

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™

SOCIAL AND ETHICAL MANAGEMENT STANDARDS

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



Table of Contents

Company Profile	2
General Information	2
Management Sponsorship	2
Purpose	2
Risk Assessment	2
Human and Labor Rights.....	3
Non-Discrimination.....	3
Worker’s Rights	4
Indigenous Peoples Rights	4
Stakeholder Complaints, Grievances and RFI’s	4
Occupational Health and Safety.....	5
Local Communities	6
Communication and Engagement.....	6

Social Ethical Management System	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 production and coating operation headquartered in Des Plaines, Illinois. This social and ethical management system articulates Jupiter’s responsibility to respect all Human and Labor Rights in line with international best practice. This document focuses on the areas that have been identified as priorities for the Aluminum semi-fabrication industry.

General Information

Management Sponsorship

Jupiter Aluminum’s internal structure allows for effective and responsible management of the social impacts associated with its business operations. Jupiter has assigned its Vice President, Human Resources, as its Social Management Representative (SMR) as this individual has the appropriate responsibility, authority, and resources to implement and maintain Jupiter’s social management processes.

Purpose

Jupiter Aluminum seeks to create a guiding system for maintaining a high standard regarding Human Rights, Indigenous Peoples Rights, and Labor rights. This system is reviewed annually and updated according to any changes in international best practice. These practices are further detailed below as well as in the Jupiter Aluminum Employee Handbook.

Risk Assessment

Jupiter Aluminum conducts a Human Rights Assessment every 2 years that covers risk areas including Human Rights, Discrimination, Child Labor, Contract Labor, Woman's Rights, Indigenous Peoples’ rights, Freedom of association and right to collective bargaining, Forced Labor, Disciplinary practice, communication and engagement, remuneration, and working time. Each of these components is reviewed and a risk rating is determined. Based on the determined risk, Jupiter assigns a prevention and mitigation strategy to remediate impacts.

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Human and Labor Rights

Jupiter Aluminum is committed to ensuring all fundamental human rights practices in accordance with international best practice. Jupiter is dedicated to promoting respect for fundamental human rights wherever it operates and encourages consideration of these principles by others where it has an influence, particularly contractors, suppliers and all other entities and individuals with whom it has a business relationship. It believes that these standards are fundamental to its future operations as well as the sustainability of its surrounding communities. Jupiter has developed this policy to promote women’s rights, child labor laws and forced labor laws, along with anti-discrimination practices. Jupiter Aluminum does not hire anyone under the age of 18. It is every employee’s responsibility to follow this code to maintain an environment that reflects respect for human rights and is free from all forms of discrimination and harassment.

These standards are based on, but not limited to, the following conventions:

- United Nations Guiding Principles on Business and Human Rights
- The UN Convention on the Elimination of all Forms of Discrimination Against Women, 1979
- Title VII of the Civil Rights Act of 1964
- Universal Declaration of Human Rights (UDHR)
- International Labor Organization’s (ILO) Declaration of Fundamental Principles and Rights at Work, and Conventions 138, 182, 105, 29, and Protocol 29,
- Title 18 of the Trafficking Victims Protection Act (TVPA)
- Fair Labor Standards Act of 1938

Non-Discrimination

Jupiter Aluminum is determined to eliminate all discrimination in the workplace. Any effect of nullifying or impairing equality of opportunity or treatment in employment or occupation on the basis of race, color, origin, gender, sexual orientation, pregnancies, age, disability, religion, genetic information, marital status, family responsibilities and political or union affiliation is considered discriminatory in nature. At Jupiter, every employee is held accountable to uphold these labor rights as these standards are crucial to maintain a respectful and productive environment at the company.

In addition to anti-discrimination, Jupiter Aluminum is committed to an Affirmative Action plan. Details regarding affirmative action can be found in Jupiter’s Employee Handbook.

These standards are based on, but not limited to, the following conventions:

- ADEA The Age Discrimination in Employment Act of 1967.
- Genetic Information Nondiscrimination Act (GINA) 2008
- ADA Americans with Disabilities Act 1990 and its amendments act 2008
- US Equal Employment Opportunity Commission Standards.
- The Equal Pay Act of 1963
- ILO Conventions C100 and C111
- Rehabilitation Act of 1973
- Vietnam Era Veterans’ Readjustment Assistance Act of 1974
- Family and Medical Leave Act of 1993

Social Ethical Management System	Prepared By: EHS Department	Approved By: Paul-Henri Chevalier	
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Worker’s Rights

Jupiter Aluminum complies with United States Federal and State Laws, as well as the International Labor Organization guidelines regarding remuneration, working times, family leave, disciplinary practices, and Freedom of Association/Collective Bargaining. Details about these requirements and best practices can be found within Jupiter’s Collective Bargaining Agreement and Employee Handbook and are based on the following conventions.

- Fair Labor Standards Act 1938
- Family and Medical Leave Act of 1993 (FMLA)
- ILO 1998 Declaration of Fundamental Principles and Rights at Work
- National Labor Relations Act (NLRA) 1935

Indigenous Peoples Rights

Although North America Jupiter Aluminum does not operate on any Native American Reservation or Tribal Land, it believes in creating a culture of respect for the indigenous people of the world. It observes all applicable regulations regarding Native American rights within its local communities. The entity understands the significance Native American, and groups found within the United States and adheres to the recommendations put in place by the Indiana Native American Indian Affairs Commission (INAIAC), The American Declaration on the Rights of Indigenous Peoples, and the US Agency for International Development (USAID) regarding Free and Prior Informed Consent, Resettlement standards, and cultural and sacred heritage. Additionally, the Entity is consistent with international standards including ILO Convention 169 and the UN Declaration on Rights of Indigenous Peoples.

Stakeholder Complaints, Grievances and RFI’s

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. Its stakeholders include the communities in which it operates, its employees, as well as the upstream and downstream members of its supply chain. Jupiter’s complaint resolution mechanism enables a multi-tiered response that encapsulates feedback from floor supervisors to our board of directors. Please find more information within Jupiter’s Collective Bargaining Agreement and employee handbooks. To report a concern please leverage the following contacts:

- Jupiter Aluminum EHS Director:
+1 (219) 933-2750
- Jupiter Aluminum Vice President, Human Resources:
+1 (219) 933-2710
- Jupiter Aluminum Anonymous Submissions:
[Jupiter Aluminum Corp.](#)
- Indiana Department of Environmental Management:
+1 (800) 451-6027 | [Indiana Environmental](#)

Social Ethical Management System	Prepared By: EHS Department	Approved By: Paul-Henri Chevalier	
Date of Origin: August 15, 2019	Date of Revision: 6/01/2023	Date of Approval: 6/12/2023	Page 4 of 7



- City of Hammond:
+1 (219) 853-6306 | [City of Hammond Environmental](#)
note: To report non-environmental concerns, contact the City of Hammond, Code Enforcement Division at 219-853-6447.
- West Virginia Department of Environmental Protection
+1-304-926-0440
- Occupational Safety & Health Administration (OSHA):
+1-847-803-4800 | [OSHA Complaint](#)
- Equal Employment Opportunity Commission (EEOC):
+1-800-669-4000 | [EEOC Complaint](#)
- Environmental Protection Agency (EPA): [EPA Complaint](#)

Occupational Health and Safety

As an Aluminum re-melt operation, Jupiter Aluminum emphasizes the importance of an effective Environmental Health and Safety (EHS) management system.

Jupiter believes that a safe and healthy workplace is a fundamental right of every person and therefore vital to maintaining a sustainable operation. Jupiter has upheld an EHS Manual that is founded upon continuous improvement and goes above and beyond the requirements set by the Occupational Safety and Health Administration (OSHA) and ILO Conventions 155 and 176. This system applies to all workers and visitors and ensures that all employees are aware of the hazards and safe practice procedure for their work. If a worker feels unsafe, they should stop working immediately and reach out to a supervisor. Please refer to Jupiter Aluminum’s EHS: Written Program and Procedures and Collective Bargaining Agreement for further details.

The EHS Manual consists of the following components:

- EHS Policy
- Joint Plant Safety Committee
- Personal protection and safety equipment
- Risk assessments, Inspections and equipment maintenance
- Safe work procedure guidelines
- Work function specific safety training
- Safety awareness training
- Enforcement of health and safety guidelines
- Injury or illness reporting
- Reporting and correcting unsafe acts and unsafe conditions
- Reporting and investigating all accidents/incidents
- Accident/Emergency Procedures

Social Ethical Management System	Prepared By: EHS Department	Approved By: Paul-Henri Chevalier	
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Local Communities

Jupiter Aluminum respects the legal and customary rights and interests of local communities by ensuring their safety and addressing any potential concerns. Jupiter acknowledges that it will not exploit the natural resources of the surrounding environment and will take necessary action to prevent and address any impacts on local community livelihoods resulting from its activities. Jupiter is committed to respecting and supporting the surrounding community through employment opportunities, sponsorship programs and volunteer activities. These programs include but are not limited to local youth sporting events and municipal services such as the police and fire department.

Communication and Engagement

Jupiter Aluminum conducts regular training regarding employee benefits, safety, strategy and additional work roles and procedures. Jupiter employs a grievance procedure that is detailed in the employee handbooks and collective bargaining agreement.

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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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