



**JUPITER ALUMINUM**

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Des Plaines, IL 60018, USA

# JUPITER ALUMINUM RESPONSIBLE SOURCING POLICY





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JAC Responsible Sourcing Policy	Prepared By: EHS Department	Approved By: Paul-Henri Chevalier	
Date of Origin: October 1st, 2020	Date of Revision:6/9/2022	Date of Approval: 6/13/2022	Page 1 of 5



## General Information

### Statement of Intent

Jupiter Aluminum has outlined this Responsible Sourcing Policy (RSP) to address sustainability within its value chain. Jupiter strives to produce high-quality aluminum with minimal environmental and social impact while maintaining positive relationships with its stakeholder communities. This RSP supports Jupiter's main objectives in producing high quality aluminum without compromising ethics, safety, or legal obligations for the sake of profitability. This RSP outlines 3 core principles: Safety, Respect, and Business Integrity.

Although we recognize that every entity has different legal and cultural environments, we believe that these core principles should be shared across all levels of the aluminum lifecycle.

### Due Diligence

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

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

### Scope

This RSP applies to and will be communicated with all Jupiter Aluminum scrap aluminum suppliers. It will set guidelines in the following areas:

- Safety
- Environment
- Human Rights
- Labor Rights
- Legal Compliance
- Fair Competition and Anti-Corruption

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## Jupiter Aluminum Supplier Principles

Jupiter Aluminum expects all suppliers to respect their employees, the environment, and human rights at all operational levels - suppliers must conduct their business with ethics and integrity. These principles include the following components:

### Safety

A safe and healthy workplace is a fundamental right for employees and essential to maintaining a successful business operation. Therefore, all suppliers shall:

- Provide a safe and healthy work environment for all employees;
- Comply with all relevant local, state, and federal safety regulations; and
- Uphold and continuously improve upon existing safety management systems.

### Environment

Jupiter Aluminum understands that the Environment is at risk of degradation due to human impacts. To help mitigate this risk, Jupiter expects its suppliers to:

- Conduct business in an efficient and environmentally sound way;
- Minimize adverse impacts on the environment wherever possible;
- Adhere to all applicable federal and state regulations related to the environment;
- Implement energy-efficient processes and products where possible;
- Leverage conservation measures, recycling, reuse, and material substitution to reduce waste; and
- Evaluate, manage, and mitigate operational environmental impacts across all aspects of the business.

### Human Rights

Jupiter Aluminum's suppliers must uphold the human rights of all individuals associated with their operations, including local communities and workers. Suppliers shall:

- Uphold the rights of workers, individuals, and the communities in which they operate;
- Maintain a code of conduct or other system to prevent discrimination based on race, color, religion, national origin, disability, gender identity, sexual orientation, genetic, veteran status, sex, or age;
- Respect the rights of local communities and Indigenous peoples;
- Never take part in human trafficking, child labor, forced labor (including prison labor), forcibly indentured labor, bonded labor, slavery, or servitude;
- Under no circumstances, conduct business in conflict affected and high-risk areas; and
- Adhere with the Jupiter Aluminum [Conflict Minerals Policy](#).

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## Labor Rights

Jupiter Aluminum’s suppliers must uphold the rights of all individuals employed by the entity. The supplier shall:

- Prohibit any kind of corporal punishment, harassment, discrimination or abuse of applicants or workers;
- Ensure that workers’ compensation meets or exceeds the legal minimum standard and complies with all applicable laws related to timely and properly documented remuneration;
- Comply with all state and federal laws and industry standards regarding working time, public holidays, and paid annual leave; and
- Recognize the freedom of employees to join, or refrain from joining, legally authorized associations or organizations such as unions.

## Legal Compliance

Compliance with US Federal and State laws is mandatory for all parties that work with Jupiter Aluminum. Suppliers shall:

- Have systems in place to maintain awareness of and ensure compliance with Applicable laws and regulations;
- Seek legal advice where there is uncertainty about legal obligations; and
- Maintain accurate records of all business operations and transactions.

## Fair Competition and Anti-Corruption

Suppliers must conduct their business with ethics and integrity. Suppliers shall:

- Maintain compliance with the United States Foreign Corrupt Practices Act and all other applicable anti-corruption, fraud, and anti-bribery laws;
- Understand and respect the obligations of Jupiter Aluminum and its employees to comply with Jupiter’s Anti-Corruption and Vendor Gift Policy
- Uphold fair business standards in advertising, sales, and competition; and
- Conduct business with a commitment to maximum transparency consistent with ethical governance and commercial confidentiality.

## Stakeholder Complaints and Grievances

Jupiter Aluminum takes pride in its ability to assess and respond to stakeholder complaints, grievances, and other requests for information in a prompt and sensitive manner. If you would like to voice a concern regarding this Responsible Sourcing Policy or any other issue, please leverage the following contact information:

- Jupiter Aluminum Customer Service Manager:  
1 (219) 933-2712 | [shelli.henry@jupiteraluminum.com](mailto:shelli.henry@jupiteraluminum.com)
- For anonymous complaints please submit a suggestion via the [JAC Corporate Webpage](#)

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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.