COMMONWEALTH
Rolled Products

Commonwealth Rolled Products – Biodiversity Policy

Purpose

Commonwealth Rolled Products, Inc. (CRP) recognizes that healthy ecosystems, biodiversity, and natural resources are essential to long-term business success, environmental sustainability, and community well-being.

CRP is committed to minimizing adverse impacts on biodiversity and nature across its operations, products, and supply chain while supporting the conservation, restoration, and responsible management of natural resources.

This policy establishes CRP's commitment to protecting biodiversity, reducing nature-related risks, conserving natural resources, and promoting responsible business practices that contribute to ecosystem resilience.

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2. Scope

This policy applies to:

- All CRP operations and facilities.
- All employees and contractors working on behalf of CRP.
- Suppliers and business partners where biodiversity and nature-related impacts may occur.
- Activities related to land use, water use, emissions, waste generation, resource consumption, and supply chain sourcing.

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3. Policy Statement

CRP is committed to:

- Protecting biodiversity and ecosystems affected by our business activities.
- Preventing and minimizing adverse environmental impacts.
- Conserving natural resources.
- Supporting responsible land and water stewardship.
- Managing nature-related risks in decision-making processes.

- Promoting biodiversity considerations throughout our value chain.
- Driving continual improvement in environmental performance.

Biodiversity and nature considerations shall be integrated into environmental management, operational planning, capital projects, procurement decisions, and sustainability initiatives.

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4. Commitments

4.1 Compliance

CRP will:

- Comply with applicable environmental laws, regulations, permits, and biodiversity-related requirements.
- Evaluate emerging biodiversity and nature-related regulations and stakeholder expectations.
- Maintain environmental management systems designed to identify and manage environmental risks.

4.2 Impact Prevention and Mitigation

CRP is committed to:

- Avoiding, minimizing, and mitigating impacts on ecosystems where practical.
- Identifying activities that may affect habitats, wildlife, species, or ecological resources.
- Considering biodiversity impacts during project planning and operational changes.
- Applying pollution prevention principles to reduce impacts on surrounding ecosystems.

4.3 Water Stewardship

CRP recognizes that water resources are critical to both business operations and ecosystem health.

CRP will:

- Promote efficient water use.
- Monitor significant water consumption.
- Reduce avoidable water losses where feasible.
- Support protection of local watersheds and aquatic ecosystems.
- Prevent unauthorized discharges and releases to the environment.

4.4 Waste and Circular Economy

CRP will attempt to:

- Reduce waste generation.
- Improve recycling and beneficial reuse of materials.
- Support circular economy principles.
- Reduce landfill disposal where practical.
- Improve resource efficiency throughout operations.

4.5 Pollution Prevention

CRP will:

- Reduce emissions, releases, and waste streams that may adversely affect ecosystems.
- Manage chemicals responsibly.
- Maintain appropriate controls for air emissions, wastewater, and waste management.
- Continuously seek opportunities to reduce environmental impacts from operations.

4.6 Climate and Nature Linkages

CRP recognizes the connection between climate change and biodiversity loss.

CRP will support initiatives that:

- Reduce greenhouse gas emissions.
- Improve energy efficiency.
- Support lower-carbon manufacturing practices.
- Reduce climate-related risks that may affect ecosystems and natural resources.

4.7 Sustainable Supply Chain

CRP encourages suppliers to:

- Comply with environmental regulations.
- Manage biodiversity and environmental risks.
- Reduce pollution and resource consumption.
- Protect ecosystems and natural habitats.
- Support sustainable sourcing practices.

Biodiversity and environmental considerations may be incorporated into supplier selection, supplier assessments, risk evaluations, and sustainability reviews.

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5. Biodiversity Risk Assessment

CRP will periodically evaluate biodiversity and nature-related risks associated with:

- Facility operations.
- Land use activities.
- Water use and discharge activities.
- Waste management activities.
- Supply chain activities.
- Future expansion or development projects.

Where significant risks are identified, mitigation actions and improvement opportunities will be evaluated.

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6. Employee Awareness and Engagement

CRP will support employee awareness regarding:

- Environmental stewardship.
- Biodiversity protection.
- Resource conservation.
- Pollution prevention.
- Responsible environmental practices.

Employees are encouraged to contribute ideas that improve environmental performance and support biodiversity conservation.

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7. Objectives and Targets

CRP is committed to continual improvement and has established the following objectives:

Water Management

- Maintain programs to monitor significant water use.
- Identify water reduction opportunities within operations.

Waste Reduction

- Improve recycling and material recovery practices.
- Reduce waste sent for disposal where feasible.

Environmental Compliance

- Maintain compliance with applicable environmental permit requirements.
- Investigate and address significant environmental incidents.

Biodiversity and Nature

- Conduct periodic reviews of biodiversity and nature-related risks associated with operations.

- Integrate biodiversity considerations into environmental planning and significant project evaluations.

Supply Chain

- Increase engagement with suppliers regarding environmental and sustainability performance.
- Incorporate environmental sustainability considerations into supplier management processes.

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8. Governance

Executive leadership is responsible for ensuring that biodiversity and nature considerations are incorporated into CRP's sustainability strategy.

Environmental and ESG leadership are responsible for:

- Maintaining this policy.
- Monitoring performance.
- Identifying improvement opportunities.
- Supporting implementation across the organization.
- Communicating relevant expectations to stakeholders.

Managers and employees are responsible for supporting policy implementation within their areas of responsibility.

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9. Monitoring and Reporting

CRP will monitor relevant environmental performance indicators, which may include:

- Water consumption.
- Waste generation and recycling.
- Environmental incidents.
- Compliance performance.
- Environmental improvement initiatives.

Where appropriate, biodiversity and nature-related performance information may be incorporated into sustainability reporting and management reviews.

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10. Continuous Improvement

CRP is committed to the continual improvement of its environmental and sustainability performance through:

- Risk assessment.
- Objective setting.
- Performance monitoring.
- Corrective and preventive actions.
- Employee engagement.
- Supplier collaboration.

This policy will be reviewed periodically to ensure continued alignment with business objectives, stakeholder expectations, and emerging environmental best practices.

Approved,

Parvin Phillips
Director, HSE