

JW Aluminum Modern Day Slavery Statement 2023

September 5, 2023



Our vision is WIN. We are the leading aluminum rolled products company in the world. We do this by developing our people, improving our processes and delivering value to the marketplace. All of this is to improve our financial performance and secure our future. Our target behaviors are: embrace change, Think and act like an owner, we are one team, practice

At the cornerstone of JW Aluminum's WIN Culture is our Vision Statement: By Developing our People, Improving our Processes, and Delivering Value to the Marketplace Safely, the JW Aluminum team can achieve our Vision to become The Leading Aluminum Rolled Products Company in the World.

JW Aluminum's stance on Modern Slavery directly reflects these cultural principles and provides a framework for behavioral expectations for all teammates at every level, specifically regarding social, environmental and governance principles. It sets forth the expectations of how we live our WIN culture, conduct business, and interact with each other, our business partners, and the environment.

This is JW Aluminum's first Modern Slavery Statement and we are committed to continuously improving not just our internal processes, but also our supply chain.

Founded in 1979, JW Aluminum is a privately owned, flat rolled aluminum products producer headquartered in Charleston, South Carolina.

Over 450 JW Aluminum teammates are dedicated to working safely and ethically every day to secure a safe and sustainable future for our stakeholders, shareholders, and rightsholders.

At the heart of American manufacturing for over 40 years, JW Aluminum produces infinitely recyclable aluminum sheet and foil used to make products essential to our everyday lives, like the building products and HVAC components that keep our homes comfortable and safe.

JW Aluminum cultivates a strong company culture called WIN. Our WIN culture – our vision, our strategies, and our target behaviors – drives everything we do. We are a team of diverse, actively engaged individuals, a business of business people who take ownership and work with integrity. These cultural values hold us accountable to very high standards, and these standards are reflected through the company's way of doing business.

Locations



Core Markets



Building Products



HVAC/R Fin Stock



RV & Cargo

Culture



JW Aluminum only has operations in the United States of America.

400+ Teammates



Driven by a Culture of Active Engagement

2 Plant Locations



300+ Million Pounds Shipped Annually

- JW Aluminum is proud of its long-standing relationship with our suppliers.
- The majority of products and services are sourced from domestic suppliers, with the remainder imported from Canada, Europe, Mexico, and Australia.
- JW Aluminum sources products and services for use in manufacturing and to support our operations.
 - Products sourced for use in manufacturing may include primary aluminum and scrap aluminum such as Painted Siding, MLC, Foil, UBC, Fin Stock, EC Wire, and Extrusions.
 - Services sourced for use in manufacturing may include contractors, consulting services, utilities, and other.
 - Product sourced to support operations may include IT equipment, manufacturing machinery, distribution network requirements, and other.
 - Services sourced to support operations may include cleaning services, security, consulting services, and other corporate and operational requirements.
- JW Aluminum has a centralized procurement team managing the procurement of the bulk products and services purchased.

JW Aluminum has a formal governance structure with senior leadership oversight, auditing mechanisms and programs including the review and reporting of Modern Slavery.

JW Aluminum’s Governance structure and its statements are supported by a policy set. The policies outlined below are those most relevant to managing Modern Slavery risks.

Policy	Purpose
JW Governance Policy	JW Aluminum uses this governance policy to drive ethical, accountable, and transparent business practices. It outlines the principles, policies, and approach we take to manage risk and operate responsibly
Code of Conduct	The Code of Conduct and Ethics (the “Code of Conduct” or the “Code”) sets forth the expectations of how we live WIN, conduct business, and interact with each other and our business partners. We are a business of business people committed to a culture of teamwork and continuous improvement to Secure the Future for teammates and customers.
Equal Employment Opportunity and commitment to diversity.	JW Aluminum recognizes the importance of equal opportunity and diversity in the workplace and values the contribution of all teammates regardless of gender, age, ethnicity, disability, sexual orientation, cultural background, and other immutable characteristics. These policies aim to ensure that the work environment is free from discrimination, harassment and bullying and that everyone respects and value the diversity of our workplace.
Human Rights Policy	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.
Child Labor Policy	As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn’t take part in children’s exploitation and helps end it to the best of our ability.
Human Trafficking Policy	JW Aluminum strictly prohibits teammates, subcontractors, subcontractor employees, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.
Responsible Sourcing Policy	JW Aluminum partners with suppliers who share our desire to build and maintain a responsible supply chain that reflects our environmental, social, and governance values.
Supplier Conduct Policy	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
Supplier Trading Agreement	The content of the Supplier Conduct Policy is included in our Purchase Order Terms and Conditions. Acceptance of our purchase order constitutes acceptance of the Supplier Conduct Policy.

Risk Assessment – Modern Day Slavery Risks



JW Aluminum understands that there is a risk that its operations could inadvertently cause, contribute to or be directly linked to Modern Slavery. As part of its efforts to address Modern Slavery, risk areas have been identified and are described in the table below.

Risk	Description	Finding	Our Risk Exposure
1	Contract workers directly engaged	JW's workforce is 100% permanent.	LOW
2	Workers under the age of 18	JW does not hire workforce under the age of 18.	LOW
3	Migrant Workers	JW has 1 teammate on a temporary visa. This teammate is in a managerial position.	LOW
4	Seasonal Workforce	JW operations are not seasonal and is not considered in hiring practices. Turnover is consistent during the reporting period.	LOW
5	Freedom of Association	JW respects freedom of association although none of our locations operate under bargaining agreements.	LOW
6	External Auditing	JW is audited to Quality Standard ISO9001, but is not currently audited by a third party for environmental, safety, social, or responsible sourcing	MEDIUM
7	Operational Sector Risk	JW does not operate in a high-risk sector	LOW
8	Services directly engaged	JW relies on services including recruitment, legal, cleaning services, property maintenance, waste disposal and equipment maintenance. Recruitment, construction and cleaning services are considered particularly high risk, but none of these are sourced outside the United States, thus lowering the risk.	LOW

Risk Assessment – Modern Day Slavery Risks in our Supply Chain

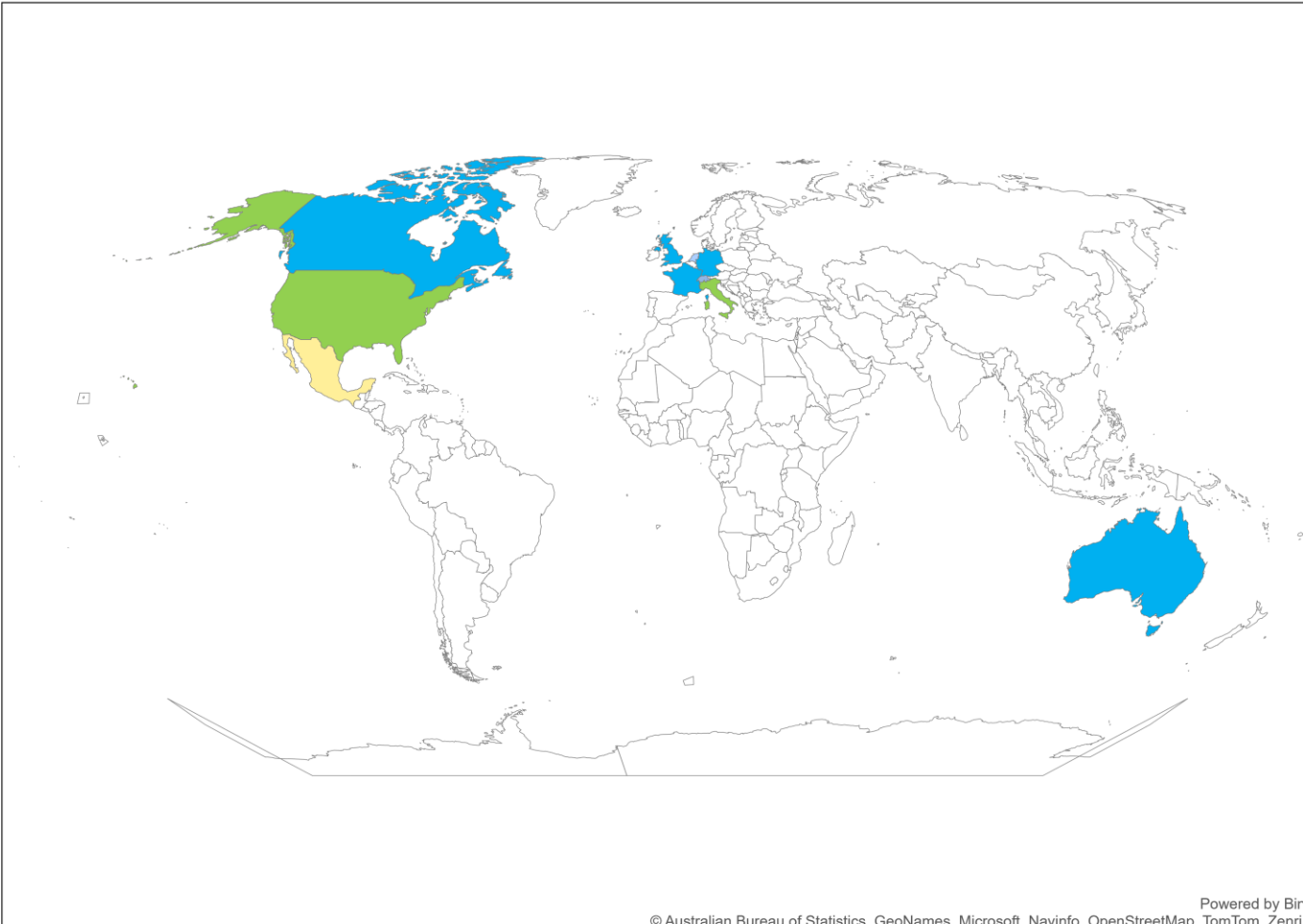


- JW Aluminum is committed to assessing significant suppliers based on business impact and geographical location.
- JW Aluminum's risk assessment of suppliers considers the following:
 - Location: Some countries and regions have increased risk of Modern Slavery. JW Aluminum classified country risk based on the 2022 Global Slavery Index's Vulnerability profile.
 - Outsourcing: JW Aluminum purchases some of its raw materials from bulk suppliers and may have limited visibility into their procurement of the raw materials. JW Aluminum will consider the products from these suppliers on a future risk assessment.
 - Audits: Suppliers are given a regular supplier questionnaire that is targeted at gathering additional information to determine the level of human rights and modern slavery risk associated with that supplier.
 - Trade Agreements: JW Aluminum has updated its Terms and Conditions of Purchase and some specific trade agreements to include our Supplier Conduct policy which contains a Modern Slavery clause. When a supplier accepts our Purchase Order or signs such specific trade agreements, JW Aluminum considers such supplier to have a lower risk.
 - Industry: Suppliers in industries dependent on low-cost labor are considered higher risk.

Risk Assessment – Modern Day Slavery Risks in our Supply Chain



Modern Slavery Risk



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The weighted average Vulnerability Index (weighted on \$ purchased) is 24.5
JWAluminum's overall supply chain risk is Low.

Suppling Country	% of Total JW Aluminum \$ purchased	# of Suppliers	Global Slavery Vulnerability Index
Australia	0.0032%	1	6.8
Canada	0.5511%	3	10.7
France	0.0177%	1	13.3
Germany	0.0003%	1	10.7
Italy	0.0765%	2	21.7
Mexico	0.8512%	2	58.1
Netherlands	0.0357%	2	6.0
Switzerland	1.1515%	1	13.6
United Kingdom	0.3411%	7	14.3
United States	96.9716%	708	24.5
Total	100%	728	

Index Range	Risk Level
0-20	Very Low
21-40	Low
41-60	Medium
61-80	High
81-100	Very High

**Data collected is Q1 2022 – Q2 2023. JW purchase and supplier sources are consistent from year to year.*

Thus, an update of purchasing values and supplier data will be provided every two years, with the next refresh of this information in 2025.

Risk Assessment – Modern Day Slavery Risks in our Supply Chain

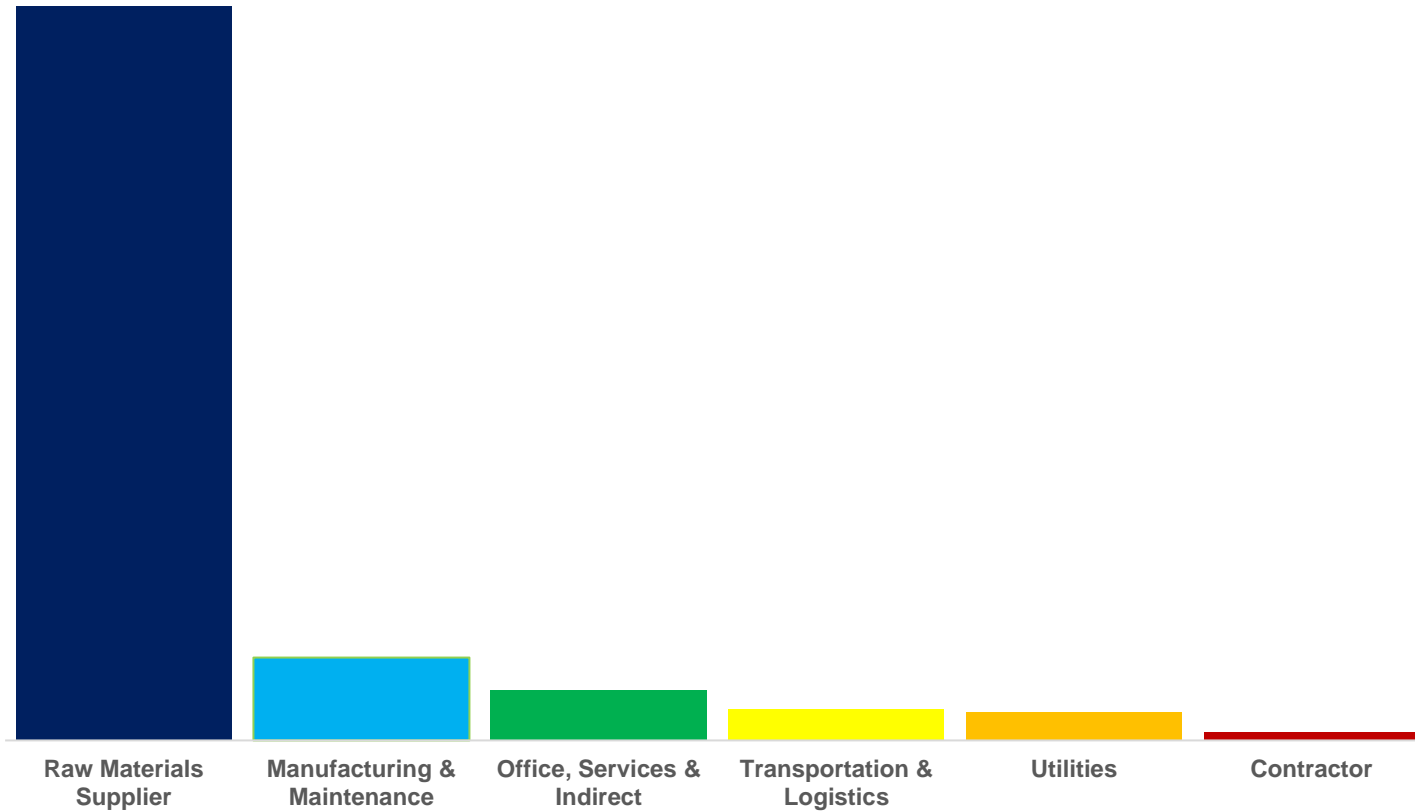


During the reporting period Q1 2022 – Q2 2023, JWAluminum focused on the largest suppliers in raw material purchases and any supplier with operations outside of the United States regardless of procurement segment.

JWAluminum's largest procurement segment feeding its manufacturing business is the purchase of raw materials namely scrap aluminum., US suppliers account for 97% of the raw material purchased and 76% of total procurement.

JWAluminum has identified:

- 3 Tier 1 suppliers in the US with a total contribution of 80% of raw material supplied and 63% of total spend.
- 2 Tier 1 suppliers outside of the US with total contributions of 3.22% of raw materials purchased and 2.53% of total spend.
- 18 suppliers outside of the US in other segments contributing 1% of total spend



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JWAluminum is beginning its process of investigating the potential risks of Modern Slavery in its Supply Chain. We have created internal policies, procedures, and assigned responsibilities for managing supplier risks in the Supply Chain. JW introduced a Supplier Conduct Policy with a 'Modern Slavery' clause to the Terms and Conditions of purchase orders in 2023.

During this year, JW also started investigating Labor Rights, Human Rights, and Modern Slavery risks of its Tier 1 suppliers as well as overseas suppliers. Our 1st phase of Supplier Risk questionnaires were sent out in October to 23 suppliers to survey their operational, governance, employment, and supply chain practices. JW will begin evaluating responses when received, by scoring and categorizing suppliers' risk levels and defining if further action or information is needed. No suppliers have responded to date.

Looking forward to 2024, JW is planning the following:

- Escalating reminders and following up on outstanding responses from the initial group who have not returned a completed questionnaire
- Conduct follow ups for further clarifications where the supplier's survey has been evaluated and earmarked as such
- Sending out the Supplier Risk questionnaires to the next set of 10 Tier 1 suppliers.
- Expand collaboration between JW's internal stakeholders to strengthen risk governance, establish more efficient processes for managing risks and increase effectiveness in communicating and investigating exposures.
- Continue to screen Overseas suppliers to ensure they meet JW's high expectations and are assessed for safety, quality, human and labor rights risk.

JWAluminum has not yet assessed the effectiveness of its actions as JW is in the early stages of the implementation.