



# JW Supplier Conduct Policy



**Level 1 Manual**  
**Version 0 – January 2023**



JW Supplier Conduct Policy

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## 1. Policy Statement

At JW Aluminum, we have a strong commitment to living WIN and using our Target Behaviors to treat each other, customers, suppliers, and stakeholders with respect.

JW Aluminum recognizes that our supply chain activities can have wide ranging social, environmental and governance impacts and that our responsibility extends beyond our own operations, into our supply chain.

We are committed to responsible sourcing and have set high standards for the way we do business so our customers and other partners know we can be trusted.

Our JW Vision requires that we work only with Suppliers who can consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own.

This commitment is reflected in our Supplier Conduct Policy, that sets out the minimum standards of behavior we require of our Suppliers.

We ask our Suppliers to not just comply with the policy, but to use reasonable efforts to exceed it and promote continual improvement throughout their business operations.





## JW Supplier Conduct Policy

### **2. Application & Acceptance**

This Policy is applicable to all contract Suppliers and business partners. Sustainability and compliance with this Supplier Conduct Policy are part of the criteria JW Aluminum uses during Supplier selection, and this policy is applicable to all our Suppliers and their affiliates. We expect our Suppliers to cascade these requirements to their own supply chain. We request, Suppliers diligently provide official answers, documents, and certificates related to sustainability when requested by JW Aluminum. Adhering to this Policy is therefore a requisite to do business with JW Aluminum.

The content of this policy is included in our Purchase Order Terms and Conditions. Acceptance of our purchase order constitutes acceptance of this Supplier Conduct Policy.

### **3. Assessment**

By adhering to this Supplier Conduct Policy, each Supplier accepts to be assessed or audited by JW Aluminum or by a third party mandated by JW Aluminum.

In case of violation of this Policy, JW Aluminum will determine corrective actions with the violating Supplier which can include termination of our business relationship.

The Supplier Assessment helps to indicate if:

- High-risk and potentially adverse ESG impacts exist
- Appropriate policies, systems and resources are in place to properly manage potential and actual impacts

### **4. Communication**

Suppliers may raise any concern or questions regarding this policy via our website using the 'Contact Us' link at the top of the home page: <https://www.jwaluminum.com/>.

### **5. Governance & Ethics**

JW Aluminum conducts its business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations and expect its business partners to do the same.

#### **5.1. Compliance with Laws**

Suppliers shall comply with all applicable laws, rules, regulations, and requirements in managing their business and in providing goods and services to JW Aluminum. The areas of compliance include, without limitation, regulations related to the environment, employment and labor, human rights, health and safety, safe workplace practices, and competition/anti-bribery, and shall refrain from any form of illegal, dishonest, or unethical conduct.



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### **5.2. Anti-Corruption/Ethics**

Suppliers shall conduct business with ethics, integrity, and transparency. JW Aluminum has a strict policy against bribery and corruption. Suppliers shall not make payments or provide entertainment and gifts or anything of value directly or indirectly to the government.

### **5.3. Conflict Minerals**

Supplier certifies that it is not knowingly sourcing or using any “conflict minerals”, as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act from the Democratic Republic of the Congo or any adjoining countries (“DRC Countries”) for use in the manufacture of its products supplied to JW Aluminum. Supplier will continue to monitor its supply chain for information as to potential sources of “conflict minerals” from the DRC Countries and will update JW Aluminum upon request regarding any additional information relating to sourcing of “Conflict Minerals” from the DRC Countries that may be obtained by Supplier.

## **6. Labor & Human Rights**

JW Aluminum is committed to upholding human and labor rights of workers, and to treating them with dignity and respect as required by international laws. Suppliers will ensure that the human rights of all associated with your operations including local communities and workers. We expect our Suppliers to adhere to, among others, the following principles:

1. Shall ensure that their employees are treated fairly and equally and are not harassed or discriminated against.
2. Shall not employ anyone under the legal working age, nor condone physical or other unlawful abuse or harassment in any of their businesses.
3. Shall ensure that there is no forced labor, modern slavery or human trafficking within their operations and their supply chain.
4. Shall judge their employees upon their abilities and not discriminate based on any condition or characteristic which is protected by applicable law or regulation.
5. Shall respect each employee’s right to associate with any legally sanctioned organization.
6. Shall comply with all applicable laws for work hours, wages, and benefits.

## **7. Health & Safety**

Suppliers shall provide a safe working environment for all employees and shall comply fully with all applicable federal, state, and local health and safety laws, rules, and regulations. Suppliers shall adopt policies and procedures for their operations in accordance with best practices for their industry and business to maintain the health and safety of their employees

## **8. Environment**

Suppliers shall act responsibly to maintain compliance with all applicable environmental laws and regulations in their operations and implement plans to correct any non-compliant practices or conditions. Additionally, suppliers will conduct their business in such a manner as to minimize adverse environmental impacts and leverage conservation measures.