COMMONWEALTH
Rolled Products

2024 SUSTAINABILITY REPORT

CONTENTS

01 MESSAGE FROM OUR CEO 4

02 ABOUT US 5
What Defines Us 7
Industries Served 8
Industry Association Memberships 8

03 SUSTAINABILITY STRATEGY & COVERNANCE 9
Our Material Topics 10
Sustainability Strategy 11
Sustainability Governance 13
Our Certifications and Commitments 15
Sustainability Quarterly Summit 16
CRP Sustainability Council 16

04 OPERATIONS EXCELLENCE 17
Operational Management 19
Our Products 21
Product Quality Checkpoints 24
Product Sustainability 25
Health and Safety 27

05 ENVIRONMENTAL STEWARDSHIP 34
Greenhouse Gas Management 36
Decarbonization Strategy 37
Feature Story: Cast House Modernization 38
Waste Management 39
Water Management 39

06 PEOPLE 41
Workforce Overview 42
Workforce Development 43
Diversity, Equity, and Inclusion (DEI) 46
Community Relations 48

07 GOVERNANCE & TRANSPARENCY 51
Corporate Governance 52
Supply Chain 54
About this report 55

08 SUSTAINABILITY DATA TABLE 56

01

MESSAGE FROM OUR CEO

At Commonwealth Rolled Products, we're proud to advance our sustainability journey by integrating our safety culture, environmental stewardship, operational excellence, and community well-being across our operations. As our business continues to grow, we remain equally committed to creating a positive impact beyond our operations by leveraging aluminum's unique potential and the strength of our partnerships to drive lasting change.

Some of our key sustainability highlights in 2024 include:

- Prioritizing the health and safety of our employees by fostering a strong safety culture and continuously improving our systems.
- Conducting a full Life Cycle Assessment (LCA) to identify opportunities across our value chain.
- Expanding our reporting of Scope 3 emissions and achieving a year-over-year reduction in key GHG intensity rates, as part of our long-term decarbonization pathway.
- Earning ASI Provisional Certification in 2024, with a clear compliance action plan in place to reach full certification in 2025.
- Collaborating with customers to develop scrap-friendly alloys that maintain stringent performance requirements while supporting circularity.
- Continuing to highlight aluminum's infinite recyclability as a material uniquely positioned to help society meet sustainability goals.
- Strengthening our internal capabilities through expanded analytical tools training, and process management education to build consistency and resilience across operations.

I'm proud of our team's achievements this past year and excited for the journey still to come. By aligning our growth with global sustainability goals, we are helping to build a stronger, more sustainable future for all.

Sincerely,

Mike Keown | CEO, Commonwealth Rolled Products

02
ABOUT US

What Defines Us

Industries Served

Industry Association Memberships

About Us

We are proud to lead the way in aluminum rolled product manufacturing, delivering top-tier solutions to industry-leading customers across diverse sectors such as automotive, industrial, and consumer goods. Our close collaboration with our customers allows us to tailor reliable and innovative rolled products that leverage aluminum's potential as a sustainable, lightweight material, while meeting critical criteria like durability and strength. This approach ensures we not only meet but exceed the expectations of our valued partners in various industries.

1,000 + EMPLOYEES

54 ACRES OF MANUFACTURING FLOOR

3 LOCATIONS

- Production facility in Lewisport, KY
  Largest Employer in Hancock County, KY
- Research and Development Center in Madison Heights, MI
- Sales Office in Independence, OH

Through our leadership role in the Hancock County LEPC, we help develop and implement emergency response plans that safeguard our employees, neighbors, and environment - demonstrating our deep commitment to community wellbeing (more details on our LEPC partnership can also be found in the Health and Safety section).

WHAT DEFINES US

Our Purpose

- Advance Aluminum's Unlimited Potential
- Deliver Creative Solutions to Meet and Exceed Customer Expectations
- Be the Mill of Choice

Our Vision

- Safety for Our People
- Value for Our Customers
- Growth for Our Future

Our Values

Our core values guide our actions and strategy. Our steadfast commitment to these values not only shapes our day-to-day work, but are also integral in our approach to sustainability. We are committed to aligning economic progress with social responsibility and environmental stewardship.

SAFETY | INTEGRITY | CUSTOMER FOCUS | OWNERSHIP | EXCELLENCE | TEAMWORK

Industries Served

We take pride in crafting our products tailored to match the precise specifications of our customers across a wide range of industries. From mobile devices and electric vehicles to household appliances and commercial transport, our products serve as critical components in everyday life and advanced technologies alike.

Aluminum is increasingly recognized as the sustainable material of choice by the U.S. Aluminum Association, and our portfolio helps advance sustainability in the metals sector while improving the performance, efficiency, and environmental profile of the customers we serve.

As we continue to broaden our reach, we are driving greater reach penetration into exposed-surface critical applications, such as marine structures, automotive fuel tanks, and other demanding environments, where material integrity, corrosion resistance, and long-term reliability are essential. These applications demonstrate not only the durability and versatility of our products but also their role in enabling safer, more sustainable solutions in challenging operating conditions.

INDUSTRY ASSOCIATION MEMBERSHIPS

The Aluminum Association

DRIVEALUMINUM

asi Aluminium Stewardship Initiative

Metals Service Center Institute 100 YEARS STRONG™

wim women in manufacturing®

Recycled Materials Association

AIAG Automotive Industry Action Group

03

SUSTAINABILITY STRATEGY & GOVERNANCE

Our Material Topics

Sustainability Strategy

Sustainability Governance

Our Certifications and Commitments

Sustainability Quarterly Summit

CRP Sustainability Council

SUSTAINABILITY STRATEGY & GOVERNANCE

Sustainability and environmental, social, and governance (ESG) considerations are increasingly taking center stage across all industries. These factors are integral to all of our stakeholders including employees, suppliers, customers and our shareholders as they shape our business and future. This report articulates our commitment to addressing the material sustainability topics which concern our business and how they inform our strategic direction and long-term sustainability goals.

Our Material Topics

In 2022, we enlisted the expertise of third-party consultants to conduct our first materiality assessment. Our goal was to gain a deeper understanding of the sustainability-related topics that are most relevant to our business and our stakeholders.

Similarly in early 2024, we worked closely with these consultants to conduct a deep-dive into the potential impact of such material topics. In this regard, we were able to produce a comprehensive materiality assessment to identify and prioritize the topics most relevant to our stakeholders and business operations at Commonwealth Rolled Products.

In order to best understand what matters most, we reviewed and gathered insights from:

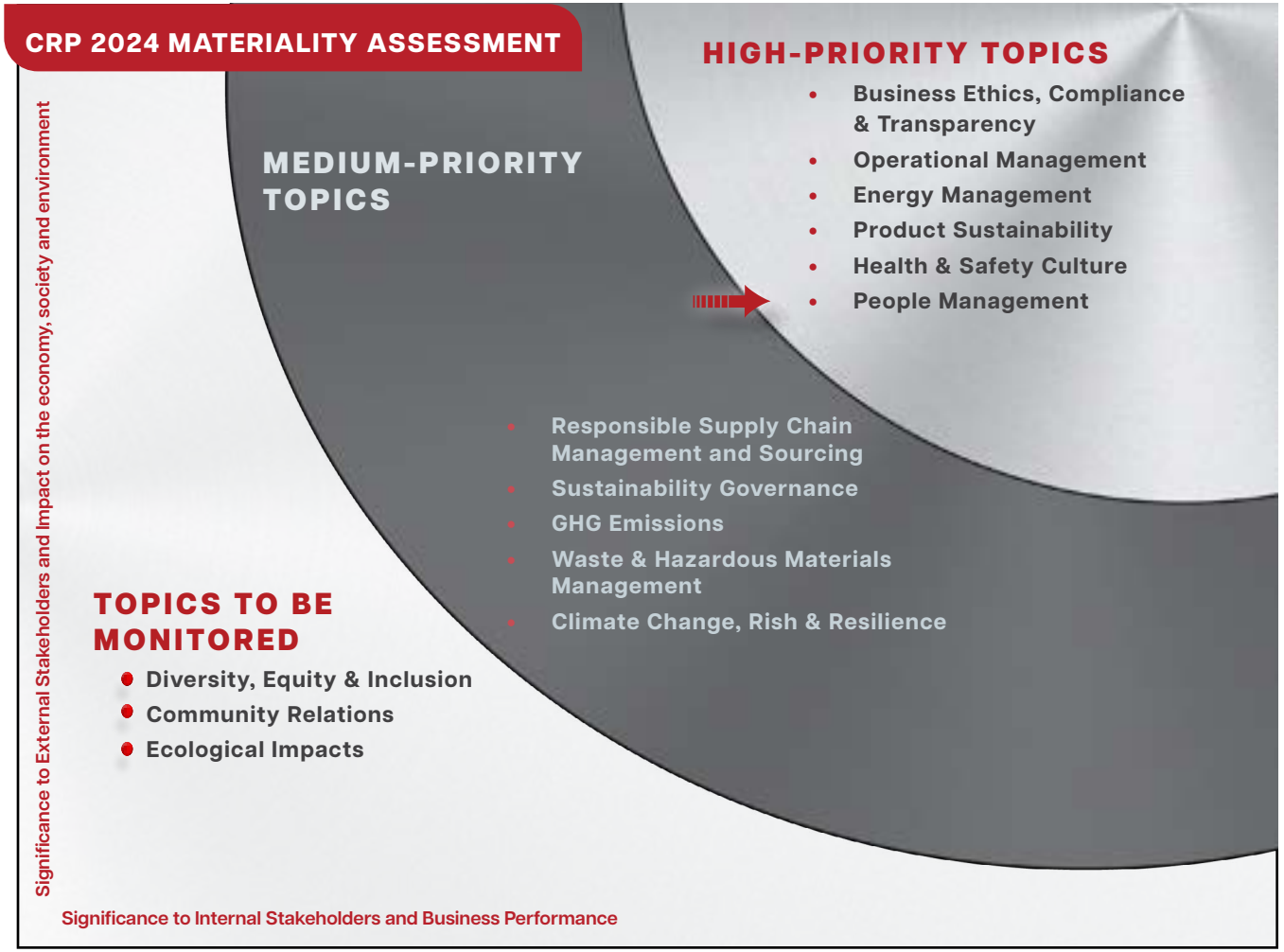
- **Aluminum Stewardship Initiative (ASI)**
- **Global Reporting Initiative (GRI) Standards**
- **Sustainability Accounting Standards Board (SASB) Framework**
- **Customer requests, targets, and surveys related to sustainability**
- **Benchmarking Insights**
- **Relevant insights from industry sources including EcoVadis, Carbon Disclosure Project (CDP), International Finance Corporation (IFC), and Environmental and Social Management System (ESMS)**

Furthermore, we conducted a workshop with the senior leadership aiming to facilitate discussions, identifying and assessing the significance of various sustainability issues, while considering both the impact on the business and stakeholder concerns. Lastly, we integrated key insights from internal stakeholder interviews to holistically capture the level of significance for each material issue relevant to CRP.

This process gave us an outlook on the challenges and opportunities affecting our business and spanning throughout our entire value chain. Through this exercise, we have prioritized the following material topics for Commonwealth Rolled Products, which will set the basis for our sustainability strategy (shown in the materiality matrix figure to the right).

Each of these material topics fall under four material strategy pillars, which guide our sustainability strategy. While we deem each of these topics relevant to CRP, we will be focusing on prioritizing and addressing the high-priority topics for our company as shown in the materiality matrix figure to the right.

Since the development of our materiality matrix in 2024, we have reviewed and identified some updated priorities, such as the increase in priority of our people management processes from medium to high (shown in the matrix). Additional information has been provided below in our sustainability strategy section.



Sustainability Strategy

At Commonwealth Rolled Products, we aim to lead the aluminum industry towards a more sustainable future by developing a strategy to holistically embed sustainability principles throughout our business and operations, in alignment with our customers' demands. By prioritizing sustainable practices and ethical governance, we aim to deliver long-term value for our stakeholders and contribute to the efforts of relevant industry associations supporting the global effort against climate change. Our sustainability strategy is focused on the four strategy pillars as shown by the figure on the next page.

SUSTAINABILITY STRATEGY PILLARS

OPERATIONAL EXCELLENCE

Operational excellence is at the core of our sustainability strategy and continuous improvement efforts. We uphold the highest standards in product quality, sustainability, and safety, demonstrating our commitment to delivering superior aluminum products while protecting the well-being of our employees and the environment. Building on this foundation, we are now advancing our focus to include metals management and process management initiatives that drive greater stability, efficiency, and resource optimization.

2024 COMMITMENTS

- Continuously provide comprehensive safety training for all employees to strengthen H&S culture
- Conduct Life Cycle Assessment and peer review in 2024
- Invest in technology and automation

2025 FORWARD-LOOKING COMMITMENTS

- Focus on process efficiency and improvement:
  - Metals management (scrap, dross, etc.)
  - Process management (stability, efficiencies, etc.)

ENVIRONMENTAL STEWARDSHIP

Our **environmental stewardship** commitments focus on minimizing our footprint through practices that improve energy efficiency, reduce waste, and lower greenhouse gas emissions. Our strategy emphasizes rigorous environmental standards, continuous improvement, and collaboration with stakeholders to drive positive change. We are dedicated to not only meeting but exceeding regulatory requirements and industry benchmarks, ensuring our operations contribute to a healthier planet for future generations.

2024 COMMITMENTS

- Carry out third party assurance of Scope 1 and 2 emissions in 2024
- Calculate Scope 3 emissions and conduct third party review in 2024
- Conduct initial decarbonization assessment in 2024
- Commit to GM ESG Partnership Pledge and environmental goals

2025 FORWARD-LOOKING COMMITMENTS

- Collaborate with customers on scrap-friendly alloys
- Partner with our power provider to transition to greener energy sources

PEOPLE

We invest in **our people** to foster strong community ties essential for long-term success and shared prosperity. Through training and career advancement, we build a workplace where employees feel valued, respected, and empowered. Furthermore, our community relations efforts extend our impact beyond our facilities, helping to shape a positive future for all. Looking ahead, we will place greater emphasis on training and education related to management processes, further strengthening workforce capability and performance.

2024 COMMITMENTS

- Focus on employee engagement and development resources
- Review and update hiring practices to continuously improve diversity and equal opportunity
- Continue current and support new programs within local community to foster positive relationships and address local concerns

2025 FORWARD-LOOKING COMMITMENTS

- Increase focus on managed processes, supported by enhanced training:
  - Process Manager Training
  - SPC Training
  - MiniTab Training
  - FMEA Training

GOVERNANCE & TRANSPARENCY

Governance and transparency are cornerstones of our sustainability framework, guiding our commitment to responsible business practices and ethical leadership. We ensure integrity across our operations and supply chain by fostering robust corporate governance and responsible sourcing practices. Our leadership initiatives underscore our dedication to accountability and openness, while transparency in disclosing our sustainability performance helps strengthen stakeholder trust, drive organizational resilience, and uphold our values as the Mill of Choice for our customers.

2024 COMMITMENTS

- Continuous improvement of data collection and transparent reporting using inaugural sustainability report to baseline
- Conduct regular third party audits against ASI standards where possible to assess compliance with ethical standards and regulatory requirements

2025 FORWARD-LOOKING COMMITMENTS

- Achieve ASI Full Certification
- Incorporate ASI requirements into the Quality Operating System

BOARD OF DIRECTORS

Oversees and advises on strategic ESG issues

SUSTAINABILITY SUMMIT

Comprised of:

- Executive Leadership Team (ELT)
- Our Board Members
- Sustainability Committee
- Director of Human Resources
- Director of Finance

Meets quarterly to align and coordinator strategic initiatives, provide status updates, and keep ELT apprised of emerging sustainability topics

SUSTAINABILITY COUNCIL

Comprised of:

- Marketing and Sales
- Quality Systems
- Health Safety and Environment
- Engineering
- Procurement
- Human Resources

Responsible for managing and driving sustainability initiatives across the company

CROSS-FUNCTIONAL SUBJECT MATTER EXPERTS

Provide support for implementing sustainability initiatives and providing respective data

Sustainability Governance

We have always prioritized resource efficiency and sustainable product development at Commonwealth Rolled Products. However, we recognize that there is always more to do. Driven by our dedication to pursuing excellence, we are continuously identifying ways to upscale our environmental, social, and governance efforts, including by formalizing processes and setting targets to embed sustainability deeper into our operations and across our value chain. Importantly, we are collaborating closely with customers who increasingly prioritize sustainability factors, aligning our initiatives with their sustainability ambitions.

In line with these efforts, we are pursuing certification through the Aluminum Stewardship Initiative (ASI), a leading global non-profit standard-setting and certification organization. This initiative aims to align us with industry best practices and demonstrate our commitment to responsible aluminum production.

To achieve ASI certification, we have undergone rigorous independent third-party audits against ASI Performance Standards to identify the gaps and opportunities relevant to our business and capabilities. We have outlined some of the key initiatives carried out below, showcasing the comprehensive efforts and steps taken to achieve (and maintain in the future) our ASI certification, highlighting our dedication to sustainability, transparency, and continuous improvement throughout our processes:

Completed

- Received ASI Provisional Certificate in November 2024
- Conducted comprehensive onsite readiness assessments and developed respective gap reports and improvement plans
- Completed a self-assessment in July through Avetta, achieving a "Leader" ranking
- Completed a biodiversity assessment in June 2023, identifying no risks or impacts
- Partnered with Avetta to enhance supplier management
- Established a comprehensive business resilience plan in July 2024
- Updated various internal processes to integrate sustainability considerations in capital projects
- For transparency, public disclosure of many of our environmental, social and sustainability policies per ASI Standards
- Completed formal ASI Audit in August 2024
- Performed a Life Cycle Assessment by contracting a 3rd party consultancy
- Contracted 3rd party consultancy to provide independent assurance of GHG calculations for annual disclosures
- Achieved customer established ESG targets; 11% reduction in scope 1 and 2 carbon emissions since baseline year 2019 and a reduction of 2.5% in scope 3 annually

Ongoing

- Surveillance audit planned for Q1 of 2025 to achieve ASI full certification
- On track to improve to next level on EcoVadis score in 2025
- Maintain frequent communication with our customers and suppliers to ensure transparency and compliance with their ESG requirements and goals - Ecovadis, CDP, GHG reporting, REACH, RoHS, CMRT, EMRT, etc.
- Regularly report significant information, data, and KPIs to our stakeholders, annually or as required
- Commit to frequent data collection and sustainability disclosure through our annual Sustainability Report
- Committed to close minor nonconforms in ASI, continue to improve recycled scrap content for all alloys, complete managed processes identified as priority ones, continue leadership level in LEPC and be change agent in community activities for ESG
- Review portfolio projects for GHG reductions

Our efforts showcase not only our commitment to achieving ASI certification but also our dedication to constantly improving our business practices to become the best we can be for our stakeholders, especially our customers.

Our Certifications and Commitments

At CRP, our certifications and memberships reflect our ongoing dedication to responsible business practices, sustainable operations, and continuous improvement. These efforts highlight our broader commitment to becoming the best we can be.

EcoVadis Sustainability Rating

In 2023, CRP earned recognition from EcoVadis with a Commitment Badge, reflecting measurable improvements in sustainability performance. This year we confirmed Bronze status, and we are actively pursuing initiatives in supply chain transparency, governance, and environmental management to reach Silver in 2025.

Aluminum Stewardship Initiative (ASI)

CRP became a member of the Aluminum Stewardship Initiative and achieved Provisional Certification in November 2024. This milestone affirms our alignment with ASI's environmental, social, and governance standards for the aluminum value chain. A surveillance audit in January 2025 will support our goal of achieving full certification. To embed this commitment, we are also working to integrate ASI requirements directly into our Quality Operating System.

London Metal Exchange (LME) Certified Brands

We prioritize LME Certified Brands, which comply with the Exchange's standards for responsible sourcing, human rights, health, and safety. This ensures our supply of primary metal avoids materials at risk of forced or child labor and supports industry-wide accountability. Additional due diligence is employed when smelters do not meet this high standard.

SNAPSHOT OF OUR PROGRESS

- **EcoVadis Commitment Badge Recognition** – Bronze 2024; *targeting Silver in 2025*
- **Member of the Aluminum Stewardship Initiative (ASI)**
- **ASI Provisional Certification** – November 2024; *surveillance audit scheduled January 2025 for full certification*
- **London Metal Exchange (LME) Certified Brands**
- **Green Circle Certified**
- **ISO 14001 Certified**

Sustainability Quarterly Summit

Every quarter, we convene our Sustainability (previously ESG) Summit to provide updates on strategic sustainability-related initiatives and performance as well as emerging sustainability trends and standards. These meetings are scheduled one week before board meetings in order for the Sustainability Committee to receive input from the leadership team on key sustainability developments and priorities that we anticipate bringing to the board. Notably, while we vary our Sustainability presentation to the board based on what the most relevant topics at the time are, we consistently report on relevant quarterly ESG KPIs and the progress on our long-term initiatives. The Committee also works closely with third-party specialists, who offer expertise and support as they seek to drive sustainability performance improvement.

CRP Sustainability Council

Our Sustainability Council is composed of a cross-functional team that meets bimonthly to discuss sustainability projects and opportunities, track incoming sustainability-related customer requests, and oversee the rollout and implementation of respective policies.

The sustainability council is made up of the following functions and team members:

Chief Operating Officer | Provides strategic oversight, ensuring all sustainability initiatives are fully integrated with operational goals and long-term business strategy.

Chief Metals Officer | Leads efforts in sustainable metal sourcing and recycling strategies, advancing circular economy principles and strengthening responsible material stewardship.

Chief Technical Officer | Champions innovation in product development and process improvements that minimize environmental impact and maximize material efficiency.

Quality Systems and ESG Specialist | Maintains quality operating systems and supports ESG reporting, analyzes key metrics, and ensures compliance with industry standards while supporting cross-functional initiatives to meet customer and regulatory expectations.

Director, HSE | Oversees environmental compliance and workplace safety, driving programs that reduce emissions, waste, and energy use while promoting a culture of safety. HSE Admin.

HSE Admin. Assistant | Supports data collection, reporting, and communication efforts related to environmental and safety programs.

Senior Environmental Engineer | Leads technical assessments of environmental performance, including air, water, and waste management, and identifies practical opportunities for continuous improvement.

Manager, Human Resources | Promotes employee engagement in sustainability programs and advances training and development initiatives that align with ESG priorities.

Director, Materials | Ensures responsible sourcing and drives inventory management practices that reduce waste and support sustainable supply chains.

Director, Technical | Drives technical excellence in manufacturing processes, supporting energy efficiency, product quality, and sustainable product innovations.

Senior Buyer | Evaluates supplier sustainability practices and champions procurement strategies that align with ESG standards and responsible sourcing.

Manager, Maintenance & Engineering | Implements energy-efficient technologies and maintenance practices that reduce resource consumption and extend equipment life.

Director, Account Management | Serves as the voice of the customer, ensuring sustainability commitments are embedded in customer relationships and reflect market expectations.

We also invite any ad hoc participants / members as needed or relevant to our discussions.

04

OPERATIONAL EXCELLENCE

Operational Management

Our Products

Product Quality Checkpoints

Product Sustainability

Health and Safety

OPERATIONAL EXCELLENCE

At Commonwealth Rolled Products, **Process Management is the cornerstone of our approach to Operational Excellence,** linking our Quality Operating System with our continuous improvement strategy. This section highlights our disciplined approach for driving performance across the processes that matter most to our business.

By embedding structured controls and data-driven decision-making, we ensure consistent product quality, promote sustainable practices, and drive innovation. Our commitment to sustainability is reflected in how we optimize resources, reduce waste, and enhance efficiency—delivering superior aluminum products while minimizing our environmental footprint.

Operational Management

At Commonwealth Rolled Products, our commitment to Operational Excellence is inseparable from our obligation to deliver high-quality products with the future in mind. Aluminum is essential to a more sustainable future, yet its production remains energy-intensive. This challenge drives us to continuously improve how we manage and execute our processes—seeking smarter, leaner, and more efficient ways to operate.

THROUGH DISCIPLINED PROCESS MANAGEMENT AND A CULTURE OF CONTINUOUS IMPROVEMENT, WE FOCUS ON ELIMINATING WASTE, OPTIMIZING RESOURCE USE, AND REDUCING VARIABILITY IN OUR OPERATIONS. THESE EFFORTS NOT ONLY ENHANCE PRODUCT QUALITY AND CONSISTENCY BUT ALSO SIGNIFICANTLY REDUCE OUR ENVIRONMENTAL FOOTPRINT.

Operational Management at CRP is inherently cross-functional. HR, EHS, Supply Chain, Operations, Maintenance, Materials Management, Procurement, and Finance each play a vital role in advancing ESG goals—through workforce training, emissions reduction, responsible sourcing, and transparent reporting.

Oversight comes from our Quality Steering Committee, chaired by the CEO and composed of leaders across the business. Meeting biweekly, the committee reviews strategic progress, drives cross-functional accountability, and ensures CRP sets new benchmarks for quality, safety, and sustainability in the aluminum industry.

Our Quality Operating System and Environmental Policies guide our actions and reinforce our dual commitment to customer satisfaction and environmental stewardship.

We are expanding this system with new policies on biodiversity and greenhouse gas emissions, further strengthening our role as a responsible and forward-thinking manufacturer.

To ensure consistent application, our policies are embedded in a structured management system aligned with:

- International Standards Organization: ISO 14001
- ANSI National Accreditation Board: ISO/IEC 17025
- International Automotive Taskforce: IATF 16949:2016

Key tools used in our operational excellence execution include:

- **Advanced Product Quality Planning (APQP):** Embedded into product and process development to ensure quality is built in from the start.
- **Control Plans and FMEAs:** Used to proactively identify and mitigate risks, thereby ensuring process stability and product reliability.
- **Visual Factory Management:** Key performance indicators, process flows, and procedural information are displayed prominently to support real-time awareness and accountability.
- **Leader Standard Work:** Structured routines and behaviors for leaders to reinforce expectations, monitor performance, and drive engagement.
- **Layered Process Audits (LPAs):** Regular, tiered audits conducted across all levels of the organization to verify compliance and drive continuous improvement.
- **Formal 8D Problem Solving:** A disciplined approach to root cause analysis and corrective action, ensuring sustainable resolution of issues.

Our Products

Our mission is to capture the limitless potential of aluminum. Compared to alternatives like steel and copper, aluminum excels due to a strong yet light composition, corrosion resistance, and formability. In addition to being an extremely versatile material, aluminum's recyclability is unmatched, delivering energy and cost savings across its entire lifecycle.

Our innovation center focuses on creating high-quality, sustainable solutions tailored to meet the evolving needs of our customers. Through disciplined process management, we ensure that every product meets the highest standards for quality, safety, and sustainability.

We offer products suited to a variety of industries:

AUTOMOTIVE

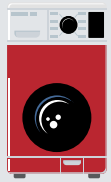
Lightweight solutions that integrate safety and sustainability into both design and manufacturing for major OEMs.

BUILDING AND CONSTRUCTION

Durable aluminum products engineered for use in commercial and residential structures.

COMMERCIAL TRANSPORTATION

Corrosion-resistant aluminum sheet products used in trucks, trailers, buses, recreational vehicles, rail cars, ships, and boats.



CONSUMER GOODS

Lightweight and formable solutions for mobile devices, computers, household appliances, RVs, and a variety of other durable products.

FACTS ABOUT ALUMINUM

INFINITE RECYCLABILITY

Aluminum can be recycled endlessly without any loss of quality, making it one of the world's most sustainable materials.

Nearly 75% of all aluminum ever produced is still in use today.

CARBON FOOTPRINT

Recycling aluminum produces only 5% of the greenhouse gas emissions compared to primary aluminum production.

VEHICLE LIGHTWEIGHTING

Every 100 kg of weight saved in a vehicle can reduce CO_2 emissions by up to 9 grams per kilometer.

GROWING DEMAND

Global demand for recycled aluminum is expected to double by 2050, driven by sustainability goals and regulatory pressures.

CLOSED-LOOP RECYCLING

Many manufacturers, including in the automotive sector, are implementing closed-loop systems where aluminum scrap is collected, recycled, and reused in new products—reducing waste and emissions.

WATER SAVINGS

Recycling aluminum also uses 95% less water than producing it from raw materials.

EV RANGE EXTENSION

Lightweight aluminum components help extend the range of electric vehicles by reducing energy consumption.

JOB CREATION

The aluminum recycling industry supports thousands of jobs and contributes significantly to circular economy.

Meeting and Exceeding Customer Expectations

Our products undergo comprehensive testing throughout the manufacturing process (e.g., chemical composition, surface texture, and dimensional consistency) to ensure they perform reliably in life-critical applications. Compliance includes:

- No substances prohibited by the **Global Automotive Declarable Substance List (GADSL)**
- Compliance with **California Proposition 65** labeling requirements
- Free of **Substances of Very High Concern (SVHC)** under **REACH**
- Conformance with the **Restriction of Hazardous Substances Directive (RoHS)** under EU directives 2011/65/EU

THIS DISCIPLINED FOCUS ON QUALITY AND COMPLIANCE HAS EARNED RECOGNITION FROM LEADING CUSTOMERS.

CUSTOMER AWARDS

In 2024, we were honored with the **Toyota Partnership Award and Toyota Quality Excellence Award** – recognition that reflects not only our dedication to product quality and operational excellence, but also the trust and long-term value we create for our customers.

We remain committed to building on this momentum, continuing to grow and earning recognition from our customers through innovation and excellence.

Product Quality Checkpoints

At Commonwealth Rolled Products, product quality is safeguarded through a layered Operational Excellence framework that cascades from the boardroom to the shop floor. This disciplined approach ensures processes are in control and capable, driving consistent performance in the life-critical applications our customers depend on.

Our system includes:

- **Monthly Board Reviews** – Oversight of process management and alignment with long-term quality and business objectives.
- **Monthly Quality Steering Committee (Executive Leadership Team)**– Status updates on quality performance and continuous improvement initiatives.
- **Monthly Department Reviews** – Process managers and leadership review input and output variables critical to product quality, recovery, and efficiency.
- **Daily Site-Level Reviews** – Tracking of key outputs such as recovery and customer rejects against plantwide targets.
- **Daily Process Manager Reviews** – Monitoring of key input variables that directly control outputs.
- **Daily Operator Audits** – Operators and skilled crafts perform audits tied to process control plans to ensure standards are consistently met.

This top-to-bottom alignment on quality objectives allows us to deliver products that meet stringent requirements, backed by rigorous testing throughout the manufacturing process (e.g., chemical composition, surface texture, width consistency, and dimensional accuracy).

OUR DISCIPLINED PROCESS MANAGEMENT AND COMMITMENT TO CONTINUOUS IMPROVEMENT HAVE REDUCED OUR CUSTOMER REJECTION RATE BY MORE THAN 55% SINCE 2019.

Product Sustainability

Aluminum is endlessly recyclable without any loss of quality, reducing the need for mining virgin resources and therefore minimizing its environmental impact. The lightweight nature of aluminum contributes to energy-efficient transportation and reduced carbon emissions. Moreover, its corrosion resistance and durability extend the useful life of products. Through leveraging innovative techniques and continuous improvement, we create products that help our customers meet their sustainability goals.

Maximizing Recycled Content and Reducing Waste

Conventional aluminum production involves bauxite extraction and refining which is very energy intensive. In contrast, recycling aluminum involves recovering scrap, melting it down, and reshaping it into new products without the need for mining new material. This recycling process can reduce energy consumption by over 90% compared to manufacturing aluminum from virgin materials.

For these reasons we aim to optimize the use of recycled content in our products. To read about our other energy efficiency measures, see page 11.

All our alloys are independently certified by GreenCircle, which has a rigorous evaluation process for ensuring the amount of recycled content in our products. We recycle scrap from our own facility as well as from other sources based in North America. We are focusing our efforts on increasing the amount of scrap that we purchase externally.

This past year we significantly increased the volume of scrap consumed in our process as certified by GreenCircle:

PRODUCT	RECYCLED CONTENT CERTIFIED BY GREENCIRCLE *for 2024 year-end total purchases (compared to 2023)*
3105 Aluminum Alloy	6% Increase
5052 Aluminum Alloy	19% Increase
3003 Aluminum Alloy	4% Increase
5849 Aluminum Alloy	1% Increase
6667 Aluminum Alloy	10% Increase
6659 Aluminum Alloy	1% decrease
6656 Aluminum Alloy	6% Increase
9207 Aluminum Alloy	4% Increase
9754 Aluminum Alloy	4% Increase

For more information on our recycling efforts, go to page 14.

ENHANCING SCRAP UTILIZATION AND RECYCLABILITY THROUGH INNOVATION

In 2024, we significantly advanced our scrap utilization strategy, aligning innovation with sustainability and operational efficiency. Building on prior alloy development efforts, we focused on optimizing the metal charge mix by increasing the proportion of in-plant and purchased scrap, reducing reliance on externally sourced prime and ingot. This shift directly contributes to lowering Scope 3 emissions.

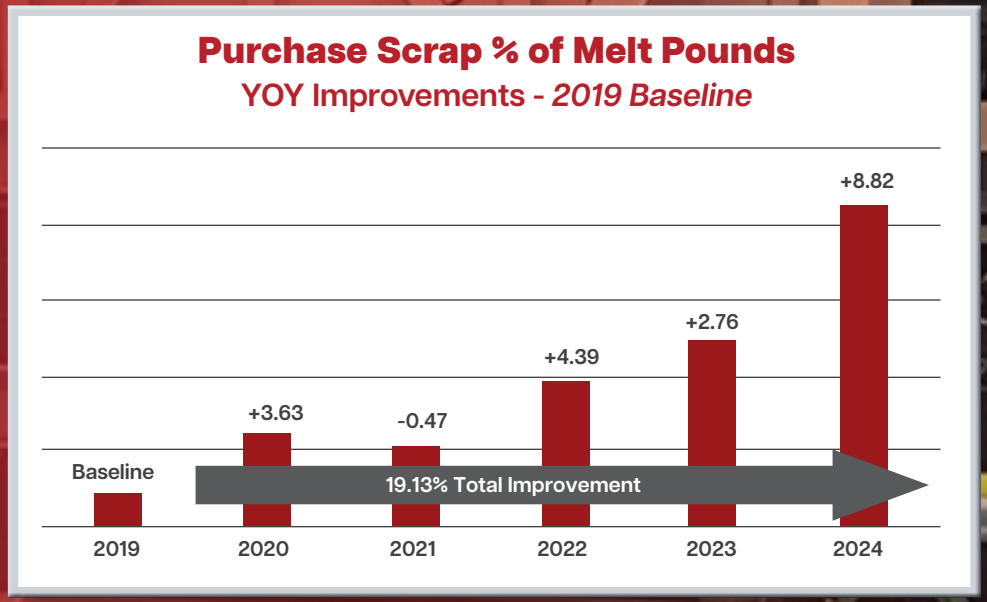
Key innovations included the commissioning of a new dry-hearth furnace, enabling the safe use of previously unchargeable scrap types. As a result:

- Purchased scrap usage increased, representing a 170% increase in scrap as a percentage of total charge.
- Dross segregation reached 100%, up from 96.4% in 2023, drastically reducing mixed scrap generation and scrap sales of off-chemistry material.
- Mixed scrap generation dropped to 0.025M lbs/month, down from 0.123M lbs/month in 2023.

These improvements were supported by internal scrap bin systems and alloy tagging, which enhanced traceability and chemistry control. Segregation efforts enabled more precise blending, reducing the need for prime inputs and improving overall recyclability.

Looking ahead, we are exploring the use of AI-driven optimization to further refine scrap blending strategies. This will allow us to adjust charge compositions based on real-time chemistry data, maximizing recovery and minimizing environmental impact.

These scrap-focused innovations not only reduce waste and emissions but also reinforce our commitment to circularity and long-term resilience in a rapidly evolving market.



Health and Safety

At Commonwealth Rolled Products, protecting the health and well-being of our employees, contractors, and communities is at the core of how we operate. Our Health, Safety, and Environmental (HS&E) Policy commits us to conducting all operations with integrity, ensuring compliance with applicable laws and regulations, and continuously improving our performance. Through strong leadership, employee involvement, and a shared responsibility for safe practices, we foster a culture where safety and accident prevention are a priority both on and off the job.

Environmental responsibility is equally embedded in our operations. We are dedicated to pollution prevention, the efficient use of energy and natural resources, and the implementation of management systems that drive compliance and ongoing performance improvements.

HS&E and security considerations are also integrated into our product stewardship, ensuring our products are manufactured, distributed, used, and ultimately recycled or disposed of in ways that protect people and the planet.

We strive to protect the health and well-being of each of our employees, our contractors, and our visitors. We firmly believe that safety is both a collective and personal responsibility. It is our expectation that each individual adheres to safe practices, not only to protect themselves but also to ensure the well-being of others.

Health, Safety & Environmental Policy Highlights

- Protect employees, contractors, and communities
- Leadership accountable for safe practices
- Prevent accidents through training and tools
- Conserve resources and reduce environmental impact
- Comply with laws and continuously improve
- Design and distribute products responsibly

15 SAFETY ELEMENTS

Safety Leadership

Employee Ownership

Safety Meetings - Committees

Hazard Recognition - Control

Mechanical Integrity

Engineering Review - Assessment

Safety Behavioral Observation

Industrial Health - Hygiene

Safety Training

Incidence Analysis - Review

Safety Standards - Procedures

Contractor Safety Program

Audits - Inspections

Housekeeping

Rewards - Recognition

12 SAFETY PRINCIPLES

All injuries and occupational illnesses can be prevented

Safety is everyone's responsibility

Working safely is a condition of employment for employees, and is a requirement for all contractors/visitors

Line management is directly accountable for preventing injuries and occupational illnesses

Training is an essential element for safe workplaces

I am the most critical element in the success of a safety and health program

Safety audits must be conducted, and appropriate corrective action implemented to timely address deficiencies

Safe work practices will be reinforced, and all unsafe acts and unsafe conditions must be corrected promptly

All injuries must be reported immediately

It is essential to report and investigate injuries, occupational illnesses and near misses

Safety off-the-job is an important element of the overall safety effort

We will demonstrate our unquestionable commitment to the safety of all employees, contractors and visitors

Our Central Safety Committee oversees our Health and Safety program and is led by the site management team, bargaining unit president and safety co-chair. They are responsible for:

- Promoting the value of safety.
- Creating and rolling out health and safety policies and procedures.
- Developing strategies for achieving the safety goals and objectives in our plantwide and department-specific safety excellence plans.
- Monitoring and reporting on key performance indicators.
- Establishing committees on an as-needed basis to address specific health and safety concerns.

All committee members must also be safety champions and exemplify best practices to promote our culture of safety throughout the organization.

SAFETY PERFORMANCE	2022	2023	2024
Total Recordable Incident Rate	.92	.90	.98
Lost Time Incident Rate	.38	.53	.46
Serious Incidents / Serious Near Misses Rate	1.07	.75	1.35
Near Miss Frequency Rate	19.10	21.24	18.78
First Aid Frequency Rate	11.89	12.99	14.95
Property Damage Frequency Rate	11.66	13.06	14.57
Observations	5,066	5,226	4,061
Near Miss Reporting	249	283	249

AT 0.98, OUR TRIR IS >60% LOWER THAN INDUSTRY AVERAGE FOR HEAVY INDUSTRIAL MANUFACTURING.

*U.S. BUREAU OF LABOR STATISTICS

To gain a comprehensive understanding of our safety performance, to identify potential risks, and to promote continuous improvement, we track both lagging and leading safety metrics.

Considering that safety is our core priority in the workplace, we monitor where our areas of improvement and opportunity are to consistently improve health standards and safety of our work environment.

More information on our safety observations, investigations and related training is provided in the following sections.

Safety Observations and Investigations

At Commonwealth Rolled Products, safety is a core value and complacency is never an option. We assess work and provide real-time feedback daily, with leaders, including our CEO, regularly visiting the floor to reinforce safe practices and identify potential risks before they escalate.

We take great pride in the safety culture we've built and even more in how our team lives it every day. All injuries and near misses, no matter how minor, must be reported immediately to a supervisor and the HSE team. Prompt reporting enables thorough investigations, root cause analysis, and corrective actions that help prevent recurrence. Guided by the belief that safety always comes before production, we empower every employee to speak up and take ownership, living by the mottos: "See Something, Say Something" and "Not On My Watch."

Beyond our own operations, we actively learn from others; when incidents occur at nearby facilities, our Director of Health, Safety, and Environment (HSE) visits to understand what went wrong and evaluate any relevance to our work. These insights are then integrated into our safety program to strengthen prevention.

Focus on Serious Injury or Fatality (SIF) Prevention

At Commonwealth Rolled Products, we have been progressively shifting our focus toward the proactive prevention of Serious Injuries and Fatalities (SIFs), defined as incidents or near misses with the potential to cause, or that result in, fatal or life-altering harm. Even during periods of strong safety performance, we recognize that SIF exposure must be continuously monitored and managed. This proactive approach targets the most critical workplace risks to help prevent devastating outcomes.

Each year, we set specific goals to reduce the number of SIFs across the organization, reinforcing our commitment to protecting every team member.

Every SIF event undergoes a comprehensive Cause Map analysis to uncover all contributing factors and develop effective, sustainable solutions to mitigate risk and prevent recurrence.

Our risk assessments follow a structured methodology that evaluates both severity and likelihood to determine an uncontrolled risk rating. We then apply preventative controls which are evaluated based on their effectiveness in reducing or eliminating risk, and these factors are used to calculate the controlled risk rating. This ensures that our mitigation strategies are prioritized, targeted, and effective.

This process is highly collaborative, engaging area leaders, safety representatives, and employees in identifying lessons learned and improvement opportunities. Final reviews and approvals are conducted by our executive leadership team, reinforcing our commitment to safety at every level.

Safety Trainings

We provide the appropriate equipment, tools, and training to empower our employees to perform their roles safely. Training is provided to all new employees as well as any visitors to ensure they are aware of the hazards throughout the facility and recognize the proper precautions that need to take place.

We aim to provide such training in order to enable our employees to be safer and improve as operators. Employee safety is an integral part of employee satisfaction as well and increases productivity, engagement and long-standing relationships with employees and the community.

All workers enter a robust training process before they are allowed to conduct work at our locations. On a monthly basis, we highlight a safety topic to ensure the lessons from our trainings stay fresh in everyone's mind. Additionally, we kick off every meeting with a safety contact to reinforce safety as an integral part of our company culture.

Partnering with Local College for Contractor Safety Program

Since 2017, Commonwealth Rolled Products (CRP) has partnered with Owensboro Community and Technical College (OCTC) to deliver a comprehensive Contractor Safety Training (CST) program. Completion of CST is required for all contractors working on our site, ensuring safety is prioritized before work begins and that CRP's environmental, health, and safety standards are consistently met. Training must be renewed every two years, and since its launch, more than 7,000 contractors have successfully completed the program.

This collaboration not only provides contractors with industry-leading instruction aligned with CRP's rigorous standards, but also strengthens community ties by supporting local education. To date, the program has generated more than $1 million in revenue for OCTC, helping to fund workforce development initiatives and broaden the college's impact.

New Safety Emergency Alert Siren

Installed in early 2024 as part of a county-wide upgrade, the new safety alert siren—jointly funded by Commonwealth Rolled Products (CRP) and the Hancock County Fiscal Court with support from state grants—marks a significant enhancement in emergency preparedness for the region. Now one of 15 sirens across Hancock County, it is directly connected to County Dispatch, enabling real-time activation during severe weather events. The siren is programmed to activate for three minutes when the National Weather Service issues a Severe Thunderstorm Warning or Tornado Warning for the area. With an audible range of over two miles, it serves not only the CRP plant but also the surrounding community, helping ensure outdoor individuals are alerted to seek shelter immediately.

While the siren is a powerful outdoor alert system, it's important to note that it is not designed to be heard inside buildings or homes. Some areas within the plant may not hear the siren clearly, which is why CRP has additional safety protocols in place. During a warning, Security will make announcements over the intercom system, directing employees to take shelter in one of the plant's dozen-plus designated muster points, each equipped with tornado shelters. These shelters allow workers to take cover quickly and safely without disrupting critical operations. Weekly siren tests are conducted every Friday at noon, lasting 30–60 seconds, ensuring the system remains fully operational and ready to respond when needed.

Partnering for Community Safety: Local Emergency Planning Committee

In addition to our internal governance, CRP is an active participant in the Hancock County Local Emergency Planning Committee (LEPC), created under the Emergency Planning and Community Right-to-Know Act (EPCRA). LEPCs were established by Congress to ensure transparency, preparedness, and cooperation between facilities that handle hazardous materials and the communities where they operate.

The Hancock County LEPC brings together emergency responders, industry, government, education, healthcare, and community representatives to develop coordinated emergency response plans, conduct training, run scenario planning exercises, and provide public right-to-know outreach. CRP's involvement ensures that our operations remain aligned with county-wide preparedness strategies and that we actively contribute to protecting both our employees and our neighbors. Through the LEPC, CRP also identifies and maintains systematic engagement with affected populations (if any), enabling their participation in identifying risks, shaping preparedness plans, and contributing to decision-making related to community safety. We are proud to uplift community voices through this engagement and ensure any concerns are heard, addressed, and integrated into broader grievance and response processes.

As part of its mission, the LEPC develops detailed emergency response plans that identify and address potential risks from hazardous or chemical materials in the community. These plans include:

- **SHELTER-IN-PLACE OR EVACUATION PROCEDURES**
  to protect residents in the event of a release.
- **FACILITY RESPONSE POINTS AND EMERGENCY CONTACTS**
  for rapid coordination with first responders.
- **TRAINING, DRILLS, AND SCENARIO PLANNING EXERCISES**
  to prepare for a range of potential incidents.
- **PUBLIC RIGHT-TO-KNOW OUTREACH,**
  giving community members access to important safety information.

By collaborating through the LEPC, CRP extends its culture of safety beyond the plant floor, reinforces regional preparedness, and helps build trust and resilience across the Hancock County community.

05

ENVIRONMENTAL STEWARDSHIP

Greenhouse Gas Management

Decarbonization Strategy

Feature Story: Cast House Modernization

Waste Management

Water Management

ENVIRONMENTAL STEWARDSHIP

In this section of our report, we affirm our commitment to environmental stewardship by showcasing the progress we've made and the actions we're taking to reduce our environmental footprint. Our initiatives span greenhouse gas (GHG) reduction, energy efficiency, waste and water management, and sustainable sourcing—each aligned with our long-term decarbonization strategy.

As our customers intensify their climate commitments, we continue to serve as a strategic partner in helping them meet their goals. Aluminum's durability and lightweight nature make it a climate-favorable material over its lifecycle. Yet, its energy-intensive production process presents opportunities for improvement. That's why we've set ambitious climate targets and are actively implementing measures to make the aluminum value chain cleaner and more efficient.

Since our 2019 baseline, we've significantly reduced our GHG intensity and improved operational efficiency. In 2024, we expanded scrap utilization, installed a new dry hearth melter, and launched an oil-water separator project—each contributing to lower Scope 3 emissions. We also achieved ASI certification and completed M2030 reporting updates, reinforcing our commitment to transparency and continuous improvement. These efforts, combined with our focus on renewable energy and process optimization, position us to meet our 2030 goal of a 40% reduction in Scope 1 and 2 emissions and ultimately reach carbon neutrality by 2038.

As a result of our efforts so far, we have had significant success in improving our greenhouse gas (GHG) intensity since our 2019 baseline. We expect this figure to fall even further as we continue to implement new efficiency initiatives and optimize production levels.

Greenhouse Gas Management

The reported GHG emissions are limited to the Lewisport facility, which is the material facility for Commonwealth's GHG inventory. Please refer to the Basis of Reporting for GHG Inventory table on pages 62-65 for more information. We obtained third party limited assurance from ERM CVS of our 2024 Total Energy, Total Scope 1, Total Scope 2 (location-based) and Total Scope 3 GHG emissions. The reported Scope 3 emissions consist of the following categories: 1, 2, 3, 4, 5, 6, 7, 9, 10 and 12. This demonstrates our commitment to transparency and accountability in climate reporting. Please refer to the assurance letter on page 66 for additional details.

Scope 1 GHG emissions: 197,409 MT CO2e
Scope 2 GHG emissions (location-based): 95,730 MT CO2e
Total: 293,139 MT CO2e

YEAR	Scope 1 and 2 Emissions (1000s MT CO2e)	% Change from Baseline	GHG Intensity (MT CO2e/MT Aluminum)	% Change from Baseline
2019 (Baseline)	262	-	1.45	-
2020	248	-5.3%	1.4	-3.4%
2021	268	2.3%	1.19	-17.9%
2022	278	6.1%	1.11	-23.4%
2023	274	4.6	1.26	-13.1
2024	293	11.8	1.29	-11.0

YEAR	Scope 3 Emissions (1000s MT CO2e)	GHG Intensity (MT CO2e/MT Aluminum)
2024 (Baseline)	1,570,447	6.92

Reported Scope 3 emissions include Category 1, Category 2, Category 3, Category 4, Category 5, Category 6, Category 7, Category 9, Category 10 and Category 12 which were deemed material for CRP.

The board of directors is apprised of our progress towards these targets on a quarterly basis. The following strategy will help us achieve our climate goals:

1 IMPLEMENT ENERGY ABATEMENT PROJECTS

Third-party experts helped us identify several efficiency measures that will allow us to reduce emissions related to energy consumption. These range from lighting and HVAC upgrades to machinery retrofits and process redesigns.

2 ASSESS RENEWABLE ENERGY OPTIONS

Once we have implemented efficiency projects, we will evaluate renewable energy procurement (including the potential purchase of renewable energy credits) to address our Scope 2 emissions.

3 OFFSET REMAINING EMISSIONS

As a last measure, we will assess purchasing high-quality carbon credits to mitigate our most difficult to abate emissions.

Decarbonization Strategy

Recognizing the importance of decarbonization for sustainability within our industry, we have started to undergo efforts that will help us better understand our potential for decarbonization. Some of these efforts include an initial decarbonization assessment with an Life Cycle Assessment (LCA) on our production process, products and value chain. Additionally, we aim to continuously discuss these efforts amongst our management and senior leadership teams to establish the importance of the topic in decision-making processes.

We have made a commitment to ourselves and our customers through the GM ESG Partnership pledge to reach carbon neutrality for Scope 1 and 2 emissions by 2038. Furthermore, we have set the goal of achieving a 40% reduction from the 2019 baseline by 2030. Our goals are a significant driver to our business and vision of being the “Mill of Choice” for our customers.

To accelerate progress toward our climate goals, we launched a series of targeted GHG reduction projects focused on material efficiency, process optimization, and emissions abatement across our operations.

GHG Project – Utilize More Scrap in Charge

We increased the proportion of scrap in our production charge, reducing reliance on prime aluminum and externally sourced ingot. This shift directly lowers Scope 3 emissions and enhances material circularity across our operations.

GHG Project – Casting Improvements

Installation of a new dry hearth melter enabled the use of more diverse scrap types, previously unsuitable for charging. This contributed to a 170% year-over-year increase in scrap usage and a significant reduction in purchased ingot, driving down Scope 3 emissions.

GHG Project – Mixed Scrap Reduction

Through improved segregation of plant scrap and dross, we achieved 100% separation in 2024—up from just 24% in 2022. This initiative increased the share of known-chemistry scrap in our charge, reducing the need for prime inputs and enhancing recycling efficiency.

GHG Project – Quality & Recovery Improvements

We implemented over 30 targeted projects to improve first-pass quality and material recovery, reducing restarts and reworks. These efforts, supported by process management tools, led to a 5.6% improvement in recovery rates and further reduced energy and material waste.

These decarbonization projects have not only reduced emissions operationally but also translated into measurable product-level improvements. In 2024, we updated our 2023 LCA, which showed an average 22% reduction in product carbon impact. This progress was largely driven by the same initiatives outlined above: sourcing lower-GHG prime aluminum, increasing scrap utilization, and reducing external ingot procurement in favor of internal casting. While the shift to greater internal cast house use led to a modest increase in energy-related emissions, its overall effect on product footprint was limited. The LCA reaffirmed that raw material composition remains the dominant factor in determining a product’s carbon intensity, validating our strategic focus on material efficiency and circularity.

CAST HOUSE MODERNIZATION

In line with our goals to reduce our carbon footprint through facility improvements, we are undertaking the modernization of our cast house facilities. After considering several options, we decided that the best path forward would be to systematically upgrade existing key assets such as pits, holders, and melters as production permits. The project will also address replacement of key infrastructure such as electrical, process gases and data systems.

This approach allows us to carry out the process with the lowest capital expenditure and the fastest project completion and payback timeline. We began construction activities in the second quarter of 2022 and have progressed throughout 2023 to upgrade the first casting asset. We completed majority of this work by the end of 2024.

The modernization initiative aims to increase the plant's capacity and capability, reducing dependency on external ingot supply, maximizing recycled scrap content in the ingot, and reducing Scope 3 emissions tied to transportation.

Furthermore, this project has enabled significant sustainability-related improvements, including but not limited to the following:

- **Safety and Operational Efficiency:**
  - Automation of the start of cast and charging of scrap
  - Implementing automated tappers to further boost safety and operational efficiency
  - Reducing dependence on third-party purchased ingot
  - Required all contractors to attend a specialized Health & Safety training course developed with the local community college, resulting in zero recordables for the project and generating a revenue stream for the college
  - Effective collaboration with the union, management, and equipment suppliers to positively impact workplace design considering ergonomics, health and safety, maintainability, and efficiency

- **Energy Efficiency:**
  - Using regenerative burners and upgrading lighting and HVAC systems to reduce energy consumption
  - Implementing advanced fire suppression systems with zero ozone depletion potential and meet the requirements of registration under Significant New Alternatives Policy (SNAP).
  - Incorporating Best Available Control Technology (BACT) to minimize the impact of natural gas and electricity consumption while maximizing emissions capture
  - Utilization of design software to select equipment and fixtures exceeding Building Code requirements for energy efficiency

- **Technological and Capacity Enhancements:**
  - Enabling the casting of wide ingots and supporting the production of specific alloys
  - Installing a best in class melter capable of handling different classifications of scrap that weren't achievable before.
  - Upgrading outdated technology to improve operational efficiency and production capacity
  - Developing standardized work practices and associated training through collaboration with key stakeholders

- **Community and Environmental Impact:**
  - Utilization of local installation contractors for virtually all on-site work, positively impacting the financial health of the community
  - Vetting of all suppliers to ensure adherence to the Commonwealth Supplier Code of Business Conduct and Ethics Policy, as well as the Supplier Sustainability Policy
  - Ensuring the project did not result in any biodiversity impacts

We continue to conduct comprehensive training for our team, increasing awareness of the new capabilities of the cast houses and how to safely use them. Training includes instruction for operators, supervisors, and maintenance personnel on new melting technology and processes, as well as new ingot handling technology and casting pit technology.

Upon completion, this project will increase operational efficiency, reduce our environmental footprint where possible, and meet production demands in a safe and sustainable manner.

Waste Management

Waste management is a critical aspect of operations, as it directly impacts both environmental sustainability and production efficiency. Waste encompasses various byproducts, such as scrap metal and hazardous materials generated throughout the production process. Effectively addressing and minimizing waste is not only essential for complying with environmental regulations but also for optimizing resource utilization and reducing operational costs.

WE RECYCLE 100% OF OUR PRODUCTION / PROCESS SCRAP

As our products make their way through the production line, some fall short of our high-quality standards or parts get damaged. Those are trimmed off and put back into our furnace to melt down and become part of the next batch of rolled products. While we seek to minimize this as much as possible, 100% of our internal scrap is recycled back into our products.

Recycling scrap allows us to conserve valuable natural resources. It reduces the need for mining and refining ores, decreases energy consumption, and lowers greenhouse gas emissions associated with metal production.

Additionally, recycling metal helps mitigate the environmental impact of metal extraction and minimizes the amount of metal waste that ends up in landfills.

For more information on the recycled content of our products, turn to page 26.

While hazardous waste comprises a fraction of our total waste, it is critical to manage it responsibly to prevent pollution and safety incidents. We have a Hazardous Waste Labeling and Contingency Plan and Communication plan in place to ensure our employees are well-informed of proper labeling, storage, and handling procedures.

8,256 MT
TOTAL MANUFACTURING WASTE

0.04%
HAZARDOUS

99.96%
NONHAZARDOUS

Water Management

Water management plays a pivotal role in our operations. From cooling and lubrication to cleaning and chemical reactions, water is a critical resource. Effective water management strategies are essential not only for maintaining production efficiency but also for mitigating environmental impact, ensuring compliance with regulations, and promoting sustainable practices.

We are fortunate to be in a region without water stress, ensuring a reliable supply for our growing operations. To minimize adverse impacts from our wastewater, we assess the conditions and resiliency of infrastructure and storage. We also have plans and procedures in place for chemical accident prevention, preparedness, and response.

TOTAL WATER WITHDRAWAL
14,640 MEGALITERS

100% SOURCED FROM GROUNDWATER WELLS

ONSITE WATER TREATMENT & OIL SEPARATION

Understanding the impact of water treatment and the associated logistics, at CRP we have begun an on-site water treatment project supported by 3rd party experts for the separation of oil and water. This project is particularly crucial for our aluminum rolling facility, where significant amounts of water are used in cooling and lubrication processes, resulting in complex wastewater streams containing oil and other contaminants.

Historically, we have outsourced the treatment of this wastewater, leading to increased costs, dependence on external providers, and a substantial number of trucks transporting the wastewater to off-site treatment facilities. This method not only raised our operational expenses but also contributed to higher emissions from transportation.

To reduce transportation-related emissions and improve water management efficiency, we implemented an on-site oil-water separation system at our CRS facility. This initiative has already reduced the number of used oil pickups from 270 to just 60 annually—cutting emissions by approximately 157 metric tons of CO_2 each year. By eliminating the need for frequent truck transport (each averaging ~170 miles per trip), we've significantly lowered our Scope 3 emissions. In addition to emissions reductions, the system enhances our control over water quality and treatment processes, improves compliance with environmental regulations, and supports more sustainable resource recovery.

06
PEOPLE

Workforce Overview

Workforce Development

Diversity, Equity, and Inclusion (DEI)

Community Relations

PEOPLE

This section reflects our belief that investing in our people and fostering strong community ties are integral to our long-term success and shared prosperity. We provide an overview of our workforce composition, highlighting our commitment to workforce development through training and career advancement opportunities. Additionally, we delve into our initiatives promoting diversity, equity, and inclusion (DEI), aiming to create a workplace where every individual feels valued and empowered. We also showcase our community relations efforts, underscoring our commitment to making a positive impact beyond our facilities.

Workforce Overview

We are proud to have our salaried employees work side-by-side with union members represented by the United Steelworkers of the AFL-CIO, who represent 69% of our workforce and play a valuable role in contributing to our shared success.

BENEFITS

The core benefits we offer our employees include:

PAID TIME OFF

HEALTH & DENTAL COVERAGE

WELLNESS PROGRAM

401(K) CONTRIBUTIONS

REIMBURSEMENT FOR EDUCATION EXPENSES

Workforce Development

The importance of employee satisfaction and workforce development cannot be overstated. Both are intrinsically linked to the overall success and longevity of our company. Ensuring our employees are engaged helps contribute to a safe, positive workplace culture and fosters innovation.

We strive to give our employees the tools and resources they need to succeed in their role while also building on the skills and knowledge needed to adapt to a rapidly changing business landscape and to grow their careers.

Furthermore, we have a history of trusting our employees in new positions and responsibilities rather than holding them back.

Nurturing Leadership Talent

We endeavor to identify high-potential employees and support their development on the job, identifying and nurturing CRP's next generation of leaders, which is an integral part of preparing our company for the future. Development opportunities include on-the-job training, developmental assignments, formal training programs, attaining postsecondary education, as well as in-house courses and seminars.

TPP Talent Planning Process

CRP has set forth a comprehensive talent planning process involving strategic workforce planning to assess current and future talent needs aligned with business objectives. Through this process CRP is able to outline the roles, functions and future aspirations of each employee. This program enables the HR team to better understand employees' interests and help them plan for their future potentially through certifications, training and educational planning. Furthermore, through this process we are able to identify recruitment needs and set forth a plan to attract talent.

By upskilling and promoting our employee's growth, we are also able to give back to the community, which is made up of many of our employees and ensure higher quality of life for CRP employees' families.

Industrial Maintenance Apprenticeship Program

In 2024, we proudly launched a three-year Industrial Maintenance Apprenticeship Program in partnership with Ivy Tech Community College in Tell City and Evansville. This initiative is designed to build a pipeline of skilled talent while offering meaningful growth opportunities to current employees.

Each year, three employees are nominated based on seniority after bidding on an apprenticeship position. The first two years follow a hybrid model that combines classroom learning with hands-on training onsite at our plant, with tuition fully covered by the company. Participants earn a two-year certificate in industrial maintenance, specializing in either electrical or mechanical maintenance. In the third year, participants transition into full-time on-the-job training in their selected craft.

The program reflects our commitment to developing an engaged, empowered workforce while meeting the rising demand for technical talent in our operations. As Ivy Tech Chancellor Daniela Vidal stated, "They're investing in their career growth, in their education. It also helps provide employees with the opportunity to grow in the skills that are needed to perform their duties within those companies."

By offering employees the ability to immediately apply classroom lessons in real-world industrial settings, we are equipping them with the skills needed to succeed today and lead tomorrow.

SUCCESSFUL CAREERS AT COMMONWEALTH:

JAMES FERRY

James Ferry's path to leadership at Commonwealth Rolled Products is a testament to perseverance, continuous learning, and deep community roots. Starting his career in 1998 as a Leveler Helper, James steadily advanced through a variety of roles—from Slitter Setup Operator to Paintline Inspector, and eventually into Human Resources leadership.

Driven to grow professionally, James decided to pursue higher education while also working full-time. He completed a maintenance apprenticeship and earned both an associate's degree in business and a bachelor's degree in human resources from Brescia University. But his commitment didn't end there and in 2019 he also acquired his PHR certification.

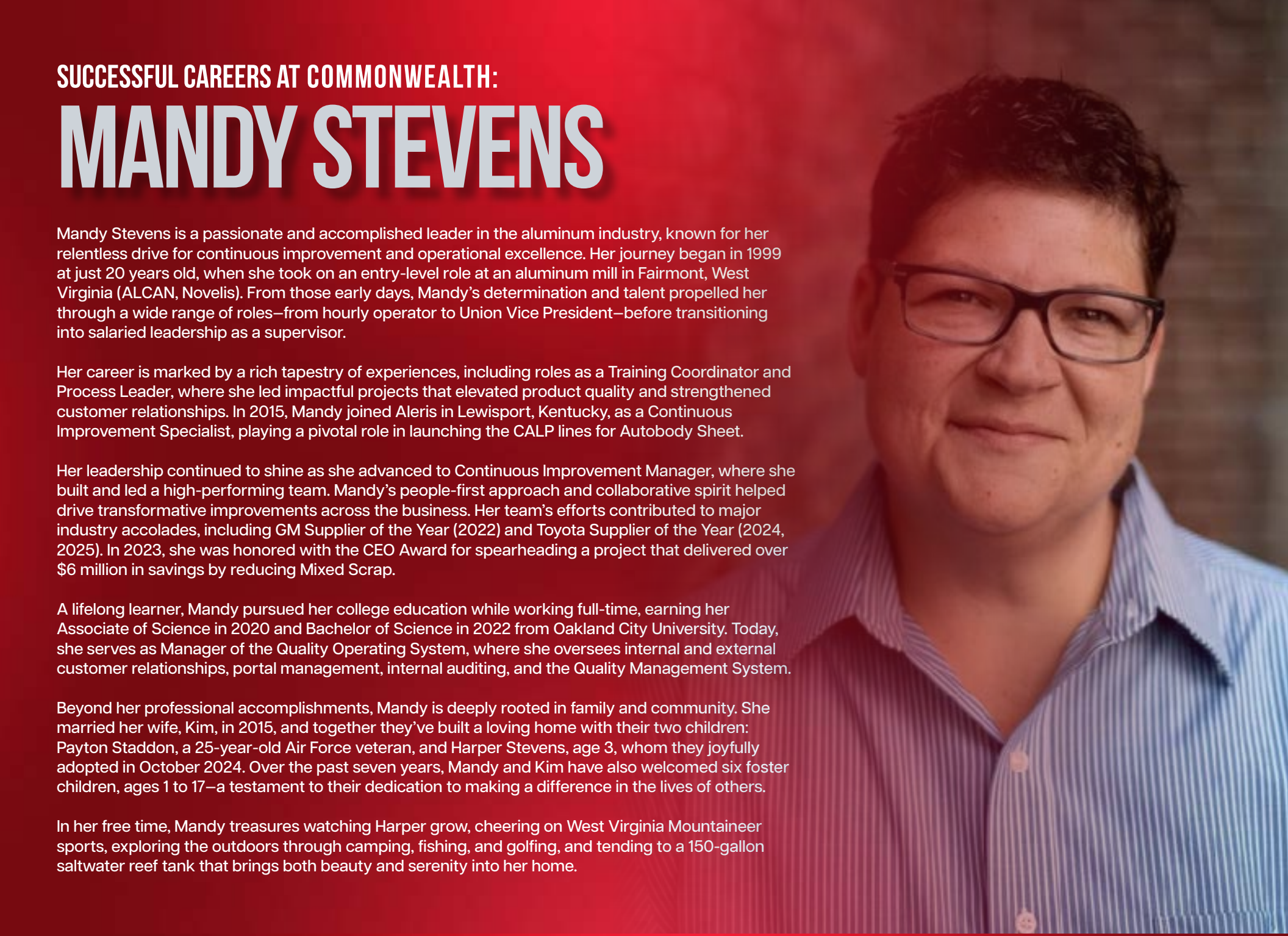
Over the years, James has held several key HR roles, including Payroll Coordinator, HR Generalist, Labor Relations Manager, and currently serves as HR Manager overseeing ABS and Finishing. His journey reflects CRP's culture of investing in employee growth and promotion from within.

James's connection to CRP runs deep—his father retired as a mechanic from the company, and his brother currently works in Cold Rolling. He's also a passionate community member, having coached youth sports and volunteered with Junior Achievement.

His story exemplifies CRP's commitment to building a workplace where employees can thrive, contribute meaningfully, and remain connected to the communities they serve.

SUCCESSFUL CAREERS AT COMMONWEALTH:

MANDY STEVENS



Mandy Stevens is a passionate and accomplished leader in the aluminum industry, known for her relentless drive for continuous improvement and operational excellence. Her journey began in 1999 at just 20 years old, when she took on an entry-level role at an aluminum mill in Fairmont, West Virginia (ALCAN, Novelis). From those early days, Mandy's determination and talent propelled her through a wide range of roles—from hourly operator to Union Vice President—before transitioning into salaried leadership as a supervisor.

Her career is marked by a rich tapestry of experiences, including roles as a Training Coordinator and Process Leader, where she led impactful projects that elevated product quality and strengthened customer relationships. In 2015, Mandy joined Aleris in Lewisport, Kentucky, as a Continuous Improvement Specialist, playing a pivotal role in launching the CALP lines for Autobody Sheet.

Her leadership continued to shine as she advanced to Continuous Improvement Manager, where she built and led a high-performing team. Mandy's people-first approach and collaborative spirit helped drive transformative improvements across the business. Her team's efforts contributed to major industry accolades, including GM Supplier of the Year (2022) and Toyota Supplier of the Year (2024, 2025). In 2023, she was honored with the CEO Award for spearheading a project that delivered over $6 million in savings by reducing Mixed Scrap.

A lifelong learner, Mandy pursued her college education while working full-time, earning her Associate of Science in 2020 and Bachelor of Science in 2022 from Oakland City University. Today, she serves as Manager of the Quality Operating System, where she oversees internal and external customer relationships, portal management, internal auditing, and the Quality Management System.

Beyond her professional accomplishments, Mandy is deeply rooted in family and community. She married her wife, Kim, in 2015, and together they've built a loving home with their two children: Payton Staddon, a 25-year-old Air Force veteran, and Harper Stevens, age 3, whom they joyfully adopted in October 2024. Over the past seven years, Mandy and Kim have also welcomed six foster children, ages 1 to 17—a testament to their dedication to making a difference in the lives of others.

In her free time, Mandy treasures watching Harper grow, cheering on West Virginia Mountaineer sports, exploring the outdoors through camping, fishing, and golfing, and tending to a 150-gallon saltwater reef tank that brings both beauty and serenity into her home.

Diversity, Equity, and Inclusion (DEI)

At Commonwealth Rolled Products, we continue to work towards ensuring that our organization is reflective of the communities we serve and provides equitable treatment for all employees. Cultivating a culture of inclusion and a diverse workforce isn't merely a moral imperative; it also drives innovation, strengthens employee engagement, and expands our talent pool.

We recognize that this goal requires continual commitment over the long- term, and is particularly challenging in an industry that remains predominantly male. Nevertheless, we are making measurable progress by tracking our diversity metrics, promoting DEI principles, and joining relevant associations (our involvement with "Women in Manufacturing" highlighted on pg. 47), among other initiatives.

We champion equal employment opportunities. It is our policy to recruit, hire, and train employees regardless of race, national origin, sex, gender identity, sexual orientation, religion, age, disability, military service, or any other characteristic protected by law. Furthermore, maintain a workplace free from harassment in any form, and all employees are encouraged to report incidents of misconduct, discrimination, harassment, or retaliation to their supervisor, Human Resources, or through our 24/7 third-party hotline.

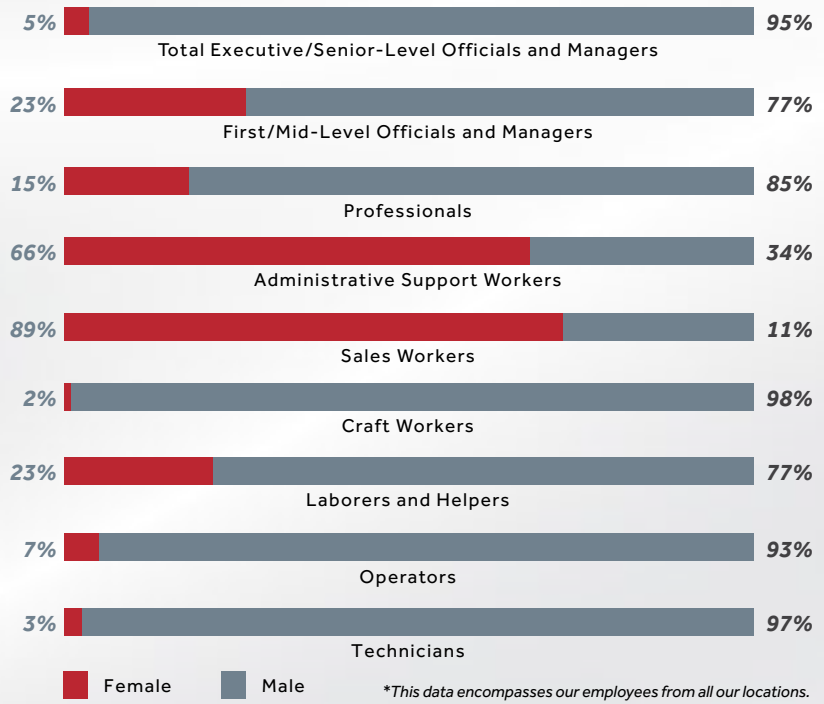
Whistleblowers are protected from any form of retaliation. Reports of policy violations are investigated by our Civil Rights Committee, comprising both union and salaried representatives, whose findings and recommendations are reviewed by the Human Resources Director to determine appropriate corrective action.

Gender Responsiveness Policy

CRP is committed to fostering a workplace that values gender equality and ensures fair treatment and equal opportunities for all employees, applicants, contractors, and stakeholders. Our Gender Equality Policy promotes a diverse, inclusive, and harassment-free environment, supported by leadership accountability, inclusive HR practices, and regular training on gender equality and unconscious bias.

To strengthen this commitment, CRP has implemented a Gender Responsive Human Rights Due Diligence Process based on the UN Guiding Principles. This process includes gender analysis, stakeholder engagement, and data collection to monitor progress. We also assess suppliers and contractors to ensure ethical standards are upheld, including the prohibition of forced labor, child labor, and discrimination. These efforts embed gender responsiveness into our governance, operations, and stakeholder engagement, in alignment with ASI requirements.

GENDER DIVERSITY



**This data encompasses our employees from all our locations.*

WOMEN IN MANUFACTURING

We became a corporate member of Women in Manufacturing (WiM), the only national trade association dedicated to supporting and promoting women who have chosen a career in the manufacturing industry. Through our membership, our employees gain access to networking and training, including leadership development programs.

According to the Women in Manufacturing Association, 23% of business leaders are women within the industry. Our goal is to increase the percentage of women leaders in our company from 19% (as of 2024) and exceed the industry average.

OUR GOAL IS TO EXCEED THE INDUSTRY AVERAGE WITH OVER 23% OF WOMEN BUSINESS LEADERS AT CRP

In 2024, we deepened our efforts by nominating emerging women leaders to participate in the **AIP Women in Leadership Conference** held in Atlanta, GA. This two-day event brought together top talent from across the AIP portfolio to explore themes of resiliency, proactive leadership, and personal growth. Attendees engaged in workshops, fireside chats with industry executives, and collaborative sessions designed to equip them with tools to thrive in dynamic industrial environments.

With more than 100 women from global portfolio companies in attendance, the conference provided a platform to shape the future of industry through bold conversations on **ESG & AI, igniting passion to prevent burnout, and elevating women's roles in leadership**. Our CRP representatives returned inspired, energized, and eager to share their insights, helping to drive a culture of inclusion, innovation, and empowerment across our organization.

Community Relations

At Commonwealth, we recognize that the strength of our operations is inseparable from the strength of our community. Supporting and partnering with our neighbors is not only part of our values but also essential to our long-term success. The community contributes to the vitality of our plant, and in turn we are committed to contributing to the safety, resilience, and well-being of the region where we live and work.

One way we demonstrate this commitment is through our active participation in the Local Emergency Planning Committee (LEPC). This partnership brings together community leaders, first responders, and local industry to coordinate emergency preparedness and response strategies. By sharing expertise, resources, and planning efforts, CRP helps ensure that our community remains resilient and ready in the face of potential risks - underscoring our belief that safety extends beyond our plant to the entire region.

We also invest in our community through philanthropy, donations, and sponsorships. To guide this work, we established an employee-run Donations Committee that fields requests from local organizations with a focus on education, health, youth sports, and community involvement. Meeting monthly, the committee ensures Commonwealth's resources are directed toward initiatives that are meaningful for employees and impactful for the broader community.

TOTAL DONATIONS IN 2024 | $162,044

$7,500	RHONDA WALKER FOUNDATION
$7,200	HANCOCK COUNTY SCHOOLS
$5,000	JOEL RAY HOWARD MEMORIAL SCHOLARSHIP
$5,000	COMMUNITY FOUNDATION ALLIANCE INC
$5,000	HIGHLANDS LATIN SCHOOL OWENSBORO LLC
$5,000	OWENSBORO MUSEUM OF FINE ARTS FOUNDATION INC
$4,000	TELL CITY SCHWEIZER FEST INC

NONPROFIT SPOTLIGHT

Extended Leadership Team Clean Up at the Empowerment Academy

In 2024, our Extended Leadership Team volunteered at the Empowerment Academy in Owensboro, KY, an organization dedicated to providing safe, stable long-term housing and life skills support for local homeless students. Their mission is to help young people reach their full educational potential while equipping them with the essential skills needed for independence and long-term success.

This issue is a growing challenge in Daviess County, often witnessed daily by teachers, school resource officers, and counselors, and the Empowerment Academy provides a critical lifeline.

Helping our community is an important part of who we are at Commonwealth Rolled Products. Opportunities like this allow us to foster a culture of service, strengthen community relationships, and give back in meaningful ways. Our team was proud to contribute to the Academy's mission and support students in creating brighter futures.

SUPPORTING LITERACY WITH THE KIDS' BOOK BANK

In June 2024, employees from CRP's Independence office volunteered their time with the Cleveland Kids' Book Bank, helping to sort and pack books for local children. Through a company-wide book drive, employees donated more than 500 books, with additional collections adding another 30 volumes. The Book Bank distributes an average of 45,000 free books every month to children in need, and CRP was proud to play a role in advancing literacy and education in the community.

SPREADING HOLIDAY CHEER THROUGH WBKR CHRISTMAS WISH

In 2024, CRP and its employees came together to sponsor 30 children across Hancock and Perry Counties through the WBKR Christmas Wish program. Employees donated gifts ranging from clothing and toys to baby essentials, ensuring that children in need experienced the joy of the holiday season. The company is proud to be able to support local families and create brighter holidays for those facing hardship.

07

GOVERNANCE & TRANSPARENCY

Corporate Governance

Supply Chain

About This Report

GOVERNANCE & TRANSPARENCY

At Commonwealth Rolled Products, governance and transparency are cornerstones of our operational framework, guiding our commitment to responsible business practices and ethical leadership. In this section, we outline our approach to ensuring integrity throughout our operations and supply chain.

From fostering a responsible supply chain and robust corporate governance practices to showcasing our leadership initiatives within the company, this section underscores our dedication to accountability and openness. Additionally, we provide insights into the purpose and scope of this report, emphasizing our commitment to transparency in disclosing our sustainability efforts and performance. By adhering to these principles, we aim to strengthen stakeholder trust, drive organizational resilience, and uphold our values as the Mill of Choice for our customers.

Corporate Governance

We recognize the paramount importance of sound governance structures and policies to effectively manage our business, drive performance, and uphold responsible and ethical values. Our dedication to transparency, accountability, and integrity serves our business and stakeholders. These foundational principles not only guide how we conduct business, but they are also integral to our commitment to environmental and social responsibility.

Stakeholder engagement is a key component of our governance approach. We interact with stakeholders by understanding the internal and external impacts of our business that may affect them, and through meaningful community involvement focused on business collaboration, local impact, and shared value. CRP is a strong community partner and an active leader in the Local Emergency Planning Committee (LEPC), reflecting our commitment to safety, preparedness, and community well-being. Additional details on our stakeholder engagement efforts can be found in the Community Relations section of this report.

Furthermore, our governance practices are reinforced by a comprehensive Social Management Plan, which is aligned with the Aluminum Stewardship Initiative (ASI). This plan is detailed further in the Policies and Practices section of this report and helps ensure our operations are socially responsible and responsive to stakeholder needs.

To further support our sustainability governance, we have established the CRP Sustainability Council, which plays a central role in guiding our strategy and overseeing implementation. More information on the Council's structure, responsibilities, can be found in the Sustainability Strategy & Governance section of this report. This council ensures that sustainability considerations are embedded across decision-making processes.

Underlying all of these efforts is our commitment to compliance with applicable local and international standards. We strive to maintain transparency and accountability across all aspects of our operations, reinforcing trust with stakeholders and supporting long-term value creation.

Leadership at Commonwealth

Our seasoned executive committee and board of directors offer crucial oversight to guarantee the effective and ethical implementation of our business objectives as well as our sustainability strategy.

EXECUTIVE COMMITTEE:

MIKE KEOWN | Chief Executive Officer
TRAVIS DEBES | Chief Commercial Officer
GLENN MILLER | Chief Financial Officer
ED HEMMERSBACH | Chief Operating Officer
RICH BURCHETT | Chief Metals Officer
CHARLES CONEY | Chief Technical Officer
JEFF WILLIS | Director Human Resources

BOARD OF DIRECTORS

KEN DABROWSKI | Chairman of the Board
MIKE KEOWN | Chief Executive Officer
DEREK LECK | Director
JOHN BECKER | Director
JULIA STEYN | Director
JUSTIN FISH | Director
KEITH GRASS | Director
NEIL SNYDER | Director
RICHARD DENNIS | Director
ZAC CARSON | Director

OUR POLICIES AND PRACTICES

At Commonwealth Rolled Products (CRP), our executives, Board of Directors, and employees are guided by a strong foundation of ethical and responsible business conduct. Our Code of Conduct and Ethics is a core policy that all new hires are required to sign, and it is readily accessible via our intranet. We provide annual training to ensure that every member of our organization understands and upholds our ethical standards, fostering a culture of integrity, responsibility, and compliance. To support transparency, we utilize an anonymous third-party reporting system for employees to raise concerns.

In addition to our Code of Conduct, CRP has implemented a comprehensive suite of formal policies that reflect our commitment to sustainability, human rights, and inclusive workplace practices:

- Code of Business Conduct and Ethics
- Supplier Code of Business Conduct and Ethics
- Supplier Sustainability Policy
- Diversity, Equity, and Inclusion Policy
- Policy Against Workplace Harassment
- Donations Guidelines
- Gender Equality Policy
- Gender Responsiveness, Human Rights and Due Diligence Process
- Health, Safety, and Environmental Policy

These policies are designed to guide ethical decision-making, promote fair treatment, and ensure responsible sourcing and operations across our value chain.

Social Management Plan

CRP's Social Management Plan is a formal framework that guides how we manage social risks, engage stakeholders, and uphold human rights. It helps identify and address social and human rights issues that may impact our operations or affected communities, using structured management systems and proactive engagement.

The plan is supported by a suite of executive-approved policies developed in consultation with affected communities, including our Code of Business Conduct and Ethics, Supplier Sustainability Policy, Gender Equality Policy, and Gender Responsive Human Rights Due Diligence Process.

We address key social risks such as occupational health and safety, labor conditions, and community health and security. Environmental risks are managed separately under ISO 14001. Risk assessments are regularly reviewed and updated, and we maintain an Emergency Action Plan alongside programs like SPCC, BMPs, and targeted training to mitigate negative impacts.

Stakeholder engagement is a core part of CRP's Social Management Plan and is facilitated through multiple channels, including direct HR access, union agreements, joint committees, anonymous hotlines, and website submissions. These mechanisms are actively monitored to ensure timely response and continuous improvement. CRP also communicates with stakeholders through regular reporting, local publications, government engagement, and active participation in the Local Emergency Planning Committee (LEPC).

A formal monitoring process ensures the effectiveness of our actions and continuous improvement in managing social risks.

To learn more about our Social Management Plan, you can find the full policy on the Commonwealth Rolled Products website.

Modern Slavery Statement

This statement outlines Commonwealth Rolled Products commitment to the prevention of all forms of slavery, forced or involuntary labor, servitude, child labor, and human trafficking across our operations and supply chain.

We do not use or tolerate any form of slave or involuntary labor, including prison labor, debt bondage, or forced labor by governments. Furthermore, we do not engage in human trafficking and any practices involving corporal punishment, physical or psychological abuse, threats of violence, or other forms of coercion.

The company fully complies with all applicable child labor laws governing hiring, wages, working hours, and conditions of employment.

Our Code of Business Conduct and Ethics explicitly prohibits child labor, forced labor, human trafficking, and slavery. Furthermore, we are assessing ways we can further strengthen our Code of Conduct and Supplier Code of Conduct, including publishing both policies on our public website as of May 2024 to promote transparency and accountability throughout our value chain.

Supply Chain

While aluminum is recyclable, true sustainability requires meeting environmental and social standards across the entire value chain. The process of creating aluminum begins with mining bauxite, followed by an energy-intensive refining process to produce ingots, which are then used in manufacturing our products.

Our supply chain spans across the globe. We maintain a Supplier Code of Conduct and Ethics Policy, along with a Supplier Sustainability Policy, to ensure our direct suppliers understand and adhere to our environmental and social expectations.

We are witnessing increasing inquiries from suppliers regarding sustainability topics, underscoring the growing demand for transparency and the integration of sustainability principles throughout our value chain. To address this, we are considering implementing a Sustainability due diligence checklist to hold our supply chain partners accountable.

As aluminum is a global commodity sourced from bauxite ore, its production involves multiple countries, making traceability challenging. Continual efforts are underway to enhance our standards and processes, ensuring compliance and enhancing transparency across our supply chain. Additionally, we are committed to maximizing the use of scrap materials—known as “secondary” inputs—to reduce our reliance on virgin materials and promote circular economy principles.

Our commitment to sustainability is reinforced by robust corporate governance principles that prioritize accountability and transparency across our operations. By enhancing the supplier processes and policies we have in place, we aim to strengthen adherence to environmental and social standards throughout our supply chain.

CAHRA Policy

Our company is committed to responsible sourcing practices that align with the OECD Due Diligence Guidance for Conflict-Affected and High-Risk Areas (CAHRA). In this respect, we have established a CAHRA Policy which can be found within both our Supplier Code of Conduct and Ethics and Supplier Sustainability Policies to assess, identify, and mitigate any potential risks associated with our supply chain. We ensure that the suppliers we work with adhere to our standards and expectations with regards to sourcing from CAHRA regions and commit to CAHRA guidelines publicly within their sustainability report (and/or similar disclosures), outlining respective due diligence processes. Furthermore, we source primary aluminum ingot exclusively from LME-Listed Brands, compliant with the LME’s Responsible Sourcing Policy.

Our due diligence process also includes monthly reviews of CAHRA listings, comparing them against last month’s data from our primary aluminum suppliers’ smelting locations as well as evaluating supplier performance through scorecards to ensure compliance with our policies. Lastly, senior management conducts regular supplier compliance reviews within monthly and quarterly meetings (including our sustainability summit), ensuring continuous oversight and ethical sourcing practices throughout our supply chain.

About this Report

This marks the third consecutive release of our sustainability report, a significant milestone in our commitment to transparent and responsible business practices. Unless otherwise noted, data applies to our manufacturing facility at Lewisport, Kentucky and covers the calendar year of 2024.

Our reporting approach draws upon multiple internationally recognized sustainability frameworks to reflect the unique characteristics of our business and industry. We primarily reference the Sustainability Accounting Standards Board (SASB), incorporating elements from both the Mining & Metals and Auto Parts standards, which we believe best align with our operations. The report is also guided by the principles of the Aluminum Stewardship Initiative. (ASI), which promotes responsible production, sourcing, and stewardship of aluminum, and has informed our disclosure on key environmental, social, and governance (ESG) elements. Additionally, this year's report includes use of the Global Reporting Initiative (GRI) Standards, reported in reference to the framework.
It is important to note that while our reporting is informed by these standards, it does not conform exclusively to any single framework. Instead, we have taken a materiality-driven approach, similar to GRI, to select disclosures that provide a holistic perspective on our sustainability journey and reflect the characteristics of our business and industry. The terms "material" and "materiality" as used in this report are not intended to be interpreted in accordance with securities laws or financial reporting standards in the United States or any other jurisdiction.

This report contains certain statements that relate to future events and expectations and, as such, constitute forward-looking statements. All statements that reflect Commonwealth Rolled Products' expectations, assumptions, or projections about the future, other than statements of historical fact, are forward-looking statements. Forward-looking statements include those containing such words as "anticipates," "believes," "could," "ensure," "estimates," "expects," "forecasts," "goal," "intends," "may," "outlook," "plans," "projects," "seeks," "should," "targets," "will," "would" or other words of similar meaning. These statements are based on certain assumptions made by us based on management's experience and perception of historical trends, current conditions, anticipated future developments, and other factors believed to be appropriate. Such statements are subject to known and unknown risks, uncertainties, and changes in circumstances that are difficult to predict. Although we believe that expectations reflected in any forward-looking statements are based on reasonable assumptions, we can give no assurance that these expectations will be attained, and it is possible that actual results may differ materially from those indicated by these forward-looking statements. Commonwealth Rolled Products disclaims any obligation to update publicly any forward-looking statements, whether in response to new information, future events or otherwise, except as required by applicable law. All company names, trademarks, and product-service names herein are the property of their respective owners and used for identification purposes only. No endorsement is implied.

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
AIR QUALITY						
Air Quality	ASI	Material Emissions to Air from its activities and, where possible, from those within its Area of Influence on an annual basis	While we have not identified any material air emissions from our operations, we calculate and provide air emissions on the pollutants below.			Qualitative
Air Quality	ASI, SASB EM-MM	Air emissions of the following pollutants:				Metric ton
		(1) CO	168	172	194.9	
		(2) NOx (excluding N2O)	142	141	162.5	
		(3) Sox	3	2.8	3.2	
		(4) Particulate Matter (PM10)	135	220	211.6	
		(5) Mercury (Hg)	0	0	0.0001	
		(6) Lead (Pb)	0	0	0.04	
		(7) Volatile Organic Compounds (VOCs)	289	399 *Increase in 2023 can be attributed to increased production and/or change in emission factor from source testing.	377.4	
COMMUNITY RELATIONS						
Community Relations	SASB EM-MM	Process to manage risks and opportunities associated with community rights and interests	$101, 058 Total Philanthropic Donations	$107,005 Total Philanthropic Donations	$162,044 Total Philanthropic Donations More information is available in the *Community Relations and Sustainability Strategy and Governance* sections on page 48 and 10 of this report, respectively.	Qualitative
Community Relations	SASB EM-MM	Number and duration of non-technical delays	0	0	0	Number
DIVERSITY, EQUITY & INCLUSION						
Diversity, Equity and Inclusion	ASI	Female representation and activities to promote gender equality	Information on our approach to promoting DEI - including our Gender Responsiveness Policy, gender diversity breakdown, and initiatives to support women in manufacturing - is available in the Diversity, Equity, and Inclusion section on page 46 of this report.			Qualitative
GREENHOUSE GAS MANAGEMENT						
Greenhouse Gas Emissions	ASI, SASB EM-MM, SASB TR-AP, SASB RT-IG	(1) Total energy consumed	Total: 4,379,865 Stationary: 3,526,219 Mobile: 24,217 Electricity: 829,429	Total: 4,342,878 Stationary: 3,508,419 Mobile: 23,267 Electricity: 811,191	Total: 4,753,711 Stationary: 3,882,177 Mobile: 27,763 Electricity: 843,771	Gigajoule
		(2) Percentage of grid electricity consumed	19%	19%	18%	Percentage
		(3) Percentage of renewable energy consumed	0.01%	0.01%	0.01%	Percentage

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
Greenhouse Gas Emissions	ASI	Total GHG emissions by source	Total scope 1 and 2 emissions: 277,171 More information on our GHG emissions is available on page 19 of our 2022 Sustainability Report report.	Total scope 1 and 2 emissions: 273,693 More information on our GHG emissions is available on page 27 of our 2023 Sustainability Report report.	Total scope 1 and 2 emissions: 293,139 Total Scope 3 emissions: 1,570,447 More information on our GHG emissions is available on page 36 of our 2024 Sustainability Report report.	MT CO2e
Greenhouse Gas Emissions	ASI, SASB EM-MM	Discussion of strategy to manage Scope 1 emissions, emissions reduction targets, and performance against targets	Information on our greenhouse gas (GHG) management practices is available on page 36 of this report.			Qualitative
LABOR RELATIONS						
Labor Practices	SASB EM-MM	Percentage of active workforce covered under collective bargaining agreements	73%	69%	68%	Percentage
Labor Practices	SASB EM-MM	Number and duration of strikes and lockouts	0	0	0	Number
Labor Practices	ASI	Annual performance and efficacy related to Modern Slavery, including an annual Modern Slavery Statement	Information on our Modern Slavery statement and respective approach is available in the Policies and Practices section on page 53 of this report.			Qualitative
Labor Practices	ASI	Policy against workplace violence and harassment, implemented in consultation with workers and their representatives	Our policy against workplace harassment is in our Employee Handbook and concerns about violations to civil rights are managed by the Civil Rights Committee, comprised of salaried and union workers. Furthermore, we published an official statement reflecting our stance and policy on such harrassment within our public website as of July 2024. More information is available in the People and Our Policies and Practices sections on page 42 and 53 of this report, respectively.			Qualitative
SOURCING						
Materials Sourcing	ASI	Responsible sourcing Policy, covering environmental, social and governance issues, consistent with the ASI principles	Our Supplier Code of Business Conduct and Ethics Policy (updated in October 2024) and Supplier Sustainability Policy are publicly available. We require 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. More information is available on page 54 of the report.			Qualitative
Materials Sourcing	SASB TR-IG	Management of risks associated with the use of critical materials	Information on our approach to responsible sourcing is available in the Supply Chain section on page 54 of this report.			Qualitative
Security, Human Rights & Rights of Indigenous Peoples	ASI, SASB EM-MM	Engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	When a concern is raised about our supply chain, we engage with suppliers to investigate and resolve in a way that we deem appropriate. More information on this topic is available in the Supply Chain and Our Policies and Practices Sections on page 54 and 53 of this report, respectively.			Qualitative

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
WASTE AND HAZARDOUS MATERIALS MANAGEMENT						
Waste and Hazardous Materials	SASB TR-AP	(1) Total amount of waste from manufacturing	12,645	10,267	8,256	Metric ton
		(2) Percentage of hazardous waste	0.0004%	0.0005%	0.0004%	Percentage
		(3) Percentage of recycled waste	50.10%	40.93%	Data not available	Percentage
Waste and Hazardous Materials	ASI, SASB EM-MM	Total weight of hazardous waste generated	5.17	3.28	3.02	Metric ton
Waste and Hazardous Materials	ASI, SASB EM-MM	Total weight of hazardous waste recycled	0	0	0	Metric ton
Waste and Hazardous Materials	SASB EM-MM	Number of significant incidents associated with hazardous materials and waste management	0	0	1	Number
Water Management	ASI	Material Discharges to Water from its activities and, where possible, from those within its Area of Influence	11,376.8 megaliters of water discharged	12,805.07	12,650.43	Megaliters
Water Management	ASI	Spills and Leakages management plan	CRP has integrated spill response planning into its Emergency Response Plan, Social Management Plan, SPCC & BMP protocols, and supporting measures such as Hazardous Waste Labeling, Contingency, and Communication Plans to ensure preparedness and compliance.			Qualitative
Water Management	ASI, SASB EM-MM	(1) Water withdrawal and use by source and type on an annual basis. (including % from regions with High or Extremely High Baseline Water Stress)	Water withdrawal by source: Groundwater: 12,670.04 Third Party Sources: 21.07	Water withdrawal by source: Groundwater: 13,999.85 3rd Party: 28.53	Ground: 14,639.94 Potable: 45.64 3rd Party: Data not available	Megaliters
		(2) Water-related risk assessment	We assess water risks to our direct operations. Water is a critical resource in our operations, however, we are not located in a region with water stress and we consider it highly unlikely to have a loss of adequate water supply.			Qualitative
Water Management	ASI	Water management plan	Based on ASI Guidance this metric is not applicable to CRP as the related risks were assessed and categorized as low.			Qualitative

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
WORKFORCE HEALTH AND SAFETY						
Workforce Health and Safety	ASI, SASB EM-MM, SASB RT-IG	(1) Mine Safety and Health Administration all-incidence rate	0.92	0.90	0.98	Rate
		(2) Fatality Rate	1.07	0.0	0.0	Rate
		(3) Near miss frequency rate (NMFR)	19.1	21.24	18.78	Rate
		(4) Average hours of health, safety, and emergency response training	We do not currently track safety training hours. Information on this topic is available within the Safety Trainings section on page 31 of this report.			Hour
ENVIRONMENTAL MANAGEMENT AND COMPLIANCE						
Biodiversity Impacts	ASI	Biodiversity Action plan and associated targets	We completed a biodiversity assessment in June 2023, which found no significant risks or impacts. Furthermore, we are expanding our Quality Operating System and Environmental Policies guide to include our policy on biodiversity which is in development.			Qualitative
PRODUCT SUSTAINABILITY						
Product Sustainability	SASB TR-AP	Total revenue and percent of revenue from products designed to increase fuel efficiency or reduce emissions	42% of our revenue is from our automotive customers, for which we produce products that enable improved fuel efficiency.	48% of our revenue is from our automotive customers, for which we produce products that enable improved fuel efficiency.	57% of our revenue is from our automotive customers, for which we produce products that enable improved fuel efficiency.	USD, Percentage
Product Sustainability	SASB TR-AP	Percentage of products sold that are recyclable	100%	100%	100%	Percentage
Product Sustainability	SASB TR-AP, SASB TR-IG	Percentage of input materials from recycled or remanufactured content, and description of initiatives to obtain end-of-life products/ parts for remanufacturing	Secondary materials: 52% of total input	Secondary materials: 60% of total input	Data not available	Percentage

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
BUSINESS ETHICS AND TRANSPARENCY						
Business Ethics and Transparency	ASI, SASB EM-MM	Description of the management system for prevention of corruption and bribery throughout the value chain	We provide information on our management of bribery and corruption in our new Code of Business Conduct and Ethics as well as our Supplier Code of Business Conduct and Ethics Policy available online. More information on Our Policies and Practices is available on page 53 of this report.			Qualitative
Business Ethics and Transparency	SASB EM-MM	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	0	0	0	Metric ton - saleable
Business Ethics and Transparency	ASI	The Entity shall publicly disclose information on Material fines, judgments, penalties and non- monetary sanctions for failure to comply with Applicable Law	If such financial information were to occur it would be disclosed within audited financial statements provided as applicable and necessary. (No material financial, labor or other types of violations, non-compliances or fines were applied to Commonwealth in 2024)			Qualitative, USD
Business Ethics and Transparency	ASI	(1) Payments to governments building on existing audit and assurance systems	If such financial information were to occur it would be disclosed within audited financial statements provided as applicable and necessary.			USD
Business Ethics and Transparency	ASI	(2) Value and beneficiaries of financial and in-kind political contributions, whether made directly or through an intermediary, on an annual basis or building on existing audit and assurance systems	If such financial information were to occur it would be disclosed within audited financial statements provided as applicable and necessary.			Qualitative, USD
Business Ethics and Transparency	ASI	Code of Conduct	CRP updated and disseminated its new Code of Business Conduct and Ethics to all employees in November 2023, with a further update completed in May 2024. More information on Our Policies and Practices is available on page 53 of this report.			Qualitative
Business Ethics and Transparency	ASI	Complaints Resolution Mechanism	External grievance mechanisms are available through the company website, EPA, OSHA, and Lighthouse Services. Additional grievance channels are established under the Social Management Plan. No grievances were reported in 2024.			Qualitative
Business Ethics and Transparency	SASB TR-AP	Total amount of monetary losses as a result of legal proceedings associated with anti- competitive behavior regulations	If such financial information were to occur it would be disclosed within audited financial statements provided as applicable and necessary.			USD

Sustainability Data Table

Topic	Framework Code	Disclosure Metric (rephrased for report publication)	2022 Data Response	2023 Data Response	2024 Data Response	Unit
GOVERNANCE						
Sustainability / ESG Governance	ASI	Management of environmental, social, and economic impacts including the governance approach to environmental, social and economic impacts as well as material environmental, social and economic impacts related to ASI principles	Information on this topic is available on page 13 of this report.			Qualitative
Governance	ASI	Emergency response plans	We have comprehensive emergency response plans including our Social Management Plan available internally and disseminated throughout our employee and contractor workforce. Furthermore, CRP is an active participant in the Local Emergency Planning Committee. More information on the LEPC and Social Management Plan is available on page 33 and 53of this report, respectively.			
Governance		Board of Directors	Information on this topic is available on page 52 of this report.			Qualitative
PRODUCT SAFETY						
Product Safety	SASB TR-AP	Number of recalls issued, total units recalled	0	0	0	Number
BUSINESS ACTIVITY METRICS						
Business Activity Metrics	SASB TR-AP	Area of manufacturing plants	218,530	218,530	218,530	Square meters

CRP Basis of Reporting for GHG Inventory 2024

Metric	Scope 1 Emissions
Definition	Total Scope 1 (direct) GHG emissions from natural gas-, diesel-, and motor-gasoline-fueled source activites operated by Commonwealth Rolled Products. Additionally, Scope 1 GHG emissions include fugitive emissions, i.e., those from refrigerant losses. Reported emissions include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Other emissions are not included as they are not material to Commonwealth's operations. CH_4 and N_2O emissions are converted to CO_2 equivalent (CO_2e) using the 100-year Global Warming Potential (GWP) recommended by the Sixth Assessment Report of the Inter-governmental Panel on Climate Change (IPCC).
Reporting Period	1/1/2024-12/31/2024
Scope	The scope of this report is limited to the Lewisport facility, which is the material facility for Commonwealth's inventory.
Units	Metric tons of carbon dioxide equivalents (MT CO_2e)
Method	Stationary and mobile combustion data was converted to MMBTU and then multiplied by the appropriate emissions factor as made available by the EPA in its GHG Emissions Factors Hub. Refrigerant gasses' recharge quantities were captured via service records and then multiplied by the appropriate factor as per IPCC AR6.

Metric	Scope 2 Emissions
Definition	Total Scope 2 (indirect) carbon emissions from electricity consumption from source activities operated by Commonwealth Rolled Products.
Reporting Period	1/1/2024-12/31/2024
Scope	The scope of this report is limited to the Lewisport facility, which is the material facility for Commonwealth's inventory, and the Madison Heights facility
Units	Metric tons of carbon dioxide equivalents (MT CO_2e)
Method	• Location-Based Method: US EPA eGRID region 2023 emission factors Commonwealth's Lewisport facility did not utilize any actively procured renewable energy in the reporting period and has thus elected to use the same emission factors for its market-based reporting.

CRP Basis of Reporting for GHG Inventory 2024

Metric	Total Energy
Definition	Total energy consumption from natural gas-, diesel-, and motor-gasoline-fueled source activites operated by Commonwealth Rolled Products plus grid electricity consumption at the Lewisport facility.
Reporting Period	1/1/2024-12/31/2024
Scope	The scope of this report is limited to the Lewisport facility, which is the material facility for Commonwealth's inventory.
Units	Gigajoules (GJ)
Method	Consumption from the facility's billing records were recorded and then converted from local units to GJ.

CRP Basis of Reporting for GHG Inventory 2024

Metric	Scope 3 Emissions
Definition	Total Scope 3 (indirect) GHG emissions from key upstream and downstream activities.
Reporting Period	1/1/2024-12/31/2024
Scope	The scope of this report is limited to the Lewisport facility, which is the material facility for Commonwealth's inventory.
Units	Metric tons of carbon dioxide equivalents (MT CO2e)
Method	Activity-based data converted using standard units and emission factors from EPA, UK Government, CaDI, and other LCA databases. CH_4 and N_2O converted to CO_2e using IPCC AR6 GWP values.
Category 1: Purchased Goods and Services	
Definition	Total Scope 3 Category 1 (indirect) GHG emissions from key upstream items included primary aluminum, hardeners, purchased ingots, purchased scrap, chemicals and consumables, and packaging.
Method	Activity-based data converted using standard units and emission factors for aluminum were sourced from smelter-specific reports, LCA databases, and industry publications.
Category 3: Fuel- and Energy-Related Activities	
Definition	Upstream emissions from natural gas and electricity consumption.
Method	The methodology involved converting energy units to kWh and applying upstream emission coefficients from public databases to estimate indirect energy-related emissions.
Category 4: Upstream Transportation and Distribution	
Definition	Emissions from items transported included ingots, primary aluminum, hardeners, packaging, and consumables.
Method	Distances for aluminum procurement were computed using suppliers' locations and mode of transport. Transport quantity for other materials was taken from logistics and material tracking files. Emission factors were applied based on transport mode (road, rail, water). The emissions were calculated using ton-kilometers and respective transport emission coefficients.
Category 5: Waste Generated in Operations	
Definition	Waste streams included landfill and recycled materials such as metals, chemicals, and dross.
Method	Emission factors were applied based on waste type and disposal method, using UK Government conversion factors on the respective waste activity data.

CRP Basis of Reporting for GHG Inventory 2024

Metric	Scope 3 Emissions
Category 6: Business Travel	
Definition	Travel modes included air and personal vehicles.
Method	Mileage estimates were derived from internal spend data and converted using EPA emission factors. This category captures emissions from employee travel for work-related purposes.
Category 7: Employee Commuting	
Definition	Emissions from emplyoee commuting to Lewisport facility.
Method	Emissions estimate based on commuting distances and frequency assumptions, with emission factors applied for personal vehicle use. Data was sourced from employee ZIP codes and modeled using standard commuting patterns.
Category 9: Downstream Transportation	
Definition	Emissions form items transported downstream including coils sent/returned to/from clients.
Method	Emission factors were applied based on transport mode (road, rail, water). The emissions were calculated using ton-kilometers and respective transport emission coefficients.
Category 10: Processing of Sold Products	
Definition	Downstream emissions from transforming CRP's intermediary products into final products (cars and common goods).
Method	The total mass was obtained from total production, minus returns/claims from clients. Emission factors were applied per kilogram of processed aluminum.
Category 12: End-of-Life Treatment of Sold Products	
Definition	This category captures the environmental impact of CRP's products after use. Emissions include recycling and landfill of automotive alloys and common alloys aluminum.
Method	Type of treatment (recycling or landfill) is assumed based on industry average end-of-life for vehicles and aluminum products. Emission factors were applied for both recycling and disposal scenarios.

Assurance Report

ERMCVS

Independent Limited Assurance Report

ERM Certification & Verification Services Incorporated ("ERM CVS") was engaged by Commonwealth Rolled Products, Inc. ("Commonwealth Rolled Products") to provide limited assurance in relation to the Selected Information set out below and presented in the Commonwealth 2024 Sustainability Report (the "Report").

ENGAGEMENT SUMMARY

Scope of our assurance engagement	Whether the following Selected Information for 2024 are fairly presented in the Report, in all material respects, in accordance with the reporting criteria. Our assurance engagement does not extend to information in respect of earlier periods or to any other information included in the Report.
Selected Information	• Total Scope 1 GHG emissions [metric tonnes CO_2e] • Total Scope 2 GHG emissions (location-based) [metric tonnes CO_2e] • Total Energy [GJ] • Total Scope 3 GHG emissions [metric tonnes CO_2e], comprised of the following categories: Category 1: Purchased Goods and Services, Category 2: Capital Goods (if any new machines/vehicles/buildings), Category 3: Fuel-and Energy-Related Activities Not Included in Scope 1 or Scope 2, Category 4: Upstream Transportation and Distribution, Category 5: Waste Generated in Operations, Category 6: Business Travel, Category 7: Employee Commuting, Category 9: Downstream Transportation and Distribution, Category 10: Processing of Sold Products, Category 12: End-of-Life Treatment of Sold Products
Reporting period	1st January 2024 – 31st December 2024
Reporting criteria	• CRP Basis of Reporting for GHG Inventory 2024 • The GHG Protocol Corporate Accounting and Reporting Standard (WBCSD/WRI Revised Edition 2015) for Scope 1 and Scope 2 GHG emissions • GHG Protocol Scope 2 Guidance (An amendment to the GHG Protocol Corporate Standard (WRI 2015) for Scope 2 GHG emissions • The Corporate Value Chain (Scope 3) Accounting and Reporting Standard (WBCSD/WRI 2011) for Scope 3 GHG emissions
Assurance standard and level of assurance	We performed a limited assurance engagement, in accordance with the International Standard on Assurance Engagements ISAE 3000 (Revised) 'Assurance Engagements other than Audits or Reviews of Historical Financial Information' The procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement and consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.
Respective responsibilities	Commonwealth Rolled Products is responsible for preparing the Report and for the collection and presentation of the information within it, and for the designing, implementing and maintaining of internal controls relevant to the preparation and presentation of the Report. ERM CVS' responsibility is to provide a conclusion to Commonwealth Rolled Products on the agreed assurance scope based on our engagement terms with Commonwealth Rolled Products, the assurance activities performed and exercising our professional judgement.

OUR CONCLUSION

Based on our activities, as described on the next page, nothing has come to our attention to indicate that the Selected Information for 2024 is not fairly presented in the Report, in all material respects, in accordance with the reporting criteria.

OUR ASSURANCE ACTIVITIES

Considering the level of assurance and our assessment of the risk of material misstatement of the Report a multi-disciplinary team of sustainability and assurance specialists performed a range of procedures that included, but was not restricted to, the following:

- Evaluating the appropriateness of the reporting criteria for the Report;
- Interviewing management representatives responsible for managing the Selected Information;
- Interviewing relevant staff to understand and evaluate the management systems and processes (including internal review and control processes) used for collecting and reporting the Selected Information;
- Reviewing of a sample of qualitative and quantitative evidence supporting the Selected Information at a corporate level;
- Performing an analytical review of the year-end data submitted by all locations included in the consolidated 2024 group data for the Selected Information which included testing the completeness and mathematical accuracy of conversions and calculations, and consolidation in line with the stated reporting boundary;
- Conducting one virtual visit to Commonwealth Rolled Products' facility in Lewisport, KY, United States to review source data and local reporting systems and controls;
- Evaluating the conversion factors, emission factors and assumptions used;
- Reviewing the presentation of information relevant to the assurance scope in the Report to ensure consistency with our findings.

ERMCVS

25 November 2025

Malvern, PA

ERM Certification & Verification Services Incorporated www.ermcvs.com | post@ermcvs.com

THE LIMITATIONS OF OUR ENGAGEMENT

The reliability of the Selected Information is subject to inherent uncertainties, given the available methods for determining, calculating or estimating the underlying information. It is important to understand our assurance conclusions in this context.

OUR INDEPENDENCE, INTEGRITY AND QUALITY CONTROL

ERM CVS is an independent certification and verification body accredited by UKAS to ISO 17021:2015. Accordingly, we maintain a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements. Our quality management system is at least as demanding as the relevant sections of ISQM-1 and ISQM-2 (2022).

ERM CVS applies a Code of Conduct and related policies to ensure that its employees maintain integrity, objectivity, professional competence and high ethical standards in their work. Our processes are designed and implemented to ensure that the work we undertake is objective, impartial and free from bias and conflict of interest. Our certified management system covers independence and ethical requirements that are at least as demanding as the relevant sections of the IESBA Code relating to assurance engagements.

ERM CVS has extensive experience in conducting assurance on environmental, social, ethical and health and safety information, systems and processes, and provides no consultancy related services to Commonwealth Rolled Products in any respect.

DRAFT

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Advancing Aluminum's Potential

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