Output Final Audit Report

Audited Body	
Puro.earth Project Proponent	Aperam Bioenergia Ltda
Name of Contact for Puro.earth Project Proponent	Angélica Figueiredo
Production Facility Operator	Aperam Bioenergia Ltda
Name of Contact for Production Facility Operator	Angélica Figueiredo
Production Facility Name	Aperam Bioenergia
Production Facility ID	175613
Production Facility Location	Capelinha, Brazil

Audit Description	
Type of Audit	Output Verification Audit
Number of CORCs under Audit	42,382.70
Tonnes of dry biochar in stock (start)	3,347.83
Tonnes of dry biochar produced under Audit	17,989.29
Tonnes of dry biochar used under Audit	29,049.56
Tonnes of dry biochar in stock (end)	None
CORC conversion factor under Audit	1.651884127 tCO_2e per tonne dry biochar
Reporting Period Covered by Audit	1 April 2025 to 30 September 2025
Objective of Audit Engagement	Provide assurance opinion against requirements of Puro.earth Rules v3.1
Date of Auditor Engagement	29 January 2026
Date of Audit Report Submission	31 March 2026

Audit Outcomes	
Number of eligible CORCs	46,874.18
Overstated CORCs	441.13
Number of verified CORCs	46,433.05 (Eligible CORCs – Overstated CORCS)
Tonnes of dry biochar in stock (start)	3,347.83
Tonnes of dry biochar produced under Audit	27,263.96
Tonnes of eligible dry biochar used	28,376.19
Tonnes of dry biochar in stock (end)	2,235.60
CORC conversion factor	1.636338423 tCO_2e per tonne dry biochar
Calculation Method	Biochar Methodology Edition 2022 v3

Auditing Body	
Auditor	EnergyLink Services Pty Ltd
Lead Auditor	Rodrigo Pardo Patron
Additional Audit Personnel	Anouk Pilgrem Blasco, Thais Montero Voll
Peer Reviewer	Katherine Simmons

This document details the nature and scope of the services provided by a member of EnergyLink Services in respect of the biochar production output and CO_2 Removal Certificates (CORCs) claims from an approved Production Facility under the requirements of Biochar Methodology v3.0 (Edition 2022) and the Puro Standard General Rules v3.1.

This document is issued to Puro.earth detailing audit procedures conducted and the auditor's opinion in relation to the eligibility of the Production Facility. It should not be used for any other purpose.

Because of the inherent limitations in any internal control structure, it is possible that fraud, error, or non-compliance with laws and rules may occur and not be detected. Further, the audit was not designed to detect all weakness or errors in internal controls so far as they relate to the requirements set out above as the audit has not been performed continuously throughout the period and the procedures performed on the relevant internal controls were on a test basis. Any projection of the evaluation of control procedures to future periods is subject to the risk that the procedures may become inadequate because of changes in conditions, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

Copies of relevant documentation are available on the Puro.earth website: puro.earth

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Version Control Record

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20260331 Aperam Bioenergia 2025 Final Output Audit Report vF.0	31 March 2026	vF.0	Rodrigo Pardo Patron	Katherine Simmons

Contents

Abbreviation	Description
ASA	Aperam South America
BIO	Aperam Bioenergia
'H'	Hydrogen
'O'	Oxygen
CO_2	Carbon Dioxide
CORC	CO_2 Removal Certificate
C_{org}	Organic Carbon
GHG	Greenhouse Gas
LCA	Life Cycle Assessment
OC	Overcalculation
UC	Undercalculation
The Puro Rules	the Puro Standard General Rules v3.1
The Biochar Methodology	The Biochar Methodology v3.0 Edition 2022

PART A: Auditor's Report

To: Puro.earth

Dear Sir / Madam,

EnergyLink Services Pty Ltd (EnergyLink) were engaged to perform a reasonable assurance audit of Aperam Bioenergia's CO_2 removal calculation for the reporting period covered by the audit, from 1 April 2025 to 30 September 2025, against the eligibility requirements of 'the Puro Standard General Rules v3.1' (hereafter referred to as "the Puro Rules").

Details of Audited Body

Puro.earth Project Proponent	Aperam Bioenergia Ltda
Production Facility Operator	Aperam Bioenergia Ltda
Production Facility Name	Aperam Bioenergia
Production Facility ID	175613
Production Facility Location	Rual Raul Coelho 725, Cidade Nova – Capelinha, Brazil

Responsibility of the Audited Body's Management

The management of the audited body is responsible for the application of the requirements of 'Biochar Methodology Edition 2022 v3' (hereafter referred to as "the Biochar Methodology") in quantifying CO_2 Removal Certificates (CORCs) from the production of biochar, which is reflected in the proof provided to EnergyLink.

The management of the audited body is responsible for preparation and presentation of the evidence in accordance with Section 5 the Biochar Methodology v3. This responsibility includes the design, implementation, and maintenance of internal controls relevant to the preparation and presentation of proofs that are free from material misstatement, whether due to fraud or error.

Our independence and quality control

EnergyLink have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence, due care, confidentiality, and professional behaviour. These include all the requirements defined in the *Fortum – Supplier Code of Conduct*[1]. Additionally, EnergyLink and the verification team declare no conflict of interest with the audited body for this engagement.

Furthermore, EnergyLink maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements, in accordance with *ISQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information.*

[1] Fortum (2020), Fortum – Supplier Code of Conduct, available at: www.fortum.com/about-us/contact-us/suppliers/code-of-conduct

Our responsibility

EnergyLink's responsibility is to express an opinion on the audited body's quantification of CORCs and compliance with the Puro Rules v 3.1 based on the procedures we have performed and the evidence we have obtained.

We have conducted a reasonable assurance engagement in accordance with the Puro Rules v3.1 and relevant international standards, as listed below:

- International Standards on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information.
- ISQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagement.

A reasonable assurance engagement in accordance with relevant international standards involves performing procedures to obtain evidence about the Production Facility process controls and quantification of CORCs in accordance with the Puro Rules v3.1. The nature, timing and extent of procedures selected depend on the assurance practitioner's judgement, including the assessment of the risks of material misstatement, whether due to fraud or error. In making those risk assessments, we considered internal controls relevant to the audited body's preparation of proofs. We believe that the assurance evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Summary of procedures undertaken

The procedures we conducted in our reasonable assurance engagement included:

- reviewing evidence provided by the audited body;
- assessing the audited body against eligibility criteria;
- conducting a (virtual) site visit to validate the evidence provided;
- analysing procedures that the audited body used to gather data;
- testing of calculations that the audited body performed; and
- identifying and testing assumptions supporting the calculations.

Use of our reasonable assurance engagement report

This audit report has been prepared for use by the audited body and Puro.earth for the sole purpose of reporting on the audited body's quantification of CORCs and compliance with the Puro Rules v3.1. Accordingly, EnergyLink Services expressly disclaim and do not accept any responsibility or liability to any party other than Puro.earth and the audited body for any consequences of reliance on this report for any purpose.

Inherent limitations

There are inherent limitations in performing assurance audits - for example, assurance engagements are based on selective testing of the information being examined - and because of this, it is possible that fraud, error, or non-compliance may occur and not be detected. An assurance engagement is not designed to detect all misstatements, as an assurance engagement is not performed continuously throughout the period that is the subject of the engagement, and the procedures performed are based on a test basis. The conclusion expressed in this report has been formed on the above basis.

Additionally, non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating, and sampling or estimating such data.

Matters Identified from the Previous Monitoring Period

Formula Amendments and Misallocation of Emissions

During the review of documents submitted for this audit, a discrepancy was identified in the CORC Report Summary for the previous reporting period (1 March 2024 – 31 March 2025). The auditor identified three (3) instances where formulas in the Puro.earth CORC Calculation Template had not correctly accounted for life cycle emissions associated with production and use of the batch.

The auditor confirmed the total tonnes of eligible dry biochar used (26,678.36 tonnes) during the previous reporting period. Aperam had modified the biochar data entry in the CORC Calculation Template for consistency purposes, which resulted in the correct values of biochar used. The modification of the CORC Calculation Template was known by Puro.earth and by the Auditor. Despite additional testing being completed by the auditor, the emissions associated with $E_{biomass}$ (0.128 tCO_2e), $E_{production}$ (0.310 tCO_2e) and E_{use} (2.423 tCO_2e) were not accounted for.

Impact on CORCs Calculation

Consequently, the eligible CORCs for the previous period should have been 39,123.37 CORCs, but the audit conclusion was made for 39,564.50 CORCs. This resulted in an over-creation of 441.13 CORCs for the previous period, which is an immaterial quantum of CORCs (1.115%) related to the claim, i.e. below the 5% materiality threshold.

Aperam confirmed the deduction of 441.13 CORCs, which had been overstated during the previous monitoring period, from the current monitoring period's eligible CORCs, as shown in Table 1.

Equation 1: Verified CORCs for the reporting period

Verified CORCs = Eligible CORCs – Overstated CORCs during previous monitoring period

Furthermore, the auditor found other instances where amendments to the Puro.earth CORC Calculation Template for the current reporting period had occurred, as noted in Corrective Action Request 1 and Corrective Action Request 2. Consequently, the auditor has issued Recommendation 1, to ensure this is not repeated in subsequent reporting periods.

Corrective Action Requests / Recommendations

During the audit process, the auditor issued two (2) corrective action requests, which were addressed during the course of the audit. Further, the auditor issued one (1) recommendation and four (4) carry forward recommendations to be implemented by the next audit.

Corrective Action Request 1: LCA Calculations

Aperam Bioenergia prepared two LCAs to account for the biochar produced on-site, which were:

1) BIO-BIO LCA: After production, the produced char was separated into coarse and fine fractions at the production facility (i.e. Aperam Bioenergia or BIO). The coarse char was subsequently sent to Aperam South America (ASA) for energy production in steel blast furnaces. The remaining fine char, along with biochar produced from forestry residues such as branches, leaves, and roots, was applied directly to the soil at BIO.
2) BIO-ASA-BIO LCA: Prior to usage in steel blast furnaces at ASA, the coarse char underwent an additional separation process into coarse and fine fractions, as only the coarse fraction was fed to the furnaces. The remaining fine char was returned to BIO for application to soil.

Both LCAs used the same feedstock and resulted in the same final application to soil in eucalyptus plantations at BIO. The sole difference was that the BIO-ASA-BIO LCA included an additional transport step to send and return the remaining fine char from ASA to BIO, which required extra fuel consumption. During the audit, the auditor observed that the original LCA submission was not aligned with the audit period. Instead, the two LCAs provided (BIO-BIO, BIO-ASA-BIO) were based on CY2023 data. Consequently, the auditor requested that Aperam Bioenergia update their LCAs to reflect the current monitoring period (1 April 2025 to 30 September 2025). Aperam Bioenergia submitted two new LCAs, correctly reflecting the current monitoring period. Both updated LCAs (BIO-BIO, BIO-ASA-BIO) used for the verification conclusion reflect the current reporting period. The following evidence was provided to support the changes:

a) Breakdown of biochar produced and applied to the soil per facility;
b) Invoices for material move between BIO-BIO and BIO-ASA-BIO;
c) Fuel consumption and electricity consumption records; and
d) Chimney emissions analysis report.

These adjustments impacted the emission factors of $E_{biomass}$, E_{use} and $E_{production}$, and consequently, the number of CORCs.

Corrective Action Request 2: CORC Calculations

During the audit, the auditor observed that whilst the evidence provided was consistent with observations made during the virtual site visit, some inconsistencies were noted in the CORC Summary. As such, the auditor requested Aperam Bioenergia to review the CORC Summary, resulting in the following:

a) Correction of the CORC Calculation Template provided by Puro.earth, as previous amendments made by Aperam Bioenergia had altered several formulas and resulted in an incorrect value for "biochar in stock at period end".
   - Initially, the CORC Summary Report indicated a biochar stock at the end of the reporting period to be -7,712.44 tonnes.
   - This incorrect value resulted from amendments made by Aperam to the original CORC Calculation Template, which altered several formulas. Specifically, the formulas for "Biochar produced from eligible biomass" and "Biochar used with evidence of end-use available" for the period April to September 2025 had been modified.
   - During the site visit, the auditor raised this issue with Aperam.
   - Upon request, Aperam restored the formulas to align with those approved by Puro.earth.
   - Following this correction, the accurate value dry biochar stock at the end of the reporting period was confirmed to be 2,235.60 tonnes.
b) Correction of a missing E_{use} entry, ensuring all biochar batches include all emissions under E_{use}.
c) Correction of missing $E_{production}$ entries, where multiple batches lacked $E_{production}$ values; all emissions were subsequently updated.
d) Reconciliation of emissions from "biochar in stock at period start", ensuring the $E_{biomass}$, $E_{production}$, and E_{use} associated with the opening stock were correct.
e) A negative "stock of biochar not yet used" balance between "biochar produced" and "biochar used" was flagged in the CORC Summary (August 2025). This variance was attributed to the use of stock deemed ineligible in the previous audit. Accordingly, the amount of biochar applied in UPER Lagoa, in August 2025, was not considered (which totalled 697.73 t), avoiding a negative balance between "biochar produced" and "biochar used".

These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs.

Recommendation 1: CORC Calculation Template

Finding

Because of the findings described in Matters Identified from the Previous Monitoring Period, Corrective Action Request 1 and Corrective Action Request 2, the auditor identified instances where formulas within the Puro.earth CORC Calculation Template had been modified and therefore, the calculation of CORCs.

Recommendation

The auditor recommends that Aperam Bioenergia enhance their training and quality assurance procedures to ensure that if changes are required to the CORC Calculation Template, to liaise with the Puro.earth's team to make the required amendments and ensure the calculation formulas are not compromised.

Carry Forward Recommendation 1: Biochar Stock Reporting

Finding

Because of the findings described in Corrective Action Request 2, the auditor has carried forward the previous audit recommendation, to be assessed in the next audit. More information on the previous audit recommendation can be found in Appendix A.

Recommendation

EnergyLink recommends that Aperam Bioenergia implement a consistent reporting approach by including both the total biochar produced and the amount applied to soil in the CORC Summary. This will ensure that future claims for "stock at period start" and "stock of biochar not yet used" are accurately documented and verifiable in subsequent audits.

Carry Forward Recommendation 2: LCA Data Accuracy

Finding

Because of the findings described in Corrective Action Request 1 and Corrective Action Request 2, the auditor has carried forward the previous audit recommendation, to be assessed in the next audit. More information on the previous audit recommendation can be found in Appendix A.

Recommendation

The auditor recommends that Aperam Bioenergia enhance its procedures to ensure that the emissions associated with biochar not yet applied to soil during the current audit period are accounted for in future audits. Additionally, the auditor recommends that Aperam Bioenergia use actual data inputs from the reporting period in the LCA, when available, to ensure consistency and accuracy.

Carry Forward Recommendation 3: Record Keeping and Quality Assurance

Finding 1

Because of the findings described in Corrective Action Request 1 and Corrective Action Request 2, the auditor has carried forward the previous audit recommendation, to be assessed in the next audit. More information on the previous audit recommendation can be found in Appendix A.

Finding 2

During the audit, the auditor noted a lack of traceability between BIO-ASA-BIO production values and supporting evidence (e.g., invoices). Aperam Bioenergia subsequently revised the documentation and provided a facility-level breakdown of charcoal and biochar production and application, supported by evidence. In addition, an incorrect Gas Burner Efficiency value was used. Upon request, Aperam Bioenergia corrected the Gas Burner Efficiency value.

Recommendation

EnergyLink recommends that Aperam Bioenergia augment its record keeping and quality assurance procedures to ensure the data inputs in the LCA and in the CORCs Calculation Template are correct, accurate, well-documented and consistent.

Carry Forward Recommendation 4: Ongoing testing

Finding

The auditor issued this recommendation during the physical site visit during August 2024 and was relevant to the continuous reactor operations. No production from the continuous reactor was part of this audit, as it remained in testing phase at the time of this audit (March 2026). As such, the auditor has carried forward this recommendation to be reassessed in the next audit, if the continuous reactor is operational. More information on the previous audit recommendation can be found in Appendix A.

Recommendation

On site testing for C_{org} and Hydrogen will enable Aperam to better understand on-site parameters to be able to control the process and ensure either biochar or char is produced at the continuous reactor. Aperam should be able to rely on these ongoing tests as long as the results are within a range obtained by third party analysis for their CORC creation.

Overall Conclusion

Verification Opinion (Qualified Conclusion)

The lead auditor is able to express a qualified reasonable assurance opinion that, noting the effects of Corrective Action Request 1, Corrective Action Request 2, and the matters discussed in the Basis for Qualified Conclusion section, the quantification of 46,874.18 CO_2 Removal Certificates (CORCs) by Aperam Bioenergia for the period of 1 April 2025 and 30 September 2025, in all material respects, is correct. The auditor identified that the eligible CORC quantity has been calculated in accordance with the Puro Standard General Rules v3.1.

As outlined in Matters Identified from the Previous Monitoring Period, the auditor identified an error in the CORC Report Summary formulas (in the previous monitoring period), which resulted from manipulation of the CORC Calculation Template. As such, an over-creation of 441.13 CORCs occurred during the previously audited monitoring period. To address this, 441.13 CORCs have been deducted from the current monitoring period's eligible CORCs (refer to the "Overstated CORCs" in Table 1). The overstated CORCs were not considered when calculating the error rate for this monitoring period. Hence, the total number of CORCs resulting from the audit period are 46,433.05 CORCs.

Table 1: Audited CORCs Summary

Biochar	CORCs Under Audit	Abs. Error (CORCs)	Abs. Error Rate (%)	Net Error (CORCs)	Net Error Rate (%)	Eligible CORCs	Overstated CORCs	Verified CORCs**
Total	42,382.70	4,491.48	10.597%	4,491.48 UC	10.597%	46,874.18	441.13	46,433.05

*OC = Overcalculation / UC = Undercalculation.

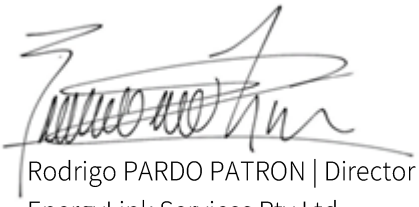
**Verified CORCs = Eligible CORCs – Overstated CORCs (from the previous monitoring period).

Basis for Qualified Conclusion

During the audit process, the auditor issued two (2) Corrective Action Requests, one (1) Recommendation and four (4) Carry-Forward Recommendations. The issues raised during the audit led to errors in the calculation of CORCs completed by the audited body, that resulted in a material error rate, but are not pervasive in nature and were corrected during the course of the audit, and included:

- Changes in the $E_{biomass}$, $E_{production}$ and E_{use} emission factors due to changes in the data of the two LCA's (i.e., BIO-BIO and BIO-ASA-BIO), as outlined in Corrective Action Request 1; and
- As outlined in Corrective Action Request 2:
  - Changes in "biochar in stock at period end";
  - Change in E_{use} input due to a missing entry;
  - Change in $E_{production}$ input due to the exclusion of emissions for several batches; and
  - Inclusion of emissions associated with "biochar in stock at period start".

Sincerely,



Rodrigo PARDO PATRON | Director of Engineering
EnergyLink Services Pty Ltd
Lead Auditor
31 March 2026

Part B: Detailed Findings

Audit Findings and Conclusions

Table 2 to Table 5 summarise the findings from the Production Output Audit. As part of the audit procedures, the auditor performed interviews with site representatives and a virtual site visit to the Production Facility. Where possible, the findings from these procedures were used to validate that the eligibility criteria under the methodology had been met, that the proofs and evidence provided by the audited body were accurate, and that the metering used to quantify the Output was appropriate and correctly calibrated.

Eligibility Assessment

Table 2: Eligibility Assessment

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the biochar is used in applications other than energy.	Y	Aperam Bioenergia (BIO) produced charcoal and supplied it to Aperam South America (ASA). ASA returned the residue of the charcoal (i.e. fines/biochar) to BIO. This process and its biochar produced were referred to as "BIO-ASA-BIO" and documented in an LCA. Additionally, Aperam Bioenergia produced biochar from forestry residues at its own facilities, without transportation to ASA, this process and its biochar produced were referred to as "BIO-BIO". The auditor confirmed that all biochar under audit was used as soil amendment on BIO's eucalyptus plantations.	N/A.
Confirm that the biochar is produced from sustainable forest or waste biomass raw materials.	Y	The feedstock used to produce char to be used for energy production in ASA's steel manufacturing process was primarily logs sourced from FSC-certified eucalyptus plantations owned and managed by BIO. The feedstock was transported using Aperam-owned trucks, unloaded by log handlers, and fed into batch char production kilns using front-end loaders. Additionally, Aperam used forestry residues - such as branches, leaves, and roots from the eucalyptus plantations. Therse residues were collected and transported to the biochar production facility to create biochar.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the producer demonstrates net-negativity with results from a LCA that shows: – [A1 Biomass and A2 Transport of biomass] carbon footprint of the biomass production and supply. – [A3 Production] emissions from the biochar production process. – [A4 Transport of biochar to site] carbon footprint of the biochar end use. – [B1 Application and use] cradle to grave.	Finding	As outlined in Corrective Action Request 1, the auditor observed that the original LCA submission was not aligned with the audit period. Instead, the two LCAs provided (BIO-BIO, BIO-ASA-BIO) were based on CY2023 data. Upon request, Aperam Bioenergia updated the LCAs to correctly reflect the monitoring period and provided evidence to support this. Based on the updated documentation, the auditor was able to confirm that the two LCAs provided by Aperam (BIO-BIO, BIO-ASA-BIO) included all information on the emissions of the different stages of the biochar cradle to grave life cycle. These adjustments impacted the Ebiomass, Euse and Eproduction emission factors and consequently, the number of CORCs.	Corrective Action Request 1 Carry Forward Recommendation 2
Confirm that measures are taken for safe handling and transport of biochar to prevent fire and dust hazards.	Y	Aperam Bioenergia's biochar production operations were batch-based. Each kiln was filled up with wood, sealed, and the pyrolysis process undertaken. The pyrolysis gases were transported (via underground pipes) to a combustion chamber. During the cooling phase, heat was dissipated through the walls and the top of the kiln, which was left to cool down over several days. Once cooled, the combustion chamber was open, and the char was handled for transportation. As such, the auditor confirmed that cooling procedures were carried out within the operation to ensure the biochar produced were not hazardous for handling and transport.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the biochar production process meets requirements 1.1.4 to 1.1.6 of the Biochar Methodology, namely that: ○ It has considered the emissions related to the use of fossil fuels (coal, oil, natural gas). ○ there is no co-firing of fossil fuels and biomass in the same reaction chamber. ○ the pyrolysis gases are recovered or combusted. ○ the molar H/Corg ratio is less than 0.7.	Y	The kilns used to produce the char were designed with lateral oxygen entrances and underground ducts that provide access to the kiln's floor. These ducts led to a centralized combustion chamber. Kindling was placed on the kiln's floor to ignite the kilns, starting the wood carbonization process. No fossil fuels were used to ignite the kilns. This was confirmed during the virtual site visit and the previously made physical site visit.	N/A.
		The auditor confirmed that the biochar was produced in the six char production facilities, namely UPER São Bento, UPER Cruz Grande, UPER Pontal, UPER Palmeiras, UPER Chacara and UPER Lagoa. Each facility had a different number of kilns, and the pyrolysis gases of all kilns within each facility were captured by underground ducted system(s) and combusted at high temperatures in a centralised gas burner. The auditor noted that due to maintenance or other operating factors, the gas burners may often be out of service. Aperam measured the time the burners were out of service and recorded this "utilisation factor". This value, internally called the "burner efficiency", was used to calculate the upper limit of the quantity of biochar produced that was eligible for CORC creation (i.e. the char produced when pyrolysis gases were recovered and combusted). Under this approach, as long as the quantity of biochar applied to land was below the total eligible biochar production, it was considered that clause 1.1.5 of the Biochar Methodology v3 had been met and CORCs could be claimed. The auditor confirmed via the LCA report, the virtual site visit, conversations undertaken with Puro.earth personnel during previous audits and remaining project evidence that the biochar production process had met requirements 1.1.4 to 1.1.6 of the Biochar Methodology v3.	
		The auditor confirmed the average molar H/Corg ratio was 0.649, which is less than 0.7.	

Confirmation of Production Facility Eligibility

Table 3: Production Facility assessment

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm the Production Facility Eligibility under the general rules of Puro Standard.	Y	The auditor confirmed that the audited body had already gone through a Production Facility Audit in 2022 and achieved a positive outcome.	N/A.
Confirm that the Production Facility demonstrate Environmental and Social Safeguards.	Y	The auditor confirmed that the CO_2 Removal Supplier showed sufficient evidence to demonstrate that the Production Facility does no significant harm to the surrounding natural environmental and local communities.	N/A.
Confirm that the quantity of biochar produced and sold is documented via appropriate processes.	Finding	During the audit, the auditor identified errors in the reported quantities of biochar in stock throughout the monitoring period, as outlined in Corrective Action Request 2. Amongst the errors in the CORC Calculation Template provided by Puro.earth, and due to amendments made by Aperam Bioenergia, several formulas had been altered which resulted in an incorrect value for “biochar in stock at period end” (the CORC Summary Report stated -7,712.44 tonnes). Upon request, Aperam Bioenergia reviewed the documents and corrected all the errors. **These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs.** In addition, the auditor noted there was insufficient traceability between the BIO-ASA-BIO production figures and the supporting evidence. Upon request, Aperam Bioenergia revised the documentation and provided a facility-level breakdown of charcoal and biochar production and application, supported by evidence.	Corrective Action Request 2 Carry Forward Recommendation 3

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that metering infrastructure is in place to determine: ○ the production output. ○ the energy use of the Production Facility.	Y	**Production output** During the virtual site visit, the auditor confirmed that an appropriately calibrated weighbridge was used to quantify both production output and the biochar sent for soil incorporation. All data was documented and tracked using a management software and an internal database. The auditor noted that the total biochar in the internal system was recorded in cubic meters rather than tonnes. Aperam Bioenergia clarified that their system only allows inputs in cubic meters, so they convert the measured biochar to cubic meters using an average density of 220 kg/m^3 to enter it into the system and then convert it back to tonnes for reporting purposes. No issues were identified by the auditor regarding this approach, as the actual tonnes were measured by the weighbridges and the cubic meters were used only for system entry. **Electricity** Electricity consumption was determined using electricity bills and the supporting documentation provided. **Fuel usage** The auditor confirmed during the virtual site visit and through additional evidence, that all diesel data was documented and tracked using management software and an internal database. **Bio-oil** The auditor confirmed that Aperam Bioenergia sold the bio-oil produced and provided the corresponding invoices.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm the calculations used to quantify emissions from the process. These must account for: ○ Cultivating and harvesting of raw materials (forest vs other biomass). ○ The energy source used in the production process. ○ Transporting of raw materials to the Production Facility (based on distance transported and fuel used).	Finding	As outlined in Corrective Action Request 2, the auditor identified several errors in the emissions associated with $E_{biomass}$, $E_{production}$ and E_{use}., including: a) Correction of a missing E_{use} entry, ensuring all biochar batches include all emissions under E_{use}. b) Correction of missing $E_{production}$ entries, where multiple batches lacked $E_{production}$ values; all emissions were subsequently updated. c) Reconciliation of emissions from "biochar in stock at period start", ensuring full attribution of $E_{biomass}$, $E_{production}$, and E_{use} associated with the opening stock. d) A negative "stock of biochar not yet used" balance between "biochar produced" and "biochar used" was flagged in the CORC Summary (August 2025). This variance was attributed to the use of stock deemed ineligible in the previous audit. Accordingly, the amount of biochar applied in UPER Lagoa, in August 2025, was not considered (which totalled 697.73 t), avoiding a negative balance between "biochar produced" and "biochar used". Aperam Bioenergia corrected all these errors during the course of the audit. Aside from the issues noted, the auditor confirmed that the calculations used to quantify the emissions from the processes were appropriate. These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs.	Corrective Action Request 2

Quantification of CO_2 Removal

Table 4: Quantification of CO_2 Removal - Calculation Methodology

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the quantification of CO_2 removal is calculated using the Calculation formula of CO_2 removal.	Y	The auditor examined the CORC calculator provided by the audited body and confirmed that the formulas applied in the quantification of CO_2 removal for biochar were in accordance with the Puro Rules v3.1.	N/A.
Confirm that the inputs to the Calculation formula of CO_2 removal are appropriate and consistent with the evidence provided.	Finding	The auditor identified inconsistencies in the inputs to the calculation formula of CO_2 removal, as specified in Corrective Action Request 2. Upon request, Aperam corrected these inconsistencies during the audit and provided supporting evidence. The auditor verified that the updated inputs to the CO_2 removal formula were appropriate and aligned with the supporting evidence. These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs.	Corrective Action Request 2

Verification of Proofs

Table 5: Verification of proofs and documentation

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the standing data for the Production Facility meets the requirements of the Biochar Methodology and is consistent with other evidence.	Y	The auditor reviewed and validated the standing data provided by the audited body and confirmed this was consistent with desktop testing and the virtual site visit.	N/A.
Confirm that the necessary proof and evidence documents are maintained by the Production Facility as per Section 5 of the Biochar Methodology[2].	Y	The auditor noted that char invoices did not include a "no double counting" disclosure. Aperam clarified that all char was either supplied exclusively to ASA or used internally, with no external end-users involved. A joint letter signed by both BIO and ASA confirmed that all rights to carbon sequestration were solely assigned to BIO, satisfying the "no double counting" requirement under Section 5 of the Biochar Methodology v3.0.	N/A.
Confirm the biochar properties are based on laboratory analyses performed in laboratories accredited by national authorities and comply with international testing standards (e.g. ASTM, ISO, AS, D).	Y	During the reporting period, Aperam Bioenergia collected and submitted a total of 12 samples to an external laboratory. The auditor confirmed that the laboratory analyses presented by Aperam Bioenergia were conducted by UFES (Federal University of Espírito Santo), an institution accredited by national authorities, and that the tests were performed in accordance with the ASTM D1762-84 (2021) standard.	N/A.

[2] Information in Section 5 of the Biochar Methodology v3 includes:

- Proof of sustainability of raw material for forest and/or waste biomass.
- LCA data for biomass and biochar production.
- Justification on the soil temperature used for the calculation of the biochar sequestration.
- Proof of product quality, production volume, sales and end use of biochar.
- Proof of no double counting/C positive marketing.

Peer Reviewer Conclusion

Name of the peer reviewer	Katherine Simmons
Peer reviewer's credentials	• Bachelor of Engineering (Honours) in Polymer Engineering (minoring in Chemical Engineering). • Category 1 Registered Greenhouse and Energy Auditor with the Clean Energy Regulator (Australia). • Climate Active Registered Consultant. • Integrated Management Systems Lead Auditor ISO 19011, ISO 9001:2015, ISO 14001:2015, ISO 45001:2018.
Peer reviewer contact details	Email: katherine.simmons@kreaconsulting.com.au Phone: +61 431 612 950
Outcome of the evaluation undertaken by the peer reviewer	I have reviewed the engagement letter, audit report and supporting work papers / source data and am satisfied that the audit has been performed in accordance with the eligibility requirements of General Rules of Puro Standard General Rules Version 3.1.

Appendix A: Response to Previous Audit Recommendations

The Output Audit conducted on 1 December 2025 (EnergyLink Services Pty Ltd) contained two (2) recommendations and two (2) carry-forward recommendations. The recommendations and the auditor's responses are provided in Table 6.

Table 6: Previous Audit Recommendation

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Recommendation (1): The auditor recommends that Aperam Bioenergia implement a consistent reporting approach by including both the total biochar produced and the amount applied to soil in the CORC Summary.	Partially	As outlined in Corrective Action Request 2, the auditor identified inconsistencies in the stock data reported in the CORC Summary. As a result, the auditor has issued Carry Forward Recommendation 1, requiring Aperam Bioenergia to implement a consistent reporting approach by including both the total biochar produced and the amount applied to soil in the CORC Summary. This will ensure that future claims for "stock at period start" and "stock of biochar not yet used" are accurately documented and verifiable in subsequent audits.	Carry Forward Recommendation 1
Recommendation (2): The auditor recommends that Aperam Bioenergia enhance its procedures to ensure that the emissions associated with biochar not yet applied to soil during the current audit period are accounted for in future audits. Additionally, the auditor recommends that Aperam Bioenergia use actual data inputs from the reporting period in the LCA, when available, to ensure consistency and accuracy.	Partially	As outlined in Corrective Action Request 2, the auditor identified that the $E_{biomass}$, E_{use} and $E_{production}$ emissions associated with "biochar in stock at period start" had not been included. In addition, as noted in Corrective Action Request 1, the two LCAs originally submitted did not reflect the current monitoring period, and instead were based on CY2023 data. The auditor has issued Carry Forward Recommendation 2 to ensure that Aperam Bioenergia enhance its procedures to ensure that the emissions associated with biochar not yet applied to soil during the current audit period are accounted for.	Carry Forward Recommendation 2

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Carry Forward Recommendation (1): The auditor recommends that Aperam Bioenergia augment its record keeping and quality assurance procedures to ensure that data inputs to their LCA and in the calculation of CORCs are correct, accurate, well-documented and consistent across documents.	Partially	The auditor reviewed inputs to LCA and in the CORCs calculation and found several errors as outlined in Corrective Action Request 1 and Corrective Action Request 2. Moreover, the auditor noted a lack of traceability between BIO-ASA-BIO production values and supporting evidence (e.g., invoices). In addition, an incorrect Gas Burner Efficiency value was used. Upon request, Aperam Bioenergia corrected the Gas Burner Efficiency value. As such, the auditor has issued Carry Forward Recommendation 3 to ensure Aperam Bioenergia continue augmenting its record keeping and quality assurance procedures to ensure data inputs to their LCA and in the calculation of CORCs are correct, accurate, well-documented and consistent across documents.	Carry Forward Recommendation 3
Carry Forward Recommendation (2): On site testing for Corg and Hydrogen will enable Aperam to better understand on site parameters to be able to control the process and ensure either biochar or char is produced at the continuous reactor. Aperam should be able to rely on these ongoing tests as long as the results are within a range obtained by third party analysis for their CORC creation.	N/A	The auditor issued this recommendation during the physical site visit during August 2024 and was relevant to the continuous reactor operations. No production from the continuous reactor was part of this audit, as it remained in testing phase. As such, the auditor has carried forward this recommendation to be reassessed in the next audit cycle, if the continuous reactor is operational.	Carry Forward Recommendation 4

Appendix B: Table of Site Visit Findings

As part of the audit procedures, the auditor performed interviews with site representatives and a virtual site visit of Aperam Bioenergia's Facility on 13 February 2025. Interviews with the staff were led by the Lead Auditor (Rodrigo Pardo Patron) and supported by audit personnel (Anouk Pilgrem Blasco and Thais Montero Voll). The site visit was guided by Aperam's team, comprised of Marina Fernandes Soier (Aperam's Sustainability and Environmental Manager) and Ana Marina Abreu Costa (Process Analyst). Additional supporting personnel involved in the operation of the biochar facility IT monitoring system also joined the site visit. No interviews with end-users were conducted.

The visit involved reviewing the documentation provided, discussing the LCA data, and virtually touring the production sites, with a focus on the centralised burner, the operation of the batch reactors, the environmental and social safeguards in place and data capture and reporting procedures. Table 7 summarises the findings from the site visit and the interviews with staff.

Table 7: Site visit summary table

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that the raw material is of eligible type and sustainably sourced.	Y	The feedstock used to produce char to be used for energy production in ASA's steel manufacturing process was primarily logs sourced from FSC-certified eucalyptus plantations owned and managed by BIO. The feedstock was transported using Aperam-owned trucks, unloaded by log handlers, and fed into batch char production kilns using front-end loaders. Additionally, Aperam used forestry residues - such as branches, leaves, and roots from the eucalyptus plantations. These residues were collected and transported to the biochar production facility to create biochar.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that the LCA provided is consistent with observations on site.	Finding	During the audit, the auditor observed that the original LCA submission was not aligned with the audit period. Instead, the two LCAs provided (BIO-BIO, BIO-ASA-BIO) were based on CY2023 data. Consequently, the auditor requested that Aperam Bioenergia update their LCAs to reflect the current monitoring period (1 April 2025 to 30 September 2025). Aperam Bioenergia submitted two new LCAs, correctly reflecting the current monitoring period. The following evidence was provided to support the changes: a) Breakdown of biochar produced and applied to the soil per facility; b) Invoices for material move between BIO-BIO and BIO-ASA-BIO; c) Fuel consumption and electricity consumption records; and d) Chimney emissions analysis report. These adjustments impacted the emission factors of $E_{biomass}$, E_{use} and $E_{production}$, and consequently, the number of CORCs.	Corrective Action Request 1 Carry Forward Recommendation 2

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Confirm that the LCA considered the emissions related to the use of fossil fuels (coal, oil, natural gas) for ignition, pre-heating, or heating of the pyrolysis reactor. Additionally, there is no co-firing of fossil fuels and biomass in the same reaction chamber.	Y	The kilns used to produce the char were designed with lateral oxygen entrances and underground ducts that provide access to the kiln's floor. These ducts led to a centralized combustion chamber. Kindling was placed on the kiln's floor to ignite the kilns, starting the wood carbonization process. No fossil fuels were used to ignite the kilns. This was confirmed during the virtual site visit and the previously made physical site visit. The auditor confirmed that the biochar was produced in the six char production facilities, namely UPER São Bento, UPER Cruz Grande, UPER Pontal, UPER Palmeiras, UPER Chacara and UPER Lagoa. Each facility had a different number of kilns, and the pyrolysis gases of all kilns within each facility were captured by underground ducted system(s) and combusted at high temperatures in a centralised gas burner. The auditor noted that due to maintenance or other operating factors, the gas burners may often be out of service. Aperam measured the time the burners were out of service and recorded this 'utilisation factor'. This value, internally called the 'burner efficiency', was used to calculate the upper limit of the quantity of biochar produced that was eligible for CORC creation (i.e. the char produced when pyrolysis gases were recovered and combusted). Under this approach, as long as the quantity of biochar applied to land was below the total eligible biochar production, it was considered that clause 1.1.5 of the Biochar Methodology v3 had been met and CORCs could be claimed. The auditor confirmed via the LCA report, the virtual site visit, conversations undertaken with Puro.earth personnel during previous audits and remaining project evidence that the biochar production process had met requirements 1.1.4 to 1.1.6 of the Biochar Methodology v3.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Evidence of safe handling and transport is provided and adequate for the production facility.	Y	Aperam Bioenergia's biochar production operations were batch-based. Each kiln was filled up with wood, sealed, and the pyrolysis process undertaken. The pyrolysis gases were transported (via underground pipes) to a combustion chamber. During the cooling phase, heat was dissipated through the walls and the top of the kiln, which was left to cool down over several days. Once cooled, the combustion chamber was open, and the char was handled for transportation. As such, the auditor confirmed that cooling procedures were carried out within the operation to ensure the biochar produced were not hazardous for handling and transport.	N/A.
Check that the Production Facility's documentation system is accurate and reliable for recording the quantity of biochar produced and sold.	Finding	During the audit, the auditor identified errors in the reported quantities of biochar in stock throughout the monitoring period, as outlined in Corrective Action Request 2. Upon request, Aperam Bioenergia reviewed the documents and corrected all the errors. These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs. In addition, the auditor noted insufficient traceability between BIO-ASA-BIO production figures and supporting evidence, as described in Carry Forward Recommendation 3. Aperam Bioenergia subsequently revised the documentation and provided a facility-level breakdown of charcoal and biochar production and application, supported by evidence.	Corrective Action Request 2 Carry Forward Recommendation 3

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that appropriate metering infrastructure is in place and calibrated correctly to quantify the Production Facility output and the energy use of the Production Facility.	Y	**Production output** During the virtual site visit, the auditor confirmed that an appropriately calibrated weighbridge was used to quantify both production output and the biochar sent for soil incorporation. All data was documented and tracked using management software and an internal database. The auditor noted that the total biochar in the internal system was recorded in cubic meters rather than tonnes. Aperam Bioenergia clarified that their system only allows inputs in cubic meters, so they convert the measured biochar to cubic meters using an average density of 220 kg/m^3 to enter it into the system and then convert it back to tonnes for reporting purposes. No issues were identified by the auditor regarding this approach, as the actual tonnes were measured by the weighbridges and the cubic meters were used only for system entry. **Electricity** Electricity consumption was determined using electricity bills and the supporting documentation provided. **Fuel usage** The auditor confirmed during the virtual site visit and through additional evidence, that all diesel data was documented and tracked using management software and an internal database. **Bio-oil** The auditor confirmed that Aperam Bioenergia sold the bio-oil produced and provided the corresponding invoices.	N/A.

Requirement	Requirement Met?	Verification Remarks	Corrective Action Request / Recommendations
Check that appropriate processes are in place to quantify the inputs to the Calculation formula of CO_2 removal for the purpose of Preparing the Output Report and calculating CORCs.	Finding	The auditor identified inconsistencies in the inputs to the calculation formula of CO_2 removal, as specified in Corrective Action Request 2. Upon request, Aperam corrected these inconsistencies during the audit and provided supporting evidence. The auditor verified that the updated inputs to the CO_2 removal formula were appropriate and aligned with the supporting evidence. These adjustments impacted the $E_{biomass}$, E_{use} and $E_{production}$ emission factors and consequently, the number of CORCs.	Corrective Action Request 2

Appendix C: Summary of CORC Calculation Parameters

A summary of the inputs to the CORC calculation formula is provided in Table 8.

Table 8: Summary of CORC calculation parameters

CORC Calculation Inputs	
Reporting Period Covered by Audit	1 April 2025 to 30 September 2025
Number of eligible CORCs	46,874.18
Number of overstated CORCs	441.13
Number of verified CORCs	**46,433.05***
Net carbon stored (E_{stored})	49,724.30 tCO_2e
Baseline carbon removal ($C_{baseline}$)	0.00 tCO_2e
Biomass project emissions ($E_{biomass}$)[3]	1,261.31 tCO_2e
Production project emissions ($E_{production}$)[4]	1,573.17 tCO_2e
Use project emissions (E_{use})	15.65 tCO_2e
Tonnes of eligible dry biochar used	**28,376.19**
CORC conversion factor	1.636338423 tCO_2e per tonne of dry biochar

* Verified CORCs = Eligible CORCs – Overstated CORCs during the previous monitoring period

[3] The VVB confirmed that there were no Land Use Change (dLUC) emissions.
[4] Embodied emissions associated with manufacturing installation, maintenance and disposal of the reactor are included within $E_{production}$ under Biochar Methodology v3- Edition 2022.