

## Gender Responsive Policy

### 1. Purpose

The purpose of this Gender Responsive Policy is to promote a workplace environment that supports and values gender equality. Commonwealth Rolled Products (CRP) is committed to ensuring that all employees and stakeholders are treated fairly, irrespective of gender, and that everyone has equal opportunities for advancement and development.

### 2. Scope

This policy applies to all employees, applicants, contractors, and stakeholders of CRP, including all levels of the organization.

### 3. Policy Statement

CRP is dedicated to creating and maintaining a workplace that upholds the principles of gender equality. We believe that all individuals, regardless of gender, should have equal access to opportunities and resources. Discrimination, harassment, and bias based on gender will not be tolerated.

### 4. Objectives

- **Equal Opportunity:** CRP ensures that all employment practices, including hiring, promotions, training, and compensation, are free from gender bias and discrimination.
- **Diversity and Inclusion:** CRP promotes a diverse workforce and inclusive culture where all employees feel valued and respected.
- **Support and Development:** CRP provides equal opportunities for professional development and career advancement to all employees, irrespective of gender.
- **Harassment-Free Environment:** CRP is dedicated to maintain a workplace free from gender-based harassment and address any incidents promptly and effectively.
- **Consideration for Pregnant Workers:** CRP ensures, protects and facilitates the rights of pregnant women and nursing mothers to health, safety and continued employment.

### 5. Responsibilities

- **Human Resources Management:** Ensures that gender equality is integrated into all organizational practices and policies. Provide resources and training to support gender equality initiatives.

- **Manager/Supervisors:** Adhere to this policy within their teams, address concerns related to gender equality, and support their team members in achieving their potential.
- **Employees:** Treat colleagues with respect and fairness, adhere to this policy, and report any concerns or violations in a timely manner.

## 6. Recruitment and Selection

All recruitment and selection processes will be conducted fairly and without bias. Job descriptions and advertisements will emphasize the commitment to gender equality, and decisions will be based on qualifications and merit.

## 7. Training and Development

Regular training on gender equality, unconscious bias, and diversity will be provided to all employees. Development opportunities will be made available to all employees equally.

## 8. Pregnant Workers

Key requirements, in line with the frameworks like the Responsible Business Alliance (RBA) as well as the Pregnant Workers Fairness Act (PWFA) include the prohibition of high-hazard work, the implementation of reasonable accommodations and the protection against forced leave. CRP adopts the following high-level protections:

- Pregnant women and nursing mothers will not be employed in working conditions that are hazardous to their health or that of their child.
- Identify and remove or reduce workplace health and safety risks associated with their work assignments.
- Provide reasonable, temporary changes to job duties or the workplace to accommodate known limitations, unless it causes undue hardship.
- Will not force a pregnant employee to take leave if another reasonable accommodation can be provided that would allow the employee to keep working.
- Will not take adverse actions against employees for requesting or using accommodations, or for needing time off for pregnancy related medical appointments or postpartum recovery.

## 9. Reporting and Complaints

Employees and individuals within the affected area who experience, or witness gender discrimination or harassment are encouraged to report it using the designated channels. CRP employees should report through the internal Civil Rights Committee or anonymously via Lighthouse. To make a report call 1-855-222-1037, email [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) or online at [www.lighthouse-services.com/commonwealthrolledproducts](http://www.lighthouse-services.com/commonwealthrolledproducts). Those in the affected

area should contact the Director of the Hancock County Industrial Foundation at 270-313-6719. CRP is committed to thoroughly investigating all complaints to identify any control gaps and taking appropriate action.

#### **10. Monitoring and Evaluation**

We will regularly review and assess our practices and the effectiveness of this policy to ensure that it meets our objectives. Feedback from employees and individuals within the affected area will be sought and considered in making improvements.

#### **11. Review**

This policy will be reviewed annually on any changes to the business that alter Material Human Rights risks and updated as necessary to ensure it remains relevant and effective.

#### **12. Contact**

For questions or concerns related to this policy, please contact the Human Resources Department.

#### **Gender Responsive Policy**

Approved by:

A handwritten signature in black ink, appearing to read 'Rich Burchett', is written over a horizontal line.

Rich Burchett  
Chief People Officer