

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

JW Aluminum

CERTIFICATE NUMBER
367

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
2 MAY 2024

DATE OF EXPIRY
1 MAY 2027

CERTIFIED SINCE
2 MAY 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
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Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at www.Aluminium-stewardship.org

Certification scope

The manufacturing of 3105 flat-rolled Aluminium coils at the Goose Creek, South Carolina (SC) facility.
The manufacturing of 1100 and 7072 flat-rolled Aluminium coils at the Russellville, Arkansas (AR) facility.
The central functions at the Corporate Office in Charleston, SC.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	JW Aluminum
ENTITY NAME	JW Aluminum
CERTIFICATION SCOPE	The manufacturing of 3105 flat-rolled Aluminium coils at the Goose Creek, South Carolina (SC) facility. The manufacturing of 1100 and 7072 flat-rolled Aluminium coils at the Russellville, Arkansas (AR) facility. The central functions at the Corporate Office in Charleston, SC.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial ConversionOther manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (19 - 22 February 2024)Surveillance Audit (22 - 24 September 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">19 - 22 February 2024 (Initial Certification Audit)22 - 24 September 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 March 2024 (Initial Certification Audit)22 October 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (19 - 22 February 2024)</u></p> <p>The Audit Scope included the manufacturing of flat-rolled Aluminium coils, including the recycling, remelting, casting, hot and/or cold rolling, annealing, and finishing operations at JW Aluminium facilities in Goose Creek, SC, and Russellville, AR, and the central functions at the Corporate Office in Charleston, SC.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial ConversionOther manufacturing or sale of products containing Aluminium. <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (22 - 24 September 2025)</u></p> <p>The Audit Scope included the manufacturing of flat-rolled Aluminium coils, including</p>

the recycling, remelting, casting, hot and/or cold rolling, annealing, and finishing operations at JW Aluminium facilities in Goose Creek, SC, and Russellville, AR, and the central functions at the Corporate Office in Charleston, SC.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication
- Material Conversion
- Other manufacturing or sale of products containing Aluminium.

Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope.

AUDIT OUTCOME

- Certification

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.

CERTIFICATION PERIOD

2 May 2024 – 1 May 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

1 May 2027

CERTIFICATE NUMBER

367



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://Aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Founded in Goose Creek, South Carolina, in 1979 as Jim Walter Metals, the Entity began as a single-facility operation with only ten employees. The Entity focuses on producing cast Aluminium coils used in home building and construction applications. Today, it operates two Aluminium mills located in South Carolina and Arkansas, with over 500 employees and an expansion in progress, the Entity produces high-quality flat-rolled Aluminium products for the building products, HVAC/R and transportation segments, including Building and Distributor Sheet, Fin Stock and Aluminium used for automotive component parts.

The Entity produces recyclable Aluminium sheets and foil used to make products essential to our everyday life, including building products and HVAC components at the Goose Creek, South Carolina, and Russellville, Arkansas facilities process the Aluminium to support these vital industries.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MEDIUM		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, Procedures, and processes that comply with its Applicable Laws and regulations.
1.2 Anti-Corruption	Conformance	<p>The Entity established an Anti-Corruption Policy, which includes Extortion and Bribery. The Policy is well communicated across the Entity and rigorously enforces zero tolerance for Bribery and Corruption, and it applies to all employees, supply chains, investors, and Stakeholders.</p> <p>The Anti-Corruption Policy is incorporated in the Code of Conduct and Ethics Report, page 10: https://www.jwaluminum.com/sustainability-0</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has systems, Policies, and Procedures for all employees, Stakeholders, suppliers, and leadership teams to acknowledge and sign-off on the current Code of Conduct and Ethical Policy.</p> <p>The Entity Code of Conduct and Ethics is available at: https://www.jwaluminum.com/sustainability-0</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established its Environmental, Social, and Governance (ESG) 'stand-alone' Policies. The Policies have been endorsed from the Entity's senior leadership and are publicly disclosed and available at: https://www.jwaluminum.com/sustainability-0
2.2a-c Leadership	Conformance	<p>The Entity's senior management has demonstrated ongoing commitment to the environmental, social, and governance Policies.</p> <p>The Entity's Chief Operating Officer is responsible for the ASI Performance Standard conformance and has appointed the ESG Guiding Coalition as the Senior Management Representative responsible for ensuring conformance and implementation in accordance with the ASI Performance Standard and the Entity's Management System.</p>
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an Environmental Management System (EMS) based on the ISO 14001 Standard. The Environmental Policy and other documents related to the EMS are publicly available at: https://www.jwaluminum.com/sustainability-0
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has established a 'stand-alone' Social and Ethical Management System (SEMS) which has utilised both the SA8000 Standard and the UN Global Compact as tools to develop the system.</p> <p>The Social and Ethical Management System Policy is available at: https://www.jwaluminum.com/sustainability-0</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity established a Responsible Sourcing Policy and associated procedures that include partners, suppliers, and the supply chain.</p> <p>Using recognised external analysis platforms and tools, the Responsible Sourcing process addresses Human Rights and Modern</p>

CRITERION	RATING	COMMENT
		<p>Slavery, assessing the risk with its most significant suppliers. The Supplier Conduct Review Framework identifies, assesses, controls, reviews, and reports risks related to the Entity's suppliers.</p> <p>The Responsible Sourcing Policy and the Corporate Supplier Conduct Policy are publicly disclosed at: https://www.jwaluminum.com/sustainability-0</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it has not made any significant changes to the Mount Holly, South Carolina, or Russellville, Arkansas, facilities since joining ASI.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it has not made any significant changes to the Mount Holly, South Carolina, or Russellville, Arkansas, facilities since joining ASI.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed and implemented a Corporate Emergency Response Plan with site-specific actions, and is available upon request.
2.8a-d Suspended Operations	Conformance	The Entity has Emergency Response Plans, including Suspended Operations, designed to minimise injury and loss of human life and company resources by training teammates, procuring, and maintaining necessary equipment, and assigning responsibilities. These plans apply to all emergencies that may reasonably be expected to occur at the Entity at any time. These include, but are not limited to, fire response, chemical releases, spills, rescue, medical emergencies, security threats, workplace violence, and vulnerabilities to weather or other naturally occurring events. The documentation provided is confidential, including facility maps and emergency contact information.
2.9a-b Mergers and Acquisitions	Conformance	If considering a potential merger or acquisition, the Entity will evaluate the potential merger/acquisition Entity's environmental, social, and governance performance history as an integral part of the Due Diligence process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	In case of closure, decommissioning, or divestment within the business, Due diligence will be performed to develop action plans to minimise environmental and social impacts.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity discloses its approach to environmental, social, and governance impacts related to principles in the ASI Performance Standard in its Annual Sustainability Report.</p> <p>The 2024 Sustainability Report is available at: https://www.jwaluminum.com/sustainability-0</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity adheres to all required applicable laws. This information is disclosed as follows: Any significant fines, judgments, or penalties can be found through public governing body databases, including OSHA, EPA, DHEC, EEOC, DOT, and other legal and regulatory authorities. Since joining ASI, JW has not had significant fines, judgments, or penalties.</p> <p>https://www.jwaluminum.com/investors</p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>The Entity is a privately held company; the Entity only makes or has made Payments to the Government on its behalf on a legal/contractual basis, disclosed internal legal service payments, or financial reports. Additional information is disclosed in the Annual Sustainability Report: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf.</p> <p>Also, within the Entity and supply chain businesses, the disclosure of payments are documented in the Code of Conduct: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented and established a Code of Conduct, Corporate Ethics Training, and Open Door Policy which has been disclosed at: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has participated in and reported the Environmental Life Cycle Assessment publicly disclosed at: https://www.aluminum.org/</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity utilises the LCA published by The Aluminum Association, this information is reported and publicly disclosed at: https://www.aluminum.org/</p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable to the Entity, as all Product Designs are implemented according to customer specifications.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity minimises the generation of process Scrap by optimising the manufacturing process, producing more easily recyclable Scrap sizes and shapes. It collects and stores 100% of the process Scrap to minimise leakage to near zero. It melts the collected and stored Scrap energy efficiently, along with regular fresh Scrap and primary Aluminium, to minimise energy and oxidation losses. It uses the generated molten metal effectively and energy efficiently in the subsequent casting process steps to make saleable coils. It also recovers most of the Aluminium from Dross produced during melting operation by using an energy-efficient and vetted third-party dross processing company. The Entity has established and documented its Scrap Process, which is publicly disclosed on the Sustainability Report: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has established, documented, and reported the Collection and Recycling of Products at the End of Life; recycling Aluminium is considered as part of the Entity's business model and promotes a circular economy. The Entity's Recycling strategy is outlined on the Sustainability Report, page 14: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity is an active member of The Aluminum Association and engages with national and local recycling organisations: the Institute of Scrap Recycling Industries (ISRI), Sustain SC, and the Arkansas</p>

CRITERION	RATING	COMMENT
		Recycling Coalition (ARC).
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity publicly discloses its Greenhouse Gases (GHG) emissions by source and by location in its Annual Sustainability Report. The 2024 data were verified by an external and independent expert firm. The data are disclosed in the 2024 Sustainability Report, page 14: https://www.jwaluminum.com/sustainability-0</p> <p>Whilst natural gas is used and included in the total Scope 1 emissions reported, the breakdown of energy use by source published in the Report however does not include natural gas.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started Production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In Production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity implemented a documented GHG Emissions Reduction Plan and used the ASI endorsed GHG Pathways Calculation Tool to demonstrate conformance with a 1.5°C warming scenario.</p> <p>The reduction plan consists of various actions, including the implementation of new technologies, ceasing or changing certain processes and increasing the volume of local recycled input.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	<p>The Entity implemented a documented GHG Emissions Reduction Plan and has used the ASI endorsed GHG Pathways Calculation Tool to demonstrate conformance with a 1.5°C warming scenario.</p> <p>The Entity established a corporate-wide GHG intensity reduction goal, including an Intermediate Target for 2029. The 'up-to-date' version of the GHG Emissions Reduction Plan, the latest version of the GHG Emissions Reduction Pathway and progress against the GHG Emissions Reduction Plan are publicly disclosed in the Greenhouse Management Plan, available at: https://www.jwaluminum.com/environmentaldocs</p> <p>The 2024 Sustainable Report also addresses the GHG Reduction Plan and targets, pages 14-15: https://www.jwaluminum.com/sustainability-0</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an Environmental Management System (EMS) based on the ISO 14001 Standard. GHG management is a component of the EMS, with procedures and work instructions to manage its operation and implementation. Procedures to manage, limit, reduce and monitor GHG emissions are also in place.</p> <p>The Greenhouse Gas Management Plan outlines how each GHG scope emission type is calculated, the reduction targets and actions to reach this goal. The Plan is reviewed annually, and the reductions are tracked through an internal Key Performance Indicator set by the</p>

CRITERION	RATING	COMMENT
		Entity's Management.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity's Air Emission Monitoring Plan aims to minimise exposure to and impacts from Emissions to Air at the JW Aluminum Mt. Holly, SC, and Russellville, AR facilities. The majority of the emissions reduction mechanisms described in this Plan relate to the specific conditions of each facility's operating permit. The Entity has publicly disclosed its Emission to Air data at:</p> <p>https://www.jwaluminum.com/environmentaldocs</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity quantifies its Discharges to Water for each facility through its Environmental Management System. No wastewater is discharged, and no pre-treatment is required. According to the authorities' permits, prescribed sampling for control is selected and monitored on a periodic basis depending on the nature of the measurement.</p> <p>The Entity publicly discloses the quantity of discharge to water in its Annual Sustainability Report. For 2024, the information is available in the 2024 Sustainability Report, page 16:</p> <p>https://www.jwaluminum.com/sustainability-0</p> <p>A documented Discharges to Water Plan has been implemented and is periodically reviewed as per internal requirement. The Plan is available at: https://www.jwaluminum.com/environmentaldocs</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established an Environmental Management System (EMS) based on the ISO 14001 standard. As a part of its EMS, the Entity has undertaken an environmental assessment in which major risk areas of operations where Spills and Leakages could contaminate air, water and/or soil have been identified and assessed. The EMS includes various plans to monitor, prevent and reduce risk, and to manage major adverse events.</p> <p>Spill Prevention Plans, Stormwater Pollution Prevention Plans, and Spill Control, Prevention and Countermeasure (SPCC) Plans are publicly disclosed at: https://www.jwaluminum.com/environmentaldocs</p> <p>The Plan is periodically reviewed as per internal requirement.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity is committed to disclosing to Affected Populations and Organisations the volume, type, and potential impact of Material Spills and leakages as soon as practicable after an incident. It also commits to publicly disclosing, in its Annual Sustainability Report, updated information about significant Spills, the assessment of their impacts, and the mitigation actions undertaken.</p> <p>This commitment is stated in the Spill Prevention, Control, and Countermeasure (SPCC) Plans, available at: https://www.jwaluminum.com/environmentaldocs</p> <p>However, there were no major Spills or other significant adverse environmental events during the previous year. This information is provided in the 2024 Sustainability Report, page 16: https://www.jwaluminum.com/sustainability-0</p>
6.5a-c Waste Management and	Conformance	<p>The Entity has implemented an Environmental Management System (EMS), starting from the frame and the requirement of the ISO 14001</p>

CRITERION	RATING	COMMENT
Reporting		<p>standard. Through its EMS, the Entity monitors inventory and annually completes a survey of Hazardous and Non-Hazardous Waste generated.</p> <p>Information is compiled within the Site Recycling Survey and in the Annual Waste Stream Inventory, and documents have been consulted during the Audit.</p> <p>The Entity publicly discloses the quantity of Hazardous and Non-Hazardous Waste generated at its facilities, by source, on an annual basis in its Annual Sustainability Report. The quantity of Hazardous and Non-Hazardous Waste generated for 2024 is disclosed in the 2024 Sustainability Report, page 17: https://www.jwaluminum.com/sustainability-0</p> <p>As a part of the EMS, Environmental aspects and impacts include an assessment of Hazardous and Non-Hazardous Waste generated.</p> <p>Both facilities have achieved multi-attribute environmental third-party certification from GreenCircle Certified, LLC. The Certified Environmental Facts® labels provide environmental data at a glance, in the form of a nutrition label, and include recycled content composition, carbon footprint and energy reduction, and waste diversion.</p> <p>The Entity's Waste Management and Reporting Strategy follows the Waste Mitigation Hierarchy. The review of aspects and impacts includes any potential environmental or human impacts that may be caused by the Entity's Aluminium waste generation.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity maintains and follows a Dross Management Plan and has implemented performance indicators relating to metal recovery in Dross that are reviewed. Information has been made publicly available at: https://www.jwaluminum.com/environmentaldocs
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>Water use by source and facility is quantified and reported annually in the Annual Sustainability Report. Water-related disclosures for 2024 is publicly disclosed in the 2024 Sustainability Report, page 16: https://www.jwaluminum.com/sustainability-0</p> <p>The Entity has prepared a basic water inventory map and assessment to demonstrate flows to and from the facilities. The Entity does not use any groundwater wells and does not directly withdraw from any surface water body.</p>
7.2a-e Water Management	Not Applicable	All water supplied to the Entity's facilities originates from surface water withdrawals supplied by local municipalities.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted a Biodiversity Assessment, which deemed that the impact of both facilities is low. The Entity has documented its potential impacts. https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Biodiversity%20Management.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4 Alien Species	Conformance	The Entity has identified the potential Alien Species and listed corrective actions in its Biodiversity Assessment and Management Alien Species. Refer to: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Biodiversity%20Management.pdf
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity is committed to not explore or develop new projects in World Heritage Properties. Presently, there are no World Heritage Properties in the Entity's Area of Influence. https://whc.unesco.org/en/list/
8.6a-d Protected Areas	Conformance	According to Entity's search results from the Integrated Biodiversity Assessment Tool (IBAT) and the USGS confirm that the Entity is not located near to any Protected Area.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has outlined its commitment to enforce respect for Human Rights according to the UN Guiding Principles on Business and Human Rights through its Code of Conduct, Human Rights Policy, and Supplier Conduct Policy. These Policies are available at: https://www.jwaluminum.com/sustainability-0</p> <p>These Policies are formally reviewed, supported, and endorsed by senior leadership, and all staff and contractors receive annual training.</p> <p>The Entity has implemented a Due Diligence Process through the use of the UN Global Compact Assessment Tool. The Entity's Human Rights Due Diligence (HRDD) assessment is reviewed annually by the ESG Guiding Coalition. Appropriate actions are identified and addressed through plant-specific projects, rapid improvement events, and action items. The HRDD did not identify any Human Rights risks.</p> <p>The Entity has also consulted Bureau of Indian Affairs: Tribal Leaders Directory (https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes) which lists federally recognised</p>

CRITERION	RATING	COMMENT
		tribes by State to determine risks within its Area of Influence.
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity is committed to promoting gender equity and women's empowerment by applying and implementing, among other things, multiple Policies such as the Code of Conduct, Human Rights Policy, Supplier Conduct Policy, Anti-Harassment and Bullying Policy, Social and Ethical Management System Policy, Non-Discrimination Policy, Workplace Violence Prevention Policy, and Aluminium Modern Day Slavery Statement 2024.</p> <p>These Policies are publicly disclosed online and are supported by a program that promotes gender equity and women's empowerment through actions focused on equal opportunity employment, 'work-life' balance, professional development, maintaining a safe and inclusive workplace, and strengthening representation and leadership.</p> <p>The ESG Guiding Coalition, which is composed of managers, conducts an annual review of these programs, workforce demographics, and ongoing diversity and inclusion efforts. The effectiveness and results of the Gender Equity and Women's Empowerment initiatives are detailed in the 2024 Sustainability Report, pages 21-22: https://www.jwaluminum.com/sustainability-0</p>
9.3a-i Indigenous Peoples	Not Applicable	<p>The Entity does not operate in any area where Indigenous People reside, or are affected. JW has consulted https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes for the location of Indigenous Peoples</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity as it not undergone any new projects or major changes since joining ASI. The Entity has updated its Corrective Action Request (CAR) process to include triggers for Due Diligence or impact assessments. or if a new project or major change occurs.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	<p>The Entity does not operate in any area where Indigenous People reside, or are affected. The Entity has consulted https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes for the location of Indigenous Peoples.</p>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	<p>This Criterion is not applicable as the Entity does not operate in any area where Indigenous People reside, or are affected.</p>
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a process for Stakeholder engagement to actively identify and address any concerns of potentially Affected Populations and Organisations for all facilities and supply chains.</p> <p>The Entity has implemented a plan to identify, prevent, monitor,</p>

CRITERION	RATING	COMMENT
		<p>mitigate, and account for any significant impacts, including health and safety, social and cultural Human Rights, and environmental impacts resulting from its activities, including on Affected Populations and Organisations and the Area of Influence. The Plan is periodically reviewed as per internal requirements.</p> <p>Potential impacts on Affected Populations and Organisations and in the Area of Influence, and actions to address impacts, are identified through the Due Diligence Process outlining Affected Populations. An external process mapping tool was used to determine the Affected Populations with the support of the UN Global Compact Self-Assessment Tool.</p> <p>There are no current significant impacts identified.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>The Entity has implemented several Policies, procedures, and processes to establish a strong Management System for its supply chain activities.</p> <p>The Entity has conducted a risk-based Due Diligence of its Aluminium supply chain in accordance with the OECD Due Diligence Guidance for Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). To support Due Diligence, a process to review areas from which its materials are sourced is in place, using external platforms and tools. A Supplier Risk Assessment and a Modern Slavery Statement are in place and actively managed by the Procurement team.</p> <p>The Entity is not located in, nor does it source Primary Aluminium from Conflict-Affected and/or High-Risk Areas.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity has established a Management System in relation to responsible sourcing led by procurement, with clear roles and responsibilities, supplier screening, risk assessment and escalation processes. All mineral material purchased comes from the USA only.</p> <p>The Entity's Responsible Sourcing Policy outlines the risk criteria. The document and the Responsible Sourcing Policy and Supplier Conduct Policy are available at: https://www.jwaluminum.com/sustainability-0</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	<p>This Criterion is not applicable to the Entity, as the processes did not identify any actual or potential risks. All mineral material purchased comes from the USA only.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity is not located in a Conflict-Affected and/or High-Risk Area, as due diligence, JW has initiated a process to review areas from which it sources material, mainly Scrap and primary Aluminium. A Supplier Risk Assessment and Modern Slavery Statement has been implemented and is actively managed by the Procurement team. This ASI audit meets the requirement of this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity reports annually on its Conflict-Affected and High-Risk Areas Due Diligence in its Modern Day Slavery Statement, which is available at: https://www.jwaluminum.com/sustainability-0.</p>
9.9 Security practice	Conformance	<p>Security at both of the Entity's facilities is contracted through an independent provider and Workers are required to attend Safety Training during their 1st week of employment and annually after that. Contractors must sign the training attendance, which constitutes their agreement to abide by JW policies and procedures. Language</p>

CRITERION	RATING	COMMENT
		detailing appropriate actions concerning Human Rights is also included in the contractual obligations with the contracting firm.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity is committed to sound labour relations there is no Union at the Facilities as Workers have currently chosen not to bargain collectively. Whilst the Entity does not collectively bargain with its Workers, there is no restriction on the right to Freedom of Association.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as there is no restriction on the right to Freedom of Association and collective bargaining in the United States,m where the Entity operates.
10.2a-c Child Labour	Conformance	<p>In accordance with its Child Labour Policy, the Entity does not hire any employees under the age of 18, nor does it permit its contractors and suppliers to do so.</p> <p>The Entity is dedicated to promoting respect for fundamental Human Rights and avoiding the use of Child Labor wherever it operates and encourages consideration of these principles by others where it has an influence, particularly contractors, suppliers, and all other entities and individuals with whom it has a business relationship..</p>
10.3a-c Forced Labour	Conformance	<p>The Entity is not engaged in any kind of Forced Labor or Human Trafficking. The Entity strictly prohibits Forced Labor and Human Trafficking. This prohibition applies to its own activities and employees and to all its contractors and suppliers by its Workers Rights Policy and Human Trafficking Policy.</p> <p>The Entity publicly discloses its annual Modern Day Slavery Statement, available at: https://www.jwaluminum.com/sustainability-0</p>
10.4a-c Non-Discrimination	Conformance	The Entity developed and applied a Non-Discrimination Policy, an Anti-Harassment and Bullying Policy and a Code of Conduct to ensure that all Workers can work in an environment free from unlawful Harassment, Discrimination, and retaliation. These Policies are disclosed at: https://www.jwaluminum.com/sustainability-0
10.5 Communication and engagement	Conformance	<p>The Entity applies an 'open-door' Policy to provide a means of communication engagement with Workers regarding any issue, including, but not limited to working conditions and resolution of workplace or compensation issues, without threat of retaliation.</p> <p>Further information on communication and engagement is available in the Entity's Code of Conduct, available at: https://www.jwaluminum.com/sustainability-0</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established and maintains a Workplace Anti-Harassment and Bullying Policy, a Workplace Violence Prevention Policy, and a Code of Conduct, all of which clearly state zero tolerance for unacceptable behaviour.</p> <p>The Policies are periodically reviewed as per internal requirements and are available at: https://www.jwaluminum.com/sustainability-0</p> <p>A process is also in place to identify and evaluate the risk of</p>

CRITERION	RATING	COMMENT
		Harassment, to mitigate these risks, and to receive any comments or complaints regarding actual or apparent cases of Violence, Harassment, or Discrimination, including disciplinary consequences.
10.7a-d Remuneration	Conformance	The Entity's Workers are paid above the minimum legal wage, and wages are in the highest quarterly percentile for the area. The Entity has an ongoing relationship with third-party independent legal firms to ensure compliance with Applicable Laws and regulations. The Entity also adheres to required Department of Labour laws.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave, and provides Paid Time Off (PTO) accrual along with ten paid public holidays annually.
10.9a-b Informing Workers of Rights	Conformance	Information on Workers' rights is communicated openly and in various ways at all facilities of the Entity. The Entity's Code of Conduct addresses Workers' rights as well as a formal position on Freedom of Association and Collective Bargaining. The Code of Conduct is available at: https://www.jwaluminum.com/sustainability-0

II. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System that applies to all of the Entity's facilities and includes a commitment to and responsibility for leadership, OH&S risk assessment, the participation of Workers, how safety goals and objectives are planned and tracked, and the risks and opportunities present within the Entity's facilities.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	The OH&S Management System is reviewed in accordance with internal requirements. The Entity publicly discloses the effectiveness of the OH&S Management System on an annual basis within its Annual Sustainability Report. OH&S-related information for 2024 is presented in the 2024 Sustainability Report, pages 7-8: https://www.jwaluminum.com/sustainability-0 OH&S leading and lagging indicators are publicly disclosed, however, although data on the Health and Safety performance of the Entity is available in the Bureau of Labour Statistics public database and these data on peer businesses is separately available online, the Entity did not publicly disclose comparative analyses of performance with peer businesses and leading practices.
11.2 Employee engagement on Health and Safety	Conformance	The Entity's policy for safety includes a documented goal of zero injuries. Orange cards and 'OSHA 300' logs are kept for records of performance. Incident Reporting in the Dakota System and safety-focused Rapid Improvement Events are also included. The Safety Committee is comprised of both salaried and hourly paid Workers. All members on this Committee are volunteers, and each shift has an elected representative. The team is currently comprised of 41 Workers. The demographics of the safety committee are as follows: 12% Female, 2% Asian, 54% African American, 2% Hispanic, and 41% White.

CRITERION	RATING	COMMENT
		<p>Workers actively participate in safety walks, submitting Orange Cards to correct or improve safety infractions, and participating in WIN huddles weekly to discuss a variety of safety topics to stay engaged with the safety culture at the Entity.</p> <p>Additionally, all Workers have undergone a third-party safety training program, SafeStart, to emphasise the importance of safety both at home and at work. Through this program, Workers are given an additional mechanism by which they could report safety incidents: SafeStart cards. These cards are reviewed weekly.</p> <p>As part of the Entity's culture (Target Behaviours), Workers are encouraged to practice open and honest communication with, and at every level of the organisation. Workers also have direct access to personnel at all levels across the Entity.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 May 2024	Initial Certification Audit - Full Certification
1	24 November 2025	Surveillance Audit; Correction to the conformance rating for Criterion 9.8d in the Initial Certification Audit from 'Not Applicable' to 'Conformance'.