

The logo for Jupiter Aluminum features the word "JUPITER" in a bold, black, sans-serif font. Below it, the word "ALUMINUM" is written in a smaller, black, sans-serif font, followed by a trademark symbol (TM). A blue arc is positioned to the right of the text, partially enclosing it.

JUPITER
ALUMINUM™

CHAIN OF CUSTODY
MANAGEMENT
SYSTEM

A series of four parallel, light blue diagonal lines extending from the bottom left towards the top right, positioned to the right of the main title text.



Table of Contents

General Information..... 3

 Company Profile..... 3

 Purpose 3

 Scope 3

 Management Sponsorship 3

 Relevant Personnel 4

Communications 4

 Responsible Sourcing 4

 Training..... 4

 ASI Secretariat Reporting 5

Supplier Due Diligence 5

 General Information..... 5

 Scope 5

 Criteria..... 6

 Methodology 6

 Risk Screening 6

 Data Collection..... 6

 Risk Assessment 7

Material Accounting System 9

 Material Accounting Period..... 9

 Eligible Inputs..... 9

 Inventory Analysis..... 9

 Inspection 9

 Inventory Tracking..... 9

 Mass Balance System 10

CoC Order Process: 11

 CoC Documents..... 11

 CoC Document Contents 11

 CoC Document Template..... 11

 Verification Requests/Error Management 12

Marketing Claims Guide 12

 General Information..... 12

 General Claims..... 12

 Certification Claims 12

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 1 of 16 |



Product Claims 13

Logo Use 13

Approvals..... 14

 Approval Process..... 14

Monitoring use of claims:..... 14

Non-compliance..... 14

Records Retention.....15

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 2 of 16 |



General Information

Company Profile

Jupiter Aluminum, founded in 1992, is a privately held, aluminum coil manufacturer headquartered in Des Plaines, Illinois. Jupiter produces aluminum coils with 97% recycled aluminum scrap using natural gas fired Oxy-fuel furnaces.

Purpose

In 2017, Jupiter Aluminum became a member of The Aluminium Stewardship Initiative (ASI). ASI is an international standard setting organization that has created guidelines for aluminum industry members to improve operational and supply chain sustainability. In 2020, Jupiter Aluminum was awarded the Performance Standard Certification for its Hammond production facility.

ASI developed the Chain of Custody (CoC) Standard Certification program to create a system for Performance Standard certified entities in the aluminum value chain to provide stakeholders with independent assurance for responsible production and sourcing of Aluminum. To fulfill the requirements set under the ASI CoC Standard, Jupiter has implemented this management system to address all applicable components of the standard.

Scope

This management system applies to Jupiter Aluminum Corporation operations located in: Hammond, Indiana that includes scrap remelting, cold rolling, annealing, and finishing operations and coil coating operations at Jupiter Aluminum Coil Coating – Beech Bottom, located in Beech Bottom, West Virginia, and Jupiter Aluminum Coil Coating – Fairland, located in Fairland, Indiana. This management system applies to the directors, officers, and employees within all Jupiter facilities.

Management Sponsorship

Jupiter Aluminum’s internal structure allows for effective management of supply chain impacts associated with aluminum scrap sourcing, melting, casting, and roll production. Jupiter has assigned the Environmental Health and Safety (EHS) Advisor, as CoC representative. They have the appropriate responsibility, authority, and resources to implement and maintain Jupiter’s Chain of Custody program. This document will be reviewed, updated, and approved by management every 3 years.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 3 of 16 |



Relevant Personnel

The following list outlines employees responsible in implementing the CoC Management System:

| Employee Job Title | Responsibility |
|---|--|
| Environmental Health and Safety Advisor | CoC Management Representative. Provide oversight in the development, review, and implementation of CoC Management Systems. |
| Sustainability Specialist | Development and implementation of CoC Management System. |
| IT Director | ERP oversight related to implementation of CoC material inventory tracking and CoC document communication. |
| Customer Service Manager | Oversee order processing of CoC material requests. |
| Vice-President Supply Chain | Oversight regarding Supply chain and material purchasing systems. |
| Receiving Manager | Manage Material identification and inspection processes. |

Communications

Responsible Sourcing

Jupiter Aluminum maintains a Responsible Sourcing Policy (RSP) that sets guidelines for its suppliers regarding the following criteria:

- Safety
- Labor Rights
- Human Rights
- Environmental Stewardship
- Anti-corruption
- Conflict Affected and High Risk Areas

The RSP is communicated with suppliers, contractors and any others with whom we do business. For more details, please reference our RSP [here](#).

Training

Jupiter Aluminum has a training program to ensure relevant personnel are aware and competent in their responsibilities under this CoC Management System. This program includes the following:

| Training Description | Frequency |
|---|------------------------------|
| New Hire Sustainability Orientation | Initial |
| General Sustainability and ASI training (Every 2 years) | Every two years or as needed |
| Receiving Department Scrap Identification Training (Annual) | Annual |
| CoC Executive Management System Training (Every 2 years) | Every two years or as needed |
| Customer Service CoC Document Training (Every 2 Years) | Every two years or as needed |
| CoC Sales/Marketing Training | Every two years or as needed |

Note: If any changes are made during management review, Jupiter will notify and retrain any relevant employees.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 4 of 16 |



ASI Secretariat Reporting

Jupiter Aluminum will report to the ASI Secretariat within 3 months of the calendar year. The following information will be included:

- Input and Output Quantities of CoC Material;
- Input Percentage calculated for the calendar year;
- Maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any;
- Maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents;
- Total Input Quantity of Eligible Scrap, with a breakdown by Post-Consumer Scrap and Pre-Consumer Scrap that is designated as CoC Material supplied directly from a CoC Certified Entity;
- Quantity of ASI Aluminium allocated to ASI Credits in the calendar year (if applicable); and
- Quantity of ASI Credits purchased in the calendar year (if applicable).

Note: ASI is bound by its Anti-Trust Compliance policy - The individual data reported to the ASI Secretariat will be kept secure, confidential, and will not be made publicly available. Additionally, the information reported to the ASI Secretariat shall be approved by the Chain of Custody Representative before submission.

Supplier Due Diligence

General Information

Jupiter Aluminum has a due diligence process to assess and mitigate risk in its aluminum scrap material supply chain. This due diligence includes ongoing, proactive, and reactive measures to identify and reduce potential environmental, social and/or governance risk areas.

Jupiter's aluminum scrap suppliers are assessed with respect to their ability to meet Jupiter's sourcing requirements. Jupiter audits suppliers in categories including environmental performance, ethics, anti-corruption, human rights, as well as health and safety.

Scope

This due diligence process applies to and will be communicated to all Jupiter Aluminum scrap aluminum material suppliers.

It will be conducted when:

- There is a new supplier;
- Jupiter becomes aware of a significant change with a supplier (i.e. a merger or acquisition);
- New information becomes available about a supplier (i.e. through media); and/or
- If the assessment of the supplier indicates that they are higher risk or are in a region or a supply chain that is less stable and warrants a higher level of examination, Jupiter will conduct the review on a more frequent basis.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 5 of 16 |



Criteria

The following criteria will be taken into consideration:

- Anti-Corruption
- Responsible Sourcing
- Human Rights
- Conflict Affected and High-Risk Areas

Note: For more information regarding the principles Jupiter expects its suppliers to adhere to, please reference the Jupiter Aluminum Responsible Sourcing Policy [here](#).

Methodology

Jupiter aluminum’s due diligence process will include the following components:

- Risk Screening
- Data Collection
- Risk Assessment
- Mitigation Measures

Risk Screening

Jupiter will conduct a preliminary review to establish context for presented risk based on the entity’s location, size, and the volume and nature of the material being supplied. Risks relating to origin and suppliers of Recyclable Scrap Material can vary significantly. Jupiter’s risk screening may consider the following factors:

- The origin of the material
- The supplier
- The type of material
- The value of transactions
- Unusual circumstances

Note: For Recyclable Scrap Material, the origin is considered the country in which the scrap is generated or where it is given up for recycling.

Data Collection

To attain information regarding the Criteria (see page 5), Jupiter leverages the following data collection methods:

- Due Diligence Questionnaire
- Desk Side Survey

Note: Data collected during the due diligence process will not be disclosed externally.

Due Diligence Questionnaire

Jupiter Aluminum may distribute a Supplier Due Diligence questionnaire to aluminum scrap suppliers. A completed questionnaire will provide Jupiter with additional information regarding Environmental, Social, and Governance risk in supplier business operations.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 6 of 16 |



Desk Side Survey

A deskside due diligence process may be used in place of or as a supplement to the questionnaire. This process includes a review of publicly available information from: Supplier websites, online databases, or news reports.

Risk Amplifiers

Risk amplifiers define additional criteria that may reduce or increase overall risk based on unique indicators. These are typically associated with specific scenarios related to the location of operation, the volume of material supplied, or other factors. The following risk amplifiers will be considered when conducting the risk analysis:

- Located in a Conflict Affected or High-Risk Area;
- Supplying a significant percentage (> 20%) of Jupiter’s material volume;
- Record of significant regulatory non-compliance;
- Record of significant legal non-compliance;
- Country location;
- Operations outside of the US; and/or
- Historical supply chain disruptions.

Risk Assessment

Once Jupiter has conducted a risk screening and collected the necessary supplier data, it will perform a risk assessment of the suppliers in question, and subsequently assign a risk rating based on our review of collected data. This assessment creates an objective review process for Jupiter to be able to identify and reduce relevant supply chain risks.

Risk Ratings

Once the risk assessment has been completed, Jupiter will assign risk ratings and mitigation measures as outlined in the table below.

Jupiter will work collaboratively with suppliers to help prevent and mitigate identified risks, as needed. Additionally, a risk that becomes a recurring issue may be subject to additional action.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 7 of 16 |

| Risk Rating | Scoring Threshold | Mitigation Measures |
|-------------------------|-------------------|---|
| Extreme Low Risk (ELR) | 91-100 | - No action required |
| Low Risk (LR) | 61-90 | <ul style="list-style-type: none"> - No action required - Ongoing Monitoring |
| Intermediate Risk (IR) | 31-60 | <ul style="list-style-type: none"> - Ongoing monitoring - Collaborate with vendor to review identified risks and develop corrective measures |
| High Risk (HR) | 11-30 | <ul style="list-style-type: none"> - Collaborate with vendor to review identified risks and develop corrective measures - Implement corrective measures - Establish recurring due diligence until risk is diminished |
| Extreme High Risk (EHR) | 1-10 | <ul style="list-style-type: none"> - Collaborate with vendor to review identified risks - Implement corrective measures - Establish recurring due diligence until risk is diminished - If necessary, review vendor business arrangement |



Material Accounting System

Material Accounting Period

Jupiter Aluminum will maintain a 12-month material accounting period that begins on January 1st and ends on December 31st. This follows Jupiter’s current fiscal year.

Eligible Inputs

The following materials are considered eligible for ASI Chain of Custody Certification at Jupiter Aluminum:

- Pre-Consumer Scrap that is designated as COC Material Supplied directly from a CoC certified Entity;
- Aluminum recovered from Dross and treated Dross residues that is subject to supplier due diligence (RSI);
- Scrap that is subject to supplier due diligence and is assessed by Jupiter to be of post-consumer origin; and
- A portion of Jupiter’s Internal Scrap relative to the previous month’s CoC input percentage.

Note: Jupiter Aluminum only processes material that is >90% aluminum.

Inventory Analysis

When aluminum scrap material is received at Jupiter Aluminum’s Hammond facility, it undergoes a variety of control mechanisms to ensure that it is the correct material, that it is safe for processing, and to identify whether the content is pre-consumer or post-consumer in nature.

Inspection

Jupiter Aluminum conducts visual inspections for all incoming aluminum raw material shipments. The inspection team is trained to identify pre-consumer and post-consumer materials.

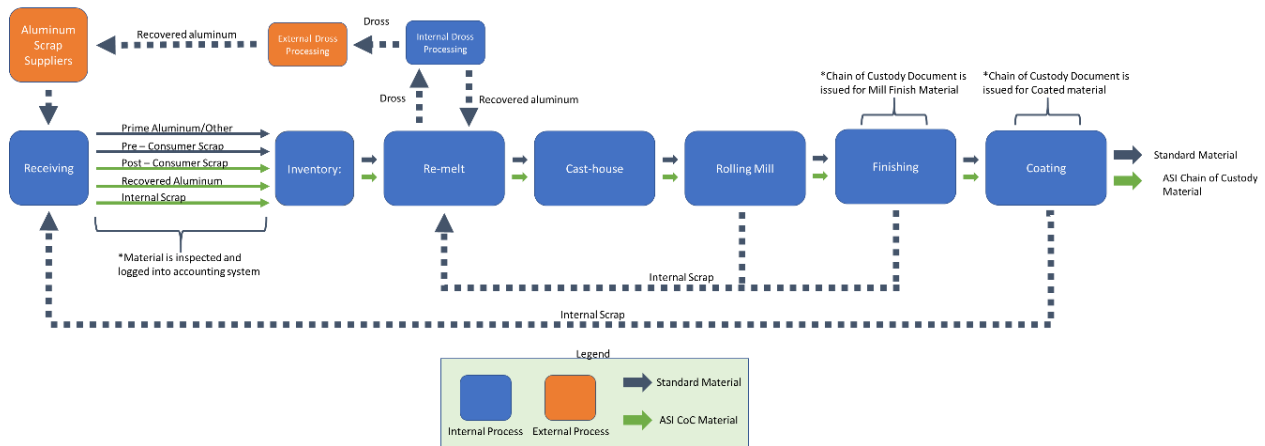
Note: for more information regarding the inspection process, please see Jupiter’s Certifying Charge Material guidelines.

Inventory Tracking

Jupiter Aluminum leverages Aptean Axis ERP (Axiom) software to track materials processed at its facilities. This includes an identification system that references inspection reports to quantify the volume and type of scrap material received (i.e., pre-consumer, post-consumer, Prime aluminum, etc.). This data is integrated into Jupiter’s mass balance system.

| | | | |
|--|-----------------------------|-----------------------------------|--------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 9 of 16 |

Jupiter Aluminum Material Process



Mass Balance System

Jupiter Aluminum maintains a mass balance system that will consolidate Internal Inventory data from Axiom to track the following material information:

- Input and Output Quantity of CoC Material;
- Input and Output Quantity of Non-CoC material;
- Input Quantity of Post-Consumer Scrap;
- Input Quantity of Pre-Consumer Scrap;
- Input Quantity of Recovered Sow Ingot (Dross Processing); and
- Input Quantity of Pre-Consumer Scrap that is Eligible Scrap, where it is supplied directly from a CoC Certified Entity (where applicable).

The Material Accounting System (Axiom) and correlated mass balance system also ensures the following:

- Input percentage is calculated as the sum of all eligible and CoC inputs divided by total inputs;
- Output quantity is determined on the basis of the calculated input quantity; and
- The absolute output quantity of CoC material is never more than the input quantity of CoC material.

In regard to a force majeure situation, the following applies:

- A material overdraw of 20% of total Input Quantity of CoC Material for the Material Accounting Period is never exceeded;
- The Internal Overdraw shall not exceed the amount of CoC Material affected;
- The Internal Overdraw shall be made up within the subsequent Material Accounting Period;
- Jupiter’s Material Accounting System must clearly identify any carry over of a Positive Balance; and
- A Positive Balance generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period shall expire at the end of that Period if not drawn down.

Note: Jupiter will review data from the mass balance system on a quarterly basis.

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 10 of 16 |



CoC Order Process:

When a customer submits a purchase order (PO), product specifications and volume is defined. Product specifications may include the desired volume of ASI Material. A Sales Order (SO) number is generated for each unique specification within the purchase order. The SO and PO numbers are used to track the order through the manufacturing process. When a coil enters finishing, a coil number is assigned and associated with an SO. Coils that Jupiter assigns as ASI material will coincide with a PO and SO that specify an ASI Material request.

CoC Documents

Once CoC material has been approved for shipping, Jupiter will generate a CoC Document. Each CoC Document will be automatically populated with data from Jupiter’s ERP system (Axiom). Whenever a CoC certified coil is dispatched to a customer or outsourced contractor, it will be accompanied (via email) by the associated CoC Documentation.

CoC Document Contents

Each automatically generated CoC document shall contain the following information:

- A date of issuance;
- A unique Sales Order Number for each order of ASI material;
- Jupiter Aluminum’s address and CoC Certification number;
- The name and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number;
- The responsible employee at Jupiter who can verify information in the CoC Document;
- A statement confirming that “The information provided in the CoC Document is in conformance with the ASI CoC Standard.”;
- The type of CoC Material in the shipment; and
- The mass of CoC Material in the shipment;

CoC Document Template

Sustainability Information

In addition to the information detailed above, Jupiter may choose to include sustainability data from the most recent reporting period:

- Mill Finish Material – Average GHG intensity (tonnes CO2e per tonnes Aluminum);
- Coated Material – Average GHG intensity (tonnes CO2e per tonnes Aluminum); and
- Recycled Content (ISO 14021, 2016) of the CoC Material as a percentage of total mass.

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 11 of 16 |



Verification Requests/Error Management

Jupiter’s CoC Representative will review the accuracy of CoC documentation on a regular basis. If a receiving entity would like to request verification of any information in the CoC document, they can make a request via the contact information provided in the CoC document. When making a request, please include the following information:

- The requesting entities name;
- The name and contact information of the person making the request;
- A copy of the CoC document in question (if available); and
- An overview of the concern.

Return Material

If an error is discovered after CoC Material or Eligible Scrap has been received, Jupiter and the customer shall document the error and the agreed steps taken to correct it. Additionally, the entities shall implement actions to avoid a recurrence.

Note: If an error is identified, the mass balance will be adjusted.

Marketing Claims Guide

General Information

The following information serves to provide an overview of the required procedures for any marketing claims or ASI logo use regarding Jupiter Aluminum’s ASI Membership or Performance/CoC certification.

For a complete summary, please reference the following:

ASI Claims Guide: <https://aluminium-stewardship.org/download/64256/>

ASI Style Guide: <https://aluminium-stewardship.org/download/64928/>

For additional information, contact the ASI Secretariat - Communications@aluminium-stewardship.org

Note: Prior to publication, all claims must be approved by Jupiter’s EHS Director or Sustainability Specialist.

General Claims

The following rules apply to general references to ASI:

- ASI can be referred to as ‘Aluminium Stewardship Initiative Ltd’, ‘Aluminium Stewardship Initiative’, and/or ‘ASI’;
- The above names and acronyms may not be translated into other languages without also retaining the English version/s for reference;
- Misleading or confusing use of the ASI name or logo is prohibited; and
- The use of the ASI name or logo as, or as part of, another brand name is prohibited.

Certification Claims

The following rules apply to claims regarding Jupiter’s certification:

- Claims must be consistent with the type and scope of ASI certification that the member achieved;

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 12 of 16 |



- Jupiter may only claim certification for the standards achieved (Performance | Chain of Custody), and the locations certified (Hammond, IN | Beech Bottom, WV | Fairland, IN); and
- Certified members may make claims about their ASI Certification to customers, suppliers, consumers, media organizations, and stakeholders generally.

Product Claims

The Following rules apply to Jupiter’s Product related claims:

- Approval is required for any claims relating to ASI that appear on products; and
- Any claims about ASI Aluminium must be supported by certification against the ASI CoC Standard, covering the relevant scope(s).

Note: Downstream products may contain a range of other metals (for example in alloys) and/or other materials (for example, plastics, glass, paints and agricultural products). Such materials are not within the scope of ASI’s standards. Product claims must not imply ASI Certification of these other non-aluminium materials.

Logo Use

The following rules apply to use of the ASI logo:

- The ASI name or logo must not be placed in such a way that it could be interpreted as belonging to any company or organization other than ASI or its members;
- The use of the ASI name or logo alongside other sustainability/responsible sourcing logos, marks or seals is generally permitted; and
- Associating the ASI name or logo with products without Chain of Custody (CoC) certification is prohibited.

Please refer to the [ASI Style Guide](#) for additional details on logo use. It provides information regarding the following:

- Available ASI logo formats;
- Minimum size of logos;
- Colors and permitted adaptations;
- Background colors;
- Exclusion zone; and
- Visual examples of acceptable and incorrect uses of logo placement, size, color, etc.

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 13 of 16 |

Approvals

Claims that appear on products or are related to sourcing ASI Aluminium and ASI Credits require approval from ASI. The following requirements must be met before seeking approval:

- Current ASI Membership.
- Current ASI Certification for both the ASI Performance Standard and ASI Chain of Custody Standard that includes the relevant production/product within its scope.
- Agree to submit a description/visual of the proposed claim/s to ASI for advance review/approval.

Approval Process

The following steps provide a guide to the process and timelines for approval of ASI product-related claims:

- **Step 1:** Submit test/design to ASI for approval using Claims Approval Request Form (Available on the ElementAl Platform).
- **Step 2:** ASI will review and aim to provide a response within 10 days in most circumstances.
- **Step 3:** If approved, the member may proceed with use of the text/design. If not, the design will need to be adjusted and re-submitted.
- **Step 4:** ASI will review the re-submitted design and aim to provide a response within 10 days in most circumstances.
- **Step 5:** Details of all applications and approvals will be recorded. Each approved application will be assigned a unique identifier to enable future traceability.

Note: Claims content or designs should not be finalized or printed for commercial application until approval is granted by ASI.

Monitoring use of claims:

- Members use of approved claims will be monitored as part of the ASI assurance process;
- Recertification audits will include an assessment of member claims; and
- For members, checks will be carried out at the time of annual renewal of membership. This will be carried out by the ASI Secretariat and will involve an inquiry to the member about any claims being made, along with follow up checks to the member's website.

Non-compliance

If an ASI Member does not comply with one or more of the rules and conditions specified in the ASI Claims Guide, ASI can withdraw the right to use the ASI logo and/or suspend or terminate ASI membership. Additionally, ASI reserves the right to act on any use of its name or logo that it believes to be inappropriate.

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 14 of 16 |



Records Retention

Jupiter Aluminum shall maintain records covering all applicable requirements of the CoC Standard for a minimum of 5 years. This data will be maintained via a combination of electronic filing systems and physical storage. The following table provides details on CoC related recordkeeping:

| Records | Duration | Filing |
|--|----------|---|
| Approved CoC Documents | 5 years | Electronic Filing |
| Supplier Profiles | 5 years | Electronic Filing |
| Supplier Survey Records | 5 years | Electronic Filing |
| Employee CoC Training Material | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Employee Training Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Production Data | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Scrap Receiving Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Scrap Identification Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Material Accounting Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Mass Balance Reports | 5 years | Electronic Filing |
| ASI Claim Approval Requests | 5 years | Electronic Filing |
| CoC Policy Approval Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| JAC Anti-Corruption Bribery Agreements | 5 years | Electronic Filing and/or On-Site Physical Storage |
| ASI CoC Order Records | 5 years | Electronic Filing and/or On-Site Physical Storage |
| Records of Management System Reviews | 5 Years | Electronic Filing and/or On-Site Physical Storage |
| Bill of Lading | 5 Years | Electronic Filing and/or On-Site Physical Storage |
| Sales Orders | 5 Years | Electronic Filing and/or On-Site Physical Storage |
| Purchase Orders | 5 Years | Electronic Filing and/or On-Site Physical Storage |

| | | | |
|--|-----------------------------|-----------------------------------|---------------|
| JAC Chain of Custody Management System | Prepared By: EHS Department | Approved By: Paul-Henri Chevalier | |
| Date of Origin: November 1, 2020 | Date of Revision: 6/01/2023 | Date of Approval: 6/12/2023 | Page 15 of 16 |



Review and Revision Log

| Reviewer(s) | Date | Revisions |
|---|-----------|--|
| Mark Volkmann Bill Kenealy Vickie Smith Laura Dinger | May 2022 | Changed titles: CFO to Vice President, Finance; Human Resources Director to Vice President, Human Resources; Director of Manufacturing to Vice President, Manufacturing. Corrected some spelling and grammar errors. |
| Mark Volkmann | June 2023 | Updated to new corporate logo. Updated Scope Reformatted some pages to accommodate insertion of new logo. Revised Table of Contents Changed title of Director of Supply Chain to Vice-President Supply Chain Changed title IT Manager to IT Director Corrected some spelling and grammar errors. |
| | | |
| | | |