

The logo for Jupiter Aluminum features the word "JUPITER" in a bold, sans-serif font with a blue horizontal bar through the letter "E". Below it, the word "ALUMINUM" is written in a smaller, all-caps 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™

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

GLOBAL CODE OF
CONDUCT



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General Information

Statement of Intent

Jupiter Aluminum is committed to upholding the highest standard of **safety, respect,** and **integrity** in its production of recycled aluminum. To maintain this standard, Jupiter has developed a Business Ethics Code of Conduct that guides all its operations, wherever those are located. All officers, directors, and employees are expected to conduct business ethically.

Scope

This Jupiter Aluminum Business Ethics Code of Conduct (COC) applies to Jupiter Aluminum Corporation and its subsidiaries, directors, officers, and employees. The COC contains a diverse set of business practices and procedures that set out the guiding principles necessary for successful operational ethics.

Safety

Jupiter believes that a safe and healthy workplace is a fundamental right of every person and vital to maintaining a successful operation. Jupiter must uphold an Environmental Health and Safety (EHS) Manual founded upon continuous improvement and goes above and beyond the requirements set by the Occupational Safety and Health Administration (OSHA). This system applies to all workers and visitors and ensures that all employees know the hazards and safe practice procedures for their work. If a worker feels unsafe, they must stop working immediately and reach out to a supervisor. Please reference Jupiter’s EHS Written Program and Procedures for more detailed information.

Respect

Sustainability and the Environment

Jupiter Aluminum is committed to maintaining a sustainable operation that respects the environment and strives to mitigate its environmental footprint at all avenues. It believes that corporate responsibility plays a crucial role in running an ethically sound business. Therefore, it has established an environmental management system that includes policies and procedures to guide current and future development. Jupiter must always support technological innovation and operate facilities with their ecological impact in consideration. Jupiter will strive to increase its energy efficiency, reduce emissions, and mitigate waste. Jupiter must adhere to all applicable environmental regulations and strive to exceed the requirements set in place by the United States Environmental Protection Agency (EPA). Jupiter conducts regular environmental impact assessments and agrees to benchmark performance on an annual basis. Please reference the Jupiter Aluminum Environmental Management System for details.

Human Rights

Jupiter Aluminum recognizes and respects the dignity of all human beings. Business and Government have an essential role in promoting respect for human rights throughout the world. Jupiter embraces the right of all people to live their lives free from social, political, or economic discrimination or abuse. Jupiter will conduct its operations within its sphere of influence and business role, according to our company values, ethics, and policies. It agrees not to contribute to armed conflicts either directly or indirectly via its operations or business partnerships. Jupiter’s position on human rights is compatible with the United Nations Universal Declaration of Human Rights and the core conventions of the International Labor Organization.

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Specifically, Jupiter will not hold any person in slavery or servitude, or use forced or indentured labor nor engage in human trafficking or child labor and shall seek to ensure that its supply chains are free of such practices. The key policies that reflect our intent regarding human rights include this Code of Conduct; Social Management System; Health, Safety and Environment Policies; and Jupiter’s position on inclusion and diversity. These address how Jupiter conducts its business with respect for all people and the environment, its accountability and responsibility to communities, ethical and trustworthy relationships, and dialogue with its stakeholders.

Workplace rights

Jupiter Aluminum recognizes the importance of maintaining and promoting proper workplace rights. Jupiter must comply with United States Federal and State Laws and the International Labor Organization guidelines regarding workplace rights. These standards include, but are not limited to, remuneration, working time, family leave, disciplinary practices, and Freedom of Association/Collective Bargaining. Jupiter must maintain a biannually negotiated Collective Bargaining Agreement. Jupiter Aluminum must ensure that it can assess and respond to stakeholder complaints, grievances, and other requests for information in a prompt, respectful and sensitive manner.

Integrity

Legal Compliance

Jupiter Aluminum’s commitment to integrity begins with compliance of laws, rules, and aluminum industry regulations. It is every employee’s responsibility to uphold the policy set in place to maintain this level of compliance. All employees must also respect and obey the laws of the cities, states, and countries in which Jupiter operates.

Jupiter’s Governance Framework establishes the overarching principles and commitment to action for Jupiter with respect to achieving compliance by:

- Identifying a clear compliance framework within which Jupiter operates;
- promoting a consistent, rigorous and comprehensive approach to compliance throughout Jupiter;
- developing and maintaining practices that facilitate and monitor compliance within Jupiter;
- seeking to ensure standards of good corporate governance, ethics and community expectations; and
- engendering a culture of compliance where every person within Jupiter accepts personal responsibility for compliance and acts ethically and with integrity.

Please find more details within the Jupiter Aluminum Governance Framework.

Fair Competition and Anti-Corruption

Jupiter Aluminum and its suppliers commit to communicate openly and truthfully about their dealings with others, obeying applicable laws and corresponding regulations governing fraud, bribery, and corruption. Additionally, it is expected that all entities be committed to the principles of fair competition and comply with the antitrust and fair competition laws of the United States and Canada.

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Reporting

Jupiter Aluminum requires truthful and precise reporting of information in order to make responsible business decisions. This standard must be enforced and maintained across all departments and applies to all forms of non-financial reporting including but not limited to environmental management, legal reporting, and internal benchmarking systems.

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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.

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