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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# JUPITER ALUMINUM

CERTIFICATE  
NUMBER

61

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

7 JANUARY 2020

DATE OF EXPIRY

6 JANUARY 2023

CERTIFIED SINCE

7 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd  
CAN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to  
continued conformance with the applicable ASI  
Standard and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Jupiter Aluminum operations located in Hammond, Indiana include scrap re-melting, cold rolling, annealing, and finishing operations. Jupiter's coil coating facilities located in Beech Bottom, West Virginia and Fairland, Indiana.

# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

|                         |   |
|-------------------------|---|
| MEMBER NAME             | Jupiter Aluminum  |
| ENTITY NAME             | Jupiter Aluminum  |
| CERTIFICATION SCOPE     | Jupiter Aluminum operations located in Hammond, Indiana include scrap re-melting, cold rolling, annealing, and finishing operations. Jupiter's coil coating facilities located in Beech Bottom, West Virginia and Fairland, Indiana.  |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul>   |
| ASI STANDARD            | <ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>   |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Certification Audit (19 – 20 November 2019)</li><li>• Scope Change Audit (8 – 9 December 2020)</li><li>• Surveillance Audit (19 – 20 May 2021)</li></ul>  |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.   |
| AUDIT DATE              | <ul style="list-style-type: none"><li>• 19 – 20 November 2019 (Certification Audit)</li><li>• 8 – 9 December 2020 (Scope Change Audit)</li><li>• 19 – 20 May (Surveillance Audit)</li></ul>   |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>• 12 December 2019 (Certification Audit)</li><li>• 29 January 2021 (Scope Change Audit)</li><li>• 18 June 2021 (Surveillance Audit)</li></ul>   |
| AUDIT SCOPE             | <p><u>Certification Audit (19 – 20 November 2019)</u></p> <p>The audit scope covered the activities at Jupiter Aluminum operations located in Hammond, Indiana USA.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> |

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All relevant criteria in the ASI Performance Standard were included in the audit scope.

Scope Change Audit (8 – 9 December 2020)

The audit scope covered the activities at Jupiter Aluminum operations located in Jupiter Aluminum Beech Bottom and Jupiter Aluminum Fairland.

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Surveillance Audit (19 – 20 May 2021)

The audit scope covered Jupiter Aluminum operations located in Hammond, Indiana, Beech Bottom, West Virginia and Fairland, Indiana, USA.

Supply chain activities included in the audit scope:

- Aluminium Re-melting / Refining
- Casthouses
- Semi-Fabrication
- Material conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the audit scope.

At the time of the Audit (May 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and a remote site tour.

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AUDIT  
OUTCOME

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION  
PERIOD

7 January 2020 – 6 January 2023

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DATE

6 January 2023

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CERTIFICATION  
NUMBER

61

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## SUMMARY OF FINDINGS

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY   |             |   |
| 1.1 Legal Compliance   | Conformance | Jupiter Aluminum has systems in place to maintain awareness of and ensure compliance with Applicable Law. They have identified a company responsible for legal requirements and have identified responsible personnel for each department. Jupiter also has agreements with many law firms to provide them with regular updates on changes in regulatory requirements.  |
| 1.2 Anti-Corruption  | Conformance | The Governance framework documents prohibition of bribery in all business practices and transactions, and the whistleblower policy. The governance framework policy has been communicated to employees through employee training and employees have signed training attendance. It is available at:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf</a>  |
| 1.3 Code of Conduct  | Conformance | Jupiter has implemented the Code of Conduct Policy document that includes principles relevant to environmental, social and governance performance. The employees have been trained on the Code of Conduct. The document is a controlled document, and has been reviewed and approved by management. Jupiter has maintained a training log and signed training attendance sheets that evidence the training.   |
| PRINCIPLE 2 POLICY & MANAGEMENT  |             |   |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | Jupiter has developed a series of policies that demonstrate its commitment to the environmental, social, and governance practices included in the ASI Performance Standard. These policies are available, under the headings Environmental Management System, Social Management System, and Governance Framework, at:<br><a href="https://www.jupitaluminum.com/Main/Responsibility">https://www.jupitaluminum.com/Main/Responsibility</a>  |
| 2.1b Environmental, Social, and Governance Policy (senior management)      | Conformance | Jupiter's policies define management sponsors who are responsible for the implementation and maintenance of each policy. All policies are reviewed by senior management and formally approved by the President. There is a policy review schedule. Policies are available, under the headings Environmental Management System, Social Management System, and Governance Framework, at:<br><a href="https://www.jupitaluminum.com/Main/Responsibility">https://www.jupitaluminum.com/Main/Responsibility</a> |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | <p>Jupiter effectively communicates its policies to both internal and external stakeholders. Policies are available to internal and external stakeholders via Jupiter's website, under the headings Environmental Management System, Social Management System and Governance Framework, at: <a href="https://www.jupitaluminum.com/Main/Responsibility">https://www.jupitaluminum.com/Main/Responsibility</a></p> <p>In addition, internal stakeholders receive training on all policies.</p>  |
| 2.2 Leadership  | Conformance | <p>According to the Jupiter Environmental Management System (EMS), Jupiter's Environment, Health and Safety (EHS) Director is responsible for ensuring the ASI social, environmental, and governance requirements are reflected in the Entity's management system. The EMS document is available at: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf</a></p> <p>In addition to the EHS Director, Jupiter has sponsored an internal environmental management committee to support the further development of the management system. All plants have individual plant managers who report to EHS Director.</p> |
| 2.3a Environmental and Social Management Systems (environmental)  | Conformance | <p>Jupiter has defined and is implementing an Environmental Management System designed to identify and mitigate environmental risks. The system is defined in the Jupiter Aluminum Environmental Management System document, available at: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Environment.pdf</a></p>   |
| 2.3b Environmental and Social Management Systems (social)         | Conformance | <p>Jupiter has developed, and is implementing, a social management system to identify and mitigate the impact of its operations on stakeholders, available at: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Social.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Social.pdf</a></p> <p>The management system is overseen by the Human Resources Director, and is reviewed annually by senior management.</p>  |
| 2.4 Responsible Sourcing  | Conformance | <p>Jupiter's Governance Framework includes a responsible sourcing policy that covers supplier requirements for environmental, governance, and social standards, available at: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf</a></p> <p>Vendors are required to acknowledge purchase orders and the company code of conduct, which are available on the Jupiter website, under the headings Global</p>  |

| CRITERION                                   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | <p>Code of Conduct, and Terms and Conditions of Purchases:<br/> <a href="https://www.jupitaluminum.com/Main/Responsibility">https://www.jupitaluminum.com/Main/Responsibility</a><br/>           These documents define vendor social, environmental, and governance practices.</p>   |
| 2.5 Impact Assessments                      | Conformance | <p>Since joining ASI Jupiter Aluminum has not undertaken any projects related to expansion or significant changes to operations at its Hammond, Beech Bottom, and Fairland locations. Jupiter's policies require it to conduct all necessary impact assessments for new projects or major changes to existing facilities.</p>   |
| 2.6 Emergency Response Plan                 | Conformance | <p>Jupiter's Emergency Action Plan includes evacuation procedures and communication protocols for various types of emergencies and defines training and record-keeping requirements. The emergency action plan was developed to meet regulatory requirements, which were developed with input from stakeholders. However, Jupiter's location in an industrial/rural area limits external stakeholder exposure to emergency situations, and so compliance with regulatory requirements is sufficient to address consultation with external stakeholders.</p>   |
| 2.7 Mergers and Acquisitions                | Conformance | <p>Jupiter's Governance Framework requires that it engage with outside specialists to perform environmental, social and fiscal due diligence on a merger or acquisition target:<br/> <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf</a><br/>           They have gone through one merger and acquisition (M&amp;A) in 20 years, which closed 5 December 2018. This occurred prior to the governance framework policy, but Jupiter did contract with an environmental consultant (RAMBL) and a local law firm, for due diligence purposes.</p>                        |
| 2.8 Closure, Decommissioning and Divestment | Conformance | <p>Jupiter's Governance Framework procedures require that it follows all legal requirements to mitigate potential health, social and environmental impacts in the event of a site closure or decommissioning event, including following Indiana Department of Environmental Management (IDEM) guidelines, West Virginia Department of Environmental Protection guideline, and the Department of Labor (DOL) Worker Adjustment and Retraining Notification Act. The Governance Framework is available at:<br/> <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf</a></p> |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | According to interviews with senior management, Jupiter has had no closures/decommissioning in 28 years of operation.  |
| PRINCIPLE 3 TRANSPARENCY  |                |  |
| 3.1 Sustainability Reporting  | Conformance    | <p>Jupiter discloses its material environmental, social and economic impacts in its Sustainability Report, available on its website: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a></p> <p>It highlights the impact of its low carbon aluminium coils on the circular economy. It covers energy consumption &amp; GHG emissions, water use and wastewater discharge, hazardous and non-hazardous waste, governance, customers and economy, people, including health and safety and local communities.</p>                   |
| 3.2 Non-compliance and liabilities                                  | Conformance    | <p>Information on Jupiter's significant fines, judgments, penalties and non-monetary sanctions are available through public databases, including:</p> <p>OSHA: <a href="https://www.osha.gov/pls/imis/establishment.html">https://www.osha.gov/pls/imis/establishment.html</a></p> <p>IDEM (Public Records Request Form): <a href="https://www.in.gov/idem/5157.htm">https://www.in.gov/idem/5157.htm</a></p> <p>WV: <a href="https://dep.wv.gov/Pages/default.aspx">https://dep.wv.gov/Pages/default.aspx</a></p> <p>EPA: <a href="https://echo.epa.gov/facilities/facility-search">https://echo.epa.gov/facilities/facility-search</a></p> |
| 3.3a Payments to governments (legal and contractual)                | Conformance    | <p>Jupiter has the required policies, training and oversight to ensure that payments made to governments are only on a legal/contractual basis. The Entity's Governance Framework establishes a zero-tolerance position on bribery and corruption. The framework outlines what is and is not acceptable for vendor gifts, facilitation payments, political contributions and charitable contributions, and establishes regular auditing requirements and responsibilities. All payments are tracked which enable the nature of the payments to be confirmed.</p>   |
| 3.3b Payments to governments (disclosure - bauxite mining)          | Not Applicable | <p>This Criterion is not applicable to the Entity's Certification Scope.</p>   |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance    | <p>The Entity has developed and is effectively implementing, a grievance mechanism that is appropriate for its operations. The mechanism is described in the Collective Bargaining Agreement and the Employee Handbook, while external stakeholders can utilize regulatory agency hotlines to file complaints. For instance, they may contact the City of Hammond's Department of Environmental</p>  |



| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | <p>Management (at 219-853-6306) or the Cities Code Enforcement Division (at 219-853-6447) or the West Virginia Department of Environment.</p> <p>External complaints can be made via the website using the 'Suggestion' link at the foot of the home page:<br/> <a href="https://www.jupiteraluminum.com/">https://www.jupiteraluminum.com/</a></p> <p>Or, if it's an environmental issue, complaints can go via appropriate agency or directly to the site or the owners of the property.</p> |
| PRINCIPLE 4 MATERIAL STEWARDSHIP                                |                |  |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts)   | Conformance    | Jupiter has provided internal production data to the American Aluminum Association in order to create a comprehensive analysis of its emissions, waste, water, and energy impacts. The first LCA analysis was published in 2013, and the second edition should be available by the end of 2021. The LCA developed by the Aluminum Association is from cradle to gate.  |
| 4.1b Environmental Life Cycle Assessment (cradle to gate)       | Conformance    | The LCA is available online and the link to the LCA has been provided in the Environmental Management System Document. The LCA developed by the Aluminum Association is from cradle to gate and can be accessed here:<br><a href="https://www.aluminum.org/sites/default/files/LCA_Report_Aluminum_Association_12_13.pdf">https://www.aluminum.org/sites/default/files/LCA_Report_Aluminum_Association_12_13.pdf</a>   |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance    | The LCA is available online and the link to the LCA has been provided in the Environmental Management System Document. The LCA is a very detailed report and includes the underlying assumptions including system boundaries.  |
| 4.2 Product design  | Not Applicable | Jupiter Aluminum does not create consumer/commercial goods nor does it play a role in designing said goods for customer needs. When opportunity arises, when customer requests for a change in the material, and does not provide specific material specifications, Jupiter provides the client with their input on how they can improve their material.   |
| 4.3a Aluminium Process Scrap (targets)                          | Conformance    | The scrap produced internally by Jupiter Aluminum at all three sites including Hammond, Beech Bottom and Fairland is used as raw material. Jupiter reuses 100% of the scrap that is produced internally. Jupiter Aluminum manufactures coils using 97% recycled aluminum scrap and 3% primary aluminum.  |
| 4.3b Aluminium Process Scrap (alloy separation)                 | Conformance    | Jupiter reuses 100% of the scrap that is produced internally. Jupiter Aluminum manufactures coils using  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | 97% recycled aluminum scrap and 3% primary aluminum. All input material is managed based on its alloy, grade and other characteristics to suit the operations.   |
| 4.4a Collection and recycling of products at end-of-life (strategy)   | Conformance    | Jupiter's strategy is to source much of its scrap through third-party scrap brokers (suppliers) to increase scrap collection from products at end of life. These suppliers work closely with scrap generators, including customers of Jupiter, to provide the physical equipment needed to sort, store and transport scrap that is at the end of its useful life.  |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance    | Jupiter is a member the American Aluminum Association, and is involved in providing input to the end clients and the aluminum community on recyclability of the product. The Aluminum Association provides support and information to its members to drive increases in aluminium recycling rates.   |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS                                  |                |  |
| 5.1 Disclosure of GHG emissions and energy use                        | Conformance    | Jupiter Aluminium calculates its direct emissions and indirect electricity use emissions (Scope 1 and 2 emissions) using EPA conversion factors and the GHG protocol. These are publicly reported in the Sustainability Report 2020, page 21:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a><br>In addition to the main emission sources from the furnaces, the scope 1 data now includes emissions from diesel and propane used to power the forklift trucks. It has the opportunity to further refine the emissions inventory and to expand the scope to include scope 3 indirect emissions. |
| 5.2 GHG emissions reductions  | Conformance    | Jupiter has committed to a 10% reduction from its 2015 baseline by 2025. This commitment is publicly available in the Sustainability Report 2020, page 20:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a><br>This commitment is applicable to Hammond, Beech Bottom and Fairland facilities.<br>In 2020 Jupiter Aluminium added a target to Reduce Coil Production and Coating GHG emissions intensity by 20% from 2018 baseline. Both targets are published in 2020 Sustainability Report.  |
| 5.3a Aluminium Smelting (management system)                           | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |

| CRITERION  | RATING         | COMMENT   |
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| 5.3b Aluminium Smelting (up to and including 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| 5.3c Aluminium Smelting (after 2020)               | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE         |                |   |
| 6.1 Emissions to Air                               | Conformance    | <p>Jupiter has systems to quantify and report Emissions to Air that have adverse effects on humans or the environment and are included as requirements in the permit issued by the Indiana Department of Environmental Management, and the West Virginia Department of Environmental Protection, Division of Air Quality. Compliance with the permit includes requirements to implement plans to minimize these adverse impacts by, among other things, periodic emissions testing, monitoring, and maintenance programs. Jupiter has documented that such plans exist and that the company has procedures in place to supervise, monitor, and continuously measure emissions to air. Jupiter is regulated for and monitors Criteria Pollutants such as PM10, PM 2.5, and VOC (Hammond), VOCs (Fairland), VOCs, and HAPs (Beech Bottom).</p>  |
| 6.2 Discharges to Water                            | Conformance    | <p>Jupiter Hammond has implemented systems to quantify and monitor water effluents to publicly owned treatment works (POTW)/ sewage treatment plants that have adverse effects on humans or the environment and is included as requirements in the permit issued by the Sanitary District of Hammond Indiana. The permit includes requirements to implement plans to minimize these adverse impacts such as pre-treatment standards and Jupiter has documented that such plans exist and that the company has procedures in place to demonstrate compliance.</p> <p>Jupiter Beech Bottom has installed a wastewater plant that treats the wastewater prior to discharge to a publicly owned treatment works (POTW)/ sewage treatment plant. The WV/NPDES permit includes requirements to implement plans to minimize these adverse impacts such as pre-treatment standards and Jupiter has documented that such plans exist and that the company has procedures in place to demonstrate compliance.</p> <p>It is important to note that Jupiter Hammond and Beech Bottom has no direct discharge to a body of water. All process-related water and a majority of stormwater is directed to the local POTW for</p> |

| CRITERION  | RATING             | COMMENT  |
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|  |                    | <p>treatment prior to discharge.</p> <p>Fairland does not discharge any water. Fairland has a septic system for domestic sewage. The NPDES permit is for the discharge of the reverse osmosis process for drinking water supply.</p>   |
| <p>6.3a Assessment and Management of Spills and Leakage (assessment)</p> | <p>Conformance</p> | <p>Jupiter Aluminum has developed a spill prevention control and countermeasure plan for each site (Hammond, Beech Bottom, and Fairland). The plan is developed to meet the USEPA regulations contained in 40 CFR Part 112 – Oil Pollution Prevention. The major risk area identified is oil storage and the plan is developed accordingly. There have been no significant incidents of spills or leakages in the last 5 years.</p>  |
| <p>6.3b Assessment and Management of Spills and Leakage (management)</p> | <p>Conformance</p> | <p>Jupiter Aluminum has developed a spill prevention control and countermeasure plan for each site (Hammond, Beech Bottom, and Fairland). The plan is developed to meet the USEPA regulations contained in 40 CFR Part 112 – Oil Pollution Prevention.</p> <p>The document has below-required information:<br/> Inventory of materials that can leak and spill;<br/> Systems and controls for detecting and monitoring spills and leakages;<br/> Documented management plans with controls to prevent the occurrence of, and to mitigate impacts associated with, spills and leakages;<br/> Procedures for communicating spills and leakages to affected personal and external stakeholders.</p> |
| <p>6.4a Reporting of Spills (immediate disclosure)</p>                   | <p>Conformance</p> | <p>The spill prevention control and countermeasure plan includes:<br/> Procedures with the documented methodology for determining Jupiter's volume, type, and potential impact of significant spills;<br/> Procedure for immediate reporting and communication of Jupiter's volume, type, and potential impact of significant spills to affected personnel and external stakeholders.</p>  |
| <p>6.4b Reporting of Spills (regular reporting)</p>                      | <p>Conformance</p> | <p>There has been no significant spills in the last five years. If there is a spill in future, in accordance with the Spill Prevention Control and Countermeasure Plan, a spill notification form will be completed and submitted to the regulatory authorities, which will be a matter of public record.</p>  |
| <p>6.5a Waste management and reporting (strategy)</p>                    | <p>Conformance</p> | <p>Jupiter Aluminum has a documented Waste Management Strategy that profiles all waste streams,</p>  |

| CRITERION   | RATING         | COMMENT  |
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|   |                | key risks and impacts associated with waste streams and identifies management routes. The Strategy is designed in accordance with the Waste Mitigation Hierarchy. Jupiter has a 30% municipal solid waste reduction target by 2025 from 2019 baseline.   |
| 6.5b Waste management and reporting (disclosure)              | Conformance    | Jupiter publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods. Summary information is available in Jupiter's Sustainability Report, page 25: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a> |
| 6.6a Bauxite Residue (storage construction)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6b Bauxite Residue (integrity checks and controls)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6c Bauxite Residue (water discharge)                        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6d Bauxite Residue (marine and aquatic environments)        | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6e Bauxite Residue (start of the art technologies)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.6f Bauxite Residue (remediation)                            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7a Spent Pot Lining (SPL) (storage and management)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7d Spent Pot Lining (SPL) (review of alternatives)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.8a Dross (recovery)   | Conformance    | Jupiter processes a proportion of dross onsite before further recovery processes and landfill of dross fines from pollution control output. It recovers a small percentage of aluminum. The Dross is sent to Sceptor and Smelter Services to further recover   |

| CRITERION                           | RATING      | COMMENT  |
|-------------------------------------|-------------|--|
|                                     |             | aluminum from dross. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter.  |
| 6.8b Dross (recycling)              | Conformance | Jupiter does not send any of its Dross Residue to landfill. Jupiter recovers a small percentage of aluminum. The Dross Residue is sent to Sceptor and Smelter Services to further recover aluminum from dross residue. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter.                      |
| 6.8c Dross (review of alternatives) | Conformance | Jupiter does not send any of its Dross to landfill. Jupiter recovers a small percentage of aluminum through aluminium recovery equipment on site. The Dross is sent to Sceptor and Smelter Services to further recover aluminum from dross. The recovered Aluminum is purchased by Jupiter from Sceptor and Smelter. |

PRINCIPLE 7 WATER STEWARDSHIP

|  |             |  |
|--|-------------|--|
| 7.1a Water assessment (mapping)          | Conformance | <p>Jupiter's water use information data report gives a summary of Jupiter's water intake, use and discharge.</p> <p>Jupiter's Hammond's water supply is sourced by the Hammond Waterworks Department, which has the sole authority to withdraw from Lake Michigan. All discharge is through a single sewer, where Jupiter pays for all treatment needs. Jupiter's water use presents no risk to the watershed or water quality. Beech Bottom uses wells currently and is moving over to Municipal water source at Beech Bottom for water quality shortly.</p> <p>Fairland uses two wells within boundary of the facility. Both of these facilities have used estimated consumption data.</p> |
| 7.1b Water assessment (risk assessment)  | Conformance | <p>Jupiter's area of influence include; the industrial park on which Hammond resides, and its immediate air shed and water shed (Valparaiso Moraine of the Lake Michigan Watershed), the watershed at the Upper Ohio South River for the Beech Bottom site and the Big Blue River watershed for the Fairland plant.</p> <p>Document review and interviews with Jupiter staff determined that Jupiter has assessed its water-related risks and concluded that their water use presents no risk to the water shed or water quality.</p>  |
| 7.2a Water management (management plans) | Conformance | <p>Jupiter does not have a formal water management plan as it has not identified material risks.</p> <p>Jupiter has now implemented water trackers and has plans for changing water supplies at Beech Bottom</p>   |

| CRITERION  | RATING                | COMMENT   |
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|  |                       | and are working on water efficiency. It has a target in place to reduce freshwater use intensity by 6% by 2025 from 2018 baseline.<br>The Jupiter approach to water management is reported in the 2020 Sustainability Report.   |
| 7.2b Water management (monitoring)                                   | Minor Non-Conformance | The ASI Performance Standard requires the Entity to monitor the effectiveness of its water management plans. Jupiter Aluminum's management system does not define a water management plan, however, it has introduced a water tracking and monitoring system. Water related risks have been assessed as low by Jupiter and it has publicly committed to developing a water management plan in its 2020 Sustainability Report, page 24:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a> |
| 7.3 Disclosure of water usage and risks                              | Conformance           | The Jupiter Aluminum 2020 Sustainability Report discloses water withdrawal by site and water related risks, page 24:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a>   |
| PRINCIPLE 8 BIODIVERSITY   |                       |   |
| 8.1 Biodiversity assessment  | Conformance           | Jupiter Aluminum has conducted a biodiversity risk assessment that assesses the risk and materiality of the impacts on biodiversity from its operations. The assessment profiles endangered flora/fauna within 2 miles of the facility, and confirms that there are no key biodiversity areas (according to the Integrated Assessment Tool) within 5 miles of the facility. There are IUNC Management, Category V protected areas within 2 miles of the facility.   |
| 8.2a Biodiversity management (biodiversity action plans)             | Conformance           | Jupiter has conducted a Biodiversity Risk Assessment, which found that no further management system or action plan is required to mitigate adverse impacts on biodiversity, due to Jupiter's small area of influence, the relative lack of biodiversity in the area, and the high level of regulatory controls in place.  |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance           | According to the Biodiversity Risk Assessment, no further management system or action plan is required to mitigate adverse impacts on biodiversity, due to Jupiter's small area of influence, the relative lack of biodiversity in the area, and the high level of regulatory controls in place.  |

| CRITERION   | RATING         | COMMENT   |
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| 8.2c Biodiversity management (reporting)  | Conformance    | Jupiter Aluminum has conducted a biodiversity risk assessment, and refers to these assessments in its 2020 Sustainability Report:<br><a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a>  |
| 8.3 Alien Species   | Conformance    | Jupiter has assessed the risks of introducing alien species through its operations, and is taking steps to mitigate potential risks, including:<br>- utilizing contractors that are implementing proper housekeeping & maintenance, and<br>- completing routine inspections of wood pallets, to ensure they are not carrying alien species.   |
| 8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope.   |
| 8.4b Commitment to “No Go” in World Heritage properties (existing operations)       | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope.   |
| 8.5a Mine rehabilitation (best available techniques)                                | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope.   |
| 8.5b Mine rehabilitation (financial provisions)                                     | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope.   |
| PRINCIPLE 9 HUMAN RIGHTS  |                |   |
| 9.1a Human Rights Due Diligence (policy)  | Conformance    | The Social and Ethical Management Standards include the Policy commitment to respect Human Rights. The Policy makes reference to the UN Guiding Principles. The Policy has been communicated to the employees through a formal training.  |
| 9.1b Human Rights Due Diligence (process)   | Conformance    | Jupiter has conducted a Human Rights Due Diligence process - The HR Director and the Sustainability Manager conducted the due diligence. Input from management and employees was taken to conduct the due diligence. The due diligence process is the first steps towards identifying potential impacts on Human Rights. Based on the risk level assigned to the identified criteria’s prevention and mitigation plans are developed.<br>Jupiter demonstrated procedures and policies in place in order to respect Human Rights and according to the UN Guiding Principles on Business and Human Rights. This is part of the Jupiter’s Code of Conduct applicable to all employees, as well as suppliers and partner companies. |



| CRITERION                                     | RATING      | COMMENT   |
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| 9.1c Human Rights Due Diligence (remediation) | Conformance | Jupiter's Human Rights Due Diligence process did not identify any adverse Human Rights impacts. Jupiter demonstrated procedures and policies in place in order to respect Human Rights and according to the UN Guiding Principles on Business and Human Rights. This is part of the Jupiter's Code of Conduct applicable to all employees, as well as suppliers and partner companies. Jupiter has a grievance reporting mechanism to report any complaints including human rights violation.   |
| 9.2 Women's Rights                            | Conformance | The Jupiter Aluminum Social and Ethical Management Standard has a combined human and women's right policy. The policy is in lines with, but not limited to United Nations Guiding Principles on Business and Human Rights - The UN Convention on the Elimination of all Forms of Discrimination Against Women, 1979.  |
| 9.3 Indigenous Peoples                        | Conformance | Jupiter has demonstrated that there are no Indigenous Peoples in the areas of its operations. However, the Social and Ethical Management Standard includes the Policy on Indigenous Peoples Rights. It further states that Jupiter aims to abide by recommendations put in place by: Indiana Native American Indian Affairs Commission (INAIAC); The American Declaration on the Rights of Indigenous Peoples; and US Agency for International Development (USAID) regarding Free and Prior Informed Consent, Resettlement standards, and cultural and sacred heritage. |
| 9.4 Free, Prior, and Informed Consent (FPIC)  | Conformance | Jupiter has demonstrated that there are no areas of governance by indigenous peoples and local communities near or around the Jupiter Facilities.   |
| 9.5 Cultural and sacred heritage              | Conformance | There are no cultural and heritage sites near to the Jupiter Aluminum Facilities.   |
| 9.6a Resettlements (avoid or minimise)        | Conformance | The Jupiter facilities are located in an industrial area since inception and there has been no resettlement required in the located site.   |
| 9.6b Resettlements (where unavoidable)        | Conformance | The Jupiter facilities are located in an industrial area since inception and there has been no resettlement required in the located site.   |

| CRITERION  | RATING         | COMMENT   |
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| 9.7a Local Communities (rights and interests)  | Conformance    | The Jupiter facilities are located in an industrial area, and rural communities. The Human Rights Due Diligence did not identify any communities whose livelihoods and use of natural resources are adversely affected by Jupiter.  |
| 9.7b Local Communities (impacts)   | Not Applicable | The Human Rights Due Diligence did not identify any communities whose livelihoods and use of natural resources are adversely affected by Jupiter.   |
| 9.7c Local Communities (livelihoods)   | Not Applicable | The Human Rights Due Diligence did not identify any communities whose livelihoods and use of natural resources are adversely affected by Jupiter.   |
| 9.8 Conflict-Affected and High-Risk Areas  | Conformance    | Jupiter Aluminum is located in the United States and does not operate in high conflict zones. Jupiter has a conflict minerals policy posted on its website, and its application is used to ensure it does not contribute to armed conflict or human rights abuses in conflict affected areas.   |
| 9.9 Security practice  | Not Applicable | Jupiter has no security check for employees and no security personnel on site.  |
| PRINCIPLE 10 LABOUR RIGHTS   |                |   |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance    | The Social and Ethical Management Standards includes a policy on rights of Workers to associate freely in Labor Unions in lines with the ILO Conventions C87 and C98. The employee handbook is provided to all employees as part of the training, which includes these policies and procedures.   |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)  | Conformance    | Jupiter Aluminum respects the rights of workers to collective bargaining, they participate in the collective bargaining process and adhere to collective bargaining agreements.<br>The Collective Bargaining Agreement is applicable only to the Hammond site and not to the Beech Bottom and Fairland sites.   |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means)      | Conformance    | The Entity operates in a country where collective bargaining agreements are legal. At Beech Bottom and Fairland where there is not one in place, there are opportunities to feedback to management and raise any concerns or requests including through an anonymous 'Submit Comments' section on its website. At all sites, Jupiter has an open door policy, uses line management and has introduced safety committees at all sites. |

| CRITERION                                      | RATING      | COMMENT   |
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| 10.2a Child Labour (minimum age)               | Conformance | Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.   |
| 10.2b Child Labour (hazardous)                 | Conformance | Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.   |
| 10.2c Child Labour (worst forms)               | Conformance | Jupiter has a Child Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C138 and C182. Jupiter does not hire anyone under the age of 18.   |
| 10.3a Forced Labour (human trafficking)        | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and has controls in place for when using employment agencies including direct interviews with all candidates.                                |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies. Jupiter does not require any form of deposit, recruitment fee or equipment advance from Workers.   |
| 10.3c Forced Labour (migrant workers)          | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies. Jupiter does not hire any migrant workers and does not require any deposits at the time of hiring. |
| 10.3d Forced Labour (debt bondage)             | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter hires all employees directly and does not use any employment agencies. Jupiter does not hire any migrant workers and does not require any deposits at the time of hiring. |

| CRITERION   | RATING      | COMMENT  |
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| 10.3e Forced Labour (freedom of movement)                                 | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter has no restriction on movement of workers in the facility.   |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter does not retain any original documents of employees including identity papers and training certificates.   |
| 10.3g Forced Labour (freedom to terminate employment)                     | Conformance | Jupiter has a Forced Labor Policy in the Social and Ethical Management Standards which is in lines with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Jupiter employees are allowed to terminate their employment at will, they are requested to provide a two weeks' notice.  |
| 10.4 Non-Discrimination   | Conformance | Jupiter has a Non-Discrimination Policy in the Social and Ethical Management Standards which is in lines in line with ILO Conventions C100 and C111. The Policy covers race, color, origin, gender, sexual orientation, pregnancies, age, disability, religion, genetic information, marital status, family responsibilities and political or union affiliation.   |
| 10.5 Communication and engagement   | Conformance | Jupiter Social and Ethical Management Standard has the required policies on freedom of association and communication. The Jupiter Hammond facility workers have a collective bargaining agreement that provides procedures that state Jupiter's approach to communication, consultation and engagement with workers, procedures and templates for the resolution of workplace issues and compensation without threat of reprisal and procedures for fair treatment and disciplinary processes.<br>For Beech Bottom and Fairland, the grievance mechanism is included in the employee handbook and is shared with them separately. The grievance mechanism is also posted on the notice boards throughout the facility. |
| 10.6 Disciplinary practices   | Conformance | The disciplinary procedure is documented in the employee handbook and collective bargaining agreement. Jupiter does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of  |

| CRITERION   | RATING      | COMMENT  |
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|   |             | Workers. Jupiter has a mature grievance reporting, tracking and handling process.  |
| 10.7a Remuneration (living wage)  | Conformance | The workers are paid above the minimum legal wage. The collective bargaining agreement reflects the pay grade and wage based on roles. Overtime is voluntary and paid 1.5 times the regular wage.  |
| 10.7b Remuneration (method of payment)  | Conformance | The review of pay slips and time sheets confirm that salary is paid in a timeline manner and correctly.  |
| 10.8 Working Time   | Conformance | The collective bargaining agreement and the employee handbook details the working hours, sick days, vacation, and overtime details. This was further verified against the payroll records. Working hours are in compliance with the local law and is communicated to all employees.  |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY                                       |             |  |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy)                       | Conformance | Jupiter has developed and effectively implements/maintains an Occupational Health and Safety Policy supported by senior management. The policy includes training requirements, applicable to all workers, as well as auditing requirements to track implementation of the standard. The policy has been reviewed by senior management, and the President has given final approval of the document. |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)         | Conformance | Jupiter's OH&S policy states that it is applicable to "Jupiter, its employees, vendors and outside contractors".<br>Staff is effectively trained on the policy, while the Jupiter Aluminum visitor safety notice defines required PPE, and rules of conduct for all visitors.  |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Employee Handbook and the OH&S policy state that Jupiter, it's employees, vendors and out-side contractors will comply with all OSHA requirements, while the Global Code of Conduct states that "Jupiter must comply with United States Federal and State Laws, as well as the International Labor Organization guidelines regarding workplace rights"   |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)    | Conformance | The OH&S Management System defines an employee's right to refuse dangerous work, and prevents retaliation against individuals who report safety violations. The policy requires regular workplace audits, to identify and address potential behavioural and physical hazards.<br>Training requirements are defined, and records of trainings were reviewed to demonstrate effective                |

| CRITERION                                     | RATING      | COMMENT   |
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|   |             | implementation the requirements. Hourly workers confirmed that they felt comfortable refusing unsafe work, though no workers every thought they or their colleagues were asked to do unsafe work. Jupiter's policies provide Workers the ability to identify hazards and safe practices for their work, and the authority to refuse or stop unsafe work   |
| 11.2 OH&S Management System                   | Conformance | The Employee Handbook & OH&S policy state that Jupiter, it's employees, vendors and out-side contractors will comply with all OSHA requirements, while the Global Code of Conduct states that "Jupiter must comply with United States Federal and State Laws, as well as the International Labor Organization guidelines regarding workplace rights". Jupiter has developed an Occupational Health and Safety Management System that meets applicable national and international standards.                             |
| 11.3 Employee engagement on health and safety | Conformance | Jupiter Aluminum has commenced Safety Committees at the Beech Bottom and Fairland facilities, by which employees can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management. At the Hammond facility, Jupiter's Collective Bargaining Agreement establishes a Plant Safety Committee consisting of union and non-union employees through which they can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management. |
| 11.4 OH&S performance                         | Conformance | Jupiter evaluates its safety performance and has now started to benchmark safety performance against industry averages and across its facilities and to track near miss data.   |

#### **Document Control and Version History**

| Revision | Date             | Notes  |
|----------|------------------|--|
| 0        | 7 January 2020   | Initial Certification  |
| 1        | 18 February 2021 | Updated to reflect Certification Scope change with addition of sites at Beech Bottom and Fairland.                                 |
| 2        | 26 July 2021     | Surveillance Audit; Update to Audit Scope (Certification Audit) to correct the Hammond facility location from Illinois to Indiana. |