Commonwealth Rolled Products - Responsible Sourcing Policy

1. Purpose

According to our Code of Conduct we must select Suppliers based on objective criteria. When purchasing products and services, we must follow the appropriate purchasing procedures as stated in our applicable procurement guidelines.

In addition, Commonwealth is committed to sourcing responsibly and ensuring that our Suppliers conduct their operations in a socially responsible manner. Transparency and sustainability are critical elements to our Supply Chain. We expect our Suppliers to follow the standards of our Code of Conduct or otherwise act in a manner consistent with our standards. Commonwealth will ensure that our ethical expectations are understood and respected by all Suppliers wherever they operate.

This Policy develops our Code and specifies the principles of selection, evaluation and retention of Suppliers from an Environmental, Human Rights, Social, Health and Safety and Governance and Integrity (hereinafter "Sustainability") matters.

2. Sourcing Responsibly Policy

Commonwealth's selection, approval, and continued use of Suppliers may be influenced by the outcome of a Sustainability risk assessment, including identified environmental, human rights, social, health and safety, governance, integrity, and supply chain risks. Suppliers presenting elevated Sustainability risks may be subject to additional due diligence, corrective action requirements, ongoing monitoring, conditional approval, or disqualification from consideration.

2.1. Scope

All Suppliers of raw materials (RM) and finished goods (FG).

This process is for all Commonwealth entities and locations and could be applied in addition to other purchasing guidelines and/or practices applicable on each manufacturing site.

2.2. Preferred Suppliers

In addition to other relevant selection factors, from a Sustainability perspective preference will be given to Suppliers which:

(1) Ensure compliance with applicable Laws and Regulations and shows respect for Human Rights.

(2) Demonstrate effective and structured work on Sustainability matters.

(3) Have a positive effect on Commonwealths' products, from an environmental Life-Cycle Assessment perspective, and on Commonwealths Sustainability targets.

2.3. Commonwealths' Expectations

We expect our Suppliers to follow the standards of our Code of Conduct or otherwise act in a manner consistent with our Sustainability standards. We expect that:

Environmental

- Suppliers operate in an environmentally responsible and efficient way. They should meet all applicable environmental laws and work toward continuously improving their environmental performance.
- Suppliers ensure they have all necessary environmental permits and registrations, keep them up to date, and follow their reporting guidelines to remain legally compliant.
- Suppliers establish and maintain an Environmental Management System to identify, manage, and reduce their significant environmental impacts.
- Suppliers who have an Environmental Management System certified under Responsible Business Alliance (RBA), ASI, IATF, ISO14001, or similar standards will be valued.
    - Suppliers are expected to comply with all applicable laws, regulations, customer requirements, and industry standards regarding restricted, prohibited, and declarable substances in materials, packaging, and products supplied to Commonwealth.
    - Suppliers are expected to provide certificates of conformance, material declarations, safety data sheets, or other documentation upon request to demonstrate compliance.

Social – Human Rights

- Suppliers are expected to respect the human rights of their employees and treat them with dignity.
- Commonwealth does not use child or forced labor in any of our operations, and we expect our suppliers to uphold the same standards. We will not work with Suppliers who use child, prison, indentured, or bonded labor, or those who use physical or mental coercion as discipline.
- Suppliers are expected to treat workers fairly, avoiding any form of harassment, discrimination, or abuse.
- At a minimum, Suppliers are expected to follow all relevant wage, hour, and labor laws, including rules on minimum wage, overtime, and working hours.

Social – Health and Safety

- Suppliers are expected to prioritize employee health and safety, ensuring a safe workplace that complies with all regulations and laws.
- At the very least, workplaces should provide clean drinking water, sufficient lighting, proper ventilation, and sanitation. If worker housing is provided, it should meet international standards for hygiene, health, and safety.
- Suppliers are expected to provide proper information and training on workplace hazards, safety protocols, and protective equipment.
- Suppliers should have a health and safety program that monitors performance and sets clear goals.

Governance

- Suppliers are expected to follow all applicable international and national laws in relation to Antibribery, Antitrust and Anti Money Laundering. They should also meet Commonwealth standards specified in Commonwealths Code of Conduct and this Policy. In cases where Commonwealths' standards exceed legal requirements, suppliers are expected to meet Commonwealths' higher standards.
- Suppliers should adhere to trade restrictions and sanctions in all business dealings, including sales, exports, purchases, or investments.
- Suppliers shall respect the intellectual property rights of Commonwealth and third parties, safeguarding all confidential and sensitive information. They must also protect individuals' privacy and comply with all laws related to personal data collection, use, and disclosure.
- Suppliers should protect proprietary information from threats, both internal and external, and ensure business continuity by managing security incidents effectively.
- If relevant to their industry, Suppliers should use alternatives to animal testing whenever scientifically valid and accepted by regulatory agencies, ensuring no compromise to product safety or quality.
- Suppliers shall support Commonwealth's responsible sourcing efforts and, when applicable, provide information regarding the source and chain of custody of tantalum, tin, tungsten, gold, and cobalt (3TG+C) if used in supplied materials or products.

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3. Evaluation of Suppliers from a Sustainability Perspective

- Suppliers may be subject to a Sustainability assessment prior to approval.
- Suppliers may be required to provide material specifications, certificates of conformance, material declarations, safety data sheets, and other supporting documentation to demonstrate compliance with applicable material restriction requirements. Commonwealth may require corrective actions when non-conformances are identified.
- Suppliers are expected to maintain records supporting compliance with applicable material restriction requirements, including specifications, declarations, and certificates of conformance, for a minimum of three (3) years or as otherwise required by law, customer requirements, or contract.

Approved,

Rich Burchett
Chief Metals Officer

Ash Ambulgekar
Chief Financial Officer