



Document 003 of the Minasul Sustainability Protocol: **LEGACY.**

RULES FOR EVALUATION/AUDIT, CERTIFICATION, IMPARTIALITY,
TRANSPARENCY, EXCEPTIONS AND COMPLAINT MECHANISM.

Reference: Doc P&C 003

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1 INTRODUCTION:

The Legacy Sustainability Protocol was drawn up to promote the continuous improvement of coffee producers in the Sul de Minas region in relation to various socio-environmental indicators. To this end, Legacy has established two incentive programs: the Legacy Suitability Journey and the Legacy Certification Program. To comply with this certification program, a series of rules relating to field evaluations and audits must be established in order to guarantee that producers participating in the program are evaluated and certified fairly, impartially and in a technically consistent manner..

Este documento tem como objetivo estabelecer estas regras, para assegurar estes parâmetros de qualidade do Legacy.

2. Eligibility criteria for entering the certification program:

To participate in the Legacy Certification Program, there are three eligibility criteria:

- Be a Minasul cooperative member and not have any financial or legal issues with the cooperative.
- Have no irregularities in complying with the basic requirements of Minasul's Social and Environmental Risk Management Tool.
- Be a coffee producer.

The Socio-environmental Risk Management Tool is a first stage in assessing essential socio-environmental issues, such as the producer not having deforested any area in the last 10 years or being on the dirty list of labor analogous to slavery.

3. Cycles in the certification process:

The Legacy certification process is designed to take place in three-year cycles, i.e. all the certification requirements, especially those classified as 'Continuous Improvement', must be implemented within three years of the producer joining the certification program. These steps are explained below:

- Year 1: Initial assessment and field audit to verify compliance with the established criteria.
- Year 2: Monitoring assessment to track progress and implementation of continuous improvements.
- Year 3: Renewal assessment to confirm maintenance of standards and eligibility for recertification.

4. Types of assessment to obtain the certificate:

4.1 Autoavaliação:

Producers carry out an initial self-assessment (with or without the help of Minasul technicians or external consultants) to identify strengths and areas in need of improvement, in preparation for the official audit. At this stage, it is possible to plan which improvements are a priority and urgent, and which can be implemented over the three-year cycle.

4.2 Field trip/audit Year 1:

Qualified auditors (Minasul staff or service providers) must carry out at least one evaluation visit to the property participating in Legacy, to verify compliance with the criteria and 'practical actions' required by the program. This evaluation will be based on a comparison between the producer's self-assessment and the auditor's field observations, interviews and document analysis. In this way, it will also be possible to analyze the producer's level of competence to carry out the socio-environmental management of his property and how much support he will need to go through the three years of the certification program.

4.3 Year 2 Evaluation:

In the second year, a monitoring assessment is carried out to check progress and ensure the continuity of the sustainable practices implemented. This evaluation may or may not include a field visit - depending on the producer's level of performance and management skills identified in Year 1.

If necessary, more than one field visit can be scheduled, including 'surprise' visits.



4.4 Evaluation Year 3:

By the third year, the producer is expected to have evolved in his sustainability practices.

4.5 Surprise or extraordinary visits:

The program reserves the right to conduct unannounced visits to ensure ongoing compliance and the integrity of the certification process.

5. Those responsible for evaluation (who can evaluate):

The assessments are conducted by independent and qualified auditors, duly accredited by the certification program, guaranteeing impartiality and competence in verifying the established criteria. The following can be accredited as auditors of the Minasul Sustainability Protocol - LEGACY:

- People with a university degree in subjects related to Legacy (Agronomy, Biology, Environmental Management, etc.)
- People with at least two years' experience in field audits.
- People with no potential conflict of interest.
- People approved by Minasul's sustainability department and who agree to undergo training to become accredited Legacy assessor.

6. Certificate:

6.1 Certificate approval:

Once the evaluations have been completed, a report is issued with the score obtained by the producer. If the producer achieves the appropriate score and has no non-compliance with Critical 'Practical Actions', the report is forwarded to the Certification Committee, which will review and approve the report and forward the approval of the certificate to Minasul's Board of Directors. Once approved by the Board, the certificate is issued, recognizing the producer's compliance with the program's socio-environmental standards.

6.2 Use of the certificate (use of the logo):

With the certificate approved and issued, producers have the right to use the program's logo on their products and promotional materials, according to the established usage guidelines, to communicate and attest to their commitment to sustainability to interested buyers or the general public.



6.3 Commercial use of the certificate (declarations):

Commercial statements regarding certification must be accurate and in accordance with the program's guidelines, avoiding misleading or unauthorized information. Incorrect or misleading use of information may result in suspension or loss of the certificate.

6.4 Suspension of certificate:

The certificate may be suspended in the event of non-compliance with the established rules, or in the event of complaints and the respective investigation of information, until these issues are clarified or the appropriate corrections are implemented. These issues must be evaluated by the Minasul Certification Committee.

6.5 Loss of certificate:

Loss of the certificate can occur in cases where there is proven misuse of information relating to the Legacy program or the certificate (declarations), in cases of investigated and proven complaints, or when the producer fails to correct a serious program performance issue within the stipulated timeframe or in cases of serious violation of the program's principles. These issues must be assessed by the Minasul Certification Committee.

7. Remedy for non-compliance with 'Practical Actions':

7.1 Non-compliance with Critical Practical Actions:

Failure to comply with critical practical actions requires immediate intervention and may result in the certificate being suspended until the issues identified have been fully resolved.

7.2 Non-compliance with 'Continuous Improvement' Practical Actions:

For unfulfilled continuous improvement actions, an action plan will be established with defined deadlines for implementing the necessary improvements. Continuous Improvement Actions must necessarily be resolved within the three-year certification cycle.

7.3 Exceptions:

Exceptional situations will be analyzed on a case-by-case basis by the Minasul Certification Committee, taking into account the specific circumstances and the producer's willingness to correct the non-conformities. The producer must



request the evaluation of a specific Legacy Protocol Criterion or Practical Action using the program's exception request template. Annually, Minasul will produce a report of exceptions and make it public through the Legacy website.

8. Transparency, Impartiality, Ethics in the use of data:

The program is committed to transparency and impartiality at all stages of the certification process, ensuring that the data collected is used ethically and confidentially, respecting producers' privacy, the use of sensitive data and current laws and regulations.

9. Mechanism for challenging the evaluation, complaints and denunciations:

Producers have the right to contest the results of the evaluations, lodge complaints or complaints through the program's official channels, which will ensure fair analysis and proper resolution of all issues raised. Complaints or challenges should be submitted to the Certification Committee via the email provided on the Legacy website.

Reports and/or complaints can be made through the channels below:

* E-mail: sustentabilidade@minasul.com.br (suggestions and criticism)

* Telephone: (35) 99880-8370 (Sustainability Department)

<https://minasul.com.br/faleconosco/sustentabilidade>

These channels are freely accessible for all interested parties to make criticisms, suggestions, complaints and other requests. They also have the function of resolving demands related to LEGACY - Minasul Sustainability Protocol. All complaints related to LEGACY must be dealt with within a period of up to 03 months, and can be investigated and repaired within 1 year. In situations considered critical, responses and resolutions will be immediate.

This document aims to ensure the integrity and effectiveness of the certification process, promoting sustainable practices in coffee growing and contributing to the appreciation of coffee produced under the established socio-environmental principles.