

Business Compliance Program

The goal of Commonwealth Rolled Products (the "Company" or "Commonwealth") Compliance Program is to ensure the Executive Leadership Team (ELT), management, and employees act in a consistently ethical and legal manner and, as a consequence, to minimize the risk that conduct by employees will provide the basis for legal actions, civil penalties or criminal sanctions against them or the Company, or damage Commonwealth's reputation, and to take into account the principles and criteria developed by the U.S. Federal Sentencing Guidelines (and other relevant agencies in the jurisdictions where Commonwealth is present) for the implementation of effective compliance and ethics programs. This program satisfies the RBA Code.

The Executive Leadership Team is committed to fostering a strong organizational culture of integrity, compliance, accountability, and ethical conduct that is grounded in the Company's vision, mission, and values and embraced by all employees.

Every executive, manager, and employee is responsible and accountable for performing his or her function in compliance with applicable laws, regulations, customer requirements, and Company policies and procedures.

Managers and supervisors are responsible for implementing and monitoring compliance with applicable labor, ethics, health and safety, environmental, and other regulatory requirements within their areas of responsibility. Employees are responsible for understanding and complying with applicable policies and for reporting concerns through established reporting channels.

The Executive Leadership Team oversees the Compliance Program and its performance to ensure a consistent focus on ethical and legal conduct throughout the organization and to reduce compliance risk.

The Executive Leadership Team supports the development and maintenance of an effective compliance and ethics program and is responsible for:

- Establishing and promoting a culture of integrity, compliance, accountability, and ethical conduct;
- Reviewing significant compliance risks and the effectiveness of risk mitigation activities;
- Ensuring appropriate policies, procedures, and controls are established and maintained;
- Assigning compliance responsibilities to appropriate functional leaders and holding them accountable for implementation and effectiveness;

- Designating a Compliance Committee or other responsible individuals, as appropriate, to support implementation, monitoring, and continual improvement of the Compliance Program;
- Periodically reviewing the effectiveness of the Compliance Program and identifying opportunities for continual improvement.

The Executive Leadership Team or its designated Compliance Committee is responsible and accountable for managing the Compliance Program. Specifically, it is responsible for:

- Setting a consistent tone that the Company conducts business in an ethical and legal manner;
- Implementing and overseeing compliance-related policies and procedures;
- Identifying and evaluating compliance risks and monitoring the effectiveness of risk mitigation activities;
- Assigning responsibility for management of specific compliance risks to appropriate functional leaders;
- Reviewing compliance concerns, investigations, audits, assessments, and corrective actions;
- Communicating compliance expectations throughout the organization;
- Monitoring compliance with applicable laws, regulations, customer requirements, and Company standards;
- Periodically reviewing the effectiveness of the Compliance Program and supporting continual improvement efforts.

All executives, managers, and employees are responsible for:

- Understanding the legal, regulatory, and policy requirements relevant to their respective functions;
- Promoting the Company's commitment to ethical and legal conduct;
- Identifying and reporting compliance concerns;
- Supporting corrective actions and continuous improvement activities.

The assessment of compliance risks are identified through Commonwealth's Risk Management practices.

In addition, a Compliance Committee or designated representatives may be assigned responsibility for supporting day-to-day compliance activities, monitoring compliance risks,

facilitating corrective actions, and communicating compliance requirements throughout the organization.

Commonwealth's Compliance Program consists of the following key components:

1. Written Standards

Commonwealth has developed written compliance policies and procedures that guide the Company and all its employees in day-to-day business operations. They are an integral part of a comprehensive framework of compliance controls that exist throughout various segments of the organization.

2. Prevention

Through education and training, implementation of suitable policies and procedures, and adequate system controls, the Company works to assure compliance with ethical and legal standards and thereby reduce the risk of breach to laws, regulations, policies and procedures. Prevention involves ongoing in-depth risk analysis to identify where the Company may need additional controls or other measures.

3. Education and Training

The knowledge and awareness of the laws, regulations and ethical principles are essential for the employees to conduct themselves in a proper, lawful and professional manner, in keeping with Commonwealth vision, mission and values, and its Code of Business Conduct and Ethics. Based on this premise, the Company undertakes to educate and train employees so that they have a basic knowledge of laws, regulations and ethical principles, as well as policies and procedures relevant to their functions.

4. Internal Communications

In order to maximize prevention and detection of non-compliance, Commonwealth has implemented a third-party anonymous system for reporting illegal or unethical behavior that requires employees to promptly report such matters in accordance with the Company's policies, confidentially and free of retaliation.

5. Monitoring and Auditing

Commonwealth conducts ongoing monitoring and targeted auditing based on identified and prioritized risk areas. The Executive Leadership Team or its designated Compliance Committee, in conjunction with the internal audit function and other departments, as necessary,

determines the scope and frequency of targeted auditing according to a variety of factors, including assessment of non-compliance risk, new legal and regulatory requirements, changes in business practices, and other considerations.

6. Assessment

The Executive Leadership Team or its designated Compliance Committee periodically assesses, or oversees the assessment of, the effectiveness of the Company's Compliance Program and its key elements. Results of assessments are reviewed to identify opportunities for corrective action and continual improvement.

7. Reporting

The Executive Leadership Team or its designated Compliance Committee periodically reviews Compliance Program performance and activities as well as developing trends, and makes recommendations, as necessary.

8. Remediation and Enforcement

In the event issues are identified through monitoring and targeted auditing, the Company promptly takes remedial actions to prevent reoccurrence, including, where appropriate, the dismissal or other discipline of employees who do not demonstrate a commitment to ethical and legal behavior.

Approved by:



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