS AND MATERIAL RECOVERY

To ensure the best possible use of the materials we receive and to continuously move toward zero landfill, we offer the following circular economy solutions:

### NON-FERROUS METAL RECYCLING

We supply materials such as zorba\* (aluminum concentrate), zurik\* (stainless steel concentrate), meatball and copper wire, recovered from our ferrous recycling process.

\*Nomenclatures according to ReMA ISRI's specifications - January/2026



See more:  
[Watch the video](#)

### FERROUS METAL RECYCLING

We supply high-quality raw materials to steel mills and foundries - shredded, LMS, LMS bundle, busheling bundles, HMS 1/2 80:20, HMS 1, PNS, turnings, cast iron, manganese



See more:  
[Watch the video](#)



### PLASTICS RECYCLING

We supply PP/PE and PS/ABS materials, also recovered from our ferrous recycling process.



See more:  
[Watch the video](#)

### AUTOMOTIVE RECYCLING

We perform complete vehicle recycling, from collection with proper deregistration through Detran-SP (São Paulo's DMV), to decontamination, processing, and recovery of all component materials - ferrous, non-ferrous, plastics, and other light waste - including the issuance of vehicle recycling credits and a full certification report covering the entire process.



See more:  
[Watch the video](#)



### RDF FOR CO-PROCESSING

We supply high-quality, high-calorific-value feedstock to the cement industry, derived from non-recyclable materials recovered from the ferrous recycling process, for use as an alternative fuel.



See more:  
[Watch the video](#)



## The role of recycling in a context of change and evolution

[GRI 3-3(201); 201-2)] Set against a global backdrop of climate change, scarcity of natural resources, and the accelerated transformation of production models, metal recycling is establishing itself as a strategic activity for the transition toward low-carbon economies. The use of recycled raw materials, especially steel, is recognized as one of the most immediate, viable, and scalable solutions for the decarbonization of industry.

The *Position Paper on Green Steel* (BIR, 2025)\* points out that the **use of recycled steel raw material** in electric arc furnaces (EAFs) can **reduce emissions by up to 74%** compared to primary production from iron ore, in addition to **reducing the consumption of virgin raw material by up to 90%**. It is, therefore, a real, available solution based on existing infrastructure and already established production chains.

\*Source: BUREAU OF INTERNATIONAL RECYCLING (BIR). *BIR Position Paper on Steel*. Brussels: BIR, 2025. In this context, our role as urban miners takes on concrete relevance.

**In 2025, our ferrous recycling activities helped prevent the emission of 110,574.57 metric tons of CO<sub>2</sub> equivalent, based on the methodology outlined in the Report on the Environmental Benefits of Recycling (BIR, 2016)\*.**

\*Source: BUREAU OF INTERNATIONAL RECYCLING (BIR). *Report on the Environmental Benefits of Recycling*. Brussels: BIR, 2016.

This result underscores the role of recycling as a direct driver of climate mitigation and highlights the measurable environmental impact of material recovery throughout the product life cycle. The Brazilian context further reinforces the strategic importance of recycling and urban mining.

The *Sindinesfa* study, in partnership with MaxiQuim/W4Chem – *Overview of Ferrous Metal Recycling in Brazil (2025)\** – indicates that the average gravimetric composition of municipal solid waste destined for landfills in Brazil contains only 1% ferrous waste.

\*Source: Sindicato das Empresas de Sucata de Ferro e Aço (SINDINESFA). *Overview of Ferrous Metal Recycling 2025 – Base Year 2024*. Porto Alegre: MAXIQUIM/W4CHEM, 2025.

All ferrous material that has become obsolete in society and has not been collected and sent for recycling therefore represents an inventory of raw material in cities. In 2024, recyclers accounted for 63.9% of the total volume of industrial and end-of-life scrap recovered in the country, constituting the main link in the steel recycling chain.

The same study shows that, although crude steel production in Brazil has remained relatively stable over the past decade, there has been a consistent increase in the use of recycled raw materials by the steel industry. In 2024, 31% of the metal feedstock used in steel production in the country was already composed of scrap. Over the past ten years, there has been a 17.8% increase in steel production via electric arc furnaces, the process that consumes the most recycled raw materials.

On the international stage, this trend is even more evident: countries like Turkey use over 80% recycled scrap in steel production, while the United States and the European Union operate at around 70% and 60%, respectively. In electric arc furnaces, scrap can replace up to 100% of the metal charge, reinforcing its central role in the global steel industry.

**It is within this context of new demands for circularity, as well as technical, regulatory, and market evolution, that we position our operations.** We seek to act proactively in response to the sector's transformations, contributing to the dissemination of best practices and prioritizing a long-term vision.

We remain steadfast in this commitment, understanding that the sector's transformation is a collective responsibility and that our work plays a leading role in promoting this change, with impacts that extend beyond the organization.

**By connecting the material stocks present in cities to industry, we act as a strategic link in the circular economy, demonstrating that recycling, when integrated with technology, processes, people, and management, constitutes a concrete, scalable, and economically viable solution to the climate and production challenges of the present and the future.**



## Our strategic commitments

[GRI 2-23; 2-24] Our actions are guided by our **strategic statement**, which comprises our **Purpose, Values, Sustainability Guidelines, and strategic objectives**. These elements guide the organization's priority projects and establish the guidelines for our **Integrated Quality and Environmental Management System**, implemented in accordance with the international standards ISO 9001 and ISO 14001.

In 2025, our Integrated Management System for the Headquarters Facility was recertified in accordance with the requirements of ISO 9001 and ISO 14001 by TÜV NORD Brasil. We also conduct "Management in Focus" training sessions for employees at the Itaquaquacetuba Facility, with the aim of fostering a culture of continuous improvement and strengthening competencies in risk management, quality, and process mapping.

## Purpose:

*To make the world more sustainable through recycling. To prosper, to promote general well-being, and to be a benchmark, inspiring other companies and people to do their part as well.*

## Values:



### INTEGRITY

We work with respect and ethics; We are responsible, punctual, consistent, and honest; We work within the rules and laws.



### SAFETY

We are committed to the safety of everyone involved in our operation, no result is more important than a someone's life.



### COMMITMENT

We honor our commitments to all stakeholders and the sector in which we operate; We act fairly; We are committed to environmental protection.



### CARE

We do all our work with care and happiness; We are careful with all of our structures; We pay attention to our relationships, offering excellent service; We care for our Planet, our team members, and our community.



### RESULTS

All of our activities aim for result, numerical or not; We do everything with high quality to provide the best customer service, products, and services; We avoid wasting time and money in our operations with rational and agile processes; We seek to continually improve and treat the risks and impacts of our processes, ensuring the company's longevity.



### COURAGE

We are bold and innovative; We are not afraid to change and transform the market to do what we believe; We constantly invest in technology; We are always looking forward; We challenge ourselves to be better every day, more productive, efficient, ecological, and human.



## Sustainability Guidelines and Strategic Objectives:

### GUIDELINE 1

**Actively working to expand recycling, playing our part in the transition to a low-carbon economy.**

- Always innovating in search of new recycling and waste recovery practices and technologies to ensure the best use of materials in the circular economy;
- Actively participate in the regulatory debate and in the construction of public policies that value and encourage recycling.;
- Contributing to society's socio-environmental education, especially about recycling.;
- Constantly seeking solutions to minimize the use of natural resources and mitigate the social and environmental impact of our operations.;
- Foster the environmental development of partner companies in our value chain.



### GUIDELINE 2

**Valuing and respecting people, encouraging partnerships and joint development.**

- Ensure safety and contribute to the health and well-being of our employees;
- Promoting a work environment that welcomes and respects diversity;
- Investing in the continuous development of our team, nurturing their commitment to our purpose;
- Supporting the education of employees and their children;
- Foster the social development of partner companies across our value chain.



### GUIDELINE 3

**Strengthen our business to continually contribute to our greater purpose.**

- Constantly improve the structuring of our governance in line with best practices, integrating our ESG agenda;
- Ensuring transparency and integrity, promoting respect for our Code of Ethics and our policies and regulations;
- Investing in relationships of trust with partners who share our purpose;
- Strengthening management processes for performance, ensuring that our leaders and staff are always guided by goals in line with our purpose and values.



See more



Visit our [Values and Guidelines](#) page.

In 2025, our Board initiated a medium-term Strategic Plan, in which we declared our ambition. The work will be completed in 2026, with the declaration of goals and the definition of levers that will drive the company's growth.

**AMBITION  
2030:**

**To be the leading reference in innovative solutions for materials recycling and recovery, with sustainable practices, solid growth, and strong economic value creation.**

## Policies and Codes:

We have policies and codes that guide our internal operations and our relationships with partners and the market, ensuring ethics and integrity. Our Code of Ethics explicitly addresses human rights, and our policies incorporate precautionary principle and due diligence, based on structured risk management, monitoring, and control processes.

In addition to corporate policies, each department also has specific procedures and work instructions. All employees receive training on these commitments during onboarding and throughout the year. Compliance with these guidelines is verified through internal and external audits, as well as through the handling of reports submitted via our Ethics Channel.

Our Environmental Policy was formalized in 2025 with the aim of articulating our commitment to environmental preservation, reducing impacts, and strengthening the circular economy through our work in Materials Recycling and Recovery.

Our **main policies and codes** are published on our website for business partners to consult:

- |  |                            |                                       |                                |
|--|----------------------------|---------------------------------------|--------------------------------|
| Code of Ethics                                 | Our People Internal Policy | Integrity and Anti-Corruption Program | General Data Protection Policy |
| Anti-Discrimination and Anti-Harassment Policy | Corporate Risk Policy      | Code of Ethics for Suppliers          | Environmental Policy           |



See more



Visit our [Ethics and Policies](#) page.

## Our company in 2025

[GRI 2-17; 2-28] The year 2025 unfolded in a challenging environment, marked by adjustments at steel mills, squeezed margins, and increased competition in the domestic market. Even so, for *Guarulhos Sucatas*, **2025 was a foundational year**. We consciously chose to reduce volume to prioritize efficiency, operational learning, and maximize the value of investments made in previous cycles. This move resulted in improved margins and higher profitability, creating a more solid foundation to sustain a new growth cycle, with consistent generation of economic, environmental, and social value.

In 2025, we maintained our efforts and our commitment to offering **high-quality recycled steel raw material**, contributing to greater efficiency in the production processes of steel mills and foundries, as our processes ensure low levels of impurities in the products. In this context, we strengthened partnerships with customers and were recognized for the excellence of the material supplied.

At the same time, keeping pace with regulatory developments and societal demands, we advanced solutions aligned with reverse logistics and full recovery of waste. We have intensified investments in **automotive recycling** with the implementation of a new vehicle decontamination station at the Itaquaquecetuba Facility, enhancing operational control and safety while meeting the growing market demand for vehicle recycling credits.

In line with the cement industry's decarbonization goals, we expanded the production of **Refuse-Derived Fuel (RDF)** from non-recyclable materials generated by our process, with the installation of a new shredder system at the Recovery Facility. This initiative helps divert materials from landfills and ensures their more efficient use as alternative fuel.

We also made progress in developing solutions for materials previously destined for landfills, creating new products and markets. This progress contributed, especially in the final months of the year, to an increase in recycling and recovery rates, as well as to a reduction in landfill disposal.

Vehicle decontamination station



RDF shredder



Even amid an economic slowdown, we maintained structural investments, including the **implementation of new management, monitoring, and automation systems**, such as TOTVS, Tractian, and Elipse, as well as fleet renewal, strengthening operational reliability, safety, and logistics efficiency. In an industry historically marked by informality and undervaluation, *Guarulhos Sucatas* positions itself as an **ethical, technical, and reliable company** that communicates its performance based on data, governance, and transparency. In 2025, we published our first Sustainability Report, an initiative recognized by our partners.

We also expanded our institutional presence through active participation in relevant industry events, including our first booth at **Eco Expo** and our presence at **Recicla Auto**, major trade shows in the sector. We also participated in and contributed to the **1st Guarulhos Recycling Forum**, in partnership with the *Guarulhos City Government*, *Sebrae*, and the *Zero Waste Institute*, promoting local debate on the topic.

We continued to invest in knowledge and continuous professional development, with the aim of improving our practices and strengthening our governance and strategic performance. As **active members of national organizations such as Inesfa and Sindinesfa, and international ones such as ReMA and BIR**, we participated in meetings aimed at strengthening institutional relationships within the sector. Our Director, Rafael Barros, continued to serve as president of *Sindinesfa* and vice president of *Inesfa* in 2025, contributing to regulatory progress in the recycling sector.



In support of PEC 34/2025, known as the Recycling PEC (Proposed Amendment to the Constitution), which seeks to promote recycled materials through tax incentives as part of the Tax Reform, we participated in the **Recycling Manifesto**, held in Brasília and organized by *Inesfa*. We also supported, alongside *Inesfa*, the progress of Bill 1800/2021, which encourages recycling in Brazil by authorizing companies under the real profit tax regime to use PIS/Cofins tax credits when purchasing recyclable waste. We also participated in drafting the 2025 **Green Mobility and Innovation Program Decree (Mover Program)**, which sets targets for decarbonization, energy efficiency, recyclability, and safety for the automotive industry. We were consulted by the *Ministry of Development, Industry, Trade, and Services (MDIC)* due to our recognized expertise and track record in Automotive Recycling.

We were also present at relevant international and national events, such as the **ReMA meeting in San Diego**, the **BIR congress in Singapore**, the **Instituto Aço Brasil Congress** in São Paulo, and panels and seminars at *Eco Expo*, where our board members contributed to the dissemination of technical knowledge. The year 2025 also brought progress in the National Circular Economy Plan. During the *World Circular Economy Forum* in Brazil, we participated in **Circular Day** in São Paulo.

Eco Expo



Recicla Auto



REMA - San Diego





BIR – Singapore

We also participated in events focused on governance and sustainability, organized by institutions such as IBGC, the *UN Global Compact – Brazil Network*, the *Ethos Institute*, and *Cubo ESG (Itaú)*. Members of our board and management committees also participated in courses related to governance, the circular economy, and the climate agenda. It is also worth noting that one of our board members is part of *ReMA's Sustainability Network* and was invited to present the case of our 2024 Sustainability Report to the group last year.



COP 30 – Belém

Expanding our role in the global debate on climate and circularity, we were present in Belém during **COP 30**, bringing to the discussion the relevance of recycling in the transition to low-carbon economies and advocating for the strengthening of the entire sector's supply chain, in partnership with *Inesfa*. In this context, we formalized our **adherence to the UN Global Compact**, reaffirming our commitments to human rights, the environment, and the fight against corruption. In 2025, we also strengthened our engagement with the Global Compact's **Circular Connection Movement**, leading to the formalization, in early 2026, of our commitment to reducing waste sent to landfills. These public commitments reinforce our position and encourage us to work alongside the group of companies involved in these initiatives and drive the circular economy in Brazil.

In addition to investments, the pursuit of efficiency, and the strengthening of our commitment to material recovery, we maintained and expanded our social initiatives, with programs focused on employee health, development, and safety, as well as community-oriented actions through programs such as the *Education Project* and *Guarulhos de Portas Abertas (Guarulhos Open Doors)*.

### International Recognition

External recognition reinforces our institutional positioning. For the second consecutive year, **our Director, Rafael Barros, was recognized by Recycling International** as one of the top 100 recycling leaders on the international stage, highlighting the technical and institutional relevance of our work, guided by responsibility, long-term vision, and operational discipline.

RECYCLING INTERNATIONAL'S TOP 100					
Paul & Steve Payne	Director of Operations	USA	USA	USA	Page 21
Brian Bauman	Director of North America	USA	USA	USA	Page 21
Thomas J. J. J. J.	Director of North America	USA	USA	USA	Page 21
...	...	...	...	...	...
Rafael Barros	Director of Brazil	Brazil	Brazil	Brazil	Page 21



UN Global Compact Membership



**28 Rafael Barros (Brazil)**  
With his sisters Daniela and Camila, Barros runs the Guarulhos Comercio De Sucatas scrap company based north of Sao Paulo. Business has been generally good but there are concerns. Trade barriers cause the biggest headaches. 'Removing the opportunity to sell recycled material globally is undoubtedly the most harmful action one can take against recycling.'



# OUR GOVERNANCE

## Guideline:

*Strengthen our business to continually contribute to our greater purpose.*

## We have made significant progress toward our strategic objective:

*Constantly improve the structuring of our governance in line with best practices, integrating our ESG agenda.*

## KEY INITIATIVES IN 2025:



Strengthening the Board by hiring an independent external board member.



Technological transition through the implementation of new computerized management and maintenance systems.



Strengthening our commitment to corporate sustainability by joining the *UN Global Compact*.

”

“Over the past year, a significant effort was made to strengthen Corporate Governance at *Guarulhos Sucatas*. In addition to monitoring the company's financial and operational performance, the Board developed and implemented a more strategic thematic agenda, addressing topics related to organizational culture, strategic planning, people management, integrity and risk management, ESG programs, and financial policies, among others. Through this approach, the Board reinforces its role as guardian of the company's institutional mission, ensuring value creation and the long-term sustainability of the business.”

Marco - Independent External Board Member



## Corporate Governance

Corporate Governance is one of the pillars supporting the evolution and longevity of *Guarulhos Sucatas*. For over 11 years, we have had a Board that guides the company’s strategic decisions, with a long-term perspective and a focus on building a solid, responsible, and future-ready business. Throughout this period, our governance model has been consolidating and maturing, contributing to the structuring of the generational transition, the strengthening of the organizational culture, and the continuous evolution of management policies, processes, and practices. These are fundamental elements for the consistent monitoring of indicators, which allow us to assess our performance in an integrated manner, both from the perspective of financial results and progress on the ESG agenda, process compliance, and our ethical stance.

[GRI 2-9; 2-10] In 2025, our Advisory Board welcomed a new independent external member, in addition to family members who participate as partners in the family holding company that controls *Guarulhos Sucatas*. This new member was selected based on his independence, prior experience on other boards, and expertise in corporate governance.

**Our Board, established in 2014, aims to ensure the company’s long-term sustainability, support the generational succession process, and strengthen governance.**

Since August 2025, the Board has consisted of five members, two of whom are women. Among its members are the company’s founder and the General Director. Since 2021, we have had a Shareholders’ Agreement that establishes guidelines regarding the involvement of family members, both in the holding company and at *Guarulhos Sucatas*, including their participation in Board meetings. The Board plays an essential role in defining the company’s strategy and meets monthly to analyze the market, review projects, evaluate financial and accounting reports, and discuss risks and opportunities.

In 2025, the addition of an independent board member contributed to the enhancement of the meeting agenda, including the initiation of discussions on the 2030 Strategic Plan and the engagement of a

relevant consulting firm in the area of organizational culture.

Since 2023, the company has had **Management Committees** responsible for addressing strategic issues and supporting the management of impacts associated with these agendas. These committees have an executive function, advising on strategic and operational decisions, as well as driving the development of priority agendas. Their activities are coordinated by a Committee Board which reports directly to the CEO. These committees are not deliberative in nature; the Board monitors their work by receiving the minutes of monthly meetings, ensuring transparency and alignment with senior leadership.

**Currently, the company has the following committees:**



ESG Committee



Safety Committee



Legal Committee



Audit Committee\*

\*Note: Until 2024, this committee was known as the Audit, Quality, and Environment Committee.

In total, nine professionals, including employees and external experts, serve on the Management Committees, five of whom are women. These professionals possess diverse skills, experiences, and technical expertise, which enriches the Committees’ discussions and actions. In 2025, two Board members also participated in Committee meetings as guests, contributing to more in-depth discussions.



[GRI 2-11; 2-15] The Advisory Board adopts a collaborative governance model, with decisions made by consensus, without a specific definition of leadership. Recommendations are discussed within the Board and implemented by the CEO, who is also a member of the Board. The holding company's Shareholders' Agreement guides the actions and involvement of members in business decisions. To date, no material cases of conflict of interest have been identified that would require the formalization of specific procedures.

[GRI 2-12; 2-13; 2-14] The Board considers sustainability – including economic, environmental, social, and governance impacts – as an integral part of the business strategy and long-term viability. The Board is responsible for overseeing the processes of identifying, assessing, and managing these impacts, incorporating them into the context analysis and annual strategic planning.

**Among the key indicators monitored are:**



**Financial indicators;**



**Material volume targets;**



**Customer deliveries compliance;**



**Recycling, recovery, and diversion from landfills rates;**



**Occupational accident rate.**

The Board is also responsible for defining and reviewing corporate policies, values, and strategic guidelines, as well as evaluating the year's major investments, considering their alignment with the company's purpose and long-term value creation. Ethical conduct guides the Board's discussions; the Board is also responsible for monitoring audit results and the whistleblowing channel, and its members are personally involved in the company's social initiatives.

Additionally, the Board maintains engagement with stakeholders through participation in industry forums, dialogue with customers, suppliers, and trade associations, and by analyzing assessments conducted by specialized consulting firms, market research, and other surveys conducted with employees and suppliers. Information derived from these processes is considered in defining strategic priorities, institutional positions, and investment decisions, ensuring alignment between operational performance, stakeholder expectations, and the generation of sustainable value.

[GRI 2-16] Critical issues are reported to the Board by the CEO, by members with operational responsibilities, or by the finance and accounting departments, through reports and supporting evidence. These topics are discussed at monthly meetings and recorded in the minutes. In 2025, complaints received through the Ethics Channel (which were duly addressed) were communicated, along with issues related to the failure to meet targets, such as budgetary targets, and concerns regarding operational risks, with the aim of seeking guidance and new actions proposed by the Board.

[GRI 2-18] **A significant evolution in the Board's maturity has been observed over time**, particularly in terms of its members' level of engagement and technical expertise. This progress was reinforced by the addition of an independent board member and has contributed to a more strategic approach by the partners, aligned with market transformations.

The performance of board members is evaluated internally through continuous monitoring of strategic objectives at monthly meetings.



Course on Board Members of Family-Owned Companies - IBGC

[GRI 3-3(202); 202-2] As mentioned earlier, *Guarulhos Sucatas'* organizational structure consists of two directors: the CEO, a company partner, and the Director of Committees, a hired professional. Both are natives of the São Paulo metropolitan area, the same region where the company's operational units are located.

## Ethics and integrity

[GRI 3-3(205)] Ethics and Integrity are fundamental principles that guide *Guarulhos Sucatas'* operations and underpin the way we conduct our business and relationships. In an industry marked by operational and structural challenges, we understand that acting with transparency, responsibility, and compliance is essential to ensuring the trust of our stakeholders and the sustainability of our business. This commitment is reflected in the recognition we have among customers, suppliers, and partners as a trustworthy company that delivers on its promises, with consistency between words and actions. More than just formal guidelines, ethics and integrity are values embedded in the organization's culture and applied in day-to-day operations, guiding decisions, preventing risks, and strengthening long-term relationships. In this context, the company conducts corruption risk assessments as part of its structured Risk Management process and the Integrity and Anti-Corruption Program, in effect since 2023.

### The assessment covers risks:



associated with internal and external activities;



related to interactions with public and private officials;



arising from contracts, bids, and authorizations;



arising from relationships with third parties.

As part of this process, the organization maintains formal internal controls, operational policies, procedures, and internal and external audits. These controls aim to prevent, detect, and mitigate risks of corruption, fraud, conflicts of interest, and other illegal acts. Governance of the Integrity and Anti-Corruption Program and the audits is the responsibility of the Audit Committee and the Controllership department, which report directly to the CEO.

[GRI 205-1; GRI 205-3] All of the company's operations are considered in the assessment of corruption-related risks, as well as other corporate risks. The company maintains a confidential and accessible Whistleblower Channel (Ethics Channel), available to employees, suppliers, partners, and other stakeholders, with the option of anonymity and protection against retaliation. To date, there have been no reports related to this issue, nor have any indications of fraud been identified in the audited processes, nor in other corporate risks. The Code of Ethics, in effect since 2022, and the Integrity and Anti-Corruption Program define the actions to be taken in cases of ethical violations.

Therefore, if such violations are identified and substantiated, disciplinary measures and remedial actions will be taken in proportion to the severity of the incident, including adjustments to controls, enhanced training, and, where applicable, reporting to the competent authorities.

[GRI 205-2] We communicate our anti-corruption guidelines through the Integrity and Anti-Corruption Program, the Code of Ethics, and the Code of Ethics for Suppliers, which establish clear rules of ethical conduct, integrity, and the prevention of corruption, fraud, and money laundering. These policies are available on our website and are also accessible to the external public.

### All employees participate in mandatory training on the Code of Ethics and the Integrity and Anti-Corruption Program, which address:

- the prohibition on offering, promising, or granting undue advantages;
- the prohibition of active or passive corruption;
- the prevention of conflicts of interest;
- compliance with anti-corruption legislation (Law No. 12,846/2013).

In March, all employees participated in training on the Code of Ethics, conducted during team meetings. In December, training on the Integrity and Anti-Corruption Program was held, also covering all employees. Additionally, in December, 17 leaders participated in in-depth training on the Integrity and Anti-Corruption Program and the Code of Ethics for Suppliers.



### INTEGRITY AND ANTI-CORRUPTION TRAINING

LOCATION	NUMBER (people)		PERCENTAGE OF EMPLOYEES (%)		STRATEGIC (people)	TACTICAL (people)	OPERATIONAL (people)	STRATEGIC (%)	TACTICAL (%)	OPERATIONAL (%)
	2024	2025	2024	2025	2025					
Guarulhos	62	79	31.47%	75.24%	3	10	66	60.00%	62.50%	78.57%
Itaquaquecetuba	7	75	3.55%	66.37%	0	5	70	not applicable*	62.50%	66.67%
<b>TOTALS</b>	69	154	35.03%	70.64%	3	15	136	60.00%	62.50%	71.96%

\*There are no strategic-level professionals associated with the Itaquaquecetuba legal entity. However, the strategic-level professionals from Guarulhos are responsible for all the company's operations.  
 Note: In 2025, we changed our understanding of the composition of functional categories based on our current organizational structure. Thus, we consider the strategic level to include the board and general management; the tactical level to include managers, consultants, supervisors, specialists, and coordinators; and the operational level to include all other positions. In 2024, the strategic level also included managers, internal consultants, and supervisors. Due to this change, it was not possible to present functional category data compared to 2024.  
 Source: HR Training Control Spreadsheet.

[GRI 3-3(206); 206-1] We remain committed to fair competition and are recognized in the market for acting ethically, encouraging these practices throughout the sector, and valuing and strengthening partnerships with companies that share the same principles. We have not been involved in any legal proceedings related to unfair competition, anti-competitive practices, or the formation of trusts or monopolies. In accordance with our Code of Ethics, we compete with integrity, in compliance with laws and market regulations, and we reject the formation of cartels or any practices that restrict free competition.

**Our business relationships are guided by trust, transparency, and value creation, based on the quality, reliability, and efficiency of our services.**

We recognize that the recycling sector still faces structural challenges, including tax asymmetries resulting from differences in tax application across states, which can create competitive distortions and encourage unfair competition practices. These disparities impact pricing, the formalization of the sector, and the predictability of investments, affecting the competitiveness of companies that operate in full tax compliance and with structured governance. In this context, we work together with our industry associations – *Inesfa* and *Sindinesfa* – to advocate for the organization and professionalization of the sector, as well as to promote taxation that is appropriate to the realities of recycling. We believe that tax policy can serve as an instrument to incentivize circularity and decarbonization, recognizing the strategic role of recycled raw materials. Our goal is to help recycled raw materials compete fairly with virgin raw materials, expanding their use by the manufacturing industry and strengthening the entire recycling chain. In this regard, we continue to support the Recycling Constitutional Amendment Proposal (PEC), which seeks to adjust taxation in the sector within the context of Tax Reform, including mechanisms that incentivize the use of recycled inputs and promote a more balanced competitive environment.

We believe that a structured, equitable tax system aligned with national environmental objectives strengthens the formalization of the sector, stimulates responsible investments, and contributes to long-term economic and socio-environmental sustainability.

[GRI 2-27] The company maintains structured processes to ensure compliance with applicable laws and regulations. Legislative updates are managed by the Controllershship department and the IMS (Integrated Management System), with support from a legal requirement monitoring tool that assesses the relevance of legal requirements by sector. The identification of legal requirements met and guidance in improvements still needed for full compliance with the aim of ensuring that our operational and tax practices are aligned with current regulations. In 2025, cases of non-compliance related to traffic laws were recorded, totaling R\$19,536.74 (174 fines), compared to R\$62,200.69 (215 fines) in 2024.

In 2025, the company also received a tax assessment notice from SEFAZ-SP, resulting from a differing interpretation regarding the methodology for calculating ICMS credits linked to the ratio between electricity consumption and operations intended for export, which is subject to defense. The penalty imposed, after a reduction resulting from a confession as a procedural alternative, totaled R\$13,175.53, which was paid in full in February 2026. The company believes that its actions were supported by a reasonable technical interpretation of tax legislation, based on the following points: 1) Transfers of goods to branches located in the State of São Paulo are ultimately intended for export operations. When considering all units and the proportionality between energy consumption and export volume, there is no loss to state tax revenue; 2) The calculation basis used in the tax assessment notice did not fully reflect the actual revenue for the audited period, resulting in a methodological discrepancy in the credit calculation. We maintain a collaborative stance with regulatory agencies, acting with transparency and responsibility, and **we reinforce our ongoing commitment to improving internal controls and regulatory compliance.**

## Risk management

[GRI 2-13; 3-3(207); 207-2] Risk management at *Guarulhos Sucatas* is conducted in a structured manner and integrated into the company's governance, covering both strategic and operational risks. Risk management oversight is supported by the Audit Committee, the Controllership department, and the Integrated Management System (IMS) department, which monitor the risk matrix, regulatory compliance, and audit results.

At the strategic level, the Board is responsible for analyzing the market context and the main risks and opportunities at its monthly meetings, deepening this assessment during the annual planning cycle. Currently, this analysis also guides the development of the 2030 Strategic Plan, which considers scenarios, trends, and potential impacts on the business.

At the operational level, risks are identified and described in departmental procedures and consolidated in the company's risk matrix. These risks are periodically assessed during internal audits, when they are discussed with those responsible for the activities to ensure their proper monitoring. In the event of deviations, corrective action plans are defined and monitored by the Audit Committee, the Controllership Department and the Director of Committees, with validation by the CEO. In this way, we ensure a continuous, preventive approach aligned with decision-making.

For tax risk management and compliance, we have a dedicated Controllership department responsible for ensuring that our practices are aligned with the company's strategy and current regulations. Our specialized accounting team works in close coordination with other departments, ensuring that tax strategy is integrated into internal processes, promoting tax efficiency with full compliance. Employees in this area continuously participate in training and technical updates.

To mitigate tax and regulatory risks, we maintain internal controls, monitored by periodic internal audits. Whenever

necessary, we also rely on the support of specialized legal consultants, who evaluate specific tax processes, contributing to legal compliance and the continuous improvement of governance. Our Ethics Channel is available for reporting issues related to conduct, including tax compliance matters.

Our tax reporting verification process is supported by an electronic audit system, which uses a structured database to identify and flag any non-compliance. The Controllership department is responsible for analyzing these reports, including reviewing tax obligations, assessing tax credits, and determining tax liability.

**The company's financial statements are subject to an independent external audit.**

This audit has been conducted since 2024 and includes verification of tax accounting. This process represents a significant strengthening of our governance, ensuring greater reliability, transparency, and adherence to accounting and tax standards, in addition to contributing to risk mitigation and the continuous improvement of our internal controls.

## Information security

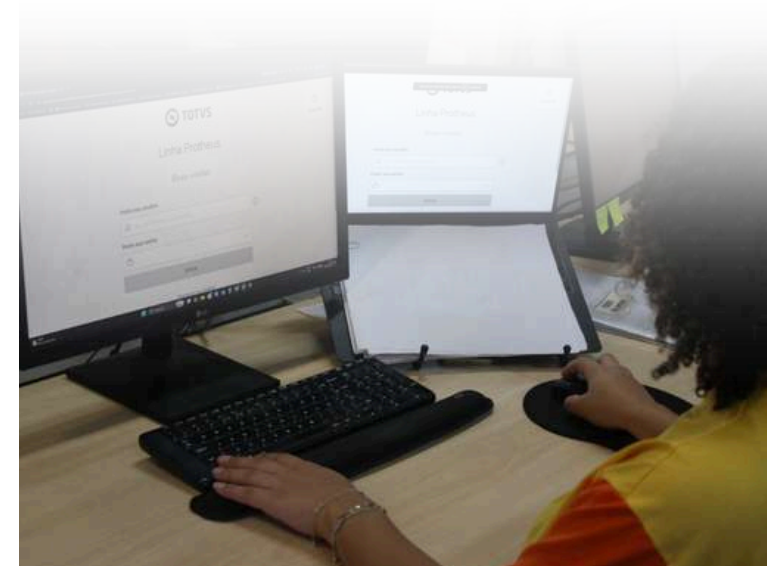
[GRI 3-3(418); 418-1] Controls aimed at protecting personal data and ensuring information security are continuously maintained in accordance with the General Data Protection Law (LGPD – Law No. 13,709/2018). Since 2021, the company has had a General Data Protection Policy and a Cookie Policy for its corporate website, establishing guidelines for the collection, processing, storage, and sharing of personal information.

In 2025, no substantiated complaints or proven incidents related

to the violation of the privacy of customer, supplier, or employee data were recorded.

In the area of information security, improvements were implemented in 2025 regarding information technology controls and data infrastructure. We began deploying a new management system in a dedicated cloud environment, with the aim of enhancing the security, traceability, and integrity of corporate information. We also made progress in documenting the network infrastructure and the camera monitoring system, including a review of connection redundancies, with a focus on greater reliability and protection of digital assets.

We recognize that information security is a dynamic and constantly evolving field. Therefore, **we continue to invest in updating systems, internal controls, and best practices in data governance**, with plans for further improvements by 2026.





# OUR ENVIRONMENTAL RESPONSIBILITY

## Guideline:

*Actively working to expand recycling, playing our part in the transition to a low-carbon economy.*

## We have made significant progress toward this strategic objective:

*Always innovating in search of new recycling and waste recovery practices and technologies to ensure the best use of materials in the circular economy.*

## KEY INITIATIVES IN 2025:



Increase in the Recycling and Recovery rate, reaching **90.95%** (target of 95% by 2030).



Continued investment in new machinery and solutions for recycling and recovery of materials and diversion from landfills:

- New shredder for processing RDF (Refuse-Derived Fuel);
- New material output as a substitute for raw materials in industry;
- New vehicle decontamination station for automotive recycling.

”

“Since 2025, we have seen major improvements driven by strategic investments. We used to face issues with dust emissions, but the installation of new water cannons significantly improved control over the process. Investments in the *Liebherr* equipment and the wheel loader also brought greater agility, safety, and productivity. The vehicle decontamination station was another important step, reducing risks and improving the environmental quality of the operation. Looking ahead, there is still potential for further investments to help process materials more efficiently and improve material cleanliness.”

Célio - Shredder Production Coordinator



## Waste generation and disposal

### RECYCLING AND RECOVERY

[GRI 3-3(301); 301-1; 301-2] Our operation is based on the transformation of waste. All materials used in our processes are recyclable and, therefore, reintroduced into the production chain, contributing to the circularity of the economy.

Our input material consists predominantly of ferrous metal scrap, sourced from external suppliers, which is collected, sorted, and processed using our equipment at the **Recycling Facilities**, where it is transformed into recycled raw material ready for use by steel mills and foundries. In 2025, we processed over 129,000 tons of ferrous recyclables. This figure was calculated based on measurements in our material intake scales.



Shredder



Baling press



Oxy-fuel cutting



Shear Baler



Recovery Facility

The incoming material, pre- and post-consumer ferrous metal scrap (such as automobiles, appliances, furniture, and metal structures), also contains other materials, such as aluminum, stainless steel, copper, and plastics. During processing, separating these materials from the ferrous material is essential to ensure high-quality recycled raw material, free of impurities and contaminants.

**This quality contributes to:**



greater efficiency in steel furnaces



reduced energy consumption



reduced slag generation

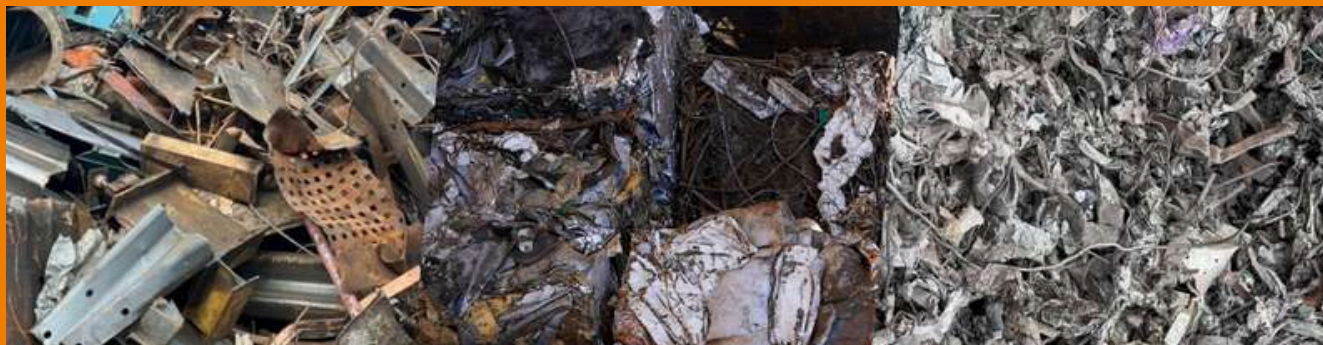


reduced emissions associated with steel production

The recovered non-ferrous materials are processed at our **Recovery Facility**, where, using magnetic, induction, and optical sensors, as well as fraction-based separation, they are sorted by type and correctly directed toward the circular economy, whether for recycling, energy recovery, or raw material substitution.



**RECYCLED AND RECOVERED MATERIALS WE SUPPLY:**



**FERROUS METALS:** shredded, LMS, LMS bundle, busheling bundles, HMS 1/2 80:20, HMS 1, PNS, turnings, cast iron, manganese.



**NON-FERROUS METALS:** zorba, zurik, meatball and copper wire.



**PLASTICS:** PP/PE, PS/ABS

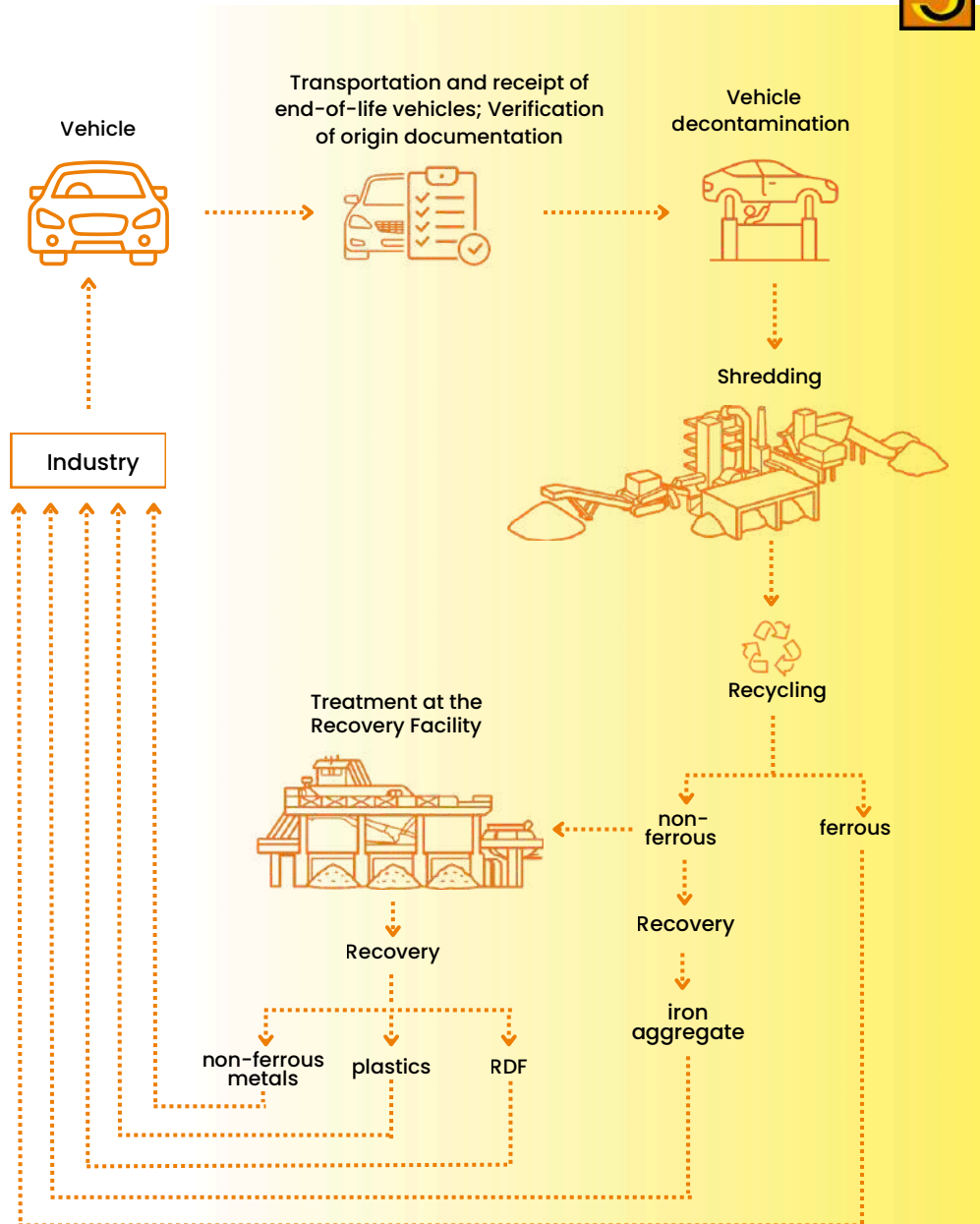


**RDF (Refuse-Derived Fuel)**



**IRON AGGREGATE**

## AUTOMOTIVE RECYCLING CYCLE



In 2025, we invested in improving **Automotive Recycling** by implementing a new vehicle decontamination station, enhancing safety and control during the removal of fluids, batteries, and flammable materials, ensuring the proper treatment and disposal of these materials.

After decontamination, we shred the vehicle in our shredder and recover the ferrous materials. We then process the non-ferrous residual materials – ASR (*Automotive Shredded Residue*) – in our Recovery Facility. **This process allows for maximum utilization of the materials, with a circular economy approach.**

We are accredited by *Detran-SP* (São Paulo's DMV) and partner with legally authorized vehicle dismantling companies, ensuring vehicle traceability and enabling the issuance of vehicle recycling credits to support our clients' reverse logistics requirements.





We continue to invest in maximizing the value of materials, improving their preparation for clients, as well as seeking alternatives for their recovery, thereby enhancing quality for clients and avoiding the disposal of materials in landfills.

In this regard, the implementation of our new RDF shredder has improved the quality of the material and its acceptance by cement plants, since this material is used for co-processing as a fuel substitute.

**As a result of our efforts to seek alternatives for materials previously sent to landfills and to improve their recovery, we have achieved:**

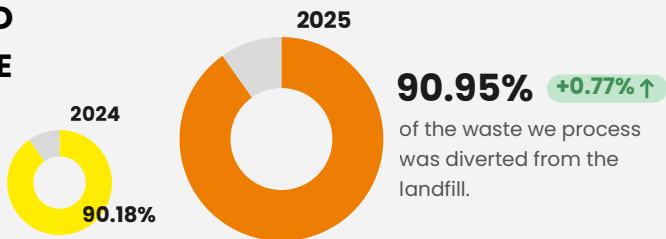


An increase in the recycling and recovery rate by 2025;



A 7.8% reduction in the landfill disposal rate from 2024 to 2025.

**RECYCLING AND RECOVERY RATE**



This trend reflects the continuous improvement in material recovery, as shown in the table of output percentages below:

**RECYCLING 86.00%**

<b>Ferrous metals</b>	<b>Non-ferrous metals</b>	<b>Plastics</b>	<b>Others</b>
<b>84.62%</b>	<b>1.22%</b>	<b>0.13%</b>	<b>0.03%</b>

**MATERIAL FOR CO-PROCESSING 3.95%**



**MATERIAL FOR RAW MATERIAL SUBSTITUTION 1.00%**



**LANDFILL 9.05%**

Note: All volume data were obtained through direct measurement using weigh-in-motion scales.



[GRI 306-5] We only send to landfills processing waste that we are unable to recover (Class II). This material consists primarily of soil and other inert materials that arrive mixed with ferrous recyclables at the time of receipt and are classified as impurities during the purchasing process, therefore not considered recyclable. In 2025, this volume totaled 12,195.56 tons, representing a 27.5% reduction in materials sent to landfills compared to 2024 (16,822.17 tons).

[GRI 306-1] Our commitment to sustainability is reflected in the continuous improvement of processes, investments in technology, and the establishment of strategic partnerships aimed at expanding the circularity of materials.

**We act innovatively to reduce waste generation and minimize landfill disposal, thereby strengthening the circular economy.**

Among the main initiatives, we highlight the development of solutions for material recovery, whether through opening new markets or adopting new technologies, as well as actions with suppliers, including raising awareness about the presence of unwanted materials in scrap and the application of discount policies associated with impurities, encouraging more efficient sorting practices at the source.

Additionally, as part of managing the impacts associated with received materials, we have a **structured radioactivity detection system**, which is part of the Radiological Protection Program. This system includes procedures for identifying contaminated materials, isolating suspicious shipments, and notifying the competent authorities, ensuring the protection of staff, the community, and the environment, in accordance with the guidelines of the CNEN (National Nuclear Energy Commission) and other applicable laws. *Guarulhos Sucatas* has fixed radiation detection gates installed at the entrance to the scale at the Itaquaquecetuba Recycling Facility, as well as a portable detector at the Shredder operation.

## WASTE GENERATED DURING OPERATIONS

[GRI 3-3(306); 306-1; 306-2] The management of waste generated by our activities is conducted through structured internal controls, in accordance with the company's Solid Waste Management Program (PGRS). The traceability of waste disposal is ensured by records in the official systems of the State of São Paulo (SIGOR) and by documents issued by licensed service providers. This process is complemented by systematic monitoring of the licenses and environmental requirements applicable to the operation. In 2025, the Internal Waste Management Procedure was created, in accordance with our practices.

The topic of waste management is incorporated into our risk matrix and widely communicated to employees through bulletin boards, team meetings, and training sessions, with the aim of ensuring not only proper disposal but also raising awareness about the efficient use of internal resources. To guide employees in the correct identification and separation of waste generated during operations, we conducted training with practical demonstrations during *SIPATMA* on Environment Day in 2025.

SIPATMA 2025, Environmental Training



Among the main sources of operational waste generation are mechanical maintenance and operational support activities. These generate oil-contaminated materials that require segregation and environmentally appropriate disposal. This waste is classified as hazardous (Class I) and is therefore sent to licensed co-processing facilities that produce fuel substitutes for industrial furnaces.

Lubricating oils from vehicle and equipment oil changes, also classified as Class I waste, are segregated and collected by a company authorized by the National Agency of Petroleum, Natural Gas and Biofuels (ANP), returning to the supply chain through re-refining, which prevents improper disposal and promotes the reuse of the material. Oil and fuel fluids removed at the new vehicle decontamination station, implemented in 2025, are also segregated, identified, and sent for re-refining.

Waste such as unusable fluorescent lamps and used batteries is sent to voluntary drop-off points, which direct these materials to manufacturers for reuse and final disposal, in accordance with the National Solid Waste Policy. Automotive batteries replaced in trucks are sent for reverse logistics, being exchanged for new ones with suppliers, who, at the end of the process, issue the respective Certificate of Disposal.

Other internally generated waste includes paper, plastic, and cardboard packaging from supplies, as well as administrative waste. These materials are collected daily, stored, and sent for recycling, either through sale to recycling companies or by forwarding them to cooperatives, and are reintroduced into the production chain.

All waste is stored at internal facilities located at the Headquarters and Itaquaquecetuba facilities prior to final disposal. In 2025, we implemented an internal Waste Center at the Itaquaquecetuba Facility, enabling us to directly manage the recyclable waste generated at this facility more effectively, with greater control and traceability of the volumes produced. The paper, cardboard, and plastic generated in Itaquaquecetuba are donated to the local cooperative, contributing to recycling and generating income for the community.



[GRI 306-3; 306-4]

**WASTE GENERATED AND DESTINATIONS**

WASTE	CLASS	2024 (tons)	2025 (tons)	DISPOSAL
Miscellaneous contaminated materials	I	6.20	2.62	Co-processing
Used lubricating oil or contaminated	I	9.20	11.98	Re-refining
Portable batteries	I	0.01*	0.03*	Recycling
Paper, cardboard, and plastics**	II	2.60	3.87	Recycling
Wood	II	1.60	0.00	Recycling
<b>TOTAL</b>		<b>20.31</b>	<b>18.50</b>	

Notes: \*The figures presented have been rounded to two decimal places. The calculated figures were 0.0054 tons in 2024 and 0.02875 tons in 2025. In 2025, the volume of piles also included materials from shipments received for processing. In this case, the piles were identified and segregated prior to the processing of ferrous scrap, ensuring their environmentally appropriate disposal and preventing operational risks, such as explosions.

\*\*With the transfer of recyclable waste from the Itaquaquecetuba unit to the local cooperative, paper, cardboard, and plastic materials began to be sent together, with the separation conducted by the cooperative itself. For this reason, the items were consolidated in the table.

Source: Environmental Performance Report

During the same period, we continued to divert automotive batteries to reverse logistics, totaling 73 units in 2025 (101 units in 2024). The observed reduction is linked to improved vehicle maintenance. Additionally, waste from cafeterias and restrooms is disposed of as municipal solid waste through municipal collection. The data presented was obtained through direct measurement and weighing, ensuring greater accuracy in monitoring. It should be noted that all waste considered is generated within the organization and does not include waste generated outside our operations.

## Greenhouse gases and air pollution

[GRI 3-3(305)] The climate agenda remains central to our environmental strategy, both due to the direct impact of emissions generated by our operations and the significantly positive effect on the decarbonization of the steelmaking chain through the use of the recycled steel raw material we produce. Our ESG Action Plan includes concrete measures to integrate sustainability into our operations and invest in innovation to contribute to a low-carbon economy. These measures focus on improving energy efficiency, transitioning to renewable sources, and adopting sustainable technologies.

[GRI 305-1; 305-2; 305-3] In 2025, we conducted our annual greenhouse gas (GHG) emissions inventory, carried out with the support of Deep ESG's Carbono IA system, in accordance with the methodology of the Brazilian GHG Protocol Program and using emission factors and *Global Warming Potential* (GWP) values based on the guidelines of the *Intergovernmental Panel on Climate Change* (IPCC). The 2025 inventory was prepared using accounting data, supplemented with questions to refine the calculation and verified through internal controls. The results were validated by the specialized consulting firm responsible for issuing the inventory. The consolidation approach adopted considers the operational control of all the company's activities.

### THE EMISSIONS INVENTORIED BY SCOPE

SCOPE	2024	2025
<b>SCOPE 1</b> Direct emissions	3,210.11 tCO <sub>2</sub> e	<b>3,031.58 tCO<sub>2</sub>e</b>
<b>SCOPE 2</b> Indirect emissions from energy – location-based approach	133.95 tCO <sub>2</sub> e	<b>146.14 tCO<sub>2</sub>e</b>
<b>SCOPE 3</b> Other indirect emissions	2,918.90 tCO <sub>2</sub> e	<b>4,713.71 tCO<sub>2</sub>e</b>

Source: Guarulhos Sucatas 2025 Greenhouse Gas (GHG) Emissions Report.

Scope 1 of the inventory covered direct emissions related to stationary combustion, mobile combustion, and fugitive emissions. The reduction in Scope 1 emissions in 2025 is attributed to a decrease in fleet trips, resulting from lower material procurement volumes that year, as part of the operational strategy. Scope 2 presents indirect energy emissions using a location-based approach.

It is worth noting that, in 2025, the increase in Scope 3 emissions represents a positive initiative resulting from an expansion of the number of categories for which we were able to collect data on new emission categories. Until 2024, Scope 3 covered emissions related to transportation and distribution (upstream and downstream), solid waste and effluents, business travel, and commuting. Starting in 2025, Scope 3 of the inventory also includes emissions from purchased goods and services and capital goods, both related to the life cycle of purchased or acquired products, as well as leased goods and fuels and energy not covered by Scopes 1 and 2.

The inventory covers emissions of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, and HFCs. Biogenic CO<sub>2</sub> emissions are monitored and reported separately, in accordance with applicable methodological guidelines. In 2025, 461.39 tCO<sub>2</sub>bio of biogenic CO<sub>2</sub> emissions were inventoried under Scope 1 (lower than the 470.97 tCO<sub>2</sub>bio recorded in 2024) and 232.26 tCO<sub>2</sub>bio under Scope 3 (lower than the 370.43 tCO<sub>2</sub>bio recorded in 2024).

Since 2024, we have adopted this year as the baseline for tracking emissions trends, due to methodological consolidation and validation of data collection and processing procedures.

[GRI 305-4] Emissions intensity*	2024	2025
Metric Tons of CO <sub>2</sub> e / Tons of recyclable waste processed	0.020	<b>0.025**</b>

Notes: \*Considering Scope 1 and 2 (location-based approach).

\*\*In 2025, there was a reduction in the volume processed without a proportional reduction in emissions and an increase in energy consumption due to operational strategy, which negatively impacted emissions intensity. This increase in emissions is being properly monitored and addressed.

[GRI 305-5] In 2025, 142.96 tCO<sub>2</sub>e were avoided through the use of electricity from renewable sources, as certified by the energy manager.

In 2024, 131.29 tCO<sub>2</sub>e were avoided. These emissions are related to Scope 2 and are significantly reduced when accounted for under the market-based approach.

**[GRI 305-5]** With regard to emissions reduction, the organization acts primarily through structural initiatives, such as:



Increasing energy efficiency in operations;



Expanding the use of energy from renewable sources (with 100% of the electricity consumed in 2025 coming from renewable sources);



Renewing the vehicle fleet with new vehicles featuring more efficient engines, lower fuel consumption, and consequently lower emissions;



investments in technologies and processes focused on the circular economy;



A significant contribution to reducing emissions in the steelmaking chain by replacing virgin raw materials with recycled materials.

**[GRI 305-7]** The control of atmospheric emissions, including pollutants and black smoke from combustion-powered machinery and vehicles (machines and trucks), is included in our environmental risk matrix. These impacts are communicated to employees through informational bulletin boards and during onboarding processes. In 2025, the procedure for controlling emissions and pollutants was formalized, in line with the Environmental Policy. In June 2025, during *SIPATMA* on Environment Day, we conducted training focused on raising awareness about environmental impacts and good management practices.

In our Shredder operation, we have bag filters installed at the air outlet, ensuring proper treatment of particulate matter. In 2025, we invested in the installation of three new misting cannons, bringing the total to four units in the shredder area, with the goal of reducing the dispersion of particulate matter and minimizing impacts on other areas of the operation and the surrounding neighborhood.



## Energy efficiency and clean energy matrix

**[GRI 3-3(302); 302-4]** Electricity consumption at the Headquarters and Itaquaquecetuba Recycling Facilities and at the Recovery Facility is sourced from the Free Energy Market, regulated by the Electric Energy Trading Chamber (CCEE) and supervised by ANEEL. In 2025, **100% of the energy purchased came from renewable sources**, duly certified by the energy manager. The company receives monthly consumption telemetry data, enabling continuous monitoring and the implementation of corrective actions.

We seek to ensure the efficient operation of machinery and equipment through continuous monitoring and active management of operational parameters. At all our facilities, we have a power supply management system, allowing for immediate interventions in the capacitor bank to correct the power factor and ensure greater system stability. In 2025, we moved forward with the consolidation of a **supervisory system** developed on the *Ellipse E3* platform, which began to integrate and process strategic electrical data from the operation. Through integration with smart relays, **we monitor parameters** such as current and voltage **in real time**, enabling:

- Detailed monitoring of equipment electrical performance;
- Identification of overloads and operational deviations;
- Historical consumption analysis to support decision-making;
- Preventive measures to mitigate demand spikes and energy inefficiencies.

The centralization of operational information into a single platform, with real-time visualization, historical data tracking, and greater measurement reliability, strengthened our ability to manage based on performance indicators, increasing operational predictability and contributing to greater energy efficiency. Overall, the system has brought greater transparency, control, and analytical capabilities, fundamental elements for improving operational efficiency, resource management, and reducing environmental impacts.

The system has been in operation at the Guarulhos Recovery Facility since August 2025 and at the Itaquaquecetuba Recycling Facility since November 2025. At the Headquarters Recycling Facility, its implementation is scheduled for 2026. The topic of energy management is included in the organization’s risk matrix. The Operations and Maintenance (O&M) Manager continuously monitors electricity consumption and excess reactive power through the internal environmental performance report, which is updated monthly. In 2025, waste associated with excess reactive energy was reduced by 59.34% (2024: 947 GJ; 2025: 562 GJ).

Our processing machinery and stationary handling equipment are predominantly electric. Regarding energy derived from fuels, diesel is used in trucks and mobile handling equipment. In 2025, we operated fueling stations duly registered with the ANP (National Agency of Petroleum, Natural Gas and Biofuels) at the Headquarters Recycling Facility and in Itaquaquecetuba Recycling Facility. Additionally, we used Liquefied Petroleum Gas (LPG) in the processing of iron scrap for cutting with torches, in metalworking activities for equipment maintenance, and to power one forklift.

**For all new machinery acquisitions, we ensure the incorporation of technologies that promote greater energy efficiency, such as:**

- ✓ high-efficiency motors;
- ✓ frequency inverters or soft starters;
- ✓ power factor correction systems;
- ✓ electronic control via Programmable Logic Controller (PLC);
- ✓ regenerative hydraulic systems;
- ✓ proportional pumps and variable displacement pumps.

Our Shredder, for example, features an optimized drive system on its main engine. This optimization is made possible by a driver unit paired with a high-efficiency engine, capable of delivering constant torque regardless of speed variations, with electronic control that reduces energy consumption peaks. This configuration enables greater operational stability, more efficient energy consumption, and a better ratio between energy consumed and production output. Our investments, such as the acquisition of a new scrap handler, aim for greater energy efficiency and reduced emissions. Starting in 2025, we also begin renewing our truck fleet, replacing vehicles with new ones that are more fuel-efficient.

**[GRI 302-1; 302-4; 302-5] The stratified energy consumption figures are:**

Energy consumption within the Organization	2024 (GJ)	2025 (GJ)
Electricity from renewable sources	11,227	<b>11,417</b>
Electricity from non-renewable sources	227	<b>0</b>
Fuel from non-renewable sources*	50,892	<b>47,108</b>

*Notes: \*For non-renewable fuel sources, we use diesel and LPG. We use S10 diesel, a lower-sulfur and less polluting fuel, containing 15% biodiesel. Source: Environmental Performance Report.*

The table shows an increase in electricity consumption from renewable sources from 2024 to 2025, accompanied by the elimination of consumption from non-renewable sources. Taking this into account, there was a net reduction of 0.32% in total electricity consumption during the period. There was a 6.33% reduction in diesel consumption and a 51.61% reduction in LPG consumption, totaling a 7.43% reduction in non-renewable fuel consumption. In 2025, electricity consumption at the Headquarters Recycling Facility in Guarulhos decreased. On the other hand, at the Itaquaquecetuba Facility and the Recovery Facility in Guarulhos, there was an increase in consumption, which can be attributed to the commissioning of new equipment, such as the RDF shredder (installed in 2025), and the plant’s full operation with new optical sorters and ISS, which began in late 2024. In addition, the Logistics Facility in Guarulhos was decommissioned, with fleet maintenance activities transferred to the Itaquaquecetuba Facility.

[GRI 302-3] Energy intensity rate	2024	2025
GJ/ton of processed material	0.38	<b>0.45*</b>

*Notes: \*In 2025, energy intensity increased due to a reduction in processed volumes and the expansion of material valorization activities. These processes, aimed at maximizing resource recovery, reducing landfill disposal, and increasing the value added to our products, require higher energy consumption per tonne processed. The sources considered include electricity and fuels consumed within the organization.*



## Water and effluent management

[GRI 3-3(303); 303-1] The water supply for our operations combines different sources, including water from the utility provider (Sabesp), rainwater stored in cisterns for reuse, and groundwater, allowing for greater flexibility and more rational use of water. Water from cisterns and groundwater collection is prioritized for compatible operational uses, such as cleaning areas and equipment, maintaining the technical reserve of the firefighting system, and dust control in the shredder operation at the Itaquaquecetuba Facility. The Headquarters Recycling Facility is exempt from requiring a permit for its groundwater collection points.

In 2025, we installed a pressurized network to utilize cistern water at the Itaquaquecetuba Recycling Facility, with the goal of reducing potable water consumption. This practice of conscious water use is scheduled to be replicated at the other facilities throughout 2026. The importance of rational water use is addressed in our risk matrix, as well as in our Environmental Policy and operational procedures. In our engagement with internal stakeholders, we conduct training sessions with the team on these guidelines, reinforcing the importance of efficient water use and the prioritization of non-potable sources for operational activities whenever possible.

Also in 2025, we began implementing a supervisory system at the facilities, which, in addition to handling electricity data, now incorporates water consumption management.

### The system enables:

- Continuous monitoring of the levels of reuse water reservoirs and cisterns;
- Real-time tracking of stored volumes, preventing overflows and improper pump operation;
- Monitoring water flow through meters with totalizers, allowing for the precise quantification of the volume consumed and reused;
- Identification of consumption deviations and potential losses with greater agility, enabling faster corrective actions.

This level of traceability increases the efficiency of reused water use and reduces dependence on external sources, directly contributing to the operation's water sustainability.

[GRI 303-3; 303-5] In 2025, total water consumption from the utility was 2.470 megalitres, according to measurements based on bills provided by Sabesp. This volume represents a 59.78% reduction compared to consumption in 2024 (4.132 megalitres). This reduction is explained, in part, by the decommissioning of the Logistics Facility, as well as by the adoption of responsible water use practices, prioritizing the use of non-potable water sources in operational activities whenever possible.

The utility's water consumption is monitored monthly through the environmental performance report, overseen by the Director of Committees and the Integrated Management System (IMS) department. With the implementation of the supervisory system, the installation of additional water meters to measure water sources not yet monitored is scheduled for 2026.

With regard to the value chain, this topic is also addressed in the Code of Ethics for Suppliers, which includes guidelines related to environmental responsibility.

[GRI 303-2; 303-4] In 2025, the Water and Soil Conservation and Effluent Treatment Procedure and the Oil Spill Containment Procedure were formalized, consolidating practices already adopted by the company.



**These procedures, aligned with the Environmental Policy, include:**

- Rational use of water by employees;
- Use of reused water in activities that do not require potable water;
- Areas for handling, processing, and storing materials with concrete floors – a key feature of the facilities – to prevent soil contamination;
- A drainage system with water-oil separators, ensuring proper treatment of effluents, in accordance with São Paulo State Decree No. 8,468/76;
- Procedures for spill containment and proper disposal of contaminated waste.

The topic of water management is also addressed in the organization's risk matrix. Additionally, the topic is communicated as a significant environmental impact on operational bulletin boards, in new employee onboarding processes, and in environmental training, including activities conducted during SIPATMA in 2025. Currently, we consider that the volume of effluent generated is proportional to water consumption and is sent for treatment by the water and wastewater utility. In cases where there are deviations from established parameters that cannot be corrected internally, we hire a specialized engineer for technical evaluation and to define corrective measures.

### We maintain periodic routines for:

- Checking and cleaning the separator boxes;
- Inspection of stormwater drainage channels;
- Maintenance of concrete floors.

Notable improvements implemented in 2025 include the enhancement of the operation of the separator boxes at the Itaquaquecetuba Recycling Facility and the maintenance of the pavement at the Headquarters Facility.



”

“I started as an assistant, moved through operations and maintenance, completed welding training, and later transitioned into the projects area, which is my passion. The company contributed greatly to my development, including supporting my engineering degree. Today, in a management role, I understand that part of my job is also to develop other people, just as I was developed. And Guarulhos provides that support, both financially and through HR. Regarding communication, team meetings have played a major role in clarifying employees’ questions. They have been essential for overall communication and especially for safety, which has improved significantly, with the safety technician participating in meetings and reinforcing workplace safety practices.”

Jefferson - Maintenance Coordinator



# OUR PEOPLE AND OUR COMMUNITY

## Guideline:

*Value and respect people, encouraging partnerships and joint development.*

## We have made significant progress toward our strategic objectives:

*Ensuring safety and contributing to the health and well-being of our employees.*

*Investing in the continuous development of our team, nurturing their commitment to our purpose.*

## KEY INITIATIVES IN 2025:



Reduction in operational accidents.



Implementation of health mentoring and improvements to the Health Plan.



Encouraging and increasing the use of physical and mental health benefits.



Expansion of employee meal benefits, with the provision of daily breakfast for the entire team.



Strengthening team skills through the organization of training sessions in the Integrated Agenda.



Increased closeness between managers and teams through the implementation of biweekly meetings.

## Human and labor rights

**People are at the heart of what we do, and it is through them that recycling happens every day.** In 2025, we expanded our workforce by 10.7%, reflecting the growth and continuity of our operations. Our People, as we call our team, is made up of professionals working in various roles, including assistants, yard supervisors, mechanics, machine operators, drivers, and administrative staff. Each role is essential for us to fulfill our mission as recyclers.

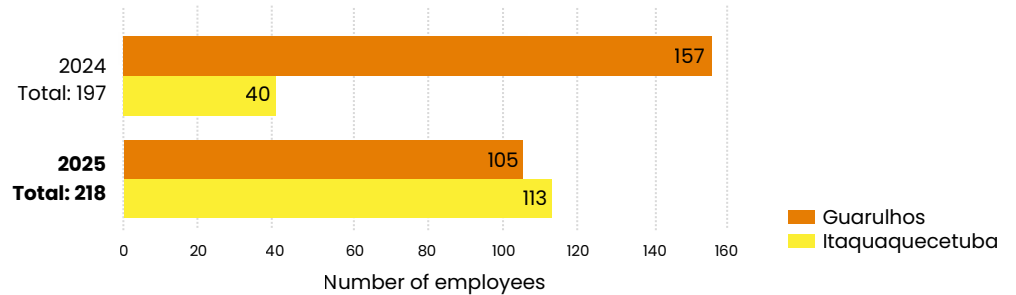
Respect for human and labor rights is a fundamental principle that guides people management at *Guarulhos Sucatas*, and for this reason, we seek to ensure dignified, safe working conditions in compliance with applicable legislation, promoting an environment of respect, equity, and appreciation for people. We expect the same standard of conduct from our partners and suppliers, strengthening a supply chain guided by responsibility.

[GRI 2-7] Our team consists of full-time employees (40 to 44 hours per week), interns (30 hours per week), young apprentices (20 hours per week), and partners. A significant portion of the team (42.9%) has been with the company for at least four years, consistently contributing to our trajectory and growth. The average tenure is approximately 3 years.

The following tables present the total number of employees, based on data as of December 31, 2025, covering the three operational sites included in this report.

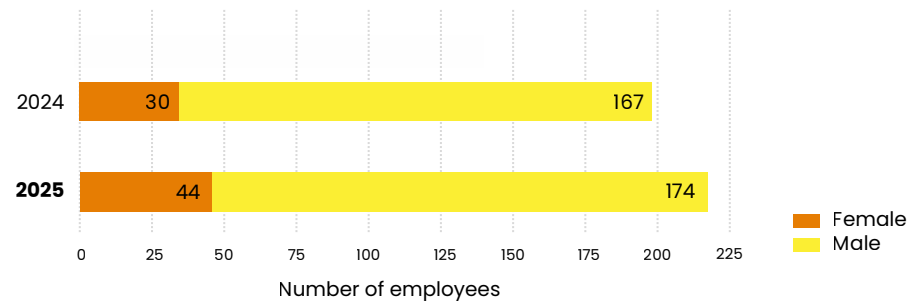


### EMPLOYEE INFORMATION BY REGION



*Notes: All employees are permanent; there are no temporary employees or employees without guaranteed working hours on the staff. Data as of 12/31/2025. Source: Computerized system used by the Human Resources department.*

### EMPLOYEE INFORMATION BY GENDER



*Notes: All employees are permanent; there are no temporary employees or employees without guaranteed working hours on the staff. Data as of 12/31/2025. Source: Computerized system used by the Human Resources department.*

The increase in the number of employees at the Itaquaquecetuba facility is related to the closure of one of the facilities in Guarulhos and the subsequent transfer of the fleet team. There has been a significant 47% increase in the number of women on the team, who now represent 20% of the total in 2025 (compared to 15% in 2024).

[GRI 2-8] At the end of 2025, in addition to direct employees, we had 10 outsourced professionals (non-employees), including nine access controllers for concierge services, with full-time annual contracts, and one quality and environmental consultant, responsible for supporting the management of the Integrated Management System (IMS), also with an annual contract and monthly allocation of hours. No temporary employees were hired, either directly or through outsourcing (via an employment agency), in 2025, resulting in a significant reduction in the number of outsourced professionals compared to 2024, when we had 17 such professionals.

[GRI 401-1] We continuously monitor employee hires and terminations to understand workforce dynamics and support decision-making in people management. The following tables present information on hires and terminations for the entire year of 2025.

**HIRES**

	Total number of new hires		Rate of new hires*	
	2024	2025	2024	2025
<b>By age group</b>				
Under 30 years old	20	62	4.76%	9.75%
Between 30 and 50 years old	42	60	3.13%	4.72%
Over 50 years old	7	8	1.17%	1.13%
<b>By gender</b>				
Male	54	103	2.69%	4.93%
Female	15	27	4.17%	5.11%
<b>By region</b>				
Guarulhos	52	59	2.78%	4.68%
Itaquaquecetuba	17	71	3.46%	5.24%
<b>TOTAL</b>	69	130	2.92%	4.97%

**TURNOVER**

	Total number of terminations		Turnover rate*	
	2024	2025	2024	2025
<b>Por faixa etária</b>				
Under 30 years old	14	43	3.33%	6.76%
Between 30 and 50 years old	33	57	2.46%	4.61%
Over 50 years old	11	10	0.82%	1.41%
<b>By gender</b>				
Male	49	95	2.45%	4.60%
Female	9	15	2.50%	2.91%
<b>By region</b>				
Guarulhos	47	47	2.51%	3.84%
Itaquaquecetuba	11	63	2.24%	4.65%
<b>TOTAL</b>	58	110	2.45%	4.20%

\*Calculation methodology: This data is tracked monthly, and the figure presented was calculated as an annual average based on the monthly values. Formula used for monthly tracking = new hires / headcount × 100.  
 Note: The rate of new hires for 2024 were adjusted because they had been calculated based on total headcount; therefore, in this report, they were corrected to account for the headcount of each category [GRI 2-4].  
 Source: Computerized system used by the Human Resources department.

\*Calculation methodology: This data is tracked monthly, and the figure presented is calculated as an annual average based on monthly values. Formula used for monthly tracking = terminations / headcount × 100.  
 Note: Employee Terminations = Total number of employees who left the organization during the reporting period, including voluntary resignations, involuntary terminations and dismissals for cause.  
 The 2024 turnover rate was adjusted because it had been calculated based on total headcount; therefore, in this report, it was corrected to account for the headcount of each category [GRI 2-4].  
 Source: Computerized system used by the Human Resources department.

In 2025, there was an 88.4% increase in hires (130 employees in 2025 versus 69 in 2024) and an 89.7% increase in terminations (110 employees in 2025 versus 58 in 2024), in line with the company's operational reorganization process, particularly with the transfer of activities to the Itaquaquecetuba facility.

The increase in the turnover rate between the compared years can be explained by the fact that, in 2025, there was a change in strategy regarding the hiring of general assistants: while in 2024 some of them were hired through a third-party agency, in 2025 all were hired directly by *Guarulhos Sucatas*. The assistant role presents significant challenges in hiring and retention in our industry (believed to be due to the age group generally under 30 and the nature of the work, which is primarily operational); we believe this fact negatively impacted our turnover rates.


[GRI 402-1] Communication regarding personnel changes takes place through team meetings, when applicable. Terminations are conducted individually by the direct supervisor, with support from the Human Resources department. All employment contracts and collective bargaining agreements are strictly adhered to regarding terms and conditions, and their requirements are communicated to employees from the moment of hire.

[GRI 2-30; 3-3(401); 3-3(402); 3-3(407); 407-1] Employment relationships fully comply with the *Brazilian Labor Laws* (CLT – Consolidation of Labor Laws), *Collective Bargaining Agreements* (CBAs), and our internal policies. All employees (direct hires) are covered by collective bargaining agreements, with 74.5% affiliated with *Sincomerciários* (Guarulhos Trade Employees Union) and 25.5% with *Sindicargas* (Guarulhos and Region Road Transport Employees Union).



Regarding *Collective Bargaining Agreements* (CBAs), *Guarulhos* keeps the team informed of relevant information and ensures the right to freedom of association and collective bargaining. CBAs are in the public domain; therefore, employees have free access to them whenever they deem necessary.

[GRI 202-1; 401-2] All compensation paid by the company is above the current minimum wage. In December 2025, the lowest salary paid was R\$2,138.59, equivalent to 41% above the minimum wage, corresponding to the base salary set by *Sincomerciários*. This amount applies to both men and women, considering permanent full-time employees. Interns and young apprentices receive compensation in accordance with current legislation and enjoy the same benefits offered to employees.

**All employees, regardless of employment status or location, have access to a STRUCTURED BENEFITS PACKAGE, including:**

-  Health insurance (reviewed in 2025 to address service improvements for staff requested in the 2024 Organizational Climate Survey);
-  Life insurance;
-  Pharmacy plan;
-  Food benefits (food vouchers, basic food basket, meal vouchers, on-site lunch, depending on role and workplace; benefits linked to Workers' Food Program);
-  Psychosocial support program;
-  Wellness platform (incentives for physical activity);
-  Transportation vouchers or fuel vouchers;
-  Student assistance (in accordance with the annual Individual Development Plan).

**In 2025, new benefits were introduced:**

-  Daily breakfast for the entire team.
-  Health mentoring (in-person welcome and counseling, support for scheduling appointments, and general health guidance).



[GRI 401-3] All employees are entitled to maternity and paternity leave in accordance with Brazilian law. In 2025, our team included 44 eligible women and 174 eligible men. During the year, 5 employees took advantage of this benefit, 2 women and 3 men, and all returned to work at the end of their leave period. Eight months after returning, one of the employees resigned; therefore, none of them were terminated by the company. The retention rate could not be calculated because the minimum return-to-work period (12 months) following the leave had not been completed.

[GRI 3-3(410); GRI 410-1] Starting in 2025, service providers working in our operations began receiving training at the facilities on our safety and ethics rules, including topics related to human rights, through the Third-Party Onboarding process, in accordance with a new procedure implemented during this period. The gatehouse team, in conjunction with the Human Resources Department, oversees this process, ensuring that all service providers receive the necessary Personal Protective Equipment (PPE) before entering operational areas. In addition, the third-party company responsible for security at the gatehouses includes, in its training process, content related to human rights and their application in security activities. In this way, we ensure that 100% of property security personnel, whether in-house or third party, receive training in human rights.

## Occupational safety

[GRI 3-3(403); 403-1; 403-8] Occupational safety remains a strategic priority for the company, given the nature of our operations, which involve heavy machinery, a vehicle fleet, maintenance, and the handling of ferrous scrap. We are fully aware of the risks involved; therefore, our team is properly trained and provided with appropriate guidance and equipment (PPE and CPE) for their duties.

Our Occupational Health and Safety Management System (OHSMS) is aligned with corporate guidelines and complies with *Regulatory Standards* (NRs) and other labor laws. The department operates based on its Policy, procedures, and work instructions applicable to operations, continuously monitoring their implementation to ensure safety in every activity.

All company employees are covered by this system, ensuring appropriate conditions for the safe and healthy performance of their duties.

In 2025, we expanded our occupational safety team with the goal of optimizing performance and improving the quality of safety practices. The team now consists of: an in-house Occupational Safety Technician; an external Occupational Safety Technician (service provider); an Occupational Safety Engineer; and an Occupational Safety Technician Assistant (a position created in 2025). The new position was created to support field activities, based at the Itaquaquecetuba facility, contributing to the strengthening of preventive measures and technical presence in operations.

The Safety Committee continues to act as an advisory body, holding monthly meetings to monitor and discuss key issues in the area. The results of these meetings are reported to the CEO, and the minutes are shared with the Board, ensuring transparency and alignment with senior management.

[GRI 403-4] The *Internal Accident Prevention Commission* (CIPA) plays a fundamental role in promoting safety, representing the active participation of employees.

### CIPA:



holds monthly meetings;



Identifies risks;



May suspend activities when they are dangerous;



Supports the organization of the Internal Week for the Prevention of Occupational Accidents and Environment (SIPATMA).

In the event of accidents, the commission holds special meetings to analyze the situation and determine appropriate



actions. In addition, CIPA also acts as a social group, promoting integration among employees. In 2025, it supported the organization of internal events, such as the June festival and the end-of-year party, in addition to investing in improvements to common areas and promoting celebratory activities, such as Easter.

[GRI 3-3 (403); 403-2; 403-7] Our occupational safety department has a specific policy, procedures, and detailed instructions for operating machinery, performing maintenance services, and conducting work at heights, ensuring safe conditions in the yards. Since 2022, we have had a **Safety Plan** in place, applied to all operational areas and activities. The plan is reviewed annually and follows the PDCA methodology (Plan, Do, Check, Act).



**Among the key practices adopted, the following stand out:**

✔ **Occupational Risk Communication** – Employees record risks identified in their areas using a specific form. The information is analyzed and addressed by the safety team using the PDCA methodology and monitored by the Safety Committee to ensure the necessary corrections are implemented.

✔ **Occupational Risk Management** – We conduct continuous risk assessments based on the *Occupational Risk Management Program*, the *Technical Report on Workplace Environmental Conditions*, and the equipment compliance report issued by the City. The information is shared with employees through Work Instructions, Work Orders, and bulletin boards, including a description of the hazard, type of risk, potential harm, and control measures.

✔ **Training and Guidance** – Employees participate in an onboarding process, biweekly safety meetings, and role-specific training. For new activities or occasional third-party services, we conduct a Preliminary Occupational Risk Assessment.

In 2025, we created and disseminated the *6 Golden Rules of Occupational Safety*, guiding critical behaviors for accident prevention and reinforcing the right to refuse unsafe activities.

**6 GOLDEN RULES OF OCCUPATIONAL SAFETY:**

1. Use the PPE and CPE specified for each activity;
2. Work with your attention focused on the task at hand and never walk around the yard or drive while using a cell phone;
3. Drive or operate vehicles and machinery only with management approval and with a valid license and up-to-date training;
4. Immediately report any accident or near-miss you witness to your supervisor or safety technician;
5. Open a PDCA to report situations that could put someone at risk;
6. Refuse to perform work without knowing the risks and following the rules.

[GRI 403-5] Employees elected and appointed as members of CIPA receive specific training for their roles as CIPA members, just as members of the Fire Brigade are trained as firefighters. During onboarding, all employees receive initial training, in addition to specific training required for each role.

**Other training sessions are conducted on an ongoing basis, including:**

- General safety standards;
- Regulatory standards;
- Proper use of PPE;
- Mandatory periodic refresher courses.

Annually, employees serving as team leaders receive training on the Safety Plan, delivered by the Safety Engineer. In 2025, this “Safety and the Role of Leadership” training included the participation of the Human resources Manager and aimed to reinforce the responsibility and attitude of leaders in promoting safety, health, and respect in the workplace.

[GRI 403-9] We conduct monthly monitoring of accidents and lost-time days recorded at our facilities. In 2025, we enhanced this **monitoring** by analyzing data by area, unit, and type of incident, distinguishing between:

- Operational accidents;
- Commuting accidents;
- Accidents involving third parties.





SIPATMA 2025  
**SUA ATITUDE,  
NOSSA SEGURANÇA**



### SIPATMA 2025

Every year we hold our *Internal Week for Accident Prevention and Environment*, an important awareness event to keep the safety culture alive in the company. In 2025, the Week focused on the attitude of each individual for the safety of all. There were training sessions related to safety, health and the environment, as well as opportunities for team integration.

This evolution allowed for greater precision in the analysis and definition of preventive actions. **In 2025, there were no recorded fatalities or accidents with serious consequences**, maintaining the same performance as in 2024.

**Also in 2025, we observed:**

**REDUCTION OF 7.7%** in the total number of operational accidents, despite a 10.7% increase in headcount.

**REDUCTION OF 15.5%** in the annual accident rate for the operation.

### ACCIDENT INDICATORS

Index*	2024	2025
Rate of fatalities as a result of work-related injury	0	0
Rate of high-consequence work-related injuries (excluding fatalities)	0	0
Rate of reportable work-related injuries	2.10	5.27

Note: \*Number of fatalities or accidents per 200,000 hours worked.  
Source: Management accident report.

The increase in the rate of reportable work-related injuries is associated with the rise in commuting accidents, which are required to be reported under Brazilian law. The main operational accidents recorded resulted from unsafe behavior, inattention, and carelessness, resulting mostly in minor injuries.

### To mitigate these risks, we have intensified:



The active participation of the safety technician in biweekly team meetings;



Reinforcement of safety guidelines and attention to operational processes;



Awareness initiatives, such as defensive driving training with an external professional, specifically aimed at the fleet team, since the majority of operational accidents in 2025 occurred in this area.

Currently, we do not track the hours worked by non-employees, which prevents us from calculating the accident rate for this group based on 200,000 hours worked. Nevertheless, we monitor all accidents occurring in the facilities. In 2025, only one accident involving third parties was recorded, of minor severity, representing a 50% reduction compared to 2024.



## Employee health and well-being

Caring for the health and well-being of our employees is essential to the sustainability of our business. **We believe that safety, the quality of our operations, and the results we deliver are directly linked to the physical and emotional well-being of Our People.** For this reason, we act in a structured and continuous manner to promote a safe, healthy, and welcoming work environment, expanding over the years our focus on caring for people, from occupational health to holistic well-being.

**[GRI 403-3] Occupational health services** follow the *Medical and Occupational Health Control Program (PCMSO)* and the *Occupational Risk Management Program (PGR)*, which maps risks and determines the required examinations for each activity, as well as *Personal Protective Equipment (PPE)* and *Collective Protective Equipment (CPE)*. Employees are trained in the proper use of this equipment, and instructions are distributed in each department, specifying the appropriate PPE for that role. We guarantee the confidentiality of personal information related to employee health, strictly adhering to the provisions of the General Data Protection Law (Law 13,709/2018).

**[GRI 403-6]** We have contracted an occupational health company to conduct pre-employment and post-employment exams, periodic (in-company) exams, provide occupational medical care, and issue *Occupational Health Certificates (ASO)*.

Regarding non-work-related health risks, since 2018 we have provided health insurance coverage for all our employees, including interns and young apprentices, which is extended to our employees' family members on a voluntary basis. In 2025, we switched health plans in response to requests for improvement from our team in the latest Organizational Climate Survey (2024). Additionally, since 2023, we have offered benefits for employees' physical health care and a psychosocial support program for employees and dependents, covering emotional, financial, legal, and substance abuse issues.

In 2025, we saw **a 25% increase in the utilization rate of this mental health benefit** by the team compared to 2024. A **40% increase** was also recorded **in the number of employees using the physical health benefit**. Additionally, there is a Pharmacy Partnership benefit to facilitate access to necessary medications.

Aiming for a comprehensive approach to the healthcare of Our People, in 2025 we hired a Health Consulting firm that provides health mentoring, with in-person individual consultations held biweekly at all sites, specifically designed to offer initial support and emotional assistance, as well as help with scheduling necessary appointments with specialists through the company's health plan.

Our team initiatives to promote health and well-being have also expanded over the past year, in partnership with the Communications and Marketing department, through initiatives promoting mental health, breast cancer prevention, and prostate cancer prevention, initiatives that are part of our Integrated Agenda, which we will discuss further below. It is important to note that SIPATMA provides annual information and training on health (physical and mental) and drug counseling. Starting in 2022, a free on-site flu vaccination program was also introduced. The active participation of occupational safety and human resources professionals in team meetings throughout the year has enabled the continuous reinforcement and encouragement of the use of our health-related benefits, demonstrating our commitment to caring for *Our People*.

Throughout the year, **HR works to foster a positive organizational climate and team relationships**, addressing the needs of employees and leaders to help people adapt to their roles, and resolving any conflicts. In 2025, we began offering breakfast in all work areas, which was seen as a positive initiative for team well-being and integration right at the start of the workday. Other team well-being initiatives, related to how we promote a culture of communication, engagement, and development, are also addressed in the human rights and labor material topic and in the employee section of the stakeholder dialogue material topic.



[GRI 403-10] In 2025, we planned to ensure full compliance with **Regulatory Standard No. 1** of the Ministry of Labor and Employment (NR-1) regarding the psychosocial risks to which workers may be exposed, for which administrative sanctions and enforcement are scheduled to begin in May 2026. The Occupational Safety department, in conjunction with the People department, has prepared and adopted measures complementary to existing ones to meet the new requirements of the standard, which mandates the management of psychosocial risks in the PGR.

**These measures included:**



Analysis and selection of the method for mapping and recording psychosocial risks in the PGR;



Hiring a health consulting firm specializing in reception, counseling, and referral for comprehensive health issues (physical and mental).

**In 2025, we continue to have no records of occupational illnesses among our employees.** This result reflects the effectiveness of the practices adopted by the company in the prevention, monitoring, and control of health risks.

The hazards to which our workers may be exposed include: inhalation of metal fumes exceeding legal standards, resulting from the oxy-fuel cutting of scrap metal; inhalation of particulate matter potentially generated during operations, such as the handling of scrap metal and the painting of vehicles and machinery; and improper handling of lubricants that may contain hydrocarbons. All measures to mitigate these risks are adopted and applied to employees through the PGR, which manages risks, and the PCMSO, which oversees workers' occupational health.



## Employee development

[GRI 3-3(404); 404-2; 404-3] Employee development is a key issue for business sustainability and the evolution of our operations. Training initiatives are structured based on the identification of training needs, considering both technical and behavioral aspects, as well as the strengthening of organizational culture.

Since 2025, these initiatives have been organized through the **Integrated Training Agenda**, which consolidates the activities carried out throughout the year. This agenda is structured by the Human Resources department, with support from the Safety, Communications, and Controllership departments, to organize and plan mandatory training and other important activities for the team. Throughout the year, we conduct technical, operational, and behavioral training, including content related to internal policies, procedures, work instructions, occupational safety and health, as well as the reinforcement of organizational values. A significant portion of the training takes place in the operational environment itself, combining theoretical and practical (“on-the-job”) approaches, which promotes greater adherence and immediate application of knowledge.

In 2025, we also developed the **Knowledge Matrix** by area, a tool that defines the training (both required and recommended) for each position, covering technical, regulatory, and safety requirements, as well as those related to leadership and technology. The matrix must be applied both during onboarding and when employees change roles, through a specific Training Protocol for internal transitions. Responsibility for implementation and monitoring is shared between HR and the direct manager, with internal mentors encouraged to support the learning process. The project began as a pilot program in late 2025, with consolidation and leadership training scheduled for 2026.

Starting with the recruitment and selection process, candidates are assessed based on competencies, in accordance with the requirements of each role. During the probationary period, structured evaluations are conducted at 45 and 90 days. Additionally, all employees undergo an **annual performance evaluation**, regardless of gender or job category. The evaluations consider specific competencies according to the strategic, tactical, or operational levels of the position. After calibrating the results, individual feedback sessions are conducted. When development opportunities are identified, an **Individual Development Plan (IDP)** is created, with defined goals and deadlines. Furthermore, HR also guides and encourages leaders to provide feedback to their teams throughout the year, documenting these follow-ups, as well as applying appropriate disciplinary measures as necessary.

The company also encourages external educational development, supporting employees who pursue technical courses, undergraduate and graduate degrees, and language studies, including full tuition assistance for those who demonstrate a commitment to their professional growth.

**Throughout the company's history, many employees have advanced internally to roles of greater responsibility and complexity, reflecting the culture of team development and recognition.**

Many of our assistants become machine operators, and we have cases of employees in operational roles who, through technical training and robust practical experience, have attained leadership positions, such as foremen or team coordinators.



People's Action 2025



Leaders' Journey 2025

In the area of leadership, we promote specific training programs annually, and in 2025 our leadership training continued to mature. At the beginning of the year, we held the “**Ação da Gente**” (People’s Action) meeting, aimed at the Board, Executive Board, Managers, and Supervisors, with a focus on strategic alignment and organizational culture. The event took place at a hotel over a weekend in the presence of families and created moments of connection and closeness, strengthening trust and partnership among the departments. This meeting was followed by a second phase, with an alignment meeting after the close of the first half of the year, to present the results of each department and provide updates on ongoing projects. We also conducted the “**Jornada de Líderes**” (Leaders’ Journey) aimed at direct team leaders and emerging talent, consisting of an off-site experience, an online learning track, and discussion circles to connect knowledge with action.

[GRI 404-1] In 2025, **the average number of training hours per employee was 21 hours**, including internal and external training as well as company-sponsored courses. The decrease in the average compared to 2024 (31.70 hours) was due to the completion of certain long-term, high-workload student assistance programs (undergraduate and graduate studies). When considering only **internal and external training** (excluding courses), **there was an increase from 2024 to 2025** from 3,170 to 3,480 total annual hours.

**AVERAGE EMPLOYEE TRAINING HOURS BY GENDER (h)**

Gender	2024	2025
Male	24.11	17.47
Female	73.93	35.07

**AVERAGE NUMBER OF TRAINING HOURS FOR EMPLOYEES BY JOB CATEGORY (h)**

Job category	2025
Strategic	33.07
Tactical	53.94
Operational	16.52

*Notes: In 2025, we revised our understanding of the composition of functional categories based on our current organizational structure. Accordingly, we now define the strategic level as: board and general management; the tactical level as: managers, consultants, supervisors, specialists, and coordinators; and the operational level as: all other positions. In 2024, the strategic level also included managers, internal consultants, and supervisors. Due to this change, it was not possible to present functional category data compared to 2024.*

*In the employee training hours presented, the hours of participants who are not company employees were not included.*

*Source: HR Training Tracking Spreadsheet.*



## Diversity and equity

[GRI 3-3(405); GRI 405-1] We value the inclusion of people of different genders, ages, races, nationalities, identities, and beliefs, ensuring a welcoming environment for employees, suppliers, customers, and partners. Respect is a fundamental principle in all our relationships. Our recruitment and selection process is conducted in a fair and non-discriminatory manner. All job postings include a statement that they are open to people with disabilities. To ensure a safe and inclusive environment, we provide a Reporting Channel to report any cases of discrimination. All complaints are handled in accordance with the Anti-Discrimination and Anti-Harassment Policy, ensuring a transparent and impartial process.

As of 2025, our Advisory Board has five members, including one external advisor, 40% of whom are women. Regarding age distribution, 60% are between 30 and 50 years old, while 40% are over 50. Currently, there are no representatives of minorities or vulnerable groups among the board members.



To present our team's profile, the following tables show the distribution of employees by job category, gender, age group, and membership in minority or vulnerable groups.

### EMPLOYEES BY FUNCTIONAL CATEGORY AND AGE GROUP (%)

Under 30 years old		Between 30 and 50 years old		Over 50 years old	
2024	2025	2024	2025	2024	2025
17.77%	<b>24.31%</b>	53.30%	<b>50.46%</b>	28.93%	<b>25.23%</b>



Job Category	Under 30 years old	Between 30 and 50 years old	Over 50 years old
<b>2025</b>			
<b>Strategic</b>	0.00%	60.00%	40.00%
<b>Tactics</b>	4.17%	75.00%	20.83%
<b>Operational</b>	27.51%	47.09%	25.40%

Note: Due to a change in the definition of functional categories in 2025, it was not possible to compare this data with that of 2024.  
Source: Computerized system used by the Human Resources department.

About 50% of our employees are between 30 and 50 years old, with the tactical category being the functional category where this age group is most concentrated. There was an increase in the percentage of employees under 30 in the operational category compared to 2024, mainly because general assistants are now hired directly by *Guarulhos Sucatas* and no longer through a third-party company.

### EMPLOYEES BY FUNCTIONAL CATEGORY AND RACE (%)\*

	Yellow	White	Indigenous	Brown	Black
<b>2025</b>					
<b>Strategic</b>	0.00%	100.00%	0.00%	0.00%	0.00%
<b>Tactics</b>	4.35%	39.13%	0,00%	52.17%	4.35%
<b>Operating</b>	0.55%	32.78%	0,55%	50.27%	15.85%

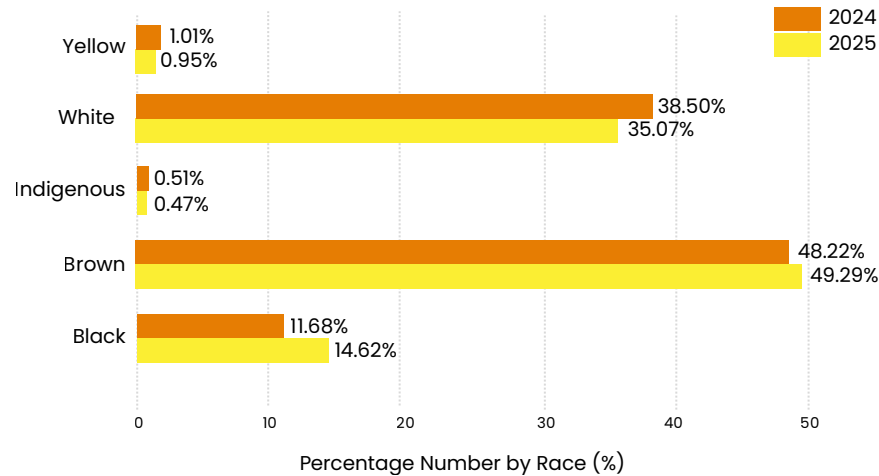
Note: Due to a change in the definition of functional categories in 2025, it was not possible to compare this data with 2024.

### EMPLOYEES BY FUNCTIONAL CATEGORY AND GENDER (%)

	Male	Female
<b>2025</b>		
<b>Strategic</b>	40.00%	60.00%
<b>Tactical</b>	58.33%	41.67%
<b>Operational</b>	83.60%	16.40%

Note: Due to a change in the definition of functional categories in 2025, it was not possible to compare this data with that from 2024.

### EMPLOYEES BY RACE (%)\*

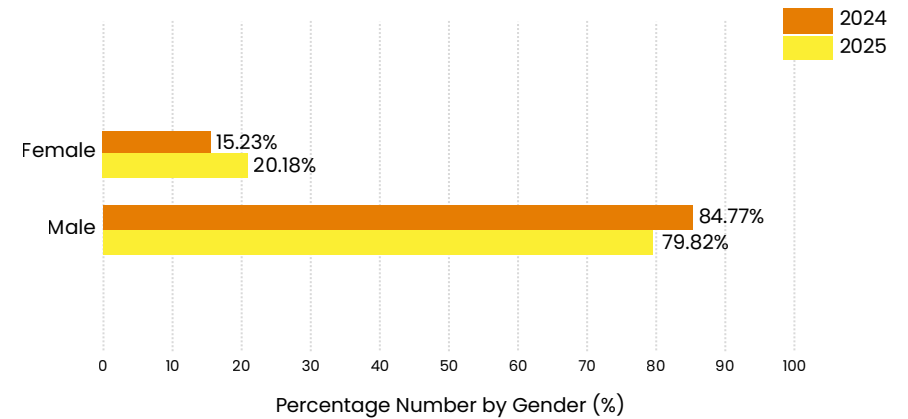


Note: \*Data self-reported via a questionnaire completed during the hiring process with a guarantee of confidentiality, in accordance with the LGPD. Source: Computerized system used by the Human Resources department.

There were no significant changes in the percentage of the race variable between the years compared.

**Brown and Black people account for more than 60% of the total workforce and more than 56% of the tactical level (which for us represents a leadership level).**

### EMPLOYEES BY GENDER (%)

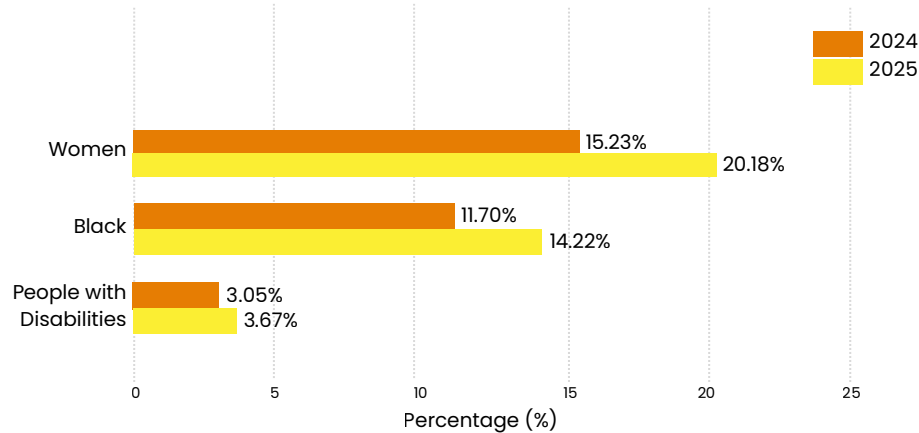


Source: Computerized system used by the Human Resources department.

**Looking at the data, we highlight the increase of 5 percentage points in female representation in just one year.**

This is the result of intentional efforts to attract and retain female talent and an internal environment that welcomes, develops, and encourages women in positions that were traditionally occupied by men in our industry.

**EMPLOYEES FROM VULNERABLE GROUPS OR MINORITIES (%)\***



Note: \*Data self-reported via a questionnaire completed during the hiring process with a guarantee of confidentiality, in accordance with the LGPD.

**From 2024 to 2025, there was a percentage increase in the three vulnerable groups/minorities measured.**

We highlight the positive experience we had in 2025, with the hiring of an employee with a physical disability for maintenance at our Recycling Facility in Itaquaquecetuba. This employee's onboarding process, the adaptation of the work environment and PPE to their role, the team's receptiveness, the support from their direct supervisor, and the employee's commitment and performance were key factors in the success of this initiative and the successful completion of the hiring process.

[GRI 3-3(406); 406-1] Regarding the handling of discriminatory acts, if a complaint of discrimination is filed, we follow a structured process in accordance with our **Anti-Discrimination and Harassment Policy**. The procedure includes the initial recording of the complaint, listening and preliminary analysis, decision-making, the development and implementation of an action plan, monitoring and preventive measures, followed by the recording of the case's conclusion. Our Whistleblowing Channel is the primary means used to report incidents of discrimination. All cases are handled with strict confidence by the Human Resources Manager, with the support of the Board of Directors and the Director of Committees. No cases of discrimination were recorded in 2025.

**Stakeholder engagement**

[GRI 2-29] We are a company that values relationships and engagement with our employees, suppliers, customers, and our community. Below, we share how we maintain dialogue with our stakeholders.

**EMPLOYEES**

[GRI 2-29] *Guarulhos* maintains structured and ongoing channels of dialogue with its employees, recognizing that internal communication and engagement are fundamental to business sustainability and the building of a strong culture. The onboarding process for new employees is designed to ensure a quick, safe, and welcoming transition. During onboarding, employees are introduced to the company's history, purpose, values, and policies, and they receive support from a more experienced employee through a mentoring system, which provides special assistance during the first few days. We monitor the organizational environment through a biennial Organizational Climate Survey and evaluations conducted during the probationary period, completed by both the employee and their manager. These tools allow us to identify opportunities for improvement and adjust management practices. The People Management department provides accessible and ongoing support in guiding teams and mediating conflicts, while leaders are encouraged to maintain open dialogue, promote regular feedback, and strengthen active listening.

Throughout the year, various initiatives focused on a culture of good conduct, prevention, and employee care were carried out. In addition to training, we also promote team-building events, such as the June Festival and the End-of-Year Party, organized in partnership with the CIPA Commission, which also improved the common areas in the courtyards by purchasing new game tables. We also value internal recognition, maintaining the **"Nossa Gente 10+"** (*Our People 10+*) program, which honors employees with over 10 years of service, reinforcing our commitment to lasting relationships and people development. Our People were also recognized in our **"Palavra de Quem Faz"** (*Words from Those Who Do*) section in our internal newsletter and in the **"Minha história na Guarulhos"** (*My Story at Guarulhos*) section on our social media, where we share the growth stories of our employees.





[GRI 3-3(402); 402-1] Dialogue also takes place through regular team meetings, internal communications on bulletin boards, announcements via WhatsApp, and our internal newsletter, the *“Guaru News”*, in both print and online versions. In 2025, the biweekly meetings held between managers and direct teams strengthened rapport, promoting greater alignment and transparency in day-to-day operational decisions, enabling objectivity and clarity in communications, fostering closeness, and avoiding communication biases. The new model also allowed for the participation of the Occupational Safety and Human Resources departments, providing information of collective interest. Additionally, the Human Resources department remains available for individual clarifications. Our Integrated Internal Agenda of initiatives for *“Our People”* included training sessions, behavioral guidance, and health and safety awareness actions carried out directly within the operational environment.

As for employee reports, these can be submitted anonymously through the Ethics Channel on our website or directly to HR. In 2025, four reports were filed through the channel, none of which were classified as harassment; they were treated as behavioral issues and recorded in confidential internal administrative forms (in 2024, there were two incidents). All were analyzed and handled with due confidentiality directly by the Human Resources Manager, through listening, guidance, corrective measures (when applicable), follow-up with the teams involved, and monitoring of the organizational climate. The company believes that the growing use of these channels by our team reflects an **environment of greater trust and psychological safety** for reporting situations.

[GRI 2-26] Employees’ questions regarding our internal policies and codes are addressed by the Human Resources Management department, while training sessions are conducted by both the Human Resources Management and Controllership departments.

## SUPPLIERS AND SUPPLY CHAIN DEVELOPMENT

[GRI 2-29; 3-3(308); 308-1; 308-2; 3-3(408); 408-1; 3-3(409); 409-1; 3-3(414); 414-1; 414-2] The company views its suppliers as an essential part of the recycling chain and maintains a close, collaborative relationship with them, focused on continuous development. Many of our partners have been working with us for decades, reflecting relationships built on trust, direct dialogue, and mutual commitment. The leadership team, including the founder, director, and purchasing management, maintains frequent contact with suppliers, welcoming them at headquarters and visiting them at their facilities.

We also maintain close relationships with cooperatives in the Guarulhos and Itaquaquecetuba regions, recognizing their strategic role in the recycling chain. We encourage their activities and support their operational needs. Throughout our history, we have contributed to the development of our partners through technical support, accounting and financial guidance to help them comply with regulations, as well as support in facilitating investments in equipment and trucks.

Engagement with suppliers occurs continuously and through multiple channels, including technical visits, direct assistance via phone and messaging apps, as well as public recognition of the partnership through the *“Parceiros da Reciclagem”* (Recycling Partners) series on our social media, where we share stories of partnership and growth from our suppliers. This approach reinforces recognition of our joint efforts and helps foster a culture of professionalism in the sector.



In the environmental and social sphere, we have established clear standards of conduct through the **Code of Ethics for Suppliers**, available on our website and formally sent to all new suppliers via the **Supplier Manual** during the first commercial contact through our integrated messaging service system. The document sets out guidelines regarding integrity, social and environmental responsibility, compliance with legislation, and respect for human rights, expressly condemning child labor and forced or slave-like labor.

We also share, via social media, guidance on material quality and the safety procedures expected of our suppliers. Employees who interact with suppliers, especially those in the Scrap Purchasing and Raw Materials Purchasing departments, receive training in the Code of Ethics for Suppliers. In 2025, this training was integrated into the Integrity and Anti-Corruption Program training conducted by the Compliance department, reinforcing the importance of compliance with legal standards and ethical principles throughout the supply chain.

Although we do not yet conduct formal structured audits or systematic assessments with socio-environmental scoring of suppliers, we adopt due diligence practices compatible with the nature of the sector. We conduct on-site visits to new scrap suppliers to learn about their operations, assess the type and origin of materials, and reinforce our responsible purchasing criteria. When purchasing vehicles, we require proper documentation and do not acquire vehicles that have not been properly deregistered with Sao Paulo's DMV. All purchases are made exclusively by accredited dismantlers, with detailed invoices, and the company is accredited with the Sao Paulo's DMV (*Detran-SP*) to acquire properly registered lots.

We understand that the development of the supply chain is an ongoing process and that formalization, ethics, and regulatory compliance are fundamental elements for strengthening the recycling sector. In this regard, we also work with industry associations, such as *Inesfa*, to promote the organization, enhancement, and professionalization of the entire supply chain.



See more



Access our [Supplier Manual and Code of Ethics for Suppliers](#).

## CUSTOMERS

[GRI 2-29] We strive to maintain a close and transparent relationship with our customers, offering various communication channels through which we respond promptly to messages and requests. We maintain constant contact with our customers through phone calls, messages, and in-person meetings, ensuring closeness and continuous engagement. Our participation in a booth at the Eco Expo recycling fair in October 2025 was also an excellent opportunity to meet and connect with our customers.

## COMMUNITY

[GRI 2-25; 2-29; 413-1; 413-2] As part of its dialogue with the community, the company has formal and informal channels for receiving complaints and concerns related to potential negative impacts arising from its operations. Third-party complaints may be submitted through direct contact with the neighborhood or via the Ethics Channel. All incidents are recorded on a confidential internal administrative form, analyzed by the responsible department, and addressed with corrective and preventive measures, prioritizing a conciliatory approach, active listening, and resolution of the identified impact.

Although our facilities are in industrial areas, we recognize that operating heavy machinery can generate noise, vibration, and dust emissions. These potential impacts are monitored through the operation's risk matrix, with specific controls for noise and air emissions. Among the measures adopted are vibration measurement, black smoke monitoring according to the Ringelmann scale, chemical air analysis, partial coverage of production areas with sheds, and the use of water cannons for dust control.

In 2025, two complaints were filed by neighbors. The first concerned the odor resulting from the processing of a specific material, which was promptly addressed through operational adjustments and considered resolved by the complainant. The second complaint referred to dust from the shredding of material in our shredder, as well as noise and vibration. In this case, in addition to correcting the machinery procedures, additional water cannons were installed, and preventive measures were adopted to avoid recurrence. There was also an inspection by the Occupational Health Reference Center (CEREST), which resulted in the complaint being dismissed as no irregularities were found.

## Community relations

[GRI 3-3(413); GRI 413-1] All *Guarulhos Sucatas* operations maintain close relationships with the communities where they operate, recognizing both the potential and actual impacts of their operations as well as their role in local development. In addition to impact management, we develop and support initiatives focused on education, productive inclusion, and environmental awareness.



## EDUCATION PROJECT

Education is an important value for us and guides our longest-running project. Since 2018, the Education Project has aimed to support the development of children and youth, the children of our employees, by offering quality educational opportunities for children aged 6 to 13 and professional development for youth aged 14 to 20. In addition to recognizing the outstanding performance of employees across a wide range of roles (from support staff to executives), the project promotes environmental awareness among families, addressing topics such as recycling and sustainability. Participating families are supported throughout the year by HR and the Board through regular communication. Three annual meetings are held, addressing topics such as sustainability and educational guidance, as well as providing opportunities for socializing and connection among families. Each year, employees' children graduate from high school and technical courses; the project grows with the arrival of new children and young people, and it is very rewarding to see the families thrive. **In 2025, the project benefited 17 families, impacting 60 people, including children, youth, and guardians.** A total of 15 educational support grants for children and 2 youth apprenticeship positions (directly linked to the project) were provided. In 2025, we invested over R\$158,000 in this initiative.



## GUARULHOS OPEN DOORS

Since 2023, this project has sought to raise awareness among new generations about the importance of recycling and inspire them to consider careers within the recycling industry. We welcome public school students and teachers for guided visits, including workshops on recycling and the circular economy, as well as a tour of our facilities. In November 2025, we welcomed 24 students and 2 teachers from the last year of high school, as well as students enrolled in technical programs in logistics and systems from Escola Walter Fusco, in Guarulhos, to our Main Recycling Yard and Recovery Facility. We also welcomed 24 students and 2 professors from the second year of the Mechanical Engineering program at the Federal Institute of Itaquaquecetuba (IFPS). In this engagement with young people and educational institutions, we also highlight two important initiatives in 2025. In March, our Director Rafael Barros was invited to give a **guest lecture** to engineering students at the IFSP-Itaquaquecetuba, where he had the opportunity to discuss the engineering behind our machinery and operations, connecting with the students and addressing their questions. Another source of joy for us is that the result of this engagement allowed us to integrate three interns from the Institute into our design and maintenance department at our Itaquaquecetuba Facility. **We value this engagement and want to increasingly promote opportunities for young people in our community.** In addition, in August, we also participated in the Guarulhos **Student Fair** organized by the Youth Secretariat, where we were able to engage with young people seeking information about the job market; we discussed recycling and career opportunities within our sector.



## SUPPORT FOR TAX INCENTIVE PROJECTS

In 2025, the amount of R\$39,700 was allocated to Tax Incentive Projects under the Rights Funds Act, Federal Law No. 8,069/1990 and the Rouanet Law—No. 8,313/1991. We highlight the **Regenera Project**, which we supported in the context of **COP 30, held in Belém**. The project's proposal is to combine environmental education, social innovation, and sustainable design. It operated in outlying neighborhoods of Belém, promoting workshops on environmental education, recycling, design, and art in partnership with public schools and the Usinas da Paz (facilities built by the Government of Pará in highly vulnerable areas of the capital). The workshops impacted more than 400 families. It also worked with waste pickers from CootAral, the Águas Lindas Recyclable Materials Waste Pickers' Cooperative, to train them to increase their income, teaching them to operate the machinery at the "plastic carpentry shop" and to create furniture from recycled plastics. After the event, the machinery was donated to the cooperative.

During COP 30, we had the opportunity to participate in the **Regenera Festival**, showcasing the work produced by the workshops and the cooperative. Our director Rafael also participated in the panel "The Value of Waste," where he spoke about the role of recycling in building a clean and inclusive future.



## SUPPORT FOR LOCAL GOVERNMENTS/ LOCAL INITIATIVES

We actively collaborate with the city governments and municipal departments of Guarulhos and Itaquaquecetuba on initiatives that directly impact the community. In 2025, we contributed to fundraising events for the Itaquaquecetuba Social Fund, such as the *Festa do Branco* and the *Itaquá Rodeio Fest*. We also supported the city government in purchasing PPE for the rescue team to assist flood victims in the city earlier this year and in renovating the military base. In addition, we participated in *Zero Waste Week*, promoted by the City of Guarulhos and the *Zero Waste Institute*, and **supported the organization of the first Guarulhos Recycling Forum**, including participating in panel discussions to share information about our recycling efforts in the city.



## DONATION FUND

Since 2023, we have allocated an annual budget for social projects. In 2025, we invested over R\$423,000 in initiatives focused on families and institutions serving children and youth in socially vulnerable situations, as well as animal welfare organizations, in the regions of Sao Paulo, Minas Gerais, Goiás, and Maranhao. The fund also supported a project by the Santos Apóstolos Parish in Itaquaquecetuba to provide supplies for weekly showers and meals for the community's homeless residents, many of whom are also recyclable waste collectors. All these initiatives are coordinated by the Board.

# GRI Content Index

Statement of use	Guarulhos Sucatas reported in accordance with the GRI Standards for the period from January 1 to December 31, 2025.				
GRI 1 used	GRI 1: Foundation 2021				
GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	06	-	-	-
	2-2 Entities included in the organization's sustainability reporting	02	-	-	-
	2-3 Reporting period, frequency and contact point	02	-	-	-
	2-4 Restatements of information	36	-	-	-
	2-5 External assurance	02	-	-	-
	2-6 Activities, value chain and other business relationships	06	-	-	-
	2-7 Employees	35	-	-	-
	2-8 Workers who are not employees	35	-	-	-
	2-9 Governance structure and composition	18	-	-	-
	2-10 Nomination and selection of the highest governance body	18	-	-	-
	2-11 Chair of the highest governance body	19	-	-	-
	2-12 Role of the highest governance body in overseeing the management of impacts	19	-	-	-
	2-13 Delegation of responsibility for managing impacts	19, 22	-	-	-
	2-14 Role of the highest governance body in sustainability reporting	02, 19	-	-	-
	2-15 Conflicts of interest	19	-	-	-
	2-16 Communication of critical concerns	19	-	-	-
	2-17 Collective knowledge of the highest governance body	14	-	-	-
	2-18 Evaluation of the performance of the highest governance body	19	-	-	-
	2-19 Remuneration policies	-	2-19-a, b	Confidentiality restrictions	Confidential information to protect sensitive data.
	2-20 Process to determine remuneration	-	2-20-a, b	Confidentiality restrictions	Confidential information to protect sensitive data.
	2-21 Annual total compensation ratio	-	2-21-a, b, c	Confidentiality restrictions	Confidential information to protect sensitive data.
	2-22 Statement on sustainable development strategy	04	-	-	-
	2-23 Policy commitments	11	-	-	-

GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
GRI 2: General Disclosures 2021	2-24 Embedding policy commitments	11	-	-	-
	2-25 Processes to remediate negative impacts	48	-	-	-
	2-26 Mechanisms for seeking advice and raising concerns	47	-	-	-
	2-27 Compliance with laws and regulations	21	-	-	-
	2-28 Membership associations	14	-	-	-
	2-29 Approach to stakeholder engagement	46, 47, 48	-	-	-
	2-30 Collective bargaining agreements	37	-	-	-
Material Topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	02	-	-	-
	3-2 List of material topics	02	-	-	-
TEMAS MATERIAIS					
Employee development					
GRI 3: Material Topics 2021	3-3(404) Management of material topics "Training and Education"	42	-	-	-
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	43	-	-	-
	404-2 Programs for upgrading employee skills and transition assistance programs	42	-	-	-
	404-3 Percentage of employees receiving regular performance and career development reviews	42	-	-	-
Stakeholder engagement					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	02	-	-	-
GRI 2: General Disclosures 2021	2-28 Membership Associations	14	-	-	-
	2-29 Approach to stakeholder engagement	46, 47, 48	-	-	-
Human and labor rights					
GRI 3: Material Topics 2021	3-3(401) Management of material topics "Employment"	37	-	-	-
	3-3(402) Management of material topics "Labor/Management Relations"	37, 47	-	-	-
	3-3(407) Management of material topics "Freedom of Association and Collective Bargaining"	37	-	-	-
	3-3(408) Management of material topics "Child Labor"	47	-	-	-
	3-3(409) Management of material topics "Forced and Compulsory Labor"	47	-	-	-
	3-3(410) Management of material topics "Security Practices"	48	-	-	-
GRI 201: Economic Performance 2016	201-3 Defined benefit plan obligations and other retirement plans	-	201-3-a, b, c, d, e	Not applicable	The company does not offer retirement plans to its employees.

GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	36	-	-	-
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	37	-	-	-
	401-3 Parental leave	38	-	-	-
GRI 402 Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	37, 47	-	-	-
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	37	407-1-a	Information unavailable/incomplete	The company is in the process of developing the supply chain on appropriate conduct.
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	47	-	-	-
GRI 409: Forced and Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	47	-	-	-
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	38	-	-	-
Diversity and equity					
GRI 3: Material Topics 2021	3-3(202) Management of material topics "Market Presence"	19	-	-	-
	3-3(405) Management of material topics "Diversity and Equal Opportunity"	44	-	-	-
	3-3(406) Management of material topics I "Non-discrimination"	46	-	-	-
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	37	-	-	-
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	44	-	-	-
	405-2 Ratio of basic salary and remuneration of women to men	-	405-2-a, b	Information unavailable/incomplete	The information needed for the calculation could not be obtained by the current data calculation model and the base salary references to be taken into account are being defined.
GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	46	-	-	-
Energy efficiency and a clean energy matrix					
GRI 3: Material Topics 2021	3-3(302) Management of material topics "Energy"	31	-	-	-
GRI 302: Energy 2016	302-1 Energy consumption within the organization	32	-	-	-
	302-2 Energy consumption outside the organization	-	-	Not applicable	The company does not have energy consumption outside the organization and fuel consumption was considered in indicator 302-1.
	302-3 Energy intensity	32	-	-	-
	302-4 Reduction of energy consumption	31, 32	-	-	-
	302-5 Reductions in energy requirements of products and services	32	-	-	-
Ethics and integrity					
GRI 3: Material Topics 2021	3-3(205) Management of material topics "Anti-corruption"	20	-	-	-
	3-3(206) Management of material topics "Anti-competitive behavior"	21	-	-	-

GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	20	-	-	-
	205-2 Communication and training about anti-corruption policies and procedures	20	-	-	-
	205-3 Confirmed incidents of corruption and actions taken	20	-	-	-
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	21	-	-	-
Greenhouse gases and air pollution					
GRI 3: Material Topics 2021	3-3(305) Management of material topics "Emissions"	30	-	-	-
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	30	-	-	-
	305-2 Energy indirect (Scope 2) GHG emissions	30	-	-	-
	305-3 Other indirect (Scope 3) GHG emissions	30	-	-	-
	305-4 GHG emissions intensity	30	-	-	-
	305-5 Reduction of GHG emissions	30, 31	-	-	-
	305-6 Emissions of ozone-depleting substances (ODS)	-	305-6-a, b, c, d 305-6-2.11	Not applicable	The company does not produce, import or export substances that destroy the ozone layer.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	31	305-7-a, b, c 305-7-2.13	Information unavailable/incomplete	The company monitors inventoried GHG emissions, but does not yet monitor other significant atmospheric emissions.
Waste generation and disposal					
GRI 3: Material Topics 2021	3-3(306) Management of material topics "Waste"	28	-	-	-
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	28	-	-	-
	306-2 Management of significant waste-related impacts	28	-	-	-
	306-3 Waste generated	29	-	-	-
	306-4 Waste diverted from disposal	29	-	-	-
	306-5 Waste directed to disposal	28	-	-	-
Water and effluent management					
GRI 3: Material Topics 2021	3-3(303) Management of material topics "Water and Effluents"	33	-	-	-
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	33	-	-	-
	303-2 Management of water discharge-related impacts	33	-	-	-
	303-3 Water withdrawal	33	-	-	-
	303-4 Water discharge	33	-	-	-
	303-5 Water consumption	33	-	-	-
Risk management					
GRI 3: Material Topics 2021	3-3(201) Management of material topics "Economic Performance"	10	-	-	-

GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
GRI 3: Material Topics 2021	3-3(207) Management of material topics "Tax"	22	-	-	-
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	10	-	-	-
GRI 207: Tax 2019	207-2 Tax governance, control, and risk management	22	-	-	-
Corporate governance					
GRI 2: General Disclosures 2021	2-9 Governance structure and composition	18	-	-	-
	2-10 Nomination and selection of the highest governance body	18	-	-	-
	2-11 Chair of the highest governance body	19	-	-	-
	2-12 Role of the highest governance body in overseeing the management of impacts	19	-	-	-
	2-13 Delegation of responsibility for managing impacts	19, 22	-	-	-
	2-14 Role of the highest governance body in sustainability reporting	02, 19	-	-	-
	2-15 Conflicts of interest	19	-	-	-
	2-16 Communication of critical concerns	19	-	-	-
	2-17 Collective knowledge of the highest governance body	14	-	-	-
2-18 Evaluation of the performance of the highest governance body	19	-	-	-	
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	-	201-1-a 201-1-b 201-1-2.1	Confidentiality restrictions	Information is not disclosed because the company is privately held; it is considered confidential to protect sensitive data and preserve the organization's competitive advantage.
Community relations					
GRI 3: Material Topics 2021	3-3(202) Management of material topics "Market Presence"	19	-	-	-
	3-3(413) Management of material topics "Local Communities"	48	-	-	-
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	19	-	-	-
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	48	-	-	-
	413-2 Operations with significant actual and potential negative impacts on local communities	48	-	-	-
Employee health and well-being					
GRI 3: Material Topics 2021	3-3(403) Management of material topics "Occupational Health and Safety"	38	-	-	-
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	38	-	-	-
	403-3 Occupational health services	41	-	-	-
	403-4 Worker participation, consultation, and communication on occupational health and safety	38	-	-	-

GRI STANDARD	CONTENT	DISCLOSURE LOCATION	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
GRI 403: Occupational Health and Safety 2018	403-6 Promotion of worker health	41	-	-	-
	403-8 Workers covered by an occupational health and safety management system	38	-	-	-
Information Security					
GRI 3: Material Topics 2021	3-3(418) Management of Material topics "Customer Privacy"	22	-	-	-
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	22	-	-	-
Occupational safety					
GRI 3: Material Topics 2021	3-3(403) Management of material topics "Occupational Health and Safety"	38	-	-	-
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	38	-	-	-
	403-2 Hazard identification, risk assessment, and incident investigation	38	-	-	-
	403-4 Worker participation, consultation, and communication on occupational health and safety	38	-	-	-
	403-5 Worker training on occupational health and safety	39	-	-	-
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	38	-	-	-
	403-8 Workers covered by an occupational health and safety management system	38	-	-	-
	403-9 Work-related injuries	39	-	-	-
	403-10 Work-related ill health	42	-	-	-

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