

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Nikkei MC Aluminum America, Inc.

CERTIFICATE NUMBER

537

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

DATE OF ISSUE

25 FEBRUARY 2026

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

24 FEBRUARY 2029

ASI ACCREDITED
AUDITING FIRM

BUREAU VERITAS
CERTIFICATION

CERTIFIED SINCE

25 FEBRUARY 2026

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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

Secondary Aluminium
manufacturing and associated
supply chain activities at the Nikkei
MC Aluminum America, Inc. (NMAA)
facility located in Columbus,
Indiana, including the recycling of
Aluminium Scrap and the supply of
Aluminium alloys to the die-casting
and gravity-casting industries.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Nikkei MC Aluminum America, Inc.
ENTITY NAME	Nikkei MC Aluminum America, Inc.
CERTIFICATION SCOPE	Secondary Aluminium manufacturing and associated supply chain activities at the Nikkei MC Aluminum America, Inc. (NMAA) facility located in Columbus, Indiana, including the recycling of Aluminium Scrap and the supply of Aluminium alloys to the die-casting and gravity-casting industries.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none">22 – 24 December 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 January 2026
AUDIT SCOPE	<p>The Audit Scope included the Nikkei MC Aluminum America, Inc. Facility located in Columbus, Indiana, United States of America.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <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 25 February 2026 – 24 February 2029

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 24 August 2027

CERTIFICATE NUMBER 537



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 MC Aluminum America, Inc. ('NMAA', or the 'Entity') was founded in 1989 and is located in Columbus, Indiana. The Entity is a manufacturer of secondary Aluminium alloys.

The Entity specialises in producing Aluminium alloys by combining Recycled Scrap with Primary Aluminium. The Entity's manufacturing processes are designed to minimise environmental impacts whilst maximising material integrity and customer value. The Entity operates four reverberatory furnaces and four casting lines, as well as chip dryer and shredding processes. The Entity currently employs approximately 100 employees with a production capacity of 56,000 tonnes of ingots per annum. The ingots are supplied to customers in a wide range of sectors, including the automotive, aerospace, structural components and industrial manufacturing industries.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity maintains a list of all legal and other compliance requirements that the operating site is subject to as part of their legal registry required as part of its ISO 14001 Certification. The Entity also subscribes to various newsletters and belongs to industry organisations to ensure that they are informed of any new or changing legal requirements. In addition, a Corporate Compliance Survey is completed by the site annually, that is administered by the Entity's corporate headquarters in Japan.
1.2 Anti-Corruption	Conformance	The Entity has implemented a documented Anti-Corruption Policy that is incorporated into the Code of Conduct. This Policy is summarised in the Employee Handbook that is provided to employees as a 'pocket-guide'. Employees acknowledge their receipt of the Code of Conduct and Employee Handbook 'pocket guide'.
1.3a-e Code of Conduct	Conformance	The Entity has published its Code of Conduct which is incorporated into the Employee Handbook and has been communicated to all employees. The Code of Conduct is incorporated into the Entity's Sustainability Report, page 8: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established and implemented a site-level Environmental and Social Policy, an Environmental, Health and Safety Policy for Contractors and a global Health and Safety Policy that outline the overall company commitment to Environmental, Social and Governance (ESG) principles. The site-level Environmental and Social Policy is available at: https://www.nmaluminum.net/_files/ugd/d06b03_9bdecc02f7704d608fef6a15ef684997.pdf
2.2a-c Leadership	Conformance	The Entity's Senior Vice President is nominated as the responsible person who has authority and designates resources for the implementation, maintenance and approval of the Management Systems relevant to ASI.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented an Environmental Management System that is currently certified to the ISO 14001 Standard.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented social governance policies and practices and provided awareness training at all levels of the organisation. Risk assessments have been conducted relevant to the Environmental and Health and Safety Management Systems.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented its Responsible Sourcing Policy, which is available at: https://www.nmaluminum.net/_files/ugd/d06b03_a11ab4bbaedd466fa7b8ef256552clf7.pdf

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity completed an Environmental Impact Assessment in 2024 to evaluate the potential impacts of a site expansion. The assessment was disclosed to the public as part of the regulatory permitting process. This resulted in a 'bioswale' being added to the site to minimise impacts to stormwater and to the Biodiversity of the area. The expansion was completed in 2024.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity completed an expansion of operations in 2024. Based on the Environmental and Social Impact Assessment conducted, the social impacts were not Material. The Entity maintains an Environmental and Social Policy which is available at: https://www.nmaluminum.net/_files/ugd/d06b03_9bdecc02f7704d608fef6a15ef684997.pdf
2.7a-f Emergency Response Plan	Conformance	The Entity maintains an Emergency Action Plan. The current version of the Emergency Action Plan is available at: https://www.nmaluminum.net/_files/ugd/d06b03_96368e80831f4492963552dd64f6a7f8.pdf
2.8a-d Suspended Operations	Conformance	The Entity has addressed business continuity in its Emergency Response Plan and Continuity Plan, both of which are incorporated into the General Planning document.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has not completed any mergers or acquisitions. However, the Entity has established protocols in the event any such activities are to take place in future.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has not had any closure, decommissioning or divestment events. If such activities are to occur in the future however, the Entity will follow relevant protocols that are established at a corporate level.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity published its company-wide Sustainability Report in December 2025, containing disclosures for Environmental, Social and Governance (ESG) and ASI relevant ESG topics, including Greenhouse Gas (GHG) emissions, community relations and employee safety. The Sustainability Report is available at: https://www.nmaluminum.net/_files/ugd/d06b03_5907dafaf6a648baa3fd5da7dce433d6.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity reports on non-compliances and liabilities within its Sustainability Report, (Section - Non-Compliance Reporting), page 11: https://www.nmaluminum.net/_files/ugd/d06b03_5907dafaf6a648baa3fd5da7dce433d6.pdf
3.3a-c Payments to Governments	Conformance	The Entity has established and implemented an Anti-Bribery/Corruption Policy. The Entity only make payments to Governments pursuant to its operational permits or tax liabilities as required by Applicable Law. Information on the Entity's Anti-Bribery/Corruption Policy is included in the Sustainability Report, page 13-15: https://www.nmaluminum.net/_files/ugd/d06b03_5907dafaf6a648baa3fd5da7dce433d6.pdf

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented and maintains a structured process for addressing complaints, grievances and requests for information from employees, supply chain partners and community Stakeholders. The Entity's Stakeholder and Grievance Procedure is outlined in the Sustainability Report. The Entity maintains an anonymous 'hotline' to receive complaints from employees and/or external Stakeholders. The Responsible Sourcing Policy also outlines the grievance process for suppliers/customers.</p> <p>The Grievance Mechanism contact lines and the Sustainability Report are accessible at: https://www.nmaluminum.net/sustainability and https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has completed a Life Cycle Assessment (LCA) for their primary Product, the 'Nikkei MC Aluminum America, Inc. Aluminium Ingot'. System boundaries are defined in the LCA Report. The LCA Report is available at: https://www.nmaluminum.net/_files/ugd/d06b03_a7ff8fb596045d9ba1ba2d6fc37c8d1.pdf</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has completed a Life Cycle Assessment (LCA) for their primary Product, the 'Nikkei MC Aluminum America, Inc. Aluminium Ingot'. System boundaries are defined in the LCA Report. The LCA Report is available at: https://www.nmaluminum.net/_files/ugd/d06b03_a7ff8fb596045d9ba1ba2d6fc37c8d1.pdf</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects production Scrap that is returned to the front end of the production process for internal re-melting. Dross is sent to an external party for processing to extract the contained Aluminium.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's Sustainability Report outlines the current recycling initiatives and the future initiatives that it intends to implement over time. As a direct initiative to enhance recycling rates, the Entity has partnered with an adjacent manufacturer and receives Scrap Aluminium chips from the manufacturer that are then re-melted in the Entity's furnace and returned to the adjacent manufacturer as molten metal to be used in its process.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Scope 1, 2 and 3 Greenhouse Gas (GHG) emissions data are accounted for and disclosed in the Entity's annual Sustainability Report. Emissions data have been independently verified by a Third Party. The Sustainability Report and verification statement are

CRITERION	RATING	COMMENT
		available at: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf and https://www.nmaluminum.net/_files/ugd/d06b03_f3390b59dd9a4ee895cc7da11508dbf2.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.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI GHG Pathway Calculation Tool for their Scope 1, 2 and 3 emissions, using 2024 as the baseline year. The GHG Pathway workbook includes both process and procurement slopes. The Entity has established an emission intensity reduction goal of 20% by 2030. The GHG Emissions Reduction Pathway is disclosed in the Entity's Sustainability Report, pages 33–36: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf
5.3b–e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI GHG Pathway Calculation Tool for Scope 1, 2 and 3 emissions using 2024 as the baseline year. The GHG Pathway workbook includes both process and procurement slopes. The Entity has established an emission intensity reduction goal of 20% by 2030. The GHG Emissions Reduction Pathway is disclosed in the Entity's Sustainability Report, pages 33–36: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented Management Systems for monitoring, collecting and calculating GHG emissions, and to assure that the required systems are in place to achieve the reduction targets. The Entity has contracted a Third Party to complete their GHG emissions data accounting, to ensure data and calculations are accurate and that the Management Systems in place can achieve its GHG emission reduction targets.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a–f Emissions to Air	Conformance	The Entity's Emissions to Air are regulated and tracked in accordance with the site's operating permits and reported to the local regulatory agencies annually, as required under Applicable Law that applies to facilities that exceed specified emission thresholds. Information on the Entity's reporting on its Emissions to Air is included in the Sustainability Report, page 31: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf

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6.2a-g Discharges to Water	Conformance	<p>The Entity's Discharges to Water include process water and stormwater. The Discharge is regulated by environmental permits that require monitoring reports to be submitted at defined frequencies and for the Entity to properly maintain and calibrate the monitoring equipment. Water discharge reports are disclosed to the environmental agency and are accessible at: https://www.in.gov/idem/legal/public-records/virtual-file-cabinet/</p> <p>The Entity's water usage is disclosed in the Sustainability Report, page 38: https://www.nmaluminum.net/files/ugd/d06b03_5907dafaf6a648baa3fd5da7dce433d6.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established response procedures and reporting requirements in the event of a Spill or Leakage. The Entity's oil storage capacity is below 1,320 gallons (5,000 litres) and, therefore, is not required under Applicable Law to have a 'Spill Prevention, Control, and Countermeasure (SPCC) plan'. The Entity has not had any reportable Spills or Leakages in the past five years.</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity, as no reportable Spills have occurred in the past five years. The Entity does however have established Spill response and reporting procedures.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has established procedures and associated training to ensure Waste is managed in accordance with local regulations. The Entity was observed to be managing Waste according to relevant environmental standards. The Entity's annual Waste volumes are reported in the Sustainability Report, pages 39-40: https://www.nmaluminum.net/sustainability</p>
6.6a-g Bauxite Residue	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
6.8a-d Dross	Conformance	<p>The Entity collects and transfers Dross generated during the melting process to a Dross processor to recover the maximum amount of Aluminium possible. The Entity has conducted vendor audits of the Dross processor.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors and tracks its water usage. The Entity has completed a water risk assessment using site specific data that are entered into a water risk assessment tool. The Entity's water usage data is disclosed in the Sustainability Report, page 38: https://www.nmaluminum.net/sustainability</p>
7.2a-e Water Management	Conformance	<p>The Entity's current management strategies and future considerations are documented in latest water risk assessment that was completed by the Entity. The Entity's water usage, risk assessment and management strategies are disclosed in the Sustainability Report, pages 38-39: https://www.nmaluminum.net/sustainability</p>

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity completed a site-wide Environmental and Biodiversity Assessment prior to completing the expansion of a new operational area. The assessment conclusions required a Wetland/Bioswale with native plantings to be installed, inspected and maintained. This assessment was disclosed to the Indiana Environmental Protection Agency. The assessment concluded that the risks to Biodiversity are low. The outcomes of the Biodiversity risk assessment are disclosed in the Entity's Sustainability Report, page 36: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity completed a site-wide Environmental and Biodiversity Assessment prior to completing the expansion of a new operational area. The assessment required a Wetland/Bioswale with native plantings to be installed, inspected and maintained. This assessment was disclosed to the Indiana Environmental Protection Agency. The assessment concluded that no Priority Ecosystem Services were present or impacted. The outcomes of the Biodiversity risk assessment are disclosed in the Entity's Sustainability Report, page 36: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the site-wide Environmental and Biodiversity Assessment concluded that the risks to Biodiversity are low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the site-wide Environmental and Biodiversity Assessment concluded that the risks to Biodiversity are low and that no Priority Ecosystem Services were present or impacted.
8.4 Alien Species	Conformance	The Entity has implemented processes that ensure Alien Species are not introduced to the Facilities by addressing key risk areas such as inbound deliveries.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	There are no World Heritage Sites near Columbus, Indiana or its surrounds, where the Entity is located.
8.6a-d Protected Areas	Conformance	The Entity has conducted an assessment of its current operations and proximity to Protected Areas. It was confirmed during the Audit that the Entity does not operate in, or near to any Protected Areas.
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 conducts a Human Rights Assessment every two years covering potential risks related to Human Rights, Discrimination, Child Labour, contract labour, women's rights, Indigenous Peoples' Rights,

CRITERION	RATING	COMMENT
		<p>Freedom of Association, Collective Bargaining, Forced Labour, disciplinary practices, communication and engagement, remuneration, and working hours. After each assessment, risk ratings are assigned and mitigation strategies are developed to address the identified impact.</p> <p>The Entity's Sustainability Report (page 8) includes a statement on its commitment to Human Rights. This statement is also included in the Employee Handbook that is provided to and acknowledged by all employees. The Entity's Sustainability Report is available at: https://www.nmaluminum.net/_files/ugd/d06b03_5907dafaf16a648baa3fd5da7dce433d6.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity complies with Applicable Law relating to Discrimination and equal employment opportunities. The Entity's Policies are stated in the Employee Handbook that is provided to and acknowledged by all employees.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as it has published a formal management statement which assessed and determined that its operations do not affect Indigenous Peoples, their rights, or any Indigenous lands, territories, resources, or sacred heritage places.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity as it has published a formal management statement which assessed and determined that its operations do not affect Indigenous Peoples, their rights, or any Indigenous lands, territories, resources, or sacred heritage places.
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 it has published a formal management statement which assessed and determined that its operations do not affect Indigenous Peoples, their rights, or any Indigenous lands, territories, resources, or sacred heritage places.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity as it has published a formal management statement which assessed and determined that its operations do not affect Indigenous Peoples, their rights, or any Indigenous lands, territories, resources, or sacred heritage places.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no cultural, historical or spiritual heritage sites identified in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it was confirmed during the Audit that its operations have not displaced any vulnerable or at-risk individuals present in their Area of Influence. The Facility is located in a commercially zoned industrial park.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has conducted a Social Impact Assessment and concluded its social impacts are not Material. The Entity is located in a commercially zoned industrial park that has minimal impact on the surrounding areas.

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a Responsible Sourcing Supply Chain Due Diligence Policy stating they will not operate in or source materials from Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has completed a supplier risk assessment to review all existing metal suppliers, and no high-risk entities or areas were identified in the supply chain.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has established a Responsible Sourcing Supply Chain Due Diligence Policy stating they will not operate in or source materials from CAHRAs. The Entity has completed a supplier risk assessment to review all existing metal suppliers, and no high-risk entities or areas were identified in the supply chain.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a Responsible Sourcing Supply Chain Due-Diligence Policy stating they will not operate or source materials from CAHRAs. The Entity has completed a supplier risk assessment to review all existing metal suppliers, and no high-risk entities/areas were identified. In addition, the Entity has established a Supplier Assessment Form that will be used to identify any risks for future suppliers.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity has established a Responsible Sourcing Supply Chain Due-Diligence Policy stating they will not operate or source materials from CAHRAs. The Entity has completed a supplier risk assessment to review all existing metal suppliers, and no high-risk entities/areas were identified. In addition, the Entity has established a Supplier Assessment Form that will be used to identify any risks for future suppliers.</p> <p>The Entity has disclosed its Responsible Sourcing Raw Material Policy at: https://www.nmaluminum.net/files/ugd/d06b03_a11ab4bbaedd466fa7b8ef256552cf7.pdf</p> <p>The Entity reports on its supply chain Due Diligence in its Sustainability Report, page 20: https://www.nmaluminum.net/files/ugd/d06b03_5907dafa16a648baa3fd5da7dce433d6.pdf</p>
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity as it does not use any external security services.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity does not prohibit activities that are protected by the National Labor Relations Act including the Freedom of Association.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as Freedom of Association and the Right to Collective Bargaining are not restricted in the USA, where the Entity conducts its activities.

CRITERION	RATING	COMMENT
10.2a-c Child Labour	Conformance	<p>The Entity's Child and Forced Labor Policy is described in the Human Rights section of the Sustainability Report. The Entity does not employ individuals under the age of 18. The Entity's Sustainability Report is available at:</p> <p>https://www.nmaluminum.net/_files/ugd/d06b03_5907dafa16a648baa3fd5da7dce433d6.pdf</p>
10.3a-c Forced Labour	Conformance	<p>The Entity does not use Forced Labour and adheres to the local laws specific to Overtime.</p> <p>The Entity has disclosed its Modern Slavery Statement at:</p> <p>https://www.nmaluminum.net/_files/ugd/d06b03_53ac47f157a247398de8aab95ca1947b.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity does not tolerate Discrimination in the workplace and has an established Discrimination, Harassment and Retaliation Policy that is communicated to Workers in the employee handbook. An ethics compliance hotline is available for anonymous reporting at:</p> <p>https://www.nmaluminum.net/sustainability</p>
10.5 Communication and engagement	Conformance	<p>The Entity maintains open communication and direct engagement with employees and maintains several avenues for employees to bring forward concerns specific to working conditions or compensation issues, without threat of reprisal, intimidation, Violence or Harassment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a Threats and Violence Policy that is incorporated into the Code of Conduct and the Employee Handbook that is provided to and acknowledged by each employee at the time of hire.</p> <p>The Code of Conduct is incorporated into the Entity's Sustainability Report, page 8:</p> <p>https://www.nmaluminum.net/_files/ugd/d06b03_5907dafa16a648baa3fd5da7dce433d6.pdf</p>
10.7a-c Remuneration	Conformance	<p>The Entity ensures employees are paid wage payments on a regular and timely basis, in legal tender. Payments are fully documented.</p>
10.8a-c Working Time	Conformance	<p>The Entity provides reasonable working hours and fair wages in Compliance with Applicable Law. The Entity's employee handbook outlines the Entity's Working Time policies, including Overtime pay and distribution.</p> <p>Employees work 12-hour shifts on an alternating week pattern for total working hours of 36 hours and 48 hours on respective alternating weeks. Workers are paid 1.5 times standard remuneration rates for Overtime worked over 40 hours a week. This was validated during the Audit through a review of pay records.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity's employee handbook addresses a commitment to inform Workers on their rights, including the Entity's respect for Freedom of Association in accordance with National Labour Laws.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has an established and implemented an Occupational Health and Safety (OH&S) Management System that includes safety procedures, training, employee engagement and key performance indicators.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has established and implemented an OH&S Management System including on-boarding, daily safety walks, weekly safety meetings with operational personnel and monthly Health and Safety meetings with the Entity's leadership.</p> <p>The Entity reviews their safety performance on at least an annual basis and compares that against equivalent industries. The Entity has summarised its OH&S performance, including the results of the peer comparison and leading and lagging indicators, in its Sustainability Report, pages 43-45: https://www.nmaluminum.net/_files/ugd/d06b03_5907daf16a648baa3fd5da7dce433d6.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity conducts weekly in-person safety meetings with each department to educate employees on Health and Safety related topics and to obtain feedback on any concerns that employees may have.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 February 2026	Initial Certification Audit – Full Certification