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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 2023

DATE OF EXPIRY

6 JANUARY 2026

CERTIFIED SINCE

30 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a light green background.

Aluminium Stewardship Initiative Ltd  
CAN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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

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MEMBER NAME            Jupiter Aluminum

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ENTITY NAME            Jupiter Aluminum

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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.

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SUPPLY CHAIN ACTIVITIES            

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

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ASI STANDARD            

- Performance Standard V2

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AUDIT TYPE            

- Certification Audit (19 – 20 November 2019)
- Scope Change Audit (8 – 9 December 2020)
- Surveillance Audit (19 – 20 May 2021)
- Re-Certification Audit (20 November – 1 December 2022)

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AUDIT FIRM            DNV Business Assurance Services UK Ltd.

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AUDIT DATE            

- 19 – 20 November 2019 (Certification Audit)
- 8 – 9 December 2020 (Scope Change Audit)
- 19 – 20 May (Surveillance Audit)
- 20 November – 1 December 2022 (Re-Certification Audit)

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AUDIT REPORT SUBMISSION            

- 12 December 2019 (Certification Audit)
- 29 January 2021 (Scope Change Audit)
- 18 June 2021 (Surveillance Audit)
- 12 January 2022 (Re-Certification Audit)

Certification Audit (19 – 20 November 2019)

The audit scope covered the activities at Jupiter Aluminum operations located in Hammond, Indiana USA.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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.

Re-Certification Audit (20 November – 1 December 2022)

The audit scope covers Jupiter Aluminum operations located in Hammond, Indiana, and Fairland, Indiana, USA.

The ASI multi-site sampling approach was undertaken for the Facilities listed within the Audit Scope and does not include the coil coating facility located in Beech Bottom, West Virginia.

Supply chain activities included in the audit scope:

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

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

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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 2023 – 6 January 2026

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DATE

7 July 2024

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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	The Entity 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. They also have agreements with several law firms to provide regular updates on changes in regulatory requirements.
1.2 Anti-Corruption	Conformance	The Governance framework documents the 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 records. It is 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>
1.3 Code of Conduct	Conformance	The Entity 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. The Entity has maintained a training log and signed training attendance records.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity 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: <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	The Entity'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: <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>The Entity effectively communicates its policies to both internal and external Stakeholders. Policies are available to internal and external Stakeholders via the Entity'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), the Entity's Environment, Health, and Safety (EHS) Director are 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, the Entity 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>The Entity 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>The Entity 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 Vice President of Human Resources and is reviewed annually by senior management.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity's Governance Framework includes a responsible sourcing policy that addresses 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 is available</p>

CRITERION	RATING	COMMENT
		<p>on the Entity website, under the headings Global Code of Conduct and Terms and Conditions of Purchases: <a href="https://www.jupitaluminum.com/Main/Responsibility">https://www.jupitaluminum.com/Main/Responsibility</a></p> <p>These documents define vendor social, environmental, and governance practices.</p>
2.5 Impact Assessments	Conformance	<p>Since joining ASI, the Entity has not undertaken any projects related to expansion or significant changes to operations at its Hammond, Beech Bottom, and Fairland locations.</p> <p>The Entity'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>The Entity'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, The Entity's location in an industrial/rural area limits external Stakeholder exposure to emergencies. As a result, compliance with regulatory requirements is sufficient to address consultation with external Stakeholders.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity's Governance Framework requires that it engages with outside specialists to perform environmental, social, and fiscal Due Diligence on a merger or acquisition target: <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>The Entity has been involved in one merger and acquisition (M&amp;A) in twenty years, which closed in December 2018. This occurred prior to the governance framework policy, however the Entity 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>The Entity'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: <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, the Entity has had no closures/decommissioning in 28 years of operation.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity discloses its material environmental, social, and economic impacts in its Sustainability Report, available at:  <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 addresses energy consumption and Greenhouse Gases (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 the Entity's significant fines, judgments, penalties, and non-monetary sanctions are available through public databases, including OSHA:  <a href="https://www.osha.gov/pls/imis/establishment.html">https://www.osha.gov/pls/imis/establishment.html</a>  IDEM (Public Records Request Form):  <a href="https://www.in.gov/idem/5157.htm">https://www.in.gov/idem/5157.htm</a>  WV: <a href="https://dep.wv.gov/Pages/default.aspx">https://dep.wv.gov/Pages/default.aspx</a>  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>The Entity 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 enables 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 utilise regulatory agency hotlines to file complaints. For instance, they may contact the City of</p>



CRITERION	RATING	COMMENT
		<p>Hammond's Department of Environmental Management or the Cities Code Enforcement Division, (or the West Virginia Department of Environment. External complaints can be made via the website using the 'Suggestion' link at the foot of the home page:  <a href="https://www.jupiteraluminum.com/">https://www.jupiteraluminum.com/</a>            If it is an environmental issue, complaints can go via an appropriate agency or directly to the site or the owners of the property.</p>
<b>PRINCIPLE 4 MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has provided internal production data to the American Aluminum Association to create a comprehensive analysis of its emissions, waste, water, and energy impacts. The first Life Cycle Assessment (LCA) analysis was published in 2013, and the second edition was completed in January 2022. The LCA developed by the Aluminum Association is from cradle to gate.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>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:  <a href="https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf">https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</a></p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The LCA is available online and the link to the LCA has been provided in the Environmental Management System Document. The LCA is a detailed report and includes the underlying assumptions including system boundaries.</p>
4.2 Product design	Not Applicable	<p>Whilst the Entity produces coils for its customers according to their technical specifications and requirements (i.e., grade/purity), it however has no influence into how its customers design and produce their finished products. The Entity provides their customers with suggestions on how they can improve their material.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The scrap produced internally by the Entity at all three sites including Hammond, Beech Bottom and Fairland is used as raw material. The Entity reuses 100% of the scrap that is produced internally. The Entity manufactures coils comprising 96% Recycled Aluminium scrap and 4% Primary Aluminium.</p>

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity reuses 100% of the scrap that is produced internally. The Entity manufactures coils comprising 96% Recycled Aluminium scrap and 4% Primary Aluminium. 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	The Entity'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 the Entity, 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	The Entity is a member of the American Aluminum Association and is involved in providing input to the end clients and the aluminium community on the 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	The Entity 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 2022 Sustainability Report: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a> 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. The Entity 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	The Entity has committed to a 10% reduction from its 2015 baseline by 2025. This commitment is publicly available in the 2021 Sustainability Report: <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a> This commitment applies to Hammond, Beech Bottom and Fairland Facilities. In 2022, the Entity added a target to Reduce Coil Production and Coating GHG emissions intensity by 20% from a 2018 baseline. Both targets will be published in the 2022 Sustainability Report.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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>The Entity 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, the West Virginia Department of Environmental Protection, and the Division of Air Quality. Compliance with the permit includes requirements to implement plans to minimise these adverse impacts by, among other things, periodic emissions testing, monitoring, and maintenance programs. The Entity has documented that such plans exist and that the company has procedures in place to supervise, monitor, and continuously measure Emissions to Air. The Entity is regulated for and monitors Criteria Pollutants such as PM<sub>10</sub>, PM<sub>2.5</sub>, and Volatile organic compounds (VOC) (Hammond), VOCs (Fairland), VOCs and Hazardous Air Pollutants (HAPs).</p>
6.2 Discharges to Water	Conformance	<p>The Entity's Hammond facility 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 minimise these adverse impacts such as pre-treatment standards and the Entity has documented that such plans exist and that the company has procedures in place to demonstrate compliance.</p> <p>The Entity's Beech Bottom facility 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 (West Virginia National Pollutant Discharge Elimination Permit) includes requirements to implement plans to minimise these adverse impacts such as pre-treatment standards and the Entity has documented that such plans exist and that the company has procedures in place to demonstrate compliance.</p>

CRITERION	RATING	COMMENT
		<p>It is important to note that Jupiter Hammond and Beech Bottom have no direct discharge to a body of water. All process-related water and a majority of stormwater are directed to the local Publicly Owned Treatment Works (POTW) for treatment prior to discharge.</p> <p>The Entity's Fairland facility 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 the drinking water supply.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has developed a spill prevention control and countermeasure plan for each site (Hammond, Beech Bottom and Fairland). The plan is developed to meet the United States Environmental Protection Agency (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.</p> <p>There have been no significant incidents of Spills or Leakages in the last five years.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity 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:</p> <ul style="list-style-type: none"> <li>- Inventory of materials that can leak and spill;</li> <li>- Systems and controls for detecting and monitoring Spills and Leakages;</li> <li>- Documented management plans with controls to prevent the occurrence of, and to mitigate impacts associated with Spills and Leakages;</li> <li>- Procedures for communicating Spills and Leakages to affected personal and external Stakeholders.</li> </ul>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The spill prevention control and countermeasure plan include:</p> <ul style="list-style-type: none"> <li>- Procedures with the documented methodology for determining the volume, type, and potential impact of significant spills;</li> <li>- Procedure for immediate reporting and communication of volume, type, and potential impact of significant spills to affected personnel and external Stakeholders.</li> </ul>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>There have been no significant spills in the last five years. If there is a spill in future, in accordance with</p>

CRITERION	RATING	COMMENT
		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.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a documented waste management strategy that profiles all waste streams, key risks and impacts associated with waste streams and identifies management routes. The strategy is designed in accordance with the Waste Mitigation Hierarchy. The Entity has a 30% municipal solid waste reduction target by 2025 from a 2019 baseline.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses 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 the 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.

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

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity's water use information data report gives a summary of its water intake, use and discharge. 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 via a single sewer where the Entity pays for all treatment needs. The Entity's water use presents no risk to the Watershed or water quality. The Entity's Beech Bottom facility uses wells currently and is transferring to the Municipal water source at Beech Bottom for water quality shortly. The Entity's Fairland facility uses two wells within the boundary of the Facility. Both facilities have used estimated consumption data.
7.1b Water assessment (risk assessment)	Conformance	The Entity's Area of Influence includes the industrial park on which Hammond resides, its immediate air shed and Watershed (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. Document review and interviews with staff determined that it has assessed its water-related

CRITERION	RATING	COMMENT
		risks and concluded that its water use presents no risk to the Watershed or water quality.
7.2a Water management (management plans)	Conformance	<p>The Entity does not have a formal water management plan as it has not identified material risks. But has implemented water trackers and has plans for changing water supplies at Beech Bottom and are working on water efficiency. It has a target in place to reduce freshwater use intensity by 6% by 2025 from a 2018 baseline.</p> <p>The Entity's approach to water management is reported in the 2021 Sustainability Report.  <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a></p>
7.2b Water management (monitoring)	Conformance	<p>The Entity'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 and it has publicly committed to developing a water management plan in its 2021 Sustainability Report, page 29:  <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a></p>
7.3 Disclosure of water usage and risks	Conformance	<p>In 2021, the Entity began implementing water use controls to manage usage more effectively across all three facilities. The initiative includes developing a management plan and installing water meters at various locations to generate more specific usage readings. Unfortunately, they were not able to implement all these initiatives in 2021. In 2021 Coil Production Water Use Intensity decreased to 1.63 M3/t Al, down from 1.69 M3/t Al in 2020.</p> <p>For more information, see the Sustainability Report, page 29:  <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Sustainability.pdf</a></p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity 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 two miles of the Facility and confirm that there are no key biodiversity areas (according to the Integrated Assessment Tool) within five miles of the Facility.</p> <p>The Entity has no impact on the key biodiversity areas.</p>

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity 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 their 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 their small Area of Influence, the relative lack of biodiversity in the area and the high level of regulatory controls in place.
8.2c Biodiversity management (reporting)	Conformance	The Entity has conducted a biodiversity risk assessment, and refers to these assessments in its 2021 Sustainability Report: <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	The Entity has assessed the risks of introducing Alien Species through its operations and is taking steps to mitigate potential risks, including utilising Contractors that are implementing proper housekeeping and maintenance, and 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 Entity’s Social and Ethical Management Standards include the policy commitment to respect Human Rights. The policy refers to the UN Guiding Principles. The policy has been communicated to the employees through formal training.



CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has conducted a Human Rights Due Diligence process. The Vice President of Human Resources and the Sustainability Manager conducted the Due Diligence. Input from management and employees was utilised in conducting the Due Diligence. Based on the risk level assigned to the identified criteria prevention and mitigation plans are developed.</p> <p>The Entity has demonstrated procedures and policies in place to respect Human Rights according to the UN Guiding Principles on Business and Human Rights. This is part of the Code of Conduct applicable to all employees, as well as suppliers and partner companies.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity's Human Rights Due Diligence process did not identify any adverse Human Rights impacts. The Entity demonstrated procedures and policies in place to respect Human Rights according to the UN Guiding Principles on Business and Human Rights. This is incorporated in the Code of Conduct applicable to all employees, as well as suppliers and partner companies.</p> <p>The Entity has implemented a grievance reporting mechanism to report any complaints including human rights violations.</p>
9.2 Women's Rights	Conformance	<p>The Entity Social and Ethical Management standard has a combined Human and Women's Rights policy. The policy is in line 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.</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity 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 they aim to abide by recommendations put in place by:</p> <ul style="list-style-type: none"> <li>- Indiana Native American Indian Affairs Commission (INAIAC);</li> <li>- The American Declaration on the Rights of Indigenous Peoples; and</li> <li>- US Agency for International Development (USAID) regarding Free and Prior Informed Consent, Resettlement standards, and cultural and sacred heritage.</li> </ul>

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Entity has demonstrated that there are no areas of governance by Indigenous Peoples and Local Communities near or around their Facilities.
9.5 Cultural and sacred heritage	Not Applicable	There are no cultural and heritage sites near the Entity's Facilities.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity's 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 Entity's Facilities are located in an industrial area since inception and there has been no resettlement required in the located site.
9.7a Local Communities (rights and interests)	Not Applicable	The Entity's 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 the Entity.
9.7b Local Communities (impacts)	Not Applicable	This Criterion is not applicable as the Human Rights Due Diligence did not identify any communities whose livelihoods and use of natural resources are adversely affected by the Entity.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion is not applicable as the Human Rights Due Diligence did not identify any communities whose livelihoods and use of natural resources are adversely affected by The Entity.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is located in the United States and does not operate in high-conflict zones. They have 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	This Criterion is not applicable as the Entity has no security check for employees and there are no security personnel present 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 include a policy on the rights of Workers to associate freely in Labor Unions in line with ILO Conventions C87 and C98. The employee handbook is provided to all employees as part of training, which includes these policies and procedures.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining, they participate in the Collective Bargaining process and adhere to collective bargaining agreements. The Collective Bargaining Agreement applies 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. All sites have an open-door policy, use line management, and have introduced safety committees at all sites. <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Global_Code.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Global_Code.pdf</a> <a href="https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf">https://www.jupitaluminum.com/assets/images/about/JAC_Governance.pdf</a>
10.2a Child Labour (minimum age)	Conformance	The Entity has a Child Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C138 and C182. They do not hire anyone under the age of eighteen.
10.2b Child Labour (hazardous)	Conformance	The Entity has a Child Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C138 and C182. They do not hire anyone under the age of eighteen.
10.2c Child Labour (worst forms)	Conformance	The Entity has a Child Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C138 and C182. They do not hire anyone under the age of eighteen.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. They hire all employees directly and have controls in place when using employment agencies including direct interviews with all candidates.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. They hire all employees directly and do not use any employment agencies nor do not require any form of deposit,

CRITERION	RATING	COMMENT
		Recruitment Fees or equipment advance from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, as well as Protocol P29 (2014) to this Convention, and C105. They do not hire all employees directly and do not use any employment agencies nor do not hire any Migrant Workers and do not require any deposits at the time of hiring.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, as well as Protocol P29 (2014) to this Convention, and C105. The Entity hires all employees directly and does not use any employment agencies. They do not hire any Migrant Workers and do not require any deposits at the time of hiring.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, as well as Protocol P29 (2014) to this Convention, and C105. They do not have a restriction on the movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, as well as Protocol P29 (2014) to this Convention, and C105. They do not retain any original documents of employees including identity papers and training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has a Forced Labor Policy in the Social and Ethical Management Standards which is in line with ILO Conventions C29, as well as with Protocol P29 (2014) to this Convention, and C105. All employees are allowed to terminate their employment at will, they are requested to provide a two weeks' notice.
10.4 Non-Discrimination	Conformance	The Entity 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, colour, origin, gender, sexual orientation, pregnancies, age, disability, religion, genetic information, marital status, family responsibilities and political or union affiliation.

CRITERION	RATING	COMMENT
10.5 Communication and engagement	Conformance	<p>The Entity's Social and Ethical Management Standard has the required policies on Freedom of Association and communication. At the Entity's Hammond facility, Workers have a collective bargaining agreement that provides procedures that state their 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.</p> <p>For the Beech Bottom and Fairland facilities, 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.</p>
10.6 Disciplinary practices	Conformance	<p>The disciplinary procedure is documented in the employee handbook and collective bargaining agreement. The Entity 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 Workers. They have a mature grievance reporting, tracking, and handling process.</p>
10.7a Remuneration (living wage)	Conformance	<p>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 is paid at 1.5 times the standard wage rate.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The review of pay slips and time sheets confirms that salaries are paid on time and correctly.</p>
10.8 Working Time	Conformance	<p>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 comply to the local law and are communicated to all employees.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed and effectively implements/maintains an Occupational Health and Safety Policy (OH&amp;S) supported by senior management. The policy includes training requirements, applicable to all Workers, as well as auditing requirements to track the implementation of the standard. The Policy has been reviewed by</p>

CRITERION	RATING	COMMENT
		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	<p>The Entity's OH&amp;S Policy states that it applies to 'Jupiter, its employees, vendors and outside contractors'.</p> <p>Staff are effectively trained on the policy, while the Entity's Visitor safety notice defines required Personal protective equipment (PPE), and rules of conduct for all Visitors.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Employee Handbook and the OH&amp;S Policy state that the Entity, its employees, vendors and outside Contractors will comply with all Occupational Safety and Health Administration (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'.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The OH&amp;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.</p> <p>Training requirements are defined, and records of training were reviewed to demonstrate the effective implementation of the requirements. Hourly workers confirmed that they feel comfortable refusing unsafe work, though no Workers ever thought they or their colleagues were asked to do unsafe work.</p> <p>The Entity's policies provide Workers with the ability to identify hazards and safe practices for their work, and the authority to refuse or stop unsafe work.</p>
11.2 OH&S Management System	Conformance	<p>The Entity has developed an Occupational Health and Safety Management System that meets applicable national and international standards.</p> <p>The Employee Handbook &amp; OH&amp;S Policy state that the Entity, its employees, vendors and outside 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'.</p>
11.3 Employee engagement on health and safety	Conformance	<p>The Entity has commenced Safety Committees at the Beech Bottom and Fairland Facilities, by which employees can raise, discuss, and participate in the resolution of OH&amp;S issues with management.</p>

CRITERION	RATING	COMMENT
		At the Entity's Hammond Facility, the 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 OH&S issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its safety performance and has implemented a benchmark safety performance against industry averages and across its Facilities 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.
3	18 January 2022	Update to inactive hyperlink for Criterion 4.1b.
4	8 February 2023	Re-Certification Audit - Full Certification