

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™

OCCUPATIONAL HEALTH AND SAFETY POLICY

A decorative graphic consisting of several parallel, slightly curved lines in a light blue color, extending diagonally from the bottom left towards the top right of the page.



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Occupational Health and Safety Policy	Prepared By: EHS Department	Approved By: Paul-Henri Chevalier	
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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 Oxy-fuel powered furnaces.

General Information

Management Sponsorship

Jupiter Aluminum’s internal structure allows for effective management of potential occupational, health and safety (OH&S) impacts associated with aluminum scrap melting operations and coil production.

Jupiter has assigned the Environmental Health and Safety (EHS) Director, as its Occupational, Health and Safety Representative (OHSR). This individual has the appropriate responsibility, authority, and resources to implement and maintain Jupiter’s OH&S processes.

Purpose

Jupiter Aluminum supports sustainable development of workplace health and safety goals as protecting employee’s health and safety is our primary objective. Our commitment to the health and safety of all our employees is founded in our goal that all injuries can be prevented. Jupiter has developed this OH&S Management System (OHSS) to manage the associated risks. This document provides an overview of the methodology.

Scope

This management system applies to Jupiter Aluminum Corporation and the directors, officers, and employees within.

Occupational, Health and Safety Policy

Jupiter Aluminum is committed to fostering a positive safety culture where all employees care for the wellbeing of one another, accept personal ownership in occupational health and safety, and are committed to being actively engaged in safe behaviors. Jupiter will provide a safe and healthy working environment through its commitment to the risk management process and the facilitation of health and safety training to all workers appropriate to their responsibilities which are integrated in daily business decisions and processes.

Safety is an integral part of everything we do here at Jupiter and should be at the forefront of every task performed. Jupiter, its employees, vendors, and out-side contractors are required to comply with all US Occupational Health and Safety (OSHA) Safety Standards and Regulations by following Jupiter’s written Safety Programs.

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Employee Rights

Under federal law, Jupiter employees are entitled to a safe workplace. Jupiter must provide a workplace free of known health and safety hazards. Employees have the right to speak up about any safety or health concerns they have without fear of retaliation. An employee also has the right to:

- Be trained in a language they understand.
- Work on machines that are safe.
- Be provided required safety gear, such as gloves or a harness and lifeline for falls.
- Be protected from toxic chemicals.
- Request an OSHA inspection and speak to the inspector.
- Report an injury or illness and get copies of your medical records.
- See copies of the workplace injury and illness log
- Review records of work-related injuries and illnesses
- Get copies of test results done to find hazards in the workplace.

Legal Framework

Jupiter Aluminum strongly promotes a legal management framework dedicated to sustainable practices. The legal framework for Jupiter’s actions is embodied by existing laws and the standards adopted by Jupiter related to the prevention of workplace injuries. It hopes to clearly state to all stakeholders the organization’s OH&S goals to provide an ethical and fiscally manageable risk profile. Additionally, Jupiter believes that responsibility goes along with accountability and that conducting business requires commitment beyond current legal requirements. This ideology permeates from the board of directors to the hourly production team.

Industrial Management System

Jupiter Aluminum’s OH&S program requires the implementation of systems that assure compliance and continuous improvement of its safety performance with the goal to eliminate incidents with injury. Each operation is required to conduct its activities in a safe manner.

In support of continuous improvements, each production facility defines specific strategies and targets to work toward. Results are benchmarked to assess improvements and corrective actions related to incident reduction and safety opportunities.

Incident Reduction Plan

Jupiter is committed to minimizing its incident frequency through encouragement of behavioral changes and physical improvements to production processes that are aimed at reducing the exposure of the employee to situations that may cause an injury or unsafe condition.

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Employee Involvement

Each of Jupiter’s employees is responsible for conducting their daily activities in a manner that is protective of their health and safety as well as the health and safety of their co-workers. It is a requirement for each employee to follow applicable health and safety regulations and company procedures. All employees are provided with information regarding these procedures and regulations during the onboarding and refresher training.

Employee Incident Reporting

Jupiter’s written Accident Procedure requires its employees to report all workplace injuries and illnesses no matter how minor to a supervisor as soon as they’re aware of the injury or illness. OSHA encourages employers to maintain and enforce workplace safety rules in order to eliminate or reduce workplace hazards and prevent injuries from occurring.

The OSH Act 1904.35(b)(1)(iv) prohibits employers from retaliating against employees for reporting work-related injuries or illnesses. This new rule is consistent with the existing prohibition contained in section 11(c) of the OSH Act, which prohibits employers from discriminating against an employee for reporting a work-related fatality, injury, or illness.

Employee Right to Refuse Dangerous Work

Jupiter encourages all employees to work in safe manner. All employees have the right to refuse to complete a dangerous task. If an employee believes working conditions are unsafe or unhealthful, it is encouraged that the employee immediately bring these concerns to a supervisor or manager so corrective measures can be identified. Employees have the right to file a complaint with OSHA concerning a hazardous working condition at any time.

Employee Discipline

At Jupiter, working safely is a condition of employment. As such, Jupiter will not permit retaliation against an employee who in good faith reports a safety violation. However, an employee who violates a safety requirement may be subject to disciplinary action, up to and including termination. Violations of specific rules will result in an immediate 5-day suspension, pending termination of employment with Jupiter.

Impact Management

Jupiter Aluminum emphasizes the potential for improvement in employee health and safety through investigation and analysis of an incident. This allows Jupiter to effectively manage the development of appropriate corrective actions that minimize or ideally, eliminate the risk of future occurrences.

Jupiter Aluminum’s OH&S Reporting section provides stakeholders with regular updates on key data, targets and other information relating to health and safety performance.

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Auditing and Training

Workplace Auditing

To maintain a safe and healthy workplace, Jupiter managers, supervisors and hourly employees conduct workplace audits to identify potential behavioral and physical hazards. These observations are reviewed and, if necessary, corrective measures implemented.

Each department supervisor, on a weekly basis, conducts a department safety audit, a safety training session and make an observation of an employee(s) performing a work task. Employee observations are reviewed with the employee.

Each operational team leader conducts a daily pre-shift safety audit. This audit is reviewed by the department manager/supervisor.

Twice weekly, the group of production department supervisors, plant management and corporate managers conduct plant wide safety reviews. The purpose is to engage with the employees to improve communication about safety. The groups also make observations to identify opportunities for improvement and to re-visit previously implemented corrective measures for effectiveness. Results of these reviews are discussed immediately and when needed, new corrective measures are identified.

To maintain a safe and healthy workplace, Jupiter managers and supervisors conduct safety training sessions.

Monthly Required Training

The following are example Safety Training Topics to be covered at a weekly safety training session. The intention is to make sure that all employees receive the same training. EHS will provide training materials each month and these training courses may be updated on an annual basis. An example of the Monthly Training Topics is shown here.

Month	Topic
January	Mobile Equipment
February	Control of Hazardous Energy (LOTO)
March	PPE & Hearing Conservation
April	Crane Safety
May	Heat Stress
June	HAZCOM & Emergency Eyewashes
July	Housekeeping
August	Emergency Response Procedures
September	Accident Reporting
October	Machine Guarding
November	Molten Metal Safety
December	Open (EHS will provide list to choose from)

Weekly Training sessions are also conducted and cover a wide variety of subject matter or can be used to discuss a recent in-plant incident.

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Risk Assessment Protocol

To properly assess the impact associated with Jupiter Aluminum's processes, Jupiter has a Risk Assessment protocol in accordance with the OSHA. This protocol is conducted daily by Jupiter's Management and Supervisors and is guided by the following principles:

- a. identify and create an Inventory of hazards and impacts;
- b. determine and rank potential for harm;
- c. create hazard elimination or risk control measures;
- d. measure the effectiveness of controls;
- e. monitor effectiveness periodically;
- f. review and improve process and risk control measures.

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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. Corrected some spelling and grammar errors.

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