COMMONWEALTH ROLLED PRODUCTS

CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

This Code of Business Conduct and Ethics (the "Code") applies to Commonwealth Rolled Products and its divisions and subsidiaries (which are collectively referred to in this Code as the "Company") and all directors, officers, employees and agents of the Company. Our Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees, officers and directors. We want you to be aware of commonly applicable laws and regulations and to be able to recognize sensitive areas and issues.

The Company wants it clearly understood that adherence to this Code carries the highest priority. Those who violate the standards in this Code are subject to appropriate, case-specific disciplinary action, up to and including termination of employment. This Code is administered by the Company's Human Resources Department.

We expect you to seek guidance when necessary in accordance with the procedures explained in Section 25 of this Code, and to report suspected crimes and violations of this Code by contacting our Human Resources Department at 270-295-5064. If you prefer to write, address your concerns to: 1 3 7 2 State Route 1957, Lewisport, KY 42351 Attention: Human Resources.

1. Compliance with Laws, Rules and Regulations

Obeying the law is the foundation on which the Company's ethical standards are built. All employees must respect and obey the laws of the cities, states and countries in which we operate. Not all employees are expected to know the details of these laws, however, if you are concerned or unsure about the legality of any actions or practices, we expect you to seek advice through the procedures outlined in Section 25 of this Code.

2. Bribery and Corruption

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 in order to obtain or retain business. The FCPA's accounting, recordkeeping and internal controls provisions apply to both foreign and U.S. operations and complement its antibribery provisions by prohibiting the creation of unreported slush funds, unreported illegal payments and other instances of false books and records. The Company's policy is that it is strictly prohibited to make illegal payments to government officials of any country or to create false books and records to circumvent the Company's internal accounting controls.

The U.S. government also has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of

these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar laws and regulations.

In addition to compliance with the FCPA, company policy prohibits bribery and corruption of any kind regardless of government affiliation which covers any and all entities that do business with Commonwealth Rolled Products, Inc.

3. Environmental Compliance

The Company is committed to good environmental management. Our personnel must obtain environmental permits when required, understand their terms and conditions, and follow the rules. Any waste materials left over from Company operations must be disposed of legally and in a way that meets the Company's environmental policies. If something occurs in a facility that might harmfully affect employees or the community, it is Company policy to promptly communicate these situations to the community and affected employees through designated Company representatives and to develop a plan to correct them effectively and quickly. It is Company policy to respond truthfully and responsibly to questions and concerns about Company environmental actions, so if you are called upon by the Company for assistance with a governmental or media inquiry, provide only truthful and accurate information. For more information on our policies and philosophy in this important area, we refer you to the Commonwealth Rolled Products Environmental Policy.

4. Internal Control Procedures

The Company has established accounting policies, systems, controls and records for authorizing, executing and recording, accurately, fairly and in reasonable detail, all transactions involving the Company's assets and liabilities. The Company's policy is that no employee will engage in any activity that circumvents the Company's accounting policies or systems of internal controls.

Company management is charged with establishing and maintaining an adequate internal control structure and procedures for the Company, in order to assess and report on the effectiveness of the Company's internal controls on an annual basis. The Company's outside auditors who certify the Company's financial statements are required to attest to management's assessment of the effectiveness of the Company's internal controls.

5. Mobile Devices

The Company provides certain employees with computers, laptops, tablets, mobile telephone devices, and other Company-owned computers and telecommunication devices (collectively, "Company Devices"). Any and all electronic communications (e.g., email, text messages, etc.) pertaining to Company business must be made through Company Devices, and may not be made through any personal devices (e.g., a personal mobile phone). Notwithstanding the fact that employees are authorized to use Company Devices, Company Devices are exclusively owned by, and the property of, Commonwealth Rolled Products, and as such, may be collected, accessed, monitored, copied, or imaged by the Company at any time. Employees do not have, and should not expect to have, any expectation of privacy with respect to any and all materials on a Company Device.

To the extent that any personal device, including without limitation any computer, laptop, tablet, or mobile telephone, is used to conduct business on behalf of the Company, or is otherwise used in

connection with an employee's employment at the Company (e.g., used to send text messages or emails concerning Company business), the Company has the right to image and copy any and all materials on such personal device. Employees who use personal devices to conduct Company business do not have, and should not expect to have, any expectation of privacy with respect to any communications or materials that relate to Company business.

6. Antitrust

Company policy requires full compliance with all antitrust laws. Further, Company policy requires all persons acting on the Company's behalf to avoid even the appearance of conduct that is contrary to antitrust laws. Anyone who violates the law, or knowingly permits a subordinate to do so, is subject to Company disciplinary action, up to and including termination of employment. Criminal penalties and civil remedies for antitrust violations are severe for both the Company and the individual and include large fines and imprisonment. The following guidelines are by no means an exhaustive list of areas where antitrust laws apply. If you have questions about a specific business activity, consult with your supervisor or the Human Resources Department.

In certain circumstances, communications or relations with customers or suppliers can result in antitrust violations. For example, it is prohibited, through an understanding or threat, to restrict a customer's freedom to set its own prices and terms for its products or for the resale of the Company's products. Also prohibited are "tying sales" in which a customer must buy one Company product in order to buy another Company product or a Company supplier must sell one product to the Company in order to sell another product to the Company. Probably the greatest danger for violations of the antitrust laws rests in contacts with competitors. The laws make illegal any agreement or understanding, expressed or implied, written or oral, which restricts competition. Good intentions, customer benefits and consumer benefits do not justify or excuse antitrust violations.

You must not engage in any communications with competitors which could result, or even appear to result, in:

- price-fixing,
- bid-rigging,
- allocation of customers, markets or territories,
- boycotts, or
- production limits to restrain trade.

Many countries other than the U.S. also have antitrust laws (known in some countries as competition laws) that set and enforce standards of corporate and individual behavior in this area. They govern a wide range of Commonwealth Rolled Products' business activities in many jurisdictions. Because breaking these laws can bring very severe penalties to the Company and the individual, and because many competition and antitrust issues are very fact-specific, this is an area where you must consult the Human Resources Department if you need guidance.

7. Extortion

This company strictly prohibits any form of extortion, including demanding, pressuring, coercing, or soliciting anything of value from another person, organization, supplier, contractor, or customer by using threats, abuse of authority, or misuse of company position.

Examples of prohibited conduct include, but are not limited to:

- Requesting or implying that a supplier or partner provide money, gifts, services, discounts, or favors in exchange for business decisions.
- Using threats, intimidation, or misuse of authority to influence another party's actions or decisions.
- Conditioning company business, approvals, or actions on personal favors or benefits.
- Any attempt to pressure individuals or organizations for personal or company gain outside of fair, transparent, and ethical business practices.

Any employee who becomes aware of extortion, attempted extortion, or related unethical behavior must report it immediately through the reporting procedures outlined in this Code. The Company strictly prohibits retaliation against anyone who reports concerns in good faith.

8. Embezzlement and Misappropriation of Assets

The Company strictly prohibits embezzlement, misappropriation, or any other unauthorized use, diversion, or theft of Company assets, funds, data, or property. This includes manipulating records, systems, or processes to conceal or personally benefit from Company or customer resources.

Prohibited conduct includes, but is not limited to:

- Diverting cash receipts, inventory, scrap, rebates, or credits for personal use.
- Creating, altering, or approving false or misleading invoices, purchase orders, time sheets, expense reports, or accounting entries.
- Using Company purchasing cards, vendor accounts, or assets for non-Company purposes without authorization.
- Concealing shortages or unauthorized transactions by manipulating systems, records, or approvals (e.g., split orders, phantom vendors, dummy shipments).

Any suspected embezzlement or misappropriation must be reported immediately via the reporting channels set forth in this Code. The Company prohibits retaliation against any person who reports concerns in good faith.

Confirmed violations will result in disciplinary action, up to and including termination, and may be referred to law enforcement.

Employees are expected to cooperate fully with internal or external investigations related to suspected embezzlement or related misconduct.

9. Conflict of Interest

Conflicts of interest are prohibited as a matter of Company policy, and can constitute grounds for termination. A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Company. A conflict of interest can arise when an individual takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. It is almost always a conflict of interest for a Company employee to work for, or on behalf of, a competitor, customer, or supplier. Conflicts of interest may also arise when an employee, or a member of his or her family, receives any improper personal benefits as a result of his or her position with the Company. You are not allowed to work for a competitor as an employee, consultant, or board member. Any and all decisions made on behalf of Commonwealth Rolled Products – including but not limited to decisions concerning the selection of vendors, suppliers, or other contractors – must always be made in the best interest of the Company.

Accepting gifts, favors, hospitality (i.e., meals), personal discounts, or similar arrangements (collectively, "Gifts") from any person or entity that has a present or may have a future business relationship with the Company can constitute a conflict of interest. Employees may only accept Gifts from third parties that are modest and infrequent (e.g., a tee shirt, branded pens, movie tickets). Employees may never receive the following from third parties who have a present or potential future business relationship with the Company: (1) cash or cash equivalents (i.e., gift cards), (2) any gift in excess of $50, or (3) anything in exchange for making any business decision on behalf of the Company.

Below is a non-exhaustive list of examples of conflicts of interests:

- Accepting lavish or frequent meals from a supplier;
- Hiring a family member or a friend;
- Awarding a contract to a business that is owned/controlled by a family member or a friend (or a business that employs a family member or friend);
- Owning a business or otherwise having a financial interest in a business that (1) transacts with the Company in any way, or (2) competes against the Company in any way; and
- Providing any non-public information concerning the pricing of a vendor/supplier to any other third party – including other vendors and suppliers.

All Company employees are required to disclose (1) any and all conflicts of interest, (2) any potential conflicts of interest, (3) any relationships that could be perceived as creating a conflict of interest, and (4) any relationship that might otherwise violate this Code. Employees must complete the Conflict of Interest Disclosure Certification annually and during the onboarding process, (which is available at **Attachment 1**). Employees are required to disclose any and all conflicts of interest and potential conflicts of interest in real time; meaning that employees must submit an updated Conflict of Interest Disclosure Certification in the event that any information (see paragraph and non-exhaustive

list above) contained on the Employee's last certification becomes false or inaccurate. Updated certifications must be submitted as soon as practically possible. Conflict of Interest Disclosure Certifications must be submitted to the Company's Human Resources department. The certifications will be reviewed and maintained by a governing committee which is chaired by the CFO.

10. Insider Trading

Employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about the Company should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. Please refer to the Commonwealth Rolled Products Insider Trading Policy. If you have any questions, please consult the Company's Human Resources Department.

11. International Boycotts

Company representatives 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, employees should review all relevant documents (for example inquiries, sales, orders, letters of credit, purchase orders and shipping papers) for illegal statements. Company representatives must also report to the U.S. Government any boycott-related requests for information, so be sure to report any such requests to your supervisor.

12. Government and Media Requests

The Company cooperates with reasonable requests from government agencies, authorities, and the media and has designated certain representatives to respond to such inquiries. If you are called upon by the Company for assistance with a governmental investigation or media inquiry, you must provide only truthful and accurate information. If a government or media representative approaches you, refer them to the Company's Human Resources Department. Do not talk to government or media representatives on your own without prior approval and preparation, not because the Company has anything to hide, but rather so that correct and complete information is provided under appropriate circumstances.

13. Intellectual Property

The Company has made a large investment in the development of patents, trade secrets and other valuable intellectual property. The continued success of the Company is dependent upon the successful commercial development and exploitation of its intellectual property. Every employee is responsible for insuring that these valuable assets are protected and preserved. In most cases the Company will automatically own all rights in intellectual property created by an employee. In some cases, however, an employee may be asked to sign a separate document transferring the employee's rights to the Company. Infringement of other parties' intellectual property rights is both expensive and illegal. It is the Company's policy to avoid unauthorized use of other companies' or persons' proprietary intellectual property, including trademarks, service marks, patents, copyrights, and trade secrets.

Therefore, employees are instructed as follows:

- Employees responsible for purchasing and/or managing software should be familiar with the terms of software licenses and should take steps to ensure that users of the software are familiar with any contractual limitations on use.

- Employees should not knowingly make unauthorized copies of software, use it in amanner, at a location, or on any machine, that is not authorized by the terms of the license agreement. As an example, employees should not bring software from home to use on their personal computers at work.

- Unless approved by appropriate management personnel, employees should not engage outside consultants or developers without adequate protection of the intellectual property rights of the Company.

- Employees should respect the intellectual property rights of other companies and persons and not knowingly misappropriate such property.

14. Corporate Opportunities

Employees, officers and directors may not take for themselves personally opportunities that are discovered through the use of Company information or property or as a result of their position with the Company. No employee may use Company property, information, or position for improper personal gain, and no employee may compete with the Company, directly or indirectly. Employees, officers, and directors owe a duty to the Company to advance our legitimate interests when the opportunity to do so arises.

15. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance and our processes, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing illegal disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practices.

To maintain the Company's reputation, compliance with our quality processes and safety requirements is essential. In the context of the Company's ethics, quality requires that our products and services be processed, designed and produced to meet our obligations to customers. All inspection and testing documents must be correct, complete and handled in accordance with all applicable regulations and all customer materials and products must be handled and processed in accordance with contractual obligations.

Company personnel may offer or give gifts, favors, personal discounts or similar arrangements at the Company's expense to any person or entity with which the Company has, or is seeking a business relationship only in accordance with Company policies then in effect.

Offering or providing gifts, favors, personal discounts or similar arrangements or meals,

entertainment and other forms of hospitality to government representatives (US or non-US) is not permitted without the prior written approval of the Human Resources Department. See also the discussion under Section 2 of this Code: "Payments to Government Personnel."

16. Human Rights

The Company is a company that prides itself on ethical and sustainable conduct. We support internationally recognized human rights, including the United Nations Guiding Principles on Business and Human Rights, and we comply with all applicable laws regarding the treatment of our employees and other stakeholders.

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

As a Company, we will not knowingly do business with any suppliers that engages in human rights abuses, including using forced labor or child labor. We expect our suppliers to comply with applicable laws, rules and regulations regarding basic human rights, including the use of forced and child labor.

17. Discrimination and Harassment

The Company 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.

18. Health and Safety

Each employee has responsibility for maintaining an environmentally compliant and safe workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are not permitted. Employees must report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated. Firearms in the workplace are prohibited.

19. Record-Keeping

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported. All financial books, records and accounts must correctly reflect transactions and events.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, voice mail, internal memos, and formal reports.

Records should always be retained or destroyed according to the Company's record retention policies. In the event of litigation or governmental investigation you may be called upon to preserve all of your records. These requirements may not always be clear-cut, so if you have a question, we expect you to seek advice through the procedures described in Section 25 of this Code.

20. Confidentiality

Employees must maintain the confidentiality of confidential information entrusted to them by the Company or its customers. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

21. Protection and Proper Use of Company Assets

All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company equipment should not be used for non-Company business. The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties.

22. U.S. Economic Sanctions

For foreign policy reasons, the United States maintains economic sanctions against various foreign countries and entities. The economic sanctions laws carry both civil and criminal penalties for violations, and the Company and all of its subsidiaries must strictly honor these laws. These comprehensive sanctions prohibit almost all transactions with the governments of these countries, their state-owned companies, their private companies, their citizens, and their agents - wherever they are located. Transactions are also prohibited with terrorist, drug dealing, and other organizations and individuals that are so designated by the U.S. government.

In order to determine whether companies or individuals are affiliated with the sanctioned countries or entities, or are themselves the subject of sanctions, the U.S. Treasury Department maintains a list of "Specially Designated Nationals" and "Blocked Persons," or similarly-named list(s). In order for the Company to proceed with any transaction with a foreign national or foreign entity, it must determine whether the foreign national or foreign entity is included on this list.

23. U.S. Export Controls

For national security reasons, the United States controls the export and re-export of a range of materials, equipment, goods, software, and technology. Controlled items can only be exported or re-exported if the Company has first obtained an export license or if the Company has determined that the item falls under certain license exceptions. Whether a license will be approved, and whether a license exception applies, depends on a combination of factors, including the item to be exported, the

country of destination, who will be using the product, and for what purpose. Both civil and criminal penalties can apply to the Company and Company personnel if controlled items are illegally exported. The Company therefore must strictly honor the U.S. export control laws.

24. Foreign Exchange Controls

Certain countries have laws limiting their citizens' right to hold foreign currency. Residents of those countries who receive foreign currency - such as United States dollars - outside their homeland are required to exchange that currency for their national currency within a specific period of time. In order to avoid participating in a violation of these laws, Company personnel must make payments to foreign nationals and foreign companies solely to and in the name of the contracting party, addressed to that party's principal place of business, within that party's country of domicile. Company personnel may not enter into any transaction that evades currency, tax, or other laws of a foreign country.

25. Reporting any Illegal or Unethical Behavior

Employees are expected to cooperate in internal investigations of misconduct. Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behavior and for guidance on the best course of action in a particular situation. The Company also provides access to an anonymous hotline for reporting known or suspected auditing, accounting or other concerns.

The website address is: www.lighthouse-services.com/commonwealthrolledproducts

The domestic hotline is: 1-855-222-1037

The email address is: reports@lighthouse-services.com

The Company does not permit retaliation against anyone who in good faith reports suspected violations or because he or she refused to carry out a directive that, in fact, constitutes a violation of this Code or violation of applicable federal or state law. Those who engage in retaliation will be subject to appropriate, case-specific disciplinary action, including termination of employment.

Additional reporting procedures may apply to certain employees who supervise or otherwise are involved in activities relating to internal controls and the preparation and review of the Company's financial statements.

26. Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

- Ask yourself: What specifically am I being asked to do? Does it seem unethical or

improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision- making process. Remember that it is your supervisor's responsibility to help solve problems.

Seek help from Company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question or concerns, discuss it locally with Human Resources, or the Chief Operations Officer. You may contact our Human Resources Department by phone (270-295-5064). If you prefer to write, address your concerns to: Human Resources Department, (1372 State Route 1957, Lewisport, KY 42351). The Company will maintain the anonymity of the employee and the confidentiality of the information that is reported to the fullest extent possible consistent with the Company's obligations to investigate the matter. Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

27. Certifications of Compliance

All of our employees must work honestly and in good faith. Employment with the Company depends on each employee's ability and willingness to comply with this Code. Adherence to these standards carries very high priority within Commonwealth Rolled Products. All employees, officers and directors are required to sign a Certificate of Compliance when they join the Company, certifying among other things that the individual has received a copy of this Code, has read it, understands it, and will apply it to all business interactions. A similar Certificate of Compliance will also have to be submitted periodically (at least annually).

Approved by:

Ash Ambulgekar, CFO

9/15/26
Date

Commonwealth Rolled Products Business Code of Conduct and Ethics

I have read and fully understand the terms of the Commonwealth Rolled Products Business Code of Conduct and Ethics.

I understand the company reserves the right to make changes to this policy as may be required. This 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.

I understand that if I violate the standards in this code, I am subject to disciplinary action and employment could be terminated.

_____ _____

Employee Signature Date

Attachment 1

ANNUAL CONFLICT OF INTEREST DISCLOSURE CERTIFICATION

Instructions: Please carefully read Section 9 of the Commonwealth Rolled Products or MetalX Code of Business Ethics on Conflicts of Interest, and then read and complete following certification. Please print your name in the space provided at the bottom of the page, and sign and date the certification.

1. Do you work, or within the last 12 months have you worked, for any employers other than Commonwealth Rolled Products or MetalX (in any capacity), or otherwise receive any compensation from any business other than Commonwealth Rolled Products or MetalX (the "Company")? If yes, please list any other employers.

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2. Are you an owner of, or have any financial interest in, or have you had any such relationship or financial interest within the last 12 months, any company or business that directly or indirectly (a) does business with Commonwealth Rolled Products or MetalX, or (b) employs or engages any Company employees or contractors? If yes, please list any such company or business.

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3. Is any Immediate Family Member of yours (this includes your spouse, domestic partner, children, brothers and sisters, brothers-in-law, sisters-in-law, daughters/sons-in-law, and anyone that resides in your personal residence), or anyone that you regularly socialize with, an owner or employee of, or otherwise have any financial interest in, any business that directly on indirectly does business with the Company? Are you aware of any such situation that existed within the last 12 months? If yes to either question, please list any such person, and the respective business or company.

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4. Is any Immediate Family Member currently employed or engaged by the Company? If yes, please list such persons and their respective titles.

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5. Have you received any money or money equivalent (including gift cards), gifts, meals, hospitality, or any other thing of value, in excess of $50 from any person, company, or business, that directly or indirectly does business with the Company? If yes, please describe.

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6. Are you aware of any unethical conduct at the Company, or conduct that otherwise actually or potentially violates the Company Code of Business Conduct and Ethics? If yes, please describe.

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   _____

I have received a copy of, and I have read and understand, and agree to comply with the Company Conflicts of Interest Policy (Section 9 in the Code of Business Conduct and Ethics). I understand that I am required to update this certification in the event that any of my responses becomes false or inaccurate, and that a violation of Commonwealth Rolled Products' and MetalX' Conflicts of Interest Policy, or any intentionally false statement in this certification, is potential grounds for discipline, including termination.

_____ _____

Date Signature

_____

Printed Name

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