

The logo for Jupiter Aluminum features the word "JUPITER" in a bold, black, sans-serif font. The letter "E" is stylized with a blue horizontal bar. Below "JUPITER" is the word "ALUMINUM" 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™

GOVERNANCE FRAMEWORK

A decorative graphic consisting of several parallel, light blue diagonal lines that extend from the bottom left towards the top right of the page, crossing behind the main text.



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Statement of Intent

Jupiter Aluminum promotes a governance framework dedicated to ethical and transparent business practices. Jupiter is a privately held company developed under United States Law that complies with formal governance regulations and generally accepted best practice. It provides clear direction regarding its management structure and policy creation process while maintaining necessary oversight at executive and board levels. These policies address, among other things, strategy and business planning, finance, risk management, organizational and employee development, health, security, safety and environment, ethics, compliance, and social responsibility. Existing policies shall be reviewed annually and revised as necessary to reflect the evolving functions of the company and developing trends of best practice and regulatory compliance in corporate governance.

Impact Assessment Policy

Jupiter Aluminum firmly believes in conducting efficient, ethical, and transparent Impact Assessments on environmental, social, cultural, and human rights. Jupiter's impact assessment process is used to screen developments, oversee expansions, and to monitor significant changes to operating facilities to determine if there are any environmental and/or social risks involved.

Impact assessments for new projects and major changes to existing facilities are required in the US under a variety of environmental laws and regulations, most notably the National Environmental Policy Act (NEPA). Were Jupiter to undertake a new project or a major change to an existing facility, it would comply with the requirements of the applicable statutes and regulations for environmental, social, and human rights impact assessments. In addition to NEPA, Jupiter Aluminum complies with the Clean Air Act, Clean Water Act, Wetlands Protection Laws, UN Guiding Principles on Business and Human Rights, and must follow local Building Codes, and US Zoning Laws.

When new equipment is installed, it may require a minor or major modification to the Part 70 Air Operating Permit. Each installation is reviewed to determine whether a modification needs to be submitted to the local department of environmental management.

This process dictates any potential environmental and/or social risks and impacts that the local community and environment could subsequently suffer from.

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Mergers and Acquisitions

Jupiter sees a commitment to sustainability as a pre-requisite to any merger or acquisition that Jupiter Aluminum may consider. Environmental, social, and governance strengths are indicators that the spirit of the company will continue in the present and into the future.

Once Jupiter identifies a merger or acquisition target, Jupiter will engage with outside specialists to perform environmental, social and fiscal due diligence. This process will maintain Jupiter’s standard of corporate social responsibility.

Closure & Decommissioning Plan

In the case of a planned or unplanned site closure or decommissioning event, Jupiter Aluminum understands the importance of following proper procedure. Jupiter’s closure procedure must adhere to the legal requirements detailed in the Department of Labor’s (DOL) Worker Adjustment and Retraining Notification Act (WARN), as well as the Indiana Department of Environmental Management (IDEM) and West Virginia Department of Environmental Protection guidelines for plant closures. Procedure components may include responsibility designations, employee notifications, financial concerns, equipment and material removal, waste disposal, impact mitigation strategy and environmental site assessments and impact mitigation. These procedures intend to close the facility in a manner that is protective of human health and the environment. Please see below resources for more details:

[-DOL Guidelines](#)

[-IDEM Guidelines](#)

[-WVDEP Guidelines](#)

Legal and Regulatory Compliance Policy

Policy Statement

Jupiter is committed to and conducts its business activities lawfully and in a manner that is consistent with its compliance obligations.

This Legal and Regulatory Compliance Policy (Compliance Policy) 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.

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Scope

This policy applies to Jupiter’s directors and employees, and to all contractors working for or at Jupiter.

Jupiter’s legal and regulatory compliance obligations include:

- Legal obligations, including:
 - legislative;
 - contractual;
 - permits, licenses and other forms of authorization;
 - common law;
 - equitable obligations; and
 - relevant industry codes and compulsory standards;
- External Obligations, including:
 - regulatory policies and codes.
- Jupiter policies, procedures and guidelines
 - Detailed operational procedures support Jupiter’s legal and regulatory compliance obligations

Legal Updates

Use of legal compliance registers to identify and maintain relevant information related to, for example, applicable legislation and regulations, licenses and permits, and reporting and disclosure obligations.

Because Jupiter’s legal compliance issues are closely controlled by the three identified individuals mentioned in the Compliance Program Section of this document, the need for a register is not warranted.

Upon their arrival at Jupiter, all employees are issued an Employee Handbook that communicates the company’s commitment to comply with applicable laws and regulations. Additionally, legally required informational posters are displayed in common spaces for employees to review.

Employees receive internal documentation and OSHA newsletters related to any legal developments that may affect their safety and/or operations.

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Policy Overview

Jupiter recognizes that there are four elements for an effective compliance program:

- Commitment – Jupiter’s commitment to, and the establishment of, a compliance program;
- Implementation – Jupiter’s implementation of a compliance program, including ongoing education and maintenance;
- Monitoring and Measuring – reporting and supervision of the compliance program; and
- Continual Improvement – regular review and continual improvement of the compliance program.

Compliance Program

The Jupiter Compliance Program includes:

- A consistent process for identification, assessment, management, reporting, review and monitoring of compliance obligations and issues;
- Periodic compliance audits;
- A mechanism to aid with identification, documentation, investigation, actioning and reporting on compliance issues; and
- Cyclical reviews of content and a program to continuously identify improvement opportunities.

Jupiter Aluminum Corporation has access to competent and qualified legal personnel focused in four areas:

- Business
- Human resources
- Environment
- Safety

For business related legal issues, the need for legal assistance is determined by Jupiter’s Vice President, Finance along with the President. Jupiter’s contact is Ken Richman at Burke, Warren, MacKay, Serritella.

For human resource related legal issues, the need for legal assistance is determined by Jupiter’s Vice President, Human Resources along with the President. For human resource related legal issues, Jupiter’s contacts are Martin Green at Zuber Lawer & Del Duca LLP; Cheryl A. Zic at Crist, Sears & Zic, LLP; and Brian West Easley at Jones Day One Firm Worldwide.

For environmental or safety related legal issues, the need for legal assistance is determined by Jupiter’s EHS Director along with the President. Jupiter’s point of contact is Anthony Sullivan at Barnes and Thornburg, LLP.

Additionally, each of these information streams is supplemented using the federal register and relevant online resources for updates on relevant regulatory changes.

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Non-Compliance Reporting

Jupiter Aluminum’s compliance program enables regular efficient and effective reporting to Executive Management while providing important information to the public.

The reporting includes information on compliance with Jupiter’s obligations, compliance issues and compliance breaches. Reports on compliance breaches outline the breach and the corrective actions planned or undertaken to ensure that the possibility of re-occurring or systemic breaches are reduced.

The Freedom of Information Act ("FOIA") is a law that allows any member of the public to request copies of federal government records including an entity’s noncompliance violations. Additionally, noncompliance related fines, judgements, penalties, and/or non-monetary sanctions may be publicly available via the following public databases:

- [Environmental Protection Agency](#)
- [Indiana Department of Environmental Management](#)
- [Department of Labor](#)
- [Equal Employment Opportunity Commission](#)
- [Occupational Safety and Health Administration](#)

Compliance Education and Training

The compliance program promotes awareness of compliance through facilitation of employee training and education.

Continuous Improvement

Jupiter’s compliance program and compliance performance are regularly monitored, measured, and reported. These reviews shall be carried out in addition to audits. As part of continuous improvement, this policy may be amended by Management for approval by the Board.

Responsibilities and Authorities

In accordance with Jupiter’s Employee Handbook, it is the responsibility of all Jupiter Directors and employees and all contractors working for or at Jupiter sites to comply with the law, Jupiter’s contractual commitments, and Jupiter’s written policies and procedures. Executive Management is responsible for promoting a culture of integrity by making decisions that are both ethical and honest. Jupiter’s employees should never encourage a violation of the law.

The Board of Directors

The Jupiter Board retains the ultimate responsibility for legal and regulatory compliance and is charged with overseeing, reviewing, and ensuring the effectiveness of Jupiter’s compliance systems. The Board is responsible for determining the appropriate level of compliance that the Board is willing to accept in the conduct of Jupiter’s business activities.

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Jupiter's Employees

Jupiter's people have a responsibility to ensure that their activities on behalf of Jupiter comply with all applicable legal and external obligations and Jupiter procedures.

Jupiter employees are required to:

- familiarize themselves with Jupiter's Compliance Policy and other policies concerning compliance with specific areas of legislation that affect their workplace activities;
- ensure that they adhere to relevant legislation and their compliance obligations;
- incorporate compliance management practices into their business units;
- perform their duties in an ethical, lawful and safe manner;
- report and escalate all compliance concerns, issues and breaches as required by the compliance program;
- undertake training in accordance with the compliance program; and
- implement the practices learned in training provided by Jupiter.

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Fair Competition and Anti-Bribery/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, the entities must be committed to the principles of fair competition and comply with the antitrust and fair competition laws of the United States.

Scope

This Anti-Bribery/Corruption policy exists to set out the responsibilities of Jupiter Aluminum Corporation and those who work for us about observing and upholding Jupiter’s zero-tolerance position on bribery and corruption. It also serves to act as a source of information and guidance for those working for Jupiter. It helps them recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy Statement

Jupiter Aluminum is committed to implementing and enforcing systems that ensure bribery and corruption is prevented in its business operations. Through proper guidance, training, and disciplinary action, Jupiter ensures the compliance of political and charitable contributions, vendor gifts, facilitation payments, and kickbacks. Furthermore, Jupiter has a zero-tolerance policy for bribery and corruption. It believes in acting professionally, fairly, and with integrity in all business dealings. Jupiter will constantly uphold all US laws relating to anti-bribery and corruption in the jurisdictions in which it operates.

Policy Coverage

This Anti-Bribery/Corruption policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with Jupiter (including third parties), or any of its subsidiaries or their employees, no matter where they are located (within or outside of the US). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organization Jupiter meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements Jupiter makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

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Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Compliance Manager.

What is and what is NOT acceptable

This section of the Anti-Bribery/Corruption Policy refers to 4 areas:

- Vendor Gifts
- Facilitation payments
- Political contributions
- Charitable contributions

Vendor Gifts

Jupiter accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favors or benefits.
- It is not made with the suggestion that a return favor is expected.
- It is compliant with local law.
- It does not include cash or a cash equivalent (*e.g.*, a voucher or gift certificate).
- It is appropriate for the circumstances (*e.g.*, giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of appropriate type/value & given at an appropriate time considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Vice President, Finance.

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Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Vice President, Finance, who will assess the circumstances.

Jupiter recognizes that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. As good practice, gifts given and received should always be disclosed to the Vice President, Finance. Gifts from suppliers should always be disclosed. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Vice President, Finance should be sought.

Facilitation Payments and Kickbacks

Jupiter does not accept and will not make any form of facilitation payments of any nature. Jupiter recognizes that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. Jupiter recognizes that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Jupiter does not allow kickbacks to be made or accepted. Jupiter recognizes that kickbacks are typically made in exchange for a business favor or advantage.

Jupiter recognizes that, despite its strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt detailing the amount and reason for the payment.
- Immediately report this incident to the Vice President, Finance

Political Contributions

Jupiter will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. Jupiter recognizes this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

Jupiter accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes. Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Jupiter will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Vice President, Finance.

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Employee Responsibilities

Employees of Jupiter must ensure that they understand and comply with the information contained within this agreement, and with any training or other information provided related to anti-bribery and corruption information. All employees and those under Jupiter’s control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this Anti-Bribery/Corruption policy.

If there is reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, the Vice President, Finance must be notified. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Jupiter has the right to terminate a contractual relationship with an employee if they breach this Anti-Bribery/Corruption policy.

What employees should do if they are a victim of bribery or corruption?

Employees must tell their Vice President, Finance as soon as possible if they are offered a bribe by anyone, if they are asked to make one, if they suspect that they may be bribed or asked to make a bribe in the near future, or if they have reason to believe that they are a victim of another corrupt activity.

Whistleblowing

This section of the policy covers 3 areas:

- How to raise a concern
- Protection
- What to do when experiencing bribery or corruption

How to raise a concern

If an employee suspects that there is an instance of bribery or corrupt activities occurring in relation to Jupiter, they are encouraged to raise concerns at an early stage. If they are uncertain about whether a certain action or behavior can be considered bribery or corruption, they should speak to the appropriate line manager, director, or Head of Governance and Legal.

Jupiter will familiarize all employees with its whistleblowing procedures so employees can vocalize their concerns swiftly and confidentially.

Protection

If they refuse to accept or offer a bribe, or they report a concern relating to potential act(s) of bribery or corruption, Jupiter understands that the person in question may feel worried about potential repercussions. Jupiter will support anyone who raises concerns in good faith under this policy, even if investigation finds that they are mistaken.

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What to do when experiencing bribery or corruption

Jupiter will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavorable treatment in relation to the concern the individual raised.

If there is reason to believe someone has been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, the appropriate line manager or Vice President, Finance should be informed immediately.

Training and communication

Jupiter will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked to formally accept that they will comply with this policy.

Jupiter’s anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

Jupiter will provide relevant anti-bribery and corruption training to employees etc. where the Entity feels that their knowledge of how to comply with the Bribery Act needs to be enhanced.

Record keeping

Jupiter will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. The Entity will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and Reviewing

Jupiter’s Vice President, Finance is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Vice President, Finance.

This policy does not form part of an employee’s contract of employment and Jupiter may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

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Sustainability Reporting Policy

Jupiter Aluminum adheres to a governance strategy that requires a transparent reporting system to benchmark the cradle to grave impact of its operation from an environmental, social, and economic perspective. To maintain continually improving processes, Jupiter has established environmental and social management systems that leverage long term strategic goals to integrate sustainability into its business procedures. Jupiter discloses data on air emissions, waste generation, energy use, and water use on an annual basis within the sustainability section of its corporate webpage. As a privately held corporation, Jupiter does not publicly disclose financial or tax related information.

Jupiter Aluminum Responsible Sourcing Policy

Jupiter Aluminum has outlined a Responsible Sourcing Policy that focuses on addressing sustainability within the value chain. This policy is crucial in maintaining an ethical and sustainable governance approach. It is based on its Code of Conduct, Employee Handbook, Safety Health and Environment Standards (SHE), Conflict Minerals Policy, as well as, The UN Guiding Principles on Business and Human Rights. Compliance with United States Federal and State laws is mandatory for all parties that work with Jupiter Aluminum.

Sustainable and ethical practices help ensure that Jupiter Aluminum remains aligned with its core principles of ethical business management. Included principles fall under the following categories: labor rights, human rights, the environment, anti-corruption, and conflict affected and high risk areas.

Jupiter Aluminum strives to produce high-quality aluminum with a minimal environmental and social impact while maintaining positive relationships with its stakeholder communities. The Responsible Sourcing Policy supports Jupiter’s main objectives in producing high quality aluminum while simultaneously maintaining and improving ethical business practices.

Jupiter’s Responsible Sourcing Policy can be found [here](#).

Supplier Requirements

Jupiter calls for all suppliers to abide by applicable laws, rules, and regulations as well as the standards relevant for their business. This requires systematic documentation and recordkeeping. Non-conformities must be identified and addressed through appropriate controls.

Jupiter Aluminum has implemented a due diligence process that aims 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.

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Suppliers of Jupiter Aluminum are assessed with respect to their ability to meet Jupiter’s requirements. Jupiter audits suppliers in categories including environmental performance, ethics, fair competition, human rights, as well as health and safety. Suppliers that do not satisfy these requirements may be subject to corrective actions. All Suppliers and Vendors must be made aware of Jupiter’s Global Code of Conduct and Responsible Sourcing Policy.

Additional details can be found in Jupiter Aluminum’s [Scrap Purchase Terms and Conditions](#).

Supply Chain Transparency

Jupiter strives to ensure that its supply chain is completely transparent to better monitor and assess risks. Jupiter expects its suppliers to work on this traceability target and to comply with the Responsible Sourcing Policy.

Fair competition and anti-corruption

Suppliers must adhere to the principles of Jupiter Aluminum’s fair competition and anti-corruption Policy. Jupiter requires its suppliers to communicate openly and truthfully about their dealings with others, obeying applicable laws and corresponding regulations governing fraud, bribery, and corruption.

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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 Volkman | June 2023 | Updated to new corporate logo. |
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