

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

JW Aluminum

CERTIFICATE NUMBER
367

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

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. Stewardship', with a long horizontal line extending to the right.

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

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

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
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">19 - 22 February 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 March 2024
AUDIT SCOPE	<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>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- ☑ 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 2 May 2024 – 1 May 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 2 November 2025

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 Aluminium produces recyclable Aluminium sheets and foil used to make products essential to our everyday lives, 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 also adheres to the ASI Performance Standard V3 Legal Compliance requirements.
1.2 Anti-Corruption	Conformance	The Entity has 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. The Anti-Corruption Policy is incorporated in the Code of Conduct and Ethics Report, page 10: https://464133.fsi.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf
1.3a-e Code of Conduct	Conformance	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. The established Code of Conduct has been publicly disclosed in their Code of Conduct and Ethics Report: https://464133.fsi.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established its Environmental, Social, and Governance stand-alone policies. The policies have been endorsed from the Entity's senior leadership. The policies are communicated with leadership, employees, stakeholders, and relevant internal and external parties.
2.2a-c Leadership	Conformance	The Entity's senior management has demonstrated commitment to the environmental, social, and governance policies. The leadership team has also provided evidence of training and communication to all interested internal and external parties. The Entity's Chief Operating Officer is responsible for the ASI Performance Standard compliance and has appointed the ESG Guiding Coalition as the Senior Management Representative responsible for ensuring conformance and implementation with the ASI Performance Standard and the Entity's Management System.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established an Environmental Management System based on the ISO 14001 framework. The Environmental Management System Policy is available at: https://464133.fsi.hubspotusercontent-na1.net/hubfs/464133/JW_EMS%20Policy_8.5X11.pdf
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Social Management System and implemented a stand-alone Social and Ethical Management System (SEMS) which has utilised both SA8000 and UN Global Compact as tools to develop the system. The Social and Ethical Management System Policy is available at: https://464133.fsi.hubspotusercontent-na1.net/hubfs/464133/JW_SEMS%20Policy_8.5X11.pdf

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has established a Responsible Sourcing Policy and associated procedures that include partners, suppliers, and the supply chain. The JW Aluminum Supplier Conduct Review Framework identifies, assesses, controls, reviews, and reports risks related to our suppliers. A key part of responsible sourcing for the Entity is related to Human Rights and Modern Slavery. This framework helps the Entity investigate and better understand its supply chain while assessing the risk with its most significant suppliers. https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Responsible%20Sourcing%20Policy.pdf
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	The Entity has established and disclosed its approach to environmental, social, and governance impacts related to principles in the ASI Performance Standard V3 in its Sustainability Report. As Due Diligence, the Entity has reviewed the materiality of the topics covered in the report and solicited input from internal and external subject matter experts to maintain the accuracy and integrity of the reported information. JW Aluminum Sustainability Report: https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	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. https://www.jwaluminum.com/investors
3.3a-c Payments to Governments	Conformance	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.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf . Also, within the Entity and supply chain businesses, the disclosure of payments are documented in the Code of Conduct: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf .
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented and established a Code of Conduct, Corporate Ethics Training, and Open Door Policy which has been disclosed at: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has participated in and reported the Environmental Life Cycle Assessment publicly disclosed at: https://www.aluminum.org/
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity utilises the LCA published by The Aluminum Association, this information is reported and publicly disclosed at: https://www.aluminum.org/
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as all Product Designs are implemented according to customer specifications.
4.3a-b Aluminium Process Scrap	Conformance	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.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
4.4a-c Collection and Recycling of Products at End of Life - Material	Conformance	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

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		circular economy. The Entity's Recycling strategy is outlined on the Sustainability Report, page 14: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
4.4d Collection and Recycling of Products at End of Life	Conformance	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 Recycling Coalition (ARC).
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has publicly disclosed its GHG Emission and Energy Plan, this information can be found on the USEPA Envirofacts website at: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/5.1%20Greenhouse%20Gas%20Mangement%20Plan.pdf
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-e GHG Emissions Reduction Plans	Conformance	<p>The Entity is committed to reducing scope 1 and 2 GHG intensity emissions by 10% company-wide by 2029, based on a 2017 baseline. The Entity intends to follow the three methods defined by the Aluminum Association as the pathway to meet reductions consistent with a 1.5°C warming scenario. The three key pathways developed by the Entity include:</p> <p>Pathway 1: Electricity Decarbonization – Continue monitoring the status of its electrical suppliers and their decarbonisation efforts.</p> <p>Pathway 2: The Entity continues to work towards direct emission reductions. It recently ceased operating outdated, inefficient equipment and replaced it with highly efficient melting and casting facilities. To meet this pathway, the Entity plans to optimise production and reduce natural gas consumption.</p> <p>Pathway 3: To ensure adherence to customer and quality requirements and the Entity's economic needs, the Entity will continue to seek options for less prime usage and strengthen producer-consumer relationships to increase closed-loop recycling, where manufacturing Scrap can be collected and returned to the Entity.</p> <p>The Entity's Emissions Reduction Plan is available in the Sustainability Report, page 16: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented a Greenhouse Gases Management Plan and reports its progress through the Sustainability Report. This plan outlines how each GHG Scope emission is calculated, the reduction targets and the plans to reach this goal. This plan is reviewed annually, and the reductions are tracked through an internal Key

CRITERION	RATING	COMMENT
		Performance Indicator set by the Executive Guiding Coalition.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	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 are specific conditions of each facility's operating permit. The Entity has publicly disclosed its Emission to Air data at: https://www.jwaluminum.com/environmentaldocs
6.2a-g Discharges to Water	Conformance	At the Mt. Holly, SC facility, the Entity does not operate any wastewater treatment facilities onsite and discharges all non-contact cooling water to Berkeley County Water and Sanitation Publicly Owned Treatment Works (POTW). All emulsion water is recycled internally. In the event process emulsion water becomes contaminated, it is collected and sent to US Water Recovery. The Entity is considered a secondary aluminium manufacturing facility but does not discharge. Any categorial process water subject to pretreatment standards listed in 40 CFR Part 421 & 467 (Secondary Aluminium Smelting Subcategory and Aluminium Forming Point Source Category). The Entity's Russellville, AR facility only discharges sanitary wastewater. No process wastewater is discharged from the facility. There is minimal risk associated with the Russellville facility and as such, are not included in this management plan. The Entity's Discharges to Water are disclosed at: https://www.jwaluminum.com/environmentaldocs
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity complies with EPA's Spill, Control, and Countermeasure (SPCC) rule, which sets specific requirements for the prevention of, preparedness for, and response to oil discharges at industrial facilities. The Entity has a documented, site-specific SPCC plan, including an environmental impact assessment of each oil-containing area for both the South Carolina and Arkansas facilities. https://www.jwaluminum.com/environmentaldocs
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has provided a Spill Prevention Control and Countermeasure Plan and Storm Water Pollution Prevention; this information is publicly disclosed at: https://www.jwaluminum.com/environmentaldocs The Entity did not have any major spills in 2022 that required further reporting.
6.5a-c Waste Management and Reporting	Conformance	The Entity uses the sustainable material waste management concepts detailed in the EPA's Waste Management Hierarchy. The Entity has evaluated each waste stream individually to determine the applicability of waste disposal alternatives by following the waste management hierarchy. Annually, the Entity reviews each waste stream's disposal method to determine if there are any changes since the previous determination. Detailed information on the Entity's waste is disclosed in the Sustainability Report, pages 20-21: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	The Entity has prepared a basic water inventory map to demonstrate flows to and from the facility at the Mt. Holly and Russellville facilities. The Entity does not have any groundwater wells and does not directly withdraw from any surface water body. Water use by source and facility is reported annually in the JW Aluminum Sustainability Report. https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
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		
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.

CRITERION	RATING	COMMENT
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 the respect to 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. https://464133.fsl.hubspotusercontent-na1.net/hubfs/464133/Human%20Rights%20Policy.pdf</p> <p>These policies are formally reviewed, supported, and endorsed by Senior Leadership, and all teammates and contractors receive annual training.</p> <p>The Entity has implemented a Due Diligence Process outlining Affected Populations. A SIPOC-process mapping tool was used to determine the affected populations with the support of the Global Compact Self-Assessment tool, Supplier Risk Assessment, and Modern Slavery Statement. The Entity has also consulted https://www.bia.gov/service/tribal-leaders-directory/federally-recognized-tribes which lists federally recognised tribes by state to determine risks within its Area of Influence.</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	The Entity has established and implemented a benefits guide that shows evidence of benchmarking hiring practices in demonstrating a commitment to promoting Gender Equity, safeguarding the rights of female Workers, and promoting women's empowerment. However, The Entity hasn't disclosed the programs and the effectiveness of the measures to promote Gender Equity in its 2023 report. The Entity is working on its 2024 Report, where the mentioned programs and their effectiveness will be published, demonstrating that progressive improvements are happening towards achieving conformance with the ASI Performance Standard.
9.3a-i Indigenous Peoples	Not Applicable	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
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	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.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	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.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as the Entity does not operate in any area where Indigenous People reside, or are affected.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a process for stakeholder engagement to actively identify and address any concerns of Affected Populations and organisations for all facilities and supply chains. These plans are monitored and reviewed annually, and any necessary improvements are identified and implemented. The Entity's execution plans, and actions are transparently disclosed in the Sustainability Report, page 15: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity is not located in, nor do source primary Aluminium from Conflict-Affected and/or High-Risk Areas. The Entity has initiated a process to review areas from where its materials are sourced. A Supplier Risk Assessment and Modern Slavery Statement are in place and actively managed by the Procurement team. The Entity consults the following source of information to assist in its processes: https://www.cfr.org/global-conflict-tracker/ This Vulnerability Index is used during the Due-Diligence process to determine its risk level. The Entity has developed several policies, procedures, and processes to establish a strong Management System for its Supply Chain activities.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Not Applicable	is the Entity is not located in a Conflict-Affected and/or High-Risk Area. The Entity has initiated a process to review areas from which its sources material, mainly Scrap and primary Aluminium. A Supplier Risk Assessment and Modern Slavery Statement is in place and actively managed by the Procurement team.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	The Entity is not located in a Conflict-Affected and/or High-Risk Area. A Supplier Risk Assessment and Modern Slavery Statement has been implemented and is actively managed by the Procurement team.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Not Applicable	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.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has initiated a process to review areas from where its materials are sourced. A Supplier Risk Assessment and Modern Slavery Statement are in place and actively managed by the Procurement team. However, at the time of the Audit, the Entity did not present a Due-Diligence Report on its supply chain.
9.9 Security practice	Conformance	Security at both of the Entity's facilities is contracted through an independent provider and Workers are required to attend Safety

CRITERION	RATING	COMMENT
		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 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 and 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, where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity is dedicated to promoting the respect for fundamental Human Rights wherever it operates and encourages consideration of these principles by others where it has an influence, particularly contractors, suppliers, and all other entities and individuals with whom it has a business relationship.
10.3a-c Forced Labour	Conformance	The Entity publicly discloses its annual Modern Slavery Statement detailing actions to address Modern Slavery. https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
10.4a-c Non-Discrimination	Conformance	The Entity has developed Non-Discrimination/anti-harassment and Equal Opportunity and Commitment to Diversity policies to ensure that all its Workers can work in an environment free from unlawful harassment, discrimination, and retaliation. This information is publicly disclosed at: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Modern%20Day%20Slavery%20Statement.pdf
10.5 Communication and engagement	Conformance	The Entity has an 'open-door' Policy to provide 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. Further information is available at: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Code%20of%20Conduct%20and%20Ethics%20122023.pdf
10.6a-g Violence and Harassment	Conformance	The Entity maintains a Workplace Anti-Harassment Bullying Policy and Code of Conduct, which is publicly disclosed at: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Anti-Harassment%20-%20Bullying%20Policy.pdf
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

CRITERION	RATING	COMMENT
		also adheres to required Department of Labor 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 nine paid public holidays annually.
10.9a-b Informing Workers of Rights	Conformance	The Entity's Code of Conduct addresses Labour Rights for Workers along with a formal position on Freedom of Association and Collective Bargaining.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System . which applies to all of the Entity's facilities and includes a commitment to, and responsibility for leadership, 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	Conformance	The Entity has implemented an OHSMS which applies to all JW Aluminum facilities. It includes commitment and responsibility of leadership, participation of Workers, how safety goals and objectives are planned and tracked, and the risks and opportunities within the facilities. The effectiveness of the OHSMS System is disclosed in the 2022 Sustainability Report, page 5-8: https://464133.fs1.hubspotusercontent-na1.net/hubfs/464133/Sustainability%20Report%20102023.pdf
11.2 Employee engagement on Health and Safety	Conformance	<p>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.</p> <p>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.</p> <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
