

HUMAN RESOURCES – *Human Rights Policy*

JW Aluminum is committed to ensuring all fundamental human rights are respected and practiced in accordance with international best practice. At JW Aluminum we believe in delivering value to the marketplace, our stakeholders, and our teammates through our core values and target behaviors of thinking and acting like owners, practicing respectful, open, and honest communication, meeting our commitments, embracing change while operating as one team. Respect for human rights is a basic tenet of our beliefs and is consistent with our values and goal to be an economically, socially, and environmentally sustainable enterprise.

JW Aluminum is committed to abiding by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

JW Aluminum complies with applicable national and local legal requirements in the states in which we operate.

Health and Safety

At JW Aluminum, we value safety above all. We have a moral and ethical responsibility to make sure no teammate gets hurt meeting our objectives. We can achieve outstanding safety performance by being self-aware, paying attention to detail, and knowing what correct and safe looks like. The tools we use to make sure we know what safe and correct looks like are Job Safety Analysis (JSA's), Standard Work and Control Plans. We absolutely believe zero injuries are possible and that is our goal.

JW Aluminum will proactively protect the health and safety of all team members and visitors by leading a culture of safety focused individuals. We will utilize a Safety management System as our foundation which ensures ownership and accountability at all levels, providing educational and preventive tools necessary to support our mission. (Safety Policy).

Forced Labor, Human Trafficking, and Working Time

At JW Aluminum, we believe that people should work because they want or need to, not because they are forced to do so. JW Aluminum prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. JW Aluminum's working time practices comply with national and state laws where we operate. (Human Trafficking Policy).

Equal Opportunity and Commitment to Diversity

We pride ourselves on providing a trusting workplace that is safe, respectful and inclusive of all individuals and that is free from harassment, bullying, offensive or disrespectful conduct. JW Aluminum believes in treating everyone fairly and equally in all employment related decisions and these decisions are based on qualifications and job-related experiences. (Equal Opportunity and Commitment to Diversity Policy).

Inclusion and Diversity

We seek to provide trusting workplaces that are safe, respectful, and inclusive of all individuals and reflect the diversity of the communities in which we operate. Building a talented and diverse workforce strengthens our company and its competitive advantage. Each of us plays an important role in creating an open and inclusive workplace where every individual is able to freely contribute to JW Aluminum's success. We embrace our teammates' varied backgrounds, cultures and perspectives while valuing our differences.

Children and Young Workers

Our hiring practices conform with the International Labor Organization (ILO) conventions for minimum age and child labor. JW Aluminum does not hire anyone under the age of 18 and we comply with all local applicable laws and regulations relating to hiring children and we do not employ children or support the use of child labor.

Compensation

We compensate teammates competitively relative to the industry and local labor markets and are committed to paying them a living wage. We communicate our compensation philosophy to teammates, and we operate in full compliance with applicable wage, work hours, overtime, and benefits laws. (Wage Administration Policy).

Freedom of Association and Collective Bargaining

We respect our teammates' right to join, to form or not to join a labor union without fear of reprisal, intimidation, or harassment. Where teammates are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. JW Aluminum is committed to bargaining in good faith with such representatives.

Relationships with Communities

We recognize and respect the diversity, cultures, customs, and values of the people in communities where we operate and take into account their needs, concerns and aspirations regarding their heritage and traditions. Furthermore, the Company recognizes its impact on these communities. We are committed to engaging with stakeholders in these communities to ensure that we are listening to, learning from, and taking into account their views as we conduct our business. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

We encourage all community stakeholders to report and express their concerns relating to our business activities.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for teammates are provided as needed and will be maintained for teammate privacy and dignity. We will promote and require human rights protections to all who have interactions with private and public security forces who are utilized or employed by the Company. (Workplace Violence Prevention Policy)

Environment

JW Aluminum is committed to operating in a way that respects and protects the environment wherever we are located. We will not compromise our environmental commitment for profit or production. We respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment and our hosting communities.

Data Privacy

We are committed to protecting the personal information of all individuals and to leverage data as an enterprise asset and mitigate risk of data breach, data losses or misuses. It is JW Aluminum's policy to comply fully with all applicable data privacy laws which it is subject to where it does business and is committed to collect, process and transfer personal data responsibly and in accordance with the principles and obligations set forth in the JW Aluminum Data Privacy Policy unless it conflicts with stricter requirements of local law.

Suppliers, Contractors and Joint Ventures

We expect our suppliers, contractors, and our non-controlled corporate affiliates ("joint ventures") to treat their teammates and to interact with communities in a manner that respects human rights and is consistent with the spirit and intent of this policy. We require that our suppliers, contractors, and joint ventures adhere to all applicable domestic laws and encourage them to be consistent with ILO core labor principles. We also engage with our key suppliers, contractors, and joint ventures to reinforce awareness of potential human rights issues. We have established and maintain appropriate procedures to evaluate and select suppliers, contractors, and joint ventures based on our core values, human rights policy, and Supplier Standards.

IMPLEMENTATION

Due Diligence and Training

We continually evaluate and review how best to strengthen our approach to addressing human rights. We are committed to conducting ongoing human rights due diligence in accordance with the United Nations Guiding Principles for Business and Human Rights and to engage with our key stakeholders around the world to continue to improve our approach. We will develop and implement training on this policy for JW Aluminum teammates and business partners.

Reporting Issues

We are committed to identifying, preventing, and mitigating adverse human rights impacts related to our business activities by maintaining operational grievance mechanisms that are transparent and accessible across the communities where we operate. If you believe that a conflict arises between the language of this policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through your management chain, which includes: Your supervisor, team leader or another member of management, Human Resources, and Corporate Human Resources.

Remedy

All concerns will be promptly, impartially, and confidentially investigated and acted upon. We place importance on the provision of an effective remedy wherever human rights impacts occur. We are committed to continue increasing the capacity of our management to effectively identify and respond to these concerns. Furthermore, we continue to build the awareness and knowledge of our teammates on human rights encouraging them to speak up, without retribution, about any concerns they may have. JW Aluminum's Anti-Retaliation policy expressly prohibits retaliation against anyone who reports any issue in good faith.