

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Min Ta Al-Tech (Taicang) Co., Ltd.

CERTIFICATE NUMBER
418

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

DATE OF ISSUE
20 MAY 2025

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
19 MAY 2028

ASI ACCREDITED
AUDITING FIRM
**SGS-CSTC STANDARDS
TECHNICAL SERVICES**

CERTIFIED SINCE
20 MAY 2025

AUTHORISED BY

A stylized black ink signature.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Production including extrusion of
Aluminium alloy parts at Min Ta Al-
Tech (Taicang) Co., Ltd, located in
Jiangsu Province, China.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	MinTa Aluminum Technology
ENTITY NAME	Min Ta Al-Tech (Taicang) Co., Ltd.
CERTIFICATION SCOPE	Production including extrusion of Aluminium alloy parts at Min Ta Al-Tech (Taicang) Co., Ltd, located in Jiangsu Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	SGS-CSTC Standards Technical Services
AUDIT DATE	<ul style="list-style-type: none">27 – 28 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">13 January 2025
AUDIT SCOPE	<p>The Audit Scope included the production, including extrusion, of Aluminium alloy parts at Min Ta Al-Tech (Taicang) Co., Ltd located in Jiangsu Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-FabricationMaterial Conversion <p>All applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	20 May 2025 – 19 May 2028

NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	19 November 2026
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CERTIFICATE NUMBER	418
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Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Min Ta Al-Tech (Taicang) Co., Ltd (the 'Entity') is located at 768 Shanghai East Road, Ludu Street, Taicang City, Suzhou City, Jiangsu Province, China. It was established in 2000. The Entity has advanced production lines with intelligent manufacturing and management information, such as Aluminium extrusion, Aluminium processing, deep processing and Aluminium surface treatment, with an annual capacity of 20,000 tonnes. The Entity operates ten Aluminium extrusion production lines and one stretch bending forming machine, among other equipment.

The Entity can produce both seamed and seamless Aluminium tubes, industrial profiles and Aluminium alloy parts for automobiles, and its products are widely used in medical equipment, electronic machinery, sports equipment, transportation equipment and other industries. It also supplies scooter and e-bike frames to markets in China, the Americas, Europe, Saudi Arabia, South Africa, and Russia. Automotive parts are supplied to China, the Americas, and Europe. Aluminium tubing is supplied to markets in China and Southeast Asia.

The Entity provides on-site ancillary infrastructure including employee dormitories and parking lots. The Entity currently employs 99 staff members. The nearest sensitive receptors to the site include the Sangang Primary School, located approximately 375 meters away, and Liuhe River, which is approximately 700 meters away. There are no residential areas, cultural relics, or nature reserves within two kilometres of the site.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	High	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established an EHS Management System and its 'Application Management Procedure for Identification and Acquisition of Laws and Regulations', which requires the Management Department and Quality Assurance Department to annually identify and evaluate Compliance with Applicable Laws and regulations related to the environment, occupational health and safety, and social responsibility. The list of regulations and records of compliance assessment have been reviewed, and all meet the specified requirements.
1.2 Anti-Corruption	Conformance	The Entity has established a documented system of business ethics, employee handbooks, anti-Bribery management measures and procedures to prohibit extortion and blackmail. It has also established a management process to control Corruption, such as anti-Bribery commitments, anti-Corruption awareness training, identification and monitoring of high-risk positions, and management of gifts and entertainment. The Entity has also established a Complaint Mechanism for 'whistleblowers' to provide information on Bribery and Corruption. The 'whistleblower' hotline was tested and found operational and effective. The Entity has established a Code of Ethics and Business Conduct with a commitment to oppose all forms of Corruption, available at: http://www.mintatc.com/uploads/soft/240628/1-24062QZ323.pdf
1.3a-e Code of Conduct	Conformance	The Entity has established a Code of Ethics and Business Conduct, which is reviewed at least every five years or when changes occur that result in significant changes to environmental, social and governance risks, or when there are signs of control deficiencies: http://www.mintatc.com/uploads/soft/240628/1-24062QZ323.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has formulated and publicly disclosed an Environmental, Social and Governance (ESG) Policy, which complies with the practical commitments of environmental, social, and governance aspects. This Policy has been approved by the General Manager, available at: http://www.minta-aluminum.com/uploads/soft/240719/1-240G9IH620.pdf The Entity has established a Management Review Control Procedure that stipulates the annual management review shall include a review of the ESG Policy.
2.2a-c Leadership	Conformance	The appointment letter for the Management Representative states that the role is responsible for leading the implementation of ESG Policies, communicating Policies internally and externally, and providing the necessary resources to achieve conformance to the ASI Performance Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an ISO 14001:2015 certified Environmental Management System: http://www.mintatc.com/uploads/soft/240628/1-24062QUU7.pdf

CRITERION	RATING	COMMENT
		To date, there have been no fines or requests for corrective action from government agencies and other Stakeholders.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established a social responsibility Management System and an Occupational Health and Safety Management System. There are 25 Social Responsibility Management System control procedures addressing areas including Worker protection and prohibition of Child Labour, protection of female Workers, working hours, Human Rights, grievance procedures, information and protection of privacy, and security, which comply with both the legal compliance requirements and the SA8000:2021 standard. The compliance assessment is conducted annually. To date, no fines or corrective action requests have been received from government agencies or other Stakeholders.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a Responsible Sourcing Policy: http://www.minta-aluminum.com/uploads/soft/240719/1-240G9145607.pdf</p> <p>It is specified in the Entity's Management Review Control Procedure that the annual management review shall include a review of this Policy.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes. However, the Entity has established an Environmental and Social Impact Management Plan for the development of new, renovated and expansion projects, available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q91332.pdf
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes. However, the Entity has established the 'Occupational Health and Safety Management Procedure for New Projects' to conduct environmental, social, cultural, and Human Rights Impact Assessments for the development of new, renovated and expansion projects.</p> <p>The Environmental Impact Assessment (an extract of results and recommendations) developed during the facility's construction is available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q91208.pdf</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established the Emergency Preparedness and Response Control Procedure, which requires emergency plans to be developed in cooperation with Workers, Affected Populations and Organisations and relevant authorities.</p> <p>The Entity has established an Environmental Emergency Plan which addresses potential environmental emergencies including natural gas leaks and explosions; spills of hazardous waste, chemicals, liquids, stormwater runoff and firefighting water; and abnormal operation of pollution control equipment resulting in excessive emissions of pollutants: http://www.mintatc.com/uploads/soft/240708/1-240FPU511.pdf</p> <p>Comprehensive Emergency Plan for Safety Production Accidents: http://www.mintatc.com/uploads/soft/240628/1-24062Q91122.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a production shutdown and resumption plan (which also covers short-term holidays such as the Spring Festival) and has analysed environmental, social and governance risks. None of

CRITERION	RATING	COMMENT
		these have a significant impact. There are no plans for long-term shutdowns.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a procedure for mergers and acquisitions that requires Due Diligence to be conducted prior to mergers and acquisitions as one of the key decision-making criteria. The Due Diligence covers environmental, social and governance impacts.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a procedure for closures, decommissioning, and divestment management, which outlines standardised workflows for planning and review processes and communication protocols for Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's Environmental, Social and Governance (ESG) Report covers government and regulators, suppliers, employees, environment and energy, media and NGOs, community, etc, available at: http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf</p> <p>The ESG Report outlines the Entity's Material environmental, social and economic impacts and its governance approach.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has established a Code of Ethics and Business Conduct which stipulates public disclosure of information on an annual basis on Material fines, judgments, penalties and non-monetary sanctions received for non-compliance with Applicable Law. The Code is available at: http://www.mintatc.com/uploads/soft/240628/1-24062QZ323.pdf</p> <p>According to the official websites of the relevant government agencies and non-government organisations (NGOs), no such case has been raised by government agencies. There were no significant fines, judgments, penalties or non-monetary sanctions for non-compliance with Applicable Laws in 2023.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has established a 'financial approval program' for every payment. Since 2023, the Entity has only made tax-related payments and no other fees or payments have been made. The Entity has disclosed that it has not made any financial payments to the or in-kind political contributions: http://www.mintatc.com/uploads/soft/250306/1-250306111005.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established a procedure for reporting and handling environmental and social responsibility issues under its Complaints Mechanism, available at: http://www.minta-aluminum.com/uploads/soft/240628/1-24062Q91516.pdf</p> <p>Contact information includes: phone number: 13616226252, e-mail: janecheng@minta-aluminum.com</p> <p>Contact information is available on the website and on-site on noticeboards in the workshop. The Entity has established a Management System review process that requires all ASI-related procedures, including the Complaints Mechanism, to be reviewed annually or whenever there is a change in material environmental, social and governance risks or any indication of a control gap.</p>

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	The Entity has not undertaken a full evaluation of the life cycle impacts of its major Product lines. The evaluation report on the life cycle impacts of the main Product lines was not available at the time of the Audit.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	The Entity has not undertaken a full evaluation of the life cycle impacts of its major Product lines. The evaluation report on the life cycle impacts of the main Product lines was not available at the time of the Audit.
4.2 Product Design	Conformance	The Entity has established clear sustainability objectives in the design and development process for Products. The Entity has set the yield rate, the height of final Products, and the height of the Aluminium ingot input.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a procedure to classify Aluminium Process Scrap. Aluminium Process Scrap is classified as 1 to 7 series Aluminium alloy. The Entity minimises the generation of Process Scrap within its own operations. All Scrap were recycled according to grade.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	The Entity has established a recycling strategy for 2025, available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q91911.pdf However, the strategy only addresses the Aluminium Process Scrap (Pre-Consumer Scrap) Aluminium Scrap.
4.4d Collection and Recycling of Products at End of Life	Minor Non-Conformance	The Entity has not engaged with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates in their respective markets for their Products containing Aluminium.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity publicly disclosed its Greenhouse Gas (GHG) emissions, for Scopes 1-3, available at: http://www.mintatc.com/uploads/soft/240711/1-240G1135519.pdf These data were verified by a Third Party. Information on Entity's energy use is disclosed in the 2023 ESG Report, pages 37-38: http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan that includes actions such as increased sourcing of low-carbon Aluminium, purchasing renewable power and building a photovoltaic power plant. The Entity disclosed a 2025 target for a reduction of 3%.</p> <p>Note: The Entity's audit was undertaken prior to the current requirement (from 1 July 2024) to use the ASI methodology.</p> <p>Following the on-site component of the Audit, the Entity used the ASI Entity GHG Pathways Calculation Tool to ensure its GHG Emissions Reduction Pathway was consistent with a 1.5C warming scenario. According to the generated slope, the Entity's 2025 targets include a reduction of Scope 1 and 2 GHG emissions to 0.411 tonnes CO₂e/ tonne of Aluminium by 2025 and 14.9 t CO₂e/ t Al for Scope 3 GHG emissions.</p> <p>However, at the time of the Audit, the Entity had not disclosed its Pathway nor any intensity-based Intermediate Targets, including an end date target or one within five years of the baseline year, as required.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established a Management System in accordance with ISO 14001 and implemented a GHG Emissions Reduction Plan to monitor and manage GHG emissions.</p> <p>The Entity plans to build a photovoltaic power plant which, when completed, will provide approximately 20% of the electricity used in production.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has established an air pollution control programme that specifies the emissions monitoring cycle and periodic review of the air emissions reduction plan. The Entity has publicly disclosed the 'Mingda Aluminum Wastewater and Exhaust Gas Plant Noise Detection Report' and the 'Mingda Aluminum Pollutant Emissions in 2023 and Emission Reduction Plan in 2024' available at: http://www.mintatc.com/uploads/soft/240628/1-24062QZA2.pdf http://www.mintatc.com/uploads/soft/240628/1-24062QZ922.pdf</p> <p>However, the Entity did not quantify the volume of emissions and effluents in the Report and the Plan did not include emissions reduction targets and testing for unregulated emissions from heat treatment flue gases.</p>
6.2a-g Discharges to Water	Minor Non-Conformance	<p>The Entity has no production wastewater discharge, only domestic wastewater discharge. The Entity has established a wastewater control procedure which requires annual testing of domestic wastewater and regular review of the water pollutant reduction plan.</p> <p>The Entity has publicly disclosed the 'Mingda Aluminum Wastewater and Exhaust Gas Plant Noise Detection Report' and the 'Mingda Aluminium's Pollutant Emissions in 2023 and Emission Reduction Plan in 2024', available at: http://www.mintatc.com/uploads/soft/240628/1-24062QZA2.pdf http://www.mintatc.com/uploads/soft/240628/1-24062QZ922.pdf</p> <p>However, the Entity did not quantify the amount of wastewater in the Report and wastewater flowmeters have not been installed to allow the Entity to measure wastewater discharge volumes.</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established emergency preparedness and response procedures and publicly disclosed the Emergency Plan for Environmental Emergencies, available at: http://www.mintatc.com/uploads/soft/240708/1-240FPU511.pdf</p> <p>The Plan has been filed with the local Environmental Protection Bureau, including emergency response measures and control plans for natural gas, hazardous waste, chemicals, liquid materials, initial rainwater, and fire wastewater leakage.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established an emergency plan for environmental emergencies that specifies the process, timing and content for the notification of Spills or Leakages. Notifications to personnel and/or sensitive targets that may be affected by a Spill are made by telephone, radio and network.</p> <p>The Entity's environmental performance was confirmed during the Audit via the Institute of Public and Environmental Affairs (IPE) 'Blue Map' and there is no record of Spills or Leakages in the last three years: https://www.ipe.org.cn/IndustryRecord/Regulatory.html</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established a solid waste control program that addresses three categories of classified Wastes including Hazardous Waste, production Waste and household Waste, covering collection, temporary storage, transfer and disposal. The disposal plan considers, in order of priority, recycling within the factory, recycling in the supply chain, incineration, safe disposal and landfill.</p> <p>The Entity has publicly disclosed the 'Statistics of Generation, Transfer, and Disposal of Hazardous Waste & Solid Waste in 2023', available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q92042.pdf</p> <p>The Entity has quantified the Hazardous and Non-Hazardous Waste generated and the relevant waste disposal methods in the 2023 ESG Report, page 46: http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and assessed its water-related risks, which determined the risk is low, as all water is sourced from the municipal supply. No groundwater or surface water is sourced. The Water Resources Assessment Report is available at: http://www.mintatc.com/uploads/soft/250306/1-250306111101.pdf</p> <p>Related disclosures are available in the 2023 ESG Report, pages 40-41: http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the water-related risk assessment determined the risk is low. Nonetheless, the Entity has developed a Water Resource Management Control Procedure and an Environmental and Social Impact Management Plan. The Procedure

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		stipulates that the annual target should include targets for water conservation and related action plans and completion deadlines (reducing domestic water consumption targets must also be included in the overall water conservation target of the factory).
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity's Environmental Impact Assessment, undertaken by a third party organisation, determined that it is not located within a high or medium level control area according to ecological boundaries and that construction projects and operational activities pose a low risk of impact on Biodiversity.</p> <p>The Entity has publicly disclosed the Biodiversity Assessment Report, available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q92228.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk of impacts on Biodiversity and Ecological Services was assessed as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk of impacts on Biodiversity and Ecological Services was assessed as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as it is located within an industrial zone and the Environmental Impact Assessment report confirmed that there are no Priority Ecosystem Services.
8.4 Alien Species	Conformance	According to the 'China Invasive Species Information System', there are 235 invasive species in Jiangsu Province. The Entity has established documented control procedures to prevent the accidental or intentional introduction of invasive species and has informed relevant parties that may introduce invasive species, requiring them to control the risk of their introduction, while also providing relevant training for their employees.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has a documented commitment to "no go" in World Heritage properties and they are not located in a World Heritage site.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as it is located within an industrial area and there are no Protected Areas within its Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has publicly disclosed gender-responsive Policies that commit to respecting Human Rights in the 2023 ESG Report, pages 56-57:

CRITERION	RATING	COMMENT
		http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf The ASI ESG-related Policies are available at: http://www.mintatc.com/uploads/soft/240719/1-240G91H620.pdf The Entity's Commitment Letter on Business and Human Rights is available at: http://www.mintatc.com/uploads/soft/240628/1-24062Q91244.pdf The Entity has identified the potentially Affected Populations and Organisations and determined that there are no Human Rights issues. The Entity has established employee communication channels.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established a procedure for the 'Protection of the Rights and Interests of Female Employees' which promotes gender equity and women's empowerment. The ratio of female employees in the management was 54%. Female Workers have several special rights and interests, including maternity leave and protection from Harassment. The effectiveness of the Entity's measures taken to promote gender equity was publicly disclosed in the 2023 ESG Report, pages 52-53 and 58-59: http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as they are located in an industrial area and there are no sites of cultural and sacred heritage as confirmed in the Environment Impact Assessment Report. Under Chinese law, the plant's construction could not go ahead if any cultural or sacred sites were identified.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it is located in an industrial zone and does not have any New Projects or Major Changes that require resettlement. No displacements have occurred.
9.7a-h Affected Populations and Organisations	Conformance	According to the on-site survey, within a range of 100 meters around the site, there are mainly industrial enterprises, and there are no environmental sensitive targets such as residential areas.

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		The Entity has established procedures to respect the legal and customary rights and interests of affected people and organisations in their lands, livelihoods and use of natural resources. The Entity is located in an industrial area and there are no New Projects affecting people and organisations.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	The Entity has established a procedure for the management of risk associated with Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has identified their direct and secondary suppliers, including suppliers that are ASI Certified Entities. Aluminium ingots are purchased from suppliers in China and no suppliers are within CAHRAs.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has established a procedure for the management of risk associated with CAHRAs. The Entity has identified their direct and secondary suppliers, including the smelters in their supply chain and suppliers that are ASI Certified Entities and conducted Due Diligence. The Entity has determined that the supply chain risk is low.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as the assessment of risks in the supply chain determined that the risk is low.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices have been audited as part of this ASI Audit, which meets the requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Entity has established the procedure for the risk management of Conflict-Affected and High-Risk Areas. However, the Entity has not reported on its supply chain Due Diligence.
9.9 Security practice	Conformance	Security is provided by an external security service, and the gatekeeper's role is to guard the gate and check the registration of people entering and leaving. They do not have the authority or armed force to prevent employees from entering or leaving the site.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with the Applicable Laws related to Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	There is a Labour Union present at the Entity, and the employees and the Entity have signed a Collective Bargaining Agreement. The Agreement addresses issues such as wages, working hours and working conditions. The Collective Bargaining Agreement has been reviewed by the local labour authorities.
10.2a Child Labour	Conformance	The Entity has established a recruitment and employment management procedure that requires Workers to be at least 18 years of age. No Workers under the age of 18 years were found at the Entity.
10.3a-c Forced Labour	Conformance	The Entity employs Workers through local recruitment websites, talent markets organised by the Human Resources and Social Security Bureau, and internal referrals. Employee interviews during the Audit

CRITERION	RATING	COMMENT
		<p>confirmed that there is no Human Trafficking, and Workers incur no fees, deposits, or advance costs. Additionally, Workers have no debts and face no restrictions on their freedom of movement. The Entity does not retain any identification documents, and Workers can terminate their employment at any time.</p> <p>The Entity has publicly disclosed a Modern Slavery Statement detailing the actions taken to address modern slavery, available at: http://www.mintatc.com/uploads/soft/250306/1-250306111316.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established a non-Discrimination procedure which addresses Discrimination in recruitment, salary, promotion, training, advancement opportunities and termination of employment. The Entity's recruitment advertisements were reviewed during the Audit and interviewed Workers confirmed that the Entity does not engage in or support Discrimination.
10.5 Communication and engagement	Conformance	The Entity has various means of communication with employees, including an employee representative congress, manager email and employee satisfaction surveys. In addition, the Union represents the employees to communicate and negotiate with the Entity on working conditions and to resolve workplace and compensation issues.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has issued the Code of Ethics and Business Conduct covering a workplace Policy on Violence and Harassment: http://www.mintatc.com/uploads/soft/240628/1-24062QZ323.pdf</p> <p>Workers interviewed during the Audit confirmed there has been no Violence or Harassment at the Entity. Training on the Code of Ethics and Business Conduct is provided to employees annually and included in the induction training for new employees.</p>
10.7a-c Remuneration	Conformance	There is signed a written employment contract (in Chinese) to describe the terms and conditions of employment. Worker remuneration was in accordance with local law. The payroll was reviewed during the Audit and compared to the local minimum wage. It was found that the wages exceeded the local minimum wage and complied with Overtime requirements.
10.8a-c Working Time	Minor Non-Conformance	The Entity did not fully comply with Applicable Law and industry standards on working hours, which requires that Workers receive at least one day off each week. Attendance records sampled during the Audit identified that one Worker had worked continuously for close to two weeks, and one Worker's working day averaged more than eight hours over a six-month period.
10.9a-b Informing Workers of Rights	Conformance	Training on Workers' rights is undertaken as part of the new employee orientation. The Workers and the Entity have signed a Collective Agreement in accordance with Chinese law, and training records were verified on site.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System, which is valid until December 2025.

CRITERION	RATING	COMMENT
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity has established indicators relevant to monitor the performance of the OH&S Management System, which is publicly disclosed at: http://www.mintatc.com/uploads/soft/240628/1-24062092150.pdf</p> <p>Further information is available in the 2023 ESG Report (pages 62-63): http://www.mintatc.com/uploads/soft/240704/1-240F4162K0.pdf</p> <p>However, the Entity has not disclosed comparative analyses of performance with peer businesses and leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has established a Health and Safety Committee where Workers can raise, discuss and participate in the resolution of OH&S issues with management through regular meetings, email, hotline and WeChat channels.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 May 2025	Initial Certification Audit – Full Certification