SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS POLICY

Introduction

Commonwealth Rolled Products, Inc. ("CRP") Supplier Code of Business Conduct and Ethics (the "CCE") Policy is the basis of our commitment to do business in a legal, ethical, and sustainable manner; along with, and is an important component of our efforts to ensure that we and our suppliers adhere to the laws and regulations that apply to our respective businesses. It is designed for the supplier to assist in recognizing and dealing with ethical issues and guide the supplier in the right course of action. For additional information please refer to the CRP **Supplier Sustainability Policy**.

While the CCE sets forth general guidelines of business practices and methods, it does not intend to capture every law or policy that applies. CRP and Suppliers are responsible for knowing the laws and regulations of the jurisdictions in which business' are operated and to understand the basic principles of the CCE towards conducting legal and ethical business accordingly.

The CCE applies to our **Direct Material Suppliers** ("Metals Procurement") and **Critical Indirect Suppliers ("**Non-Metals Procurement**")** that provide goods or services to CRP. Suppliers are expected to comply with the CCE at their sole expense. In addition, suppliers are expected to comply with the Responsible Business Alliance (RBA) Code.

1.0 Supplier Expectations

CRP expects Suppliers to conduct business in accordance with the highest ethical standards. The CCE sets forth the principles and standards of conduct for Suppliers (and their workforce) who provide goods or services to CRP. CRP may require Suppliers to demonstrate they comply with the CCE. Importantly, failure by a Supplier to comply with the expectations outlined in the CCE could result, in termination of its business with CRP. Suppliers are responsible for the following, and for ensuring that its workforce adheres to the following**:**

- Complying with the CCE and all applicable laws, rules, and regulations, and conducting itself in accordance with the highest standards of ethical business conduct; and

- Taking reasonable steps to ensure that products and services are procured from ethical sources wherever practicable and sustainable.

2.0 Laws and Regulations

CRP is committed to maintaining high standards of business conduct in all markets in which CRP provides product. CRP expects all Suppliers to conduct business with, and to provide its goods and/or services to, CRP in accordance with applicable laws, rules, and regulations and in an ethical manner.

If any law, rule, or regulation conflicts with a statement in the CCE, the supplier must comply with the law, rule or regulation; however, if a local custom or practice conflicts with the CCE, then the supplier must comply with the CCE.

The **U.S. Foreign Corrupt Practices Act ("FCPA")** prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates to obtain or retain business. CRP firmly prohibits the making of illegal payments to government officials. The FCPA applies to all United States organizations, public or private, regardless of where they operate, and any entity, including a foreign person or firm, found in violation of the FCPA in the United States. Any entity may be held liable under the FCPA for the improper activities of its foreign subsidiaries and controlled affiliates if the entity authorized or participated in the illegal conduct.

Suppliers are expected to comply with the applicable statutory obligations pertaining to the prevention of money-laundering and terrorist financing, and to refrain from becoming directly or indirectly involved in any money-laundering activities or terrorist financing.

3.0 Bribery and Corruption

CRP supports all efforts to prevent bribery and corruption. CRP complies with the anti-bribery and anti-corruption laws and expects the same of our Suppliers. Therefore, Supplier shall not engage in any form of bribery, corruption, extortion, and embezzlement (whether or not such conduct would be a violation of the FCPA) and shall have adequate procedures in place to prevent any such bribery or corruption in their supply chain or by others acting for them. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. Behaviors or actions that may negatively influence, or appear to influence, business decisions shall be avoided.

4.0 Anti-Competitive Behaviors

CRP is committed to doing business fairly. We compete fairly and ethically in the markets where we operate. Therefore, we require our Suppliers to deal with CRP in a legal, ethical, and honest manner. When preparing and submitting bids or tenders to CRP, Suppliers are required to fully comply with all antitrust laws, rules, and regulations, and must not engage in anti-competitive behavior, price-fixing, bid sharing, bid rigging, or otherwise collude with others improperly, unethically or illegally.

Any Supplier who is approached about or becomes aware of any such anti-competitive behavior or other activities relating to CRP must immediately report it to their CRP purchasing contact.

5.0 Government Officials

To avoid reputational harm or the appearance of impropriety, no gift, money, loan, entertainment, service, or other item of value may be promised or provided, directly or indirectly, by or

on behalf of a supplier to a government official, or the official's friends or family members, in connection with business for or with CRP.

For ease of definition, “government official” shall include any officer, employee, candidate, agent, representative, official or de facto official of any government, military, government-owned or affiliated company, political party, or any public international organization existing under any international treaty or treaties (e.g., United Nations or World Bank). Please be aware, that when government officials are involved, even simple business courtesies such as meals, entertainment or travel may be illegal under international law or the laws of the host country.

Suppliers may interact with government agencies and their officials and employees. However, interactions with government agencies, officials and employees are often regulated by campaign finance, lobby disclosure and government ethics laws. Before attempting to influence any election or government agency decision, or before hiring or making any payment to an individual who is a public official or employee, Suppliers should confer with its Legal representation to ensure that such conduct is lawful.

6.0 Tax Evasion

CRP has a “zero tolerance” approach to engaging in, or facilitating, tax evasion. Supplier shall prohibit all forms of tax evasion or facilitation of tax evasion. At all times and in all countries, Supplier’s business should be conducted in a manner such that tax evasion is prevented.

7.0 Legal Matters

Supplier shall promptly notify CRP in writing of any criminal investigations or charges, regulatory investigations, fines, penalties, or citations, including any other claims or litigation, against Supplier or any of its affiliates or employees so that CRP can assess their interests and the potential impacts of such investigations, claims, charges.
or litigation. Suppliers must report all such legal matters to their CRP purchasing contact.

8.0 Conflicts of Interest

CRP expects Suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with the interests of CRP, even the appearance of a conflict of interest. A conflict of interest can arise if actions are taken or if there are interests that may make it difficult for Supplier to perform business with CRP objectively and effectively.

While engaged in business with CRP, Supplier shall not engage in any activity that creates a conflict of interest, or the appearance of a conflict of interest. Any potential or actual conflicts shall be promptly disclosed to Supplier’s CRP purchasing contact in writing and, before engaging in activity that would create or continue the conflict or appearance of conflict, written approval from CRP must be obtained, including, where applicable written authorization for Supplier to remain in a situation that could be seen as a conflict. Any questions about a conflict of interest should be raised with Supplier’s CRP purchasing contact.

9.0 Gifts and Hospitality to CRP Employees

It is understood that exchanging gifts and hospitality can be appropriate and customary in some circumstances. However, it must not be such as could or might appear to create any improper influence or obligation.

Suppliers must not provide any gift, meal, or entertainment to CRP personnel (or their family members) in any situation in which it might influence or appear to influence any decision in relation to the Supplier or create a sense of obligation or a perception or appearance of obligation. However, in other type situations the Supplier may provide modest gifts, meals, or entertainment to CRP personnel (or their family members) if these are: not cash/cash equivalent (e.g., store cards, tokens, or vouchers redeemable for cash value) or in excess of $50.00.

Any gift, meal or entertainment should comply with the following:

- It must be consistent with customary business practices and policies and should not appear extravagant or excessive or improper or frequent.
- It should not violate any law or policy.
- It can be supplier-company branded marketing or promotional items which are of minimal value.
- It can include normal meals or refreshments during a business meeting or marketing events.

10.0 Computer, System Security and Cybersecurity

Suppliers who have access to CRP computer equipment and/or CRP's information systems, or are responsible for the storage, processing, or transmission of CRP information, will ensure that the security of those systems comply with the applicable CRP information and cyber security standards. Suppliers must immediately report the loss of any CRP equipment or any other equipment containing CRP data, as well as any suspected or actual breach of CRP computer system or network security or unlawful or disclosure of CRP's information. "CRP Information" includes, without limitation, proprietary information, data and intellectual property of CRP or its affiliate, information, data, and intellectual property of third parties in CRP's or its affiliate's possession and used by them with the permission of such third parties, and personal information (including PII) of their directors, officers and employees in their possession.

In addition, Suppliers must ensure the following:

- Computer accounts, passwords and other types of authorization are assigned to individual authorized users and must not be shared with or divulged to others. Authorized users will be held accountable for all actions taken on their system with their user identification.

- Sexually suggestive or explicit material, gaming, file sharing or other inappropriate files or websites are not downloaded or accessed.

- Inappropriate or pirated content is not stored on CRP equipment and is not used (directly or indirectly) in the provision of any materials or services to CRP.

- Only approved, authorized, and properly licensed software is used on CRP computer systems.

- CRP equipment should not be used to play computer games, gamble, conduct political campaigns, or for personal gain.

- No attempts are made to circumvent or attack security controls on a computer system or network.

Suppliers must immediately notify CRP of any cybersecurity incidents (e.g., ransomware attack, malicious emails attempting to harvest credentials, social engineering/phishing, etc.) which might affect CRP. Suppliers should provide the data breach window of the incident along with the detailed impact from the incident.

11.0 Trade Compliance

CRP expects its suppliers to strictly comply with the relevant international and national foreign trade regulations, including, but not limited to, regulations concerning export controls and embargoes, and to refrain from being involved in any illegal business dealings with persons, companies or organizations that are subject to sanctions.

Suppliers may not cooperate with an international boycott of countries or peoples, unless approved by the U.S. Government. When conducting business in countries that enforce boycott activities, suppliers should review all relevant documents (for example inquiries, sales, orders, letters of credit, purchase orders and shipping papers) for illegal statements. In addition, Suppliers must report to the U.S. Government any boycott-related requests for information.

12.0 Environmental Compliance

The Supplier is required to be committed to good environmental management and stewardship. Suppliers must obtain environmental permits when required, understand their terms and conditions, and follow the laws, rules and regulations pertaining to those permits. Any waste materials left over from Supplier operations must be disposed of by Supplier, at its expense, legally and in a way that meets all environmental policies, laws, rules and regulations. If an event or circumstance occurs in a Supplier's facility that might harmfully affect the environment, CRP, its employees or the surrounding community, the Supplier must promptly communicate such event or circumstance (and of the adverse effects anticipated to result from the same) to the community and CRP; and to develop a plan to correct them effectively and quickly. For additional information please refer to the **Commonwealth Rolled Products Health, Safety and Environmental Policy**.

13.0 Human Rights

CRP is a company that prides itself on ethical and sustainable conduct. We expect our suppliers to support internationally recognized human rights and comply with all applicable laws regarding the treatment of employees and other stakeholders.

Suppliers may not use slave or involuntary labor of any kind, including prison labor, debt bondage or forced labor by governments. In addition, Suppliers may not engage in human trafficking or use corporal punishment, physical or psychological abuse, threats of violence or other forms of physical or mental coercion. Suppliers must comply with all applicable child labor laws, including hiring, wages, hours and working conditions.

Suppliers may not knowingly do business with any other supplier who engages in human rights abuses, including using forced labor or child labor. CRP expects its suppliers to comply with applicable laws, rules and regulations regarding basic human rights, including the use of forced and child labor.

See appendix for Conflict-Affected and High-Risk Areas Policy.

14.0 Discrimination and Harassment

CRP will not tolerate any illegal discrimination or harassment of any kind. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances or sexually explicit remarks.

15.0 Health and Safety

Each Supplier has the responsibility for maintaining an environmentally compliant and safe workplace for their employees by following safety and health laws, regulations, rules and best practices and reporting accidents, injuries and unsafe equipment, practices, or conditions. Violence and threatening behavior toward Supplier employees or independent contractors are not permitted. Suppliers and their employees and, where applicable permitted subcontractors must report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol, and free from any effects of prescription drug medication legally obtained that could render Supplier's (or such other person's) performance of their duties hazardous to themself or others, or hazardous to any property of CRP, or non-conforming to the Supplier's contractual commitment to CRP. The use of illegal drugs in the workplace will not be tolerated. In addition, Firearms in the workplace are prohibited. For additional information please refer to the **Commonwealth Rolled Products Health, Safety and Environmental Policy**.

Summary Statement

The standards of conduct described in this CCE are critical to the ongoing success of CRP. If Suppliers encounter questionable activities, CRP encourages them to immediately notify CRP. Suppliers are expected to take all appropriate actions to enable them to comply with the requirements under the CCE and to have adequate procedures in place to monitor and ensure such compliance. Suppliers are expected to take necessary corrective actions without delay to promptly address and remedy any identified non-compliance. If a Supplier is unable or unwilling to do so, CRP may exercise its rights to suspend or terminate the relationship with any such Supplier.

CRP reserves the right at any time(s), in its sole discretion, to repeal, replace, modify, or update all or any portion(s) of this policy, and further reserves the right at any reasonable time(s), in CRP sole discretion, to audit or to cause CRP's third-party consultants or advisors to audit [Seller's] compliance with such policy. [Seller] agrees to reasonably cooperate with CRP and its consultants and advisors in connection with any such audits that are conducted by or for CRP.

Commonwealth Rolled Products policy will be monitored and reviewed periodically, but not less often than every four years, to ensure any changes to the business align with human rights and equality and diversity is continually promoted in the workplace.

Mike Keown
Chief Executive Officer
June 2026

Appendix for Conflict-Affected and High-Risk Areas Policy

Additional OECD-aligned requirements for suppliers of metals

Commonwealth Rolled Products recognizes that the extraction, handling, processing, transportation and trade of metals have the potential to contribute to, benefit from, or result in adverse social and environmental impacts. For suppliers of metals we conduct due diligence in accordance with the OECD five-step framework for responsible supply chains of metals from Conflict-Affected and High-Risk Areas. Our due diligence processes address supplier risks associated with compliance with laws, respect for human rights such as equality, non-discrimination and diversity, respect for workers' rights of freedom of association, modern slavery, child labor, health and safety, and environmental impacts. We take a risk-based approach to ensure suppliers are complying with requirements set forth in our Supplier Code of Business Conduct & Ethics, which includes expectations of our suppliers as part of our CAHRA policy, and we monitor suppliers' compliance on an on-going basis.

Expectations of our suppliers

Regarding serious abuses associated with the extraction, handling, processing, transportation and trade of metals and minerals:

1. Supplier should not profit from, contribute to, assist with or facilitate the commission of the following serious abuses:
   i. torture, cruel, inhuman and degrading treatment;
   ii. forced or compulsory labour;
   iii. the worst forms of child labour;
   iv. other gross human rights violations and abuses.

Regarding risk management of serious abuses:

2. Supplier to suspend or discontinue engagement with upstream suppliers where they identify that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1 and where attempts to mitigate such impacts have failed.
3. Supplier to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, where minerals in the supply chain are extracted through artisanal or small-scale mining.

Regarding public or private security forces:

4. Supplier to screen public or private security forces to ensure that individuals or units of security forces that are known to be responsible for gross human rights abuses will either not be hired, in the case of 'individuals', or required to demonstrate measures to mitigate the likelihood of such impacts occurring in future, in the case of 'units'.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

5. Supplier to devise, adopt and implement policies and procedures designed to prevent or mitigate the risk of bribery and/or the solicitation of bribes to conceal or disguise the origin of metals and minerals associated with the extraction, handling, processing, transportation and trade of metals and minerals.

Regarding money laundering:

6. Supplier to devise, adopt and implement policies and procedures designed to prevent or mitigate the risk of money laundering resulting from, or connected to, the extraction, handling, processing, transportation and trade of metals and minerals.

Regarding the payment of taxes, fees and royalties due to governments:

7. Supplier to devise, adopt and implement policies and procedures designed to ensure that all required taxes, fees, and royalties are paid to governments in accordance with the supplier's position in the supply chain.

If CRP has reason to believe that the sourcing practices of a supplier are not aligned with these expectations or applicable international and host country laws and regulations, CRP may ultimately choose to exit the relationship.