

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Miranda Bike Parts

CERTIFICATE NUMBER
497

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
3 SEPTEMBER 2025

DATE OF EXPIRY
2 SEPTEMBER 2028

CERTIFIED SINCE
3 SEPTEMBER 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

Manufacture of Aluminium Bicycle
Components (Portugal).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Miranda Bike Parts
ENTITY NAME	Miranda Bike Parts
CERTIFICATION SCOPE	Manufacture of Aluminium Bicycle Components (Portugal)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">11 – 13 June 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 August 2025
AUDIT SCOPE	<p>The Audit Scope covered the manufacture of Aluminium Bicycle Components at Miranda Bike Parts, located in Portugal.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Material Conversion <p>All relevant 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"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	3 September 2025 – 2 September 2028
NEXT AUDIT TYPE	Surveillance Audit

NEXT AUDIT DATE	2 May 2027
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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

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

In 1950, Miranda Bike Parts (the 'Entity') was officially incorporated as a registered company in Portugal and has a 'state-of-the-art' facility located in Águeda, Portugal, where it designs, manufactures and assembles all its bicycle components. The Entity's facilities are equipped with advanced technologies and automation, allowing for efficient production and high-quality components, including cranksets, chainrings and stems. Miranda Bike Parts has a production area of approximately 28,600 square metres (m²) and at the time of the Audit employs 183 people. The Entity's facilities include administrative offices, medical clinic, production area, canteen, warehouse, laboratory and vehicular parking. The Entity is currently undergoing small-scale construction activities for new offices with solar energy support and improved access control.

The nearest municipality is Agueda, approximately four kilometres from the facility. There are no special protection areas within or adjacent to the Area of Influence of the Entity. The main external stakeholders for the Entity include the Portuguese Government, the municipal government of Agueda and the local city of Agueda, the Portuguese environmental and labour authority, and the sectoral association ABIMOTA.

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	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	High	High	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented a Quality and Environmental Management System that includes a process for monitoring applicable legislation.</p> <p>Competent and expert legal advisors provide reference bulletins to the Entity, which alert it to legal developments and their application.</p> <p>The Entity undertakes a legal Compliance review through annual audits and senior management review.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has an anti-Corruption process in place which includes a plan to prevent Corruption risks and related offences. The Entity provides training to employees on anti-Corruption as part of its Code of Conduct training. This training is provided to employees and as information to contractors and other Stakeholders.</p> <p>The Entity has deployed a 'whistleblowing' channel which is published at: https://mirandabikeparts.com/portal-da-denuncia/</p> <p>No complaints have been received through this channel since its implementation.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct for employees, which is available at: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH07-Codigo-de-Conduta-de-Colaboradores-rev04.pdf</p> <p>The Code sets out the governance, environmental and social principles applicable to employees. The Entity has also implemented a supplier Code of Conduct, which is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/DIAPR01-Codigo-de-Conduta-dos-Fornecedores-rev02-assinado.pdf</p> <p>The Code specifies the governance, environmental and social principles applicable to the Entity's supply chain. Employees and suppliers are informed and trained in the Code of Conduct.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented a Quality and Environmental Management System that includes a Management Policy, available at: https://mirandabikestore.com/pages/management-system-policy?srltid=AfmBOoqMEnhuq8EYREIJ-gi43mc8NCDfU09cYQjtc5dqWELrZOS92Bkr</p> <p>The Entity has also developed and implemented an Ethics and Integrity Policy which defines governance, environmental and social commitments, including Human Rights, Discrimination and Harassment, support for equality and anti-Corruption. The Policy is available at: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Politicas-de-Etica-e-Integridade.pdf</p> <p>The Entity has defined its general commitments to the protection of personal data in a Privacy Policy, available at: https://mirandabikestore.com/pages/privacy-policy-terms-of-use</p>

CRITERION	RATING	COMMENT
		These Policies are reviewed annually as part of the Entity's management review process. The Entity provides training to all employees and suppliers on these Policies and the Code of Conduct.
2.2a-c Leadership	Conformance	<p>The Entity has designated the Head of Sustainability, Safety and Environment and a Sustainability Technician as responsible for implementing and leading the deployment of the Entity's Policies.</p> <p>This designation is recorded in the Roles and Responsibilities Manual. The Entity's management undertakes a review once a year to assess the effectiveness and need for improvement of the Management System and provides additional resources where required.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has implemented an Environmental Management System which is certified to the ISO 14001 Standard. Independent external audits are undertaken annually. The current certificate is available at: https://mirandabikeparts.com/wp-content/uploads/2024/11/Certificado-ISO14001-ING.pdf</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has identified and assessed social risks and opportunities relevant to its operational activities. Roles and responsibilities have been defined, and there is evidence of actions in the areas of social issues, Health and Safety, and Human Rights. Goals and targets have been defined and are monitored.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Supplier Code of Conduct, available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/DIAPR01-Codigo-de-Conduta-dos-Fornecedores-rev02-assinado.pdf</p> <p>The Code establishes the governance, environmental and social principles applicable to the Entity's supply chain and the Supplier Code of Conduct is communicated to all suppliers.</p> <p>The Entity has defined a supplier evaluation process based on a sustainability questionnaire and maintains an evaluation register.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any Major Changes currently planned.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any Major Changes currently planned.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has defined an emergency management process based on a self-protection plan. Risk scenarios have been identified, and the requirements of Stakeholders and the involvement of employees and other community agents have been considered. A control plan with emergency risk containment actions has been defined and is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>The Entity trains employees in emergency measures and undertakes emergency drills to verify the effectiveness of the self-protection plan.</p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has defined a contingency plan that considers actions to be taken in the event of various events, including the suspension of operations and their governance, environmental and social impacts. There have been no events relating to the suspension of operations in recent years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has defined a Due Diligence process that considers practices in accordance with the ASI Performance Standard and historical operations in the Aluminium sector. There have been no events relating to mergers or acquisitions in recent years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has defined a contingency plan that contemplates the actions to be taken in the event of closure or decommissioning of the plant and its governance, environmental and social impacts. This plan includes the requirements of Stakeholders, employees and community members.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has prepared a Sustainability Report that includes its strategy and impacts in the areas of governance, the environment and social issues. The Sustainability Report is prepared annually and is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity's Sustainability Report describes issues related to legal non-compliance or sanctions received on page III: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
3.3a-c Payments to Governments	Conformance	<p>The Entity has defined in its Code of Conduct a commitment to ethical practices, including transparency in reporting payments to governments, such as taxes, fees and royalties. The Audit confirmed that no payments are made to governments beyond those legally required for taxes or permits.</p> <p>The Entity's Sustainability Report describes the Entity's approach to governance and its commitment to transparency. Refer to: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible channel to collect complaints, grievances and requests for information from Stakeholders. This channel is accessible at: https://mirandabikeparts.com/portal-da-denuncia/</p> <p>No complaints or requests have been received since the implementation of the complaints channel.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has defined and implemented a procedure with methodologies to identify the main Product lines in which Aluminium is considered or used, and to assess the life cycle impacts. A list of the main Product lines in which Aluminium is considered or used is available. A documented Life Cycle Assessment (LCA) report of the main Product lines has been produced. An LCA was undertaken on a

CRITERION	RATING	COMMENT
		series of 10 bicycles cranks, and the carbon footprints of two main products have been assessed. Progress on the LCA is published in the Sustainability Report on page 54: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has defined and implemented a procedure with methodologies to identify the main Product lines in which Aluminium is considered or used, and to assess the life cycle impacts. A list of the main Product lines in which Aluminium is considered or used is available. A documented Life Cycle Assessment (LCA) report of the main Product lines has been produced. An LCA was undertaken on a series of 10 bicycles cranks, and the carbon footprints of two main products have been assessed. Progress on the LCA is published in the Sustainability Report on page 54: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p> <p>The Entity's customers to date have not requested an LCA, or extract thereof, however are available if required. LCA information is planned to be published on the Entity's website and in the next iteration of the Sustainability Report.</p>
4.2 Product Design	Conformance	The Entity has defined and implemented policies and procedures that document how sustainability and environmental life cycle performance and objectives are incorporated into the design and development process of Products or components containing Aluminium. Product line reviews are undertaken to assess the effectiveness of these policies and procedures.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has defined an environmental management strategy that is deployed in a plan for the systematic management of waste streams and the use of effective separation controls and the training of key personnel and equipment. 100 percent of Aluminium Scrap generated by the Entity is recycled and the various Aluminium Scrap alloys are separated by type.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity purchases recycled Aluminium and is a member of associations including Shift Cycling Culture, ABIMOTA and CONEBY, which promote the search for better sustainability solutions and participation in initiatives. This is described in the Sustainability Report, on page 65: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity purchases recycled aluminium and is a member of associations including Shift Cycling Culture, ABIMOTA and CONEBI, which promote the search for better sustainability solutions and participation in initiatives. This is described in the Sustainability Report, on page 65: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity calculates and reports GHG emissions data by energy type and source in its annual Sustainability Report on pages 50 and 55: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf

CRITERION	RATING	COMMENT
		The calculations and emission data are verified by a competent and independent Third Party.
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.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a GHG Emission Reduction Plan that has been prepared in accordance with the ASI Pathways Calculation Tool considering a global warming scenario of 1.5°C. The ASI Tool was used for the definition of scenarios, data and targets in the medium and long term. The GHG Emissions Reduction Plan is defined in the Ethics and Integrity Policy, page 2 and in the Sustainability Report, page 52.</p> <p>The Ethics and Integrity Policy is available at: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Políticas-de-Ética-e-Integridade.pdf</p> <p>Sustainability Report is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has developed a GHG Emission Reduction Plan that has been prepared in accordance with the ASI Pathways Calculation Tool considering a global warming scenario of 1.5°C. The ASI Tool was used for the definition of scenarios, data and targets in the medium and long term. The GHG Emissions Reduction Plan is defined in the Ethics and Integrity Policy, page 2 and in the Sustainability Report, page 52.</p> <p>The Ethics and Integrity Policy is available at: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Políticas-de-Ética-e-Integridade.pdf</p> <p>Sustainability Report is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p> <p>The Entity is aiming to eliminate 100 percent of its emissions from its direct activities. Targets and actions have been defined for each year to 2030 and medium-term targets to 2050 established for Scope 1, 2 and 3 emission types. The baseline year is 2022.</p>
5.4 GHG Emissions Management	Conformance	The Entity has developed and implemented a GHG emissions management process that includes the control of GHG emissions and energy consumption through detailed monitoring records. Emission reduction initiatives are recorded in action plans, integrating specific targets and actions to achieve the targeted reductions. The results, targets and action plans are assessed annually in the management review of the Management System.

CRITERION	RATING	COMMENT
		The Entity has joined the SME Climate Hub initiative, demonstrating its commitment to reducing carbon emissions and aligning itself with global climate targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has developed and implemented an ISO 14001 Environmental Management System that includes an atmospheric emissions management process. This process identifies the sources of emissions, measures the emissions on a regular basis and quantifies the emissions on an annual basis. Measurements are supported by records and evaluated annually during the management review. A control plan and a management plan with objectives and targets for reduction and control have been defined. The Monitoring and Measurement Plan is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>However, whilst emissions data are communicated to the environmental authority as required, they have not been publicly disclosed through the Sustainability Report, or other means.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has developed and implemented an ISO 14001 Environmental Management System that includes a water discharge management process. This process identifies the sources of discharge, measures the quantity and quality of discharge on a regular basis and quantifies the discharge annually. Measurements are supported by records and evaluated annually in the management review. A control plan and a management plan with objectives and targets for reduction and control have been defined. The Monitoring and Measurement Plan is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>The Entity's Sustainability Report provides an overview on page 59, available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed and implemented an emergency management process that addresses Leakages and Spills, where it assesses the environmental aspects by identifying the risks of leaks and spills on an annual basis. The Entity identifies risk scenarios and contingency plans that include instructions for action and quantifies leaks and spills.</p> <p>Spills and leakage measurements are supported in records and evaluated annually in the management review. A Leakage and Spillage control plan has been defined in the Monitoring and Measurement Plan, available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>The Entity provides training to its employees on the contingency plan and undertakes drills to evaluate its effectiveness. The Entity's Sustainability Report provides more information on page 66: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's Sustainability Report details its strategy and impacts relating to Leakages and Spills, including any incidents if and as required (page 66): https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed and implemented a Hazardous and Non-Hazardous Waste management process which identifies the types of Waste and defines a Waste management plan. It measures the quantity and type of Waste on a regular basis and quantifies these on an annual basis.</p> <p>Measurements and movements are supported by records and evaluated annually in the management review. A control plan and a management plan with objectives and targets for reduction and control have been defined, and is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>The Entity's Sustainability Report details its waste reduction strategy and impacts on page 65: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.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 developed and implemented a water management process for both water catchment and use. The sources of water collection and use are identified in drawings. It annually assesses environmental aspects by identifying risks and impacts on water use. Water use risk has been rated as low.</p> <p>The Entity quantifies water abstraction and its use on both a monthly and annual basis and is supported by measurements and records which are evaluated annually in the management review. A water control plan has been defined, and is available at: https://mirandabikeparts.com/wp-content/uploads/2025/06/Plano-de-monitorizacao-e-medicao-SSA_2025-1.pdf</p> <p>The Entity's water use continues to decrease over time with evidence of an improvement in the use of water through its recovery and recycling processes.</p> <p>The Entity's Sustainability Report details the quantity and use of water, as well as its strategy for improving water use (page 58): https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material risks were identified in the water-related risk assessment conducted by the Entity.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has developed and implemented a Biodiversity management process where Ecosystem Services and Protected Areas are identified, risks and potential impacts are assessed, where the assessment concluded that risks and impacts are low.</p> <p>Although risks and potential impacts have been assessed as low, the Entity has defined and implemented a Biodiversity Action Plan. The Entity's Sustainability Report provides details on its biodiversity strategy and improvement actions (page 48): https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable to the Entity as the Biodiversity management and risk assessment process determined that the risks and impacts are low.
8.2a-g Biodiversity Management	Not Applicable	The Criterion is not applicable to the Entity as although it has developed a Biodiversity Action Plan, the Biodiversity management and risk assessment process determined that the risks and impacts are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	The Entity has defined and implemented an ISO 14001 Environmental Management System that includes a Biodiversity management process. Ecosystem Services and Protected Areas are identified, and risks and potential impacts are assessed, concluding that risks and impacts are low.
8.4 Alien Species	Conformance	<p>The Entity has defined and implemented a Biodiversity Action Plan that includes the management of a wooded area adjacent to the plant to promote the protection of a natural area, including Flora and Fauna and potential Alien Species. The Entity's Sustainability Report (on page 48) details its strategy and actions to improve biodiversity: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has confirmed that there are no World Heritage Properties situated within its Area of Influence, and this has been disclosed on page 48 of its Sustainability Report.
8.6a-d Protected Areas	Conformance	Within the Entity's Area of Influence, any Protected Areas have been identified, risks and potential impacts are assessed. There are no Protected Areas situated 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	Minor Non-Conformance	The Entity has defined its commitment to respect Human Rights and alignment with the United Nations Principles on Human Rights in its Ethics and Integrity Policy, Code of Conduct for Employees and the Code of Conduct for Suppliers. These policies and codes all

CRITERION	RATING	COMMENT
		<p>incorporate a gender perspective, and are available at: https://mirandabikeparts.com/downloads/</p> <p>The Entity has defined a Human Rights Due Diligence process, that considers the expectations and needs of Stakeholders as well as the risks and impacts on the populations in its Area of Influence. This process is based on the methodology defined by the OECD and considers the participation and opinion of Stakeholders and Community members. The process is defined in the Ethics and Integrity Policy. At the time of the Audit, although this process has been initiated, it had yet to be completed.</p> <p>Whilst the process is still to be completed, no Human Rights risks and impacts had been identified at the time of the Audit.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has defined its commitment to gender equality and the promotion of women's empowerment in its Ethics and Integrity Policy, Code of Conduct for Employees and the Code of Conduct for Suppliers. Refer to: https://mirandabikeparts.com/downloads/</p> <p>The Entity has defined actions that promote equality and empowerment of women, including a protocol to combat Harassment, the assignment of management and leadership roles to women, employment of women in different areas and positions, training for women in hours and by type, training for all employees in gender equality and salary studies by gender.</p> <p>The strategy, objectives, actions and results obtained in the promotion of equality and support for women are documented in the Sustainability Report on page 68: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within 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 within 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 within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as there are no projects or activities identified that may impact cultural or sacred heritage.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no projects or activities identified that may impact cultural or sacred heritage.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as there are no projects or activities where physical and/or economic displacements of persons is required.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has defined its commitment to respect the interests of community members and the efficient use of resources in its Area of Influence in its Ethics and Integrity Policy, Code of Conduct for Employees and the Code of Conduct for Suppliers. Refer to: https://mirandabikeparts.com/downloads/</p> <p>The Entity has defined a Human Rights Due Diligence process as well as a process for assessing environmental, health and safety and social risks and impacts, in order to identify risks, impacts and opportunities in the community in its Area of Influence. As a result of these analyses, the risks identified are low and actions to support the community and the efficient use of resources are promoted. Support activities are planned and implemented with the participation of Stakeholders. The strategy, objectives, action plan and results in the Community are presented in the Sustainability Report on page 73: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source any Bauxite, Alumina or Primary Aluminium.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source any Bauxite, Alumina or Primary Aluminium.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source any Bauxite, Alumina or Primary Aluminium.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source any Bauxite, Alumina or Primary Aluminium.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Not Applicable	This Criterion is not applicable to the Entity as it does not directly or indirectly source any Bauxite, Alumina or Primary Aluminium.
9.9 Security practice	Conformance	The Entity has defined a Human Rights Due Diligence process to identify risks, impacts and opportunities in the security service in its Area of Influence. As a result of this analysis, the risks identified are low as there are no security personnel present on site. The Entity has implemented technology-based surveillance systems including closed-circuit video and alarm system, however there are no personnel assigned to security or access control.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has defined a system of labour relations that allows the collective association of Workers in accordance with Portuguese law. This commitment is defined and made public in the Employee Code of Conduct on page 6: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH07-Codigo-de-Conduto-de-Colaboradores-rev04.pdf</p> <p>The collective association is defined by the Workers freely and independently. Elected employee representatives have negotiated a</p>

CRITERION	RATING	COMMENT
		<p>Collective Bargaining Agreement (CBA) with the Entity. The CBA has been negotiated at the sectoral level through the sectoral association ABIMOTA and the various groups of Workers' representatives. Collective Bargaining takes place freely and without pressure from the Entity. The Agreement is documented in a sectoral collective agreement and published in a bulletin of the relevant labour authority. Refer to: https://www.sindel.pt/acordospdf/2024-alteracao-salarial-e-outra-112.pdf</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable to the Entity as Applicable Law in Portugal allows the Freedom of Association and Collective Bargaining.</p>
10.2a-c Child Labour	Minor Non-Conformance	<p>Portuguese legislation sets the minimum working age at 16 years, but with special conditions which consider the specific risks of the work, as well as the working hours. The Entity guarantees the age of employees by means of a copy of the employees' identity card at the time of recruitment and checking the data of the employees of sub-contractors in the coordination of business activities. The Entity does not hire employees under 18 years of age.</p> <p>The Entity's Ethics and Integrity Policy prohibits the use of Child Labour on page 3: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Politicas-de-Etica-e-Integridade.pdf</p> <p>At the time of the Audit however, the Entity had not fully assessed and documented the age of all Portuguese-based contractors.</p>
10.3a-c Forced Labour	Conformance	<p>In Portugal, Forced Labour is strictly prohibited. The Portuguese Constitution, as well as international treaties ratified by Portugal, prohibit slavery and compulsory or Forced Labour. Additionally, there are specific rules protecting young people against labour exploitation and guaranteeing fair and equitable working conditions for all Workers. Portugal has ratified the ILO Protocol on Forced Labour to combat Forced Labour in all its forms, including Human Trafficking and Debt Bondage.</p> <p>The Entity's Ethics and Integrity Policy prohibits Forced Labour on page 3: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Politicas-de-Etica-e-Integridade.pdf</p> <p>The Entity ensures no Forced Labour through the Collective Bargaining Agreement, communication to Workers and their representatives and control of the data of the employees of subcontractors in the coordination of business activities.</p> <p>The Entity has defined its general commitments to the fight against modern slavery in its Declaration against Modern Slavery, available at: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Declaracao-contr-a-esclavatura-moderna.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Ethics and Integrity Policy of Entity (on page 6), prohibits Discrimination: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Politicas-de-Etica-e-Integridade.pdf</p>

CRITERION	RATING	COMMENT
		<p>The strategy, objectives, actions and results obtained in the promotion of equality are documented in the Sustainability Report, page 68: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p> <p>The Entity develops actions that promote equality and non-Discrimination among employees, including a CBA, a salary survey that compares functions and levels, maternity leave and family reconciliation programmes, a 'whistleblowing' channel and promotion criteria with annual evaluation by individuals.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has defined a labour relations process that includes different committees and channels for engagement with employees. These include a Safety Committee, 'work climate' surveys for employees, regular internal communications, an employee portal to receive suggestions, and a monthly newsletter. It was noted during the Audit that there is a high level of engagement with employees.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has defined in its Ethics and Integrity Policy (Section 3), a policy for the prevention of Violence and Harassment. Refer to: https://mirandabikeparts.com/wp-content/uploads/2025/05/DIRH10_Politicas-de-Etica-e-Integridade.pdf</p> <p>The Entity has defined a protocol to combat Violence and Harassment, including a 'whistleblowing' channel, which is accessible at: https://mirandabikeparts.com/portal-da-denuncia/</p> <p>This protocol has been communicated to employees and contractors through notices boards throughout the Entity.</p>
10.7a-c Remuneration	Minor Non-Conformance	<p>The Entity has defined a Remuneration process in accordance with relevant legislation. It is based on the agreements defined in the Collective Bargaining Agreement (CBA) and documented in an employment contract with each employee. It is monitored that the legal minimums are met for employees of recruitment agencies.</p> <p>The Remuneration process is concluded with the issuance of a monthly payroll. Pay slips are electronic and sent by email to employees. The salary paid is higher than the minimum wage in Portugal. The payment is made in Euros and in a single monthly payment.</p> <p>However, whilst there is evidence of control of the Remuneration and payment of taxes and social security for foreign employees and contractors to ensure compliance with legislation and labour rights, there is no evidence of this control of tax and social security payments for Portuguese contractors.</p>
10.8a-c Working Time	Conformance	<p>The Entity has defined a Working Time control process in accordance with relevant legislation. It is based on the agreements defined in the Collective Bargaining Agreement (CBA) and documented in an employment contract with each employee that defines working hours, holidays and working time. Compliance with the legal minimum is monitored for employees of recruitment agencies and contractors.</p> <p>Where possible, the Entity has defined flexible start and finish times to assist with both work and family commitments.</p> <p>The Entity has agreed calendars and timetables with employee representatives that include holiday breaks, breaks in the working day</p>

CRITERION	RATING	COMMENT
		and the hours to be worked during the working day, as well as days off each week.
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has defined a labour relations system that allows for collective bargaining of Workers in accordance with Portuguese legislation. Elected Workers' representatives have negotiated a CBA that covers all Workers' Labour Rights.</p> <p>This CBA is negotiated at sectoral level through the sectoral association ABIMOTA and the different groups of Workers' representatives. The CBA is published in the bulletin of the Labour Authority: https://www.sindel.pt/acordospdf/2024-alteracao-salarial-e-outra-112.pdf</p> <p>At each recruitment, the Entity informs each employee of their rights and obligations during the onboarding process and within the employment contract.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has defined an Occupational Health and Safety (OH&S) Management System. A Health and Safety Policy has been defined and is included in the Code of Conduct for Employees, both of which are available at: https://mirandabikeparts.com/downloads/</p> <p>The OH&S Management System includes regular risk assessments, which are undertaken at least annually by a competent consultant. Roles and responsibilities have been defined in the Management System.</p> <p>The Entity has defined OH&S objectives, goals, actions and Key Performance Indicators (KPIs). A process for identifying, analysing and investigating the causes of incidents and accidents has been defined and the Entity has implemented control measures as required.</p> <p>Whilst working conditions and risks for Workers have been assessed, there is no evidence that this assessment has been completed for Portuguese contractors. Additionally, whilst improvement actions are documented in the Entity's Global Action Plan, there is no evidence of that follow-up of the actions is undertaken.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Objectives and KPIs, both leading and lagging, have been defined. Performance against the KPIs is assessed every three months, and annually via the management review.</p> <p>The strategy, objectives, actions and results are published in the Sustainability Report on page 69, however, a comparative analysis of performance with peer companies and best practices is not yet published: https://mirandabikeparts.com/wp-content/uploads/2025/06/MirandaSustainability2024.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has defined a labour relations process that includes several committees and channels for Health and Safety engagement with Workers. These include a Safety Committee, 'work climate' surveys, internal communications, employee portal to receive suggestions, and a monthly newsletter.</p> <p>The Entity has appointed several people with the task of visiting work areas to collect suggestions and proposals for OH&S improvements.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 September 2025	Initial Certification Audit – Full Certification