

## COMMONWEALTH ROLLED PRODUCTS, INC. SUPPLIER SUSTAINABILITY POLICY

It is the policy of Commonwealth Rolled Products, Inc. (“CRP”) to do business in a legal, ethical, and sustainable manner. The purpose of the Supplier Sustainability Policy (“SSP”) is to communicate requirements and expectations to CRP’s suppliers. The drive to “Be the Mill of Choice”, in conjunction with building close working relationship with suppliers, will enable Commonwealth to continuously improve and “Advance Aluminum’s Unlimited Potential” in a global economy. Therefore, CRP believes that a robust business relationship with our suppliers is essential to our mutual success.

The SSP outlines some of the expectations our suppliers should follow during their business dealings with CRP or any of CRP’s other vendors, suppliers or contractors working on CRP’s behalf. The SSP applies to our **Direct Material Suppliers** (“Metals Procurement”) and **Critical Indirect Suppliers** (“Non-Metals Procurement”) that provide goods or services to Commonwealth. Suppliers are expected to comply with the SSP at their sole expense.

### 1.0 Code of Business Conduct and Ethics

CRP conducts business with a high level of integrity and in full compliance with all applicable laws, rules and regulations. CRP believes that a strong commitment to integrity is critical to how business should be conducted and how to maintain an outstanding reputation in the local community, and in the national and global markets in which we do business.

#### 1.1 Business Integrity

Suppliers are expected to appreciate and observe CRP’s Supplier **CODE OF BUSINESS CONDUCT AND ETHICS POLICY**; along with demonstrating the highest standard of integrity and ethical conduct in all business activities, including acting in good faith, with due care. Suppliers shall also engage only in fair and open competition, by treating competitors, suppliers, customers, and colleagues in a legal and an ethical manner.

#### 1.2 Legal Compliance

Suppliers are expected to comply with all applicable legal requirements and prevent incidents or conditions that might result in a violation of law. This includes, without limitation, that all purchased goods or services satisfy any current governmental and safety constraints on restricted, toxic, and hazardous materials, as well as environmental, electrical, and electromagnetic considerations.

#### 1.3 Preventing Bribery and Corruption

Suppliers are not permitted to give or promise to give anything of value to any party for the purpose of obtaining or retaining business, or to otherwise encourage them to act inappropriately. Suppliers must conduct business with a high level of integrity and in full compliance with all applicable laws, rules and regulations pertaining to bribery and corruption.

## **2.0 Human Rights, Working Conditions, and Social Expectations**

CRP is a company that prides itself on ethical and sustainable conduct. We expect our suppliers to support internationally recognized human rights, including the United Nations Guiding Principles on Business and Human Rights, and comply with all applicable laws regarding the treatment of employees and other stakeholders.

Suppliers may not use slave or involuntary labor of any kind, including prison labor, debt bondage or forced labor by governments. In addition, Suppliers may not engage in human trafficking or use corporal punishment, physical or psychological abuse, threats of violence or other forms of physical or mental coercion. Suppliers must comply with all applicable child labor laws, including hiring, wages, hours and working conditions.

Suppliers may not knowingly do business with any other supplier who engages in human rights abuses, including using forced labor or child labor. CRP expects its suppliers to comply with applicable laws, rules and regulations regarding basic human rights, including the use of forced and child labor.

## **3.0 Responsible Sourcing of Goods and Services Sustainability**

CRP will source responsibly and take steps to ensure that goods and services directly or indirectly related to our products do not provide funding to conflicts or human rights abuses. We expect the same from our Suppliers including compliance to all applicable laws and regulations regarding ethical sourcing.

### **3.1 Traceability**

Suppliers are required to make best efforts to have full knowledge of the origin of the products and services they supply, such as implementing a management system to identify and trace their sources. In addition, Suppliers are required to make best efforts to respond in a timely fashion to CRP information requests regarding the origin of products or services.

### **3.2 Best Practice Sourcing**

Suppliers are expected to adopt best practices not only limited to securing the supply of goods and services, but also addressing environmental, social, and safety concerns. To achieve this requirement, Suppliers need to define standardized criteria and processes to assess and evaluate their own suppliers as part of their selection of suppliers to ensure that quality standards as well as statutory and regulatory requirements are met.

### **3.3 Sourcing Policy**

CRP expects Suppliers to source responsibly. It is the Supplier's responsibility to ensure that materials provided to CRP and used in our products do not directly or indirectly contribute funding to conflicts or human rights abuses. CRP requires Suppliers to perform due diligence on the source and chain of custody of their raw materials in accordance with all applicable laws and other relevant guidance.

## 4.0 Health, Safety, and Environmental Sustainability

CRP strives to be among the industry leaders in sustainable health and safety, along with our respect of the environment (see **CRP HEALTH, SAFETY, AND ENVIRONMENTAL POLICY**).

### 4.1 Health, Safety, Environmental and Quality Regulations

Suppliers are expected to comply with environmental and material health compliance initiatives. Additionally, businesses should support a precautionary approach to environmental challenges; undertake initiatives to promote greater environmental responsibility; and encourage the development and diffusion of environmentally friendly technologies.

### 4.2 Occupational Health and Safety

Suppliers should provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, suppliers will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials (any material capable of posing a risk to health, safety, property, or the environment) should be available to the workforce. A safe and healthy working environment and, if applicable, a safe and healthy company living quarters. Facilities must be constructed in accordance with local laws and building, electrical and fire safety codes. Therefore, Suppliers are required to comply with the **CRP CONTRACTOR SAFETY PROGRAM**.

### 4.3 Emergency Preparedness

Suppliers should identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.

### 4.4 Security

Where applicable, Suppliers are encouraged to familiarize themselves with the standards of the C-TPAT Program. This is a voluntary program led by the US Customs and Border Protection focused on improving the security of supply chains for all goods imported into the US with respect to terrorism.

## 5.0 Implementation of Sustainability Standards

Suppliers and all their employees and permitted subcontractors must abide by the requirements of the SSP, including identifying risks within their supply chains and taking appropriate measures to address them.

## **6.0 Audit, Compliance, Monitoring and Reporting**

CRP reserves the right at any time(s), in its sole discretion, to repeal, replace, modify, or update all or any portion(s) of this policy, and further reserves the right at any reasonable time(s), in CRP sole discretion, to audit or to cause CRP's third-party consultants or advisors to audit [Seller's] compliance with such policy. [Seller] agrees to reasonably cooperate with CRP and its consultants and advisors in connection with any such audits that are conducted by or for CRP.

Supplier will comply with all applicable legal requirements and work to prevent incidents or conditions that might result in a violation of law.

Supplier are expected to monitor and report any actions related to sustainability to CRP on an annual basis.

## **7.0 Conflict Minerals**

All CRP Suppliers are required to respond to information requests from CRP regarding the uses and sources of conflict minerals (tin, tungsten, tantalum, and gold) in their products including information about minerals that are recycled or scrap.

To respond to CRP's information requests, Suppliers will need to make similar inquiries of their own suppliers to investigate the source of materials in their products, and to provide CRP the requested information based upon the results of such inquiries.

CRP may be required, and may require its Suppliers, to perform due diligence on the source and chain of custody of its conflict minerals. In addition, suppliers may be required to make certain representations/certifications with respect to the use of conflict minerals. Additional information will be provided at the time of any request for information by CRP.

CRP incorporates sustainable considerations in the procurement of goods and services that ultimately provide the avenue to manufacture aluminum rolled products. We will continue to ensure that our products can be distributed, used, and recycled or disposed in a manner that is sustainable to the environment, safe for our employees, customers, suppliers, carriers, and end users of the products.

## **8.0 Miscellaneous**

Suppliers are responsible for requesting copies of any other CRP policies and programs that are referred to in the SSP as to be adhered to or complied with by Suppliers, and for familiarizing themselves and their employees and permitted subcontractors with the terms and conditions of those other policies and programs.