COMMONWEALTH ROLLED PRODUCTS, INC.
SUPPLIER SUSTAINABILITY POLICY

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

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

1.0 Code of Business Conduct and Ethics

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

1.1 Business Integrity

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

1.2 Legal Compliance

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

1.3 Preventing Bribery and Corruption

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

2.0 Human Rights, Working Conditions, and Social Expectations

Safety, Ownership, Integrity, Excellence, Customer Focus and Teamwork are Commonwealth's core values and the foundation of our long-term success. As part of our commitment to these values, we support and promote human rights throughout our operations, our communities in which we operate, and our global supply chain.

2.1 Child and Forced Labor

Suppliers will not employ or use any form of forced labor including but not limited to indentured labor, bonded labor, military labor, child labor, or use of corporal punishment or other forms of mental and physical coercion as a form of discipline. Supplier will verify its operations and supply chain are free from slavery and human trafficking and shall comply with all applicable modern slavery legislation. Suppliers shall abide by all local laws regarding legal working age. Suppliers are also encouraged to ensure adequate protections for workers that are above the legal working age but still below age 18.

2.2 Diversity & Inclusion/Fair Treatment

Suppliers will provide a workplace free of discrimination, retaliation, and harassment without regard to race, color, religion, age, sex, national origin, veteran status, sexual orientation, and any other legally protected status. Suppliers' workplaces will be free of harsh or inhumane treatment including any form of sexual harassment, sexual abuse, corporal punishment, or torture, mental or physical coercion or verbal abuse of employees, or the threat of any such treatment. CRP encourages suppliers to provide an inclusive and supportive working environment that supports diverse associates.

2.3 Safe Working Conditions

CRP is focused on providing safe working conditions with respect to human health and welfare. Suppliers shall comply with the **CRP CONTRACTOR SAFETY PROGRAM** while on-site at CRP along with any international standards (e.g., ISO 45001 or equivalent). Suppliers are expected to share CRP's commitments by developing and implementing their own programs focused on worker safety and well-being.

2.4 Freedom of Association

Suppliers shall respect the rights of workers to join, form or not to join an association of their choice without fear of reprisal, interference, intimidation, or harassment. In countries where the right to freedom of association is regulated, restricted, or prohibited by law, Suppliers should not hinder alternative forms of independent and free worker representation

3.0 Responsible Sourcing of Goods and Services Sustainability

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

3.1 Traceability

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

3.2 Best Practice Sourcing

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

3.3 Sourcing Policy

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

4.0 Health, Safety, and Environmental Sustainability

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

4.1 Health, Safety, Environmental and Quality Regulations

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

4.2 Occupational Health and Safety

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

4.3 Emergency Preparedness

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

4.4 Security

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

5.0 Implementation of Sustainability Standards

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

6.0 Audit, Compliance, Monitoring and Reporting

CRP reserves the right to conduct audits to ensure Supplier's compliance to the RBA Code and with these requirements to take appropriate measures, including discontinuing any relationship with a Supplier, should the Supplier or its employee or permitted subcontractor violate, fail to correct, or have a pattern of violating the SSP.

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

Supplier is expected to comply with the RBA Code requirements. CRP will work with suppliers to develop a corrective action plan (CAP) in order to address any non-compliance.

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

7.0 Conflict Minerals

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

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

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

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

8.0 Miscellaneous

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

Mike Keown
Chief Executive Officer

Ash Ambulgekar
Chief Financial Officer