

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Nikkei M.C. Aluminum (Kunshan) Co., Ltd

CERTIFICATE NUMBER

523

ASI STANDARD

PERFORMANCE
STANDARD
(v3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SHANGHAI KYLIN
CERTIFICATION
SERVICE CO., LTD.

DATE OF ISSUE

13 JANUARY 2026

DATE OF EXPIRY

12 JANUARY 2029

CERTIFIED SINCE

13 JANUARY 2026

AUTHORISED BY

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CERTIFICATION SCOPE

Production of Casting Aluminium
alloy ingots and molten Aluminium
at Nikkei M.C. Aluminum (Kunshan)
Co, Ltd, located in Jiangsu Province,
China.

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*

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	NIKKEI M.C. ALUMINUM (KUNSHAN) CO., LTD
ENTITY NAME	Nikkei M.C. Aluminum (Kunshan) Co., Ltd
CERTIFICATION SCOPE	Production of Casting Aluminium alloy ingots and molten Aluminium at Nikkei M.C. Aluminum (Kunshan) Co., Ltd, located in Jiangsu Province, China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	Shanghai Kylin Certification Service Co, Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 22 – 23 September 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 24 November 2025
AUDIT SCOPE	<p>The Audit Scope covers the production of Casting Aluminium Alloy Ingots and molten Aluminium at the Casting factory at Nikkei M.C. Aluminum (Kunshan) Co., Ltd, located in Jiangsu Province, China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Aluminium Re-melting/Refining• Casthouses• Material 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"><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 company'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

13 January 2026 - 12 January 2029

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

13 July 2027

CERTIFICATE NUMBER

523



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

Nikkei M.C. Aluminum (Kunshan) Co., Ltd. in particular the Casting factory at Nikkei M.C. Aluminum (Kunshan) Co., Ltd (the 'Entity') is a secondary Aluminium manufacturer that supplies Aluminium alloys to the die-casting and gravity-casting industries.

As a smelter, it recycles Aluminium Scrap through melting in reverberatory furnaces to produce various Aluminium alloys. The Entity currently employs sixty employees with a production capacity of 40,000 tonnes ingot per annum. The final five-kilogram ingot product is then predominantly sold to automobile industrial companies to produce wheels, engine blocks, cylinder heads, pistons, structural parts, tyre moulds, and brake components in China. The Entity also supplies special alloys developed By Nikkei M.C. Aluminum Co., Ltd.

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	Low	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Medium	MEDIUM
OVERALL			MEDIUM	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has developed a Compliance Evaluation Procedure and a Regulatory Requirements Control Procedure. The Entity's Environment, Health and Safety (EHS) Office is responsible for the environment and safety, and the General Affairs Department is responsible for labour and business ethics. The Entity has established an Identification and Evaluation Form for Laws, Regulations and Other Requirements to identify and evaluate the applicable criteria of the regulations for compliance.</p> <p>The Entity's Environmental Impact Assessment Report is divided into three phases and was submitted to the environmental protection department for approval. The Entity holds a pollutant discharge permit. The Entity also has a security status evaluation report.</p> <p>Whilst the Entity provided fire safety inspections for Phase I and Phase II, it has not however provided the fire safety inspection for Phase III of the 2020 molten Aluminium.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established anti-Corruption policies and the Anti-Corruption and Anti-Bribery Procedure, which has been approved by the General Manager. The General Affairs Department is responsible for receiving relevant reports and conducting anti-Bribery investigations. There have been no relevant event records in the past year. The management and office personnel of the Entity has received compliance training.</p> <p>The Entity conducts an annual online staff survey which is facilitated by its Japanese headquarters, which also includes compliance and anti-Corruption content. The Anti-Corruption and Anti-Bribery Management Procedure stipulates the limits for single or individual business entertainment activities.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established an ASI Code of Conduct, which includes environmental, social, and corporate governance content and is available at:</p> <p>https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%AE%80%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8ASI%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf</p> <p>The Code of Conduct is reviewed every five years or when there are changes that affect ESG issues.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	<p>The Entity has developed an ASI Management Policy, which includes ESG issues:</p> <p>https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/ASI%E7%AE%A1%E7%90%86%E6%96%B9%E9%92%88.pdf</p> <p>The Entity stipulates that every five years, when there are changes that may affect ESG issues, the Policy must be reviewed.</p> <p>According to interviews undertaken during the Audit, employees are however not familiar with the ASI Management Policy.</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	<p>The Entity's General Manager has appointed the Factory Manager as the ASI Management Representative, who is responsible for implementing and communicating ASI policies and providing resources for establishing, implementing, maintaining and improving the ASI system. The appointment letter is available at:</p> <p>https://api01.miancp.com/web/www.nmakcn/ch/product/pdf/%E7%AE%AE%E4%BB%A3%E4%BB%E5%91%BD%E4%B9%A6.pdf</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	<p>The Entity has established a certified ISO 14001 Environmental Management System covering the production of Aluminium alloy ingots.</p>
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has established a certified ISO 45001 Occupational Health and Safety (OH&S) Management System, covering the production of Aluminium alloy ingots and molten Aluminium. The Entity has also established social management procedures including women's protection, Human Rights Due Diligence, underage Worker management, prohibition of Child Labour, supplier subcontractors, employment rules, and compensation and benefits.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established an ASI Management Policy which includes responsible procurement that will be reviewed every five years or when there are changes that may affect ESG issues. Refer to:</p> <p>https://api01.miancp.com/web/www.nmakcn/ch/product/pdf/ASI%E7%AE%A1%E7%90%86%E6%96%99%E9%92%88.pdf</p> <p>The Entity has released its 2025 Supply Chain Due Diligence Report and established management procedures for conflict minerals, supplier subcontractors, and other related matters. The Entity's suppliers are required to complete ESG self-assessment reports and sign commitment letters with commitment to adhere to the ASI Performance Standard requirements.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing Facilities since the Entity joined ASI.</p> <p>The Entity has established an Impact Management Procedure for Renovation and Expansion Projects, which stipulates the conduct of Environmental and Social Impact Assessments in the event of significant changes.</p>
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 to existing Facilities since the Entity joined ASI.</p> <p>The Entity has established an Impact Management Procedure for Renovation and Expansion Projects, which stipulates the conduct of Environmental and Social Impact Assessments in the event of significant changes.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has established both an Emergency Plan for sudden environmental incidents and an Emergency Plan for production safety. The Entity's General Manager serves as the commander of the emergency centre. The emergency plan includes both specialised and comprehensive plans and has been registered in relevant government departments.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has established annual emergency drills, which in 2025, included drills for heatstroke, fire evacuation, high-temperature Aluminium water leakage and explosion, hazardous chemical leakage, Aluminium water burns, Hazardous Waste leakage and limited space first aid.</p> <p>Emergency Response Plan for Production Safety Incidents: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E5%AE%89%E5%85%A8%E7%94%9F%E4%BA%A7%E4%BA%8B%E6%95%85%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%882023.pdf</p> <p>Emergency Response Plan for Sudden Environmental Incidents: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/2023%E5%B9%B4%E7%AA%81%E5%8F%91%E7%8E%AF%E5%A2%83%E4%BA%8B%E4%BB%B6%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%88.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a Suspension of Operations Management Procedure, which will be enacted in the event of safety accidents, natural disasters, or other situations that require suspension of operations. The Manufacturing and Equipment Departments must submit a Suspension of Operations Application Form to explain the impact on ESG.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has established the Mergers and Acquisitions Management Procedure, which stipulates the evaluation of compliance, company values, finance, social responsibility, and other aspects during any mergers and/or acquisition event.</p> <p>The Entity has not engaged in any mergers or acquisitions since it joined ASI.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a Closure, Retirement, and Withdrawal Management Procedure, which stipulates that in the event of closure, retirement, or withdrawal, the Entity must conduct assessments on debt, social responsibility, employee placement, and other aspects, and resolve related issues.</p> <p>There have been no related activities since the Entity joined ASI.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has developed and published its 2024 Sustainability Report, which includes information on sustainable development, and is available at: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%AA5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8AV1.3.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has referenced in the 2024 Sustainability Report that there were no ESG violations during 2024. Refer to page 11 at: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%AA5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8AV1.3.pdf</p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>The Entity has established a Government Payment Process, which specifies the approval process for making payments to the government. The Entity has disclosed its tax and social security expenses for 2024. Refer to the 2024 Sustainability Report, page 11: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8AV1.3.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established internal and external reporting processes that both include the Group's online complaint channel (https://koueki-tsuhou.com/Fh2kAp3nlmhd/cn/index.html) and email address. Refer to the 2024 Sustainability Report, page 13: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8AV1.3.pdf</p> <p>The Entity has placed suggestion boxes in the cafeteria, where received suggestions are reviewed monthly by the Entity's Vice General Manager. No employee feedback has been received so far.</p>

4. MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has developed a Life Cycle Assessment (LCA) Report, which considers one tonne of Aluminium alloy ingot.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Minor Non-Conformance	<p>The LCA report predominantly considers Greenhouse Gas (GHG) emissions and does not incorporate other impacts such as acidification. The emissions factor for Primary Aluminium was calculated however using data from 201 and not using latest Primary Aluminium emissions data.</p> <p>Aluminium Ingot Life Cycle Research Report: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%8A%A5%E5%91%8A2024-V1.0.pdf</p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable to the Entity as its operational activities relate to the melting and re-melting of it is Melting/Re-melting activities only.</p>
4.3a-b Aluminium Process Scrap	Minor Non-Conformance	<p>Surface-floating slag generated by the workshop melting furnace is collected and then stirred to recover the Aluminium material through screening. The remaining Aluminium Dross has a low Aluminium content. The waste at the bottom of the furnace, some of which is manually crushed, and Aluminium blocks are recycled for use in a lower grade. During workshop production, the Recycled Aluminium materials is be mixed and reused according to the product number and the ingredient book regulations.</p> <p>The Entity however has not yet established a target for 100% recycling and the reuse of waste materials.</p>
4.4a-c Collection and Recycling of Products at	Conformance	<p>The Entity has developed and implemented a Recycled Aluminium Strategy, with a plan to increase the Recycled Aluminium content by</p>

CRITERION	RATING	COMMENT
End of Life - Material Conversion and other Manufacturing		6% in 2025 and an additional 11% by 2030. The strategy is available at: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%E5%86%8D%E7%94%9F%E9%93%9D%E5%9B%9E%E6%94%B6%E6%88%98%E7%95%A5.pdf
4.4d Collection and Recycling of Products at End of Life	Minor Non-Conformance	<p>The Entity mainly purchases Scrap material from Aluminium processing factories with plans to cooperate with two new automobile dismantling plants and a running pilot with direct procurement points for Recycled Aluminium.</p> <p>The Entity however has not yet implemented a new procurement cooperation plan for Recycled Aluminium and has not differentiated the usage of Recycled Aluminium before and after consumption.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity utilises its inventory list to calculate the GHG emissions, energy and raw material usage for the year 2024. The Data are verified by a third party and publicly disclosed at: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%9B%9E%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%20%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E6%8E%92%E6%94%BE%E6%A0%B8%E6%9F%A5%E6%8A%A5%E5%91%8A.pdf</p> <p>The report lists the Entity's energy sources and the associated CO₂ emissions, however it does not include information on the amount of energy consumption in units (e.g. kWh, kg, GJ).</p>
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	The Entity has used the ASI Emissions Reduction Pathway calculation tool to develop a GHG Emissions Reduction Plan with a GHG Emissions Reduction Pathway based on 2024 emissions aligned with a 1.5°C warming scenario.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity has established a five-year emissions reduction plan based on the results of the ASI calculation tool and measures including technological transformation, increasing the percentage of Recycled Aluminium use, and implementing the ISO 50001 Energy Management System. Based on its ASI manual, the Entity will review the emissions reduction plan annually, or when emissions reduction targets are changed.</p> <p>Greenhouse Gas Emissions Reduction Plan: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92.pdf</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	<p>The Entity has established the Greenhouse Gas Management Regulations, which stipulate that the EHS department is responsible for GHG emissions management. The Entity considers controlling emissions from sources for Scopes 1 to 3, using appropriate calculation methods and emission factors to gradually reduce GHG emissions.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has formulated the 'Regulations on the Management of Sewage, Waste Gas Emissions and Noise' to manage atmospheric emissions and conduct emissions monitoring. The Entity collects data on major atmospheric emissions monthly, including sulphur dioxide (SO₂), nitrogen oxides (NO_x), and particulate matter (PM).</p> <p>The Entity has developed a pollutant reduction plan and set emissions reduction targets and methods for the total amount of atmospheric pollutants. The Entity has outsourced quarterly exhaust gas and semi-annual noise testing. This management process is reviewed annually.</p> <p>A summary of total exhaust emissions from September 2024 to August 2025 is available at: http://www.nmak.cn/ch/product/pdf/2024.9-2025.8%E5%BA%9F%E6%B0%94%E6%8E%92%E6%94%BE%E6%80%BB%E9%87%8F%E6%B1%87%E6%80%BB.xlsx</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has implemented a 'Regulations on the Management of Sewage, Waste Gas Emissions and Noise' procedure to manage rainwater, domestic sewage and other emissions, and conduct emissions monitoring. The Entity collects data on the water circulation rate of cooling towers, as well as the quantity of domestic water used.</p> <p>The Entity has outsourced testing for rainwater and domestic wastewater, and the results from the past year confirm the Entity has met the required standards. The Entity has developed a plan and methods for reducing water consumption. This management process is reviewed annually.</p> <p>Information on Discharges to Water, water consumption and intake information is disclosed in the Pollutant emission reduction plan, pages 2 and 7: http://www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%89%E6%B1%A1%E6%9F%93%E7%89%A9%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92.docx</p>
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-Conformance	<p>The Entity has developed a Leakage and Leakage Factor Management Plan, which identifies the risks of chemical and Hazardous Waste leakage in the production process. In addition, the Entity has also established an environmental and safety plan for hazardous chemical leakage.</p> <p>Based on the results of risk identification, the Entity has developed a management plan and emergency response plan. The ASI manual stipulates regular re-evaluation of management plans.</p> <p>The Entity however has not disclosed the Leakage and Leakage Factor Management Plan.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has established a procedure for managing leaks, which stipulates that the Equipment Department must notify Affected Populations and Organisations as soon as possible after a Spill or leak.</p> <p>The Entity has stated in its 2024 Sustainability Report that there have been no major environmental accidents in the past year, and a Leakage statement has been disclosed.</p> <p>Annual Statement of Zero Environmental Seepage and Leakage Incidents:</p> <p>https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A0%E6%B3%84%E6%BC%8F%E3%80%81%E6%B8%97%E6%BC%8F%E5%A3%B0%E6%98%8E.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has disclosed the quantity of Hazardous and Non-Hazardous Waste, available at:</p> <p>http://www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%89%E6%B1%A1%E6%9F%93%E7%89%A9%E5%87%8F%E6%8E%92%E8%AE%A1%E5%88%92.docx</p> <p>The 2024 Sustainability Report summarises methods of waste management, including the classification and sale of recyclable waste, and the disposal of Hazardous Waste by qualified Hazardous Waste disposal units in accordance with regulatory requirements. Through process adjustments and the use of environmentally friendly refining agents, the production of Aluminium Dross is reduced.</p> <p>https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%B1%EF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%A5%E5%91%8AV1.3.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	Conformance	The Entity has established a dedicated Hazardous Waste warehouse to store Aluminium Dross. The Aluminium Dross collected in the smelting furnace is crushed and sorted, and the Aluminium material is collected. The Aluminium Dross residue is collected by the qualified Hazardous Waste treatment unit, for recycling and processing. The Entity provides a Hazardous Waste transfer form for Aluminium Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has conducted a Water Resource Risk Assessment and analysed its water sources, which determined that the impact of water consumption is low. Current water resources are sourced from the municipal pipeline network. The Entity's water balance test report, which analysed the inflow and domestic and production water consumption has determined that the Environment, Health and Safety (EHS) Office is responsible for water conservation management.</p> <p>Water Balance Test Report:</p> <p>https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%B0</p>

CRITERION	RATING	COMMENT
		<u>%B4%E5%B9%B3%E8%A1%A1%E6%B5%8B%E8%AF%95%E6%8A%A5%E5%91%8A%E4%B9%A6.pdf</u>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as there were no identified significant water-related risks in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has developed a Biodiversity and Ecosystem Risk and Impact Assessment Report which analysed the impacts of its activities on hydrological, geological, and flora and fauna systems, and the potential for biological invasion. No significant risk and impacts on Biodiversity and Ecosystem Services have been identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk and potential impacts identified are assessed and documented as low. No Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks and potential impacts on Biodiversity and Ecosystem Services are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	<p>The Entity has developed a Biological Invasion Management Procedure, which stipulates that the Entity must identify and monitor potential biological invasions. They have developed response measures for Alien Species which are included in the Biodiversity and Ecosystem Risk and Impact Assessment Report.</p> <p>The report confirms that imported wooden pallets are not currently in use and there are no invasive species present within the factory area.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has outlined their commitment to "No Go" in World Heritage Properties in the 'Protecting Life in Religious Holy Sites and World Heritage Sites Letter'. There are no World Heritage sites around the Entity, and the nearest ancient town is Zhou Zhuang, which is approximately 50 kilometres away.
8.6a-d Protected Areas	Conformance	<p>The Entity has established the Management Procedure for Cultural Sites and Religious Holy Sites, which stipulates the identification, risk assessment, and protection measures for cultural sites and religious holy sites. Refer to:</p> <p><u>www.nmak.cn/ch/product/pdf/%E6%96%87%E5%8C%96%E9%81%97%E5%9D%80%E5%92%8C%E5%AE%97%E6%95%99%E5%9C%A3%E5%9C%80%E7%AE%A1%E7%90%86%E7%A8%8B%E5%BA%8F.pdf</u></p> <p>The Entity is located in Kunshan Economic Development Zone and is surrounded by factories and without cultural or natural reserves.</p>
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.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established a Human Rights Due Diligence Management Procedure and has implemented an annual personnel Due Diligence system covering all employees. The Entity has also prepared a Human Rights Due Diligence Report covering internal and external Stakeholders, which confirmed that the Entity has no Human Rights violations to date.</p> <p>The Entity has implemented a Policy Commitment on respecting Human Rights and promoting gender equality, available at: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E4%BA%E6%9D%83%E4%B8%8E%E4%BF%83%E8%BF%9B%E4%B8%A4%E6%80%A7%E5%B9%B3%E7%AD%89%E6%96%B9%E9%92%88.pdf</p> <p>As this is the Entity's initial establishment of the Human Rights Due Diligence Management Procedure, no review is required at present.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity imposes no gender restrictions on recruitment and actively encourages applications from women. Due to limited recruitment requirements over recent years, the growth in the number of female employees at the Entity has been limited. The Entity provides female employees with specialised training and career guidance, and offers flexible working arrangements, such as remote working and flexible hours, to help balance work and family life, promote women into management roles and attract female job seekers.</p> <p>The Entity has established a dedicated Women's Protection Management Procedure, which sets clear protection requirements for women covering three areas (e.g. pregnancy, maternity leave, and lactation period). The Human Rights Due Diligence report summarises the measures adopted and the procedural document provisions regarding gender equality and the protection of women's rights and interests comply with relevant laws and regulations.</p> <p>The Entity has disclosed employee training and career development goals for women and compiled statistics on the total number of employees and their proportion in the 2024 Sustainability Report, pages 27-28 and 45: https://api01.miancp.com/web/www.nmak.cn/ch/product/pdf/%E6%97%A5%E8%BD%BB%E5%95%86%E8%8F%B1%E9%93%9D%E4%B8%9A%EF%BC%88%E6%98%86%E5%B1%BF%BC%892024%E5%B9%B4%E5%8F%AF%E6%8C%81%E7%BB%AD%E5%8F%91%E5%B1%95%E6%8A%5%E5%91%8AV1.3.pdf</p>
9.3a-l 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.

CRITERION	RATING	COMMENT
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	Conformance	The Entity's Business premises are located in an industrial park, with no cultural heritage sites or religious shrines in the surrounding area. The nearest religious site is approximately three kilometres away from the Entity and is not affected by the Entity's Business activities.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, the premises are located in an industrial park, with no cultural heritage sites or religious shrines in the surrounding area. The nearest religious site is approximately three kilometres away from the Entity and is not affected by the Entity's Business activities.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as its operations are located within an established industrial park and the Entity has not conducted or considered any resettlements/activities resulting in physical dislocations.
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity has engaged its employees for communication and established a 'Community Management System and Plan Implementation Scheme' to reduce and mitigate potential risks in production and operational activities.</p> <p>The management plan however only covers the Entity's premises and does not consider the surrounding potentially affected communities and institutions, nor has the management plan been publicly disclosed.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established and implemented Conflict Minerals Control and Management Measures to ensure metals derived from regions affected by armed conflict or illegal mining will not be supported or used.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a supplier survey system, covering suppliers' commitments and feedback on fulfilling social responsibilities and responsible procurement requirements. The objective of the supplier survey system is to identify potential risks in the supply chain management process.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as there are no substantive supply chain risks identified among the covered suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were included in this ASI Performance Standard Certification Audit, which addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has established a system for the Due Diligence and reporting of its supply chain and can provide the relevant documentation however, it is not publicly report on their Due Diligence systems and practices.

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9.9 Security practice	Conformance	The Entity has deployed security personnel at the entrances and exits of its factory premises and has established the procedure on Security Management Rules and Regulations, which clarify specific measures and management requirements for protecting the enterprise's property and employees' safety. There are no behaviours by security personnel identified on-site that infringe on Human Rights, such as restricting employees' freedom, body searches or coercion.
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 Applicable Law in China. The Entity adheres to local requirements regarding Freedom of Association and the right to Collective Bargaining.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	<p>The Entity has established a Trade Union with a general election held every five years. Trade Union committee members are freely elected, and these members can represent employees to exercise their rights and participate in communications on employee-related affairs.</p> <p>The Entity has established a 'Freedom of Association and Collective Bargaining Rights Management Procedure', which specifies the Entity must respect employees' rights to Freedom of Association and Collective Bargaining to safeguard employees' legitimate rights and interests.</p>
10.2a-c Child Labour	Conformance	<p>The Entity has established a 'Child Labour Prohibition Management Procedure' and 'Juvenile Worker Management Procedure' to protect young Workers and provide guidance for the detection and remediation of Child Labour. There is no evidence of Child Labour or young Workers identified during the Audit. The Entity does not use, nor support, the Worst Forms of Child Labour.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established an 'Anti-Slavery and Anti-Forced Labor Management Procedure' opposing and prohibiting all forms of slavery and Human Trafficking in employment. Employees sign labour contracts directly with the Entity, and Personal Protective Equipment (PPE) can be freely obtained as needed at any time. The Entity provides equal pay for equal work, and no behaviours or evidence of Forced Labour such as Discrimination or retention of documents were identified during the Audit.</p> <p>The Entity has publicly disclosed its Modern Slavery Statement, which explains the actions taken to address Modern Slavery. The Statement is available at:</p> <p>http://www.nmak.cn/ch/product/pdf/%E5%8F%8D%E5%BC%BA%E8%BF%AB%E5%8A%B3%E5%8A%A8%E3%80%81%E5%8F%8D%E5%A5%B4%E9%9A%B6%E5%88%B6%E7%94%B3%E6%98%8E.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established an 'Anti-Discrimination Management Procedure', which sets out the basic requirements for non-Discrimination that employees must abide by. The Entity has achieved equal pay for equal work. Based on Audit interviews, employees work in a good physical and cultural environment, with no incidents of Discrimination, abuse, or Harassment reported.
10.5 Communication and engagement	Conformance	The Entity has strengthened employees' awareness of Human Rights through training. It has implemented an employees' congress system and collected employees' suggestions via multiple channels including

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>anonymous submissions, opinion platforms and team meetings. The Entity also conducts an annual employee satisfaction survey, using dedicated software to gather feedback to protect employee privacy. Employees can also submit feedback and file complaints anonymously via phone and suggestion box, without fear of retaliation.</p>
10.7a-d Remuneration	Conformance	<p>The Entity has established the 'Prohibition of Mental and Physical Abuse Procedure', and the ASI Management Policy addresses Violence and Harassment, which have been posted in workshops and on notice boards. The Audit and related interviews identified no incidents of Violence or Harassment at the Entity, and employees have not witnessed any such cases. The Entity plans to review ASI-related Policies annually to ensure their suitability and effectiveness.</p> <p>The ASI Management Policy, which includes guidelines against Violence and Harassment, has been publicly disclosed at: https://api01.miancp.com:2083/web/www.nmak.cn/ch/product/pdf/ASIE7%AE%A1E7%90%86%E6%96%B9%E9%92%88.pdf</p>
10.8a-c Working Time	Conformance	<p>The Entity has established employee files to maintain copies of personnel record forms, identification, and full-time labour contracts in Chinese with clear employment terms. Employees' actual wages all exceed the local minimum wage standard, which is sufficient to meet basic needs with disposable surplus. The wages paid are consistent with payroll records and bank statements. The calculation method of Overtime pay for hourly employees complies with legal requirements and is consistent with the information obtained from employee interviews. The Entity pays social insurance and commercial insurance for employees, achieving full insurance coverage for all Workers.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>A Trade Union has been established with clear procedural documents in place. The Entity respects and protects employees' rights to Freedom of Association and Collective Bargaining. Employees elect committee members through voting, who can represent their interests and rights, participate in communications on employee-related matters, and are entitled to assist employees in need with handling issues related to their interests.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established an Occupational Health and Safety (OH&S) Management System with system documentation and has obtained a valid OH&S Management System certificate. On-site occupational hazard control measures are well implemented, with adequate configuration of relevant Facilities and effective management in place.</p>

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11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System certificate remains valid. In accordance with implementation requirements, the Entity has conducted internal audits and management reviews, through which it assesses OH&S risks.</p> <p>In addition, the Entity has conducted a detailed analysis of their 2024 OH&S performance indicators and has disclosed a summary of performance on the effectiveness of the OH&S Management System. The disclosure also includes a comparative analysis against industry peers' performance and leading practices, refer to:</p> <p>http://www.nmak.cn/ch/product/pdf/%E6%98%86%E5%B1%B1%E6%97%A5%E8%BD%BB2024%E5%B9%B4%E8%81%8C%E4%B8%9A%E5%81%A5%E5%B%A%B7%E4%B8%8E%E5%AE%89%E5%85%A8%E7%BB%A9%E6%95%88%E6%8C%87%E6%A0%87.docx</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The OH&S Management System and performance indicators apply to all its departments and employees. The analysis of OH&S performance indicators serves as the basis for evaluating the systems effectiveness. Employees are aware of multiple methods to communicate with management and the Entity's Health and Safety operational controls, as well as complaint channels and methods.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	9 January 2026	Initial Certification Audit – Full Certification