



California Transparency in Supply Chains Act Disclosure Statement

The California Transparency in Supply Chains Act became effective January 1, 2012 in the State of California. The Act requires that certain companies doing business in California disclose their efforts to eliminate slavery and human trafficking from their direct supply chains.

Commonwealth Rolled Products expects its suppliers and vendors to conduct their businesses ethically and responsibly, including in a manner that respects human rights in compliance with applicable laws. Commonwealth Rolled Products terms and conditions that apply to all purchases of goods and services impose an affirmative, legally enforceable obligation requiring the supplier to comply with all applicable State and Federal laws, rules and regulations affecting the business transactions between Commonwealth Rolled Products and the supplier. This includes those laws, rules and regulations relating to human rights and ethical labor practices. In addition, suppliers are obligated to indemnify Commonwealth Rolled Products for any violation of applicable laws which reinforces Commonwealth Rolled Products expectation that suppliers engage in ethical labor practices. If a supplier or vendor fails to meet Commonwealth Rolled Products overall supplier standards, we will take appropriate action. This can include terminating all contracts with the supplier and alerting the authorities if appropriate.

Commonwealth Rolled Products efforts in compliance with the California requirement include:

- Verification:** While we do not have a formal process to verify the risks of human trafficking and slavery within our global supply chain, we are cognizant of the geographic regions of the world where such risks are elevated. We take appropriate action to increase our scrutiny of our suppliers operating in those regions. Commonwealth Rolled Products reviews a portion of our supplier base each year to assess their conformity to Commonwealth Rolled Products overall supplier standards. Commonwealth Rolled Products does not use a third party monitor to conduct verification activities.
- Audit:** Commonwealth Rolled Products does not currently conduct any specific audits to assess compliance in regards to the prohibition of slave labor and human trafficking.
- Certification:** Commonwealth Rolled Products does not require our direct suppliers to certify that materials incorporated into their products comply with slavery and human trafficking laws of the country or countries in which they do business.
- Internal Accountability:** Commonwealth Rolled Products ethical performance and integrity are inextricably tied to our corporate reputation and, ultimately, our business success. Our behavior is grounded in the Commonwealth Rolled Products Code of Business Conduct and Ethics. In addition, Commonwealth Rolled Products maintains policies that guide our business conduct and ethical behavior, including the Commonwealth Rolled Products Child Labor and Compulsory Labor Policy specifically prohibiting slavery and human trafficking. All of Commonwealth Rolled Products full-time salaried staff is required to certify annually that they have read the Commonwealth Rolled Products Code of Business Conduct and Ethics and are not aware of any violations. Failure of Commonwealth Rolled Products employees to abide by the Commonwealth Rolled Products Code of Business Conduct and Ethics can result in corrective action up to and including termination of employment.
- Training:** All of Commonwealth Rolled Products full-time salaried staff is required to take Code of Business Conduct and Ethics training periodically, and we conduct frequent training events on specific compliance topics.