



2022

SUPPLIER CODE OF CONDUCT



Logan Aluminum Inc.
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INTRODUCTION:

Logan Aluminum is the largest single can sheet facility in North America and a leader in aluminum recycling. We strive to demonstrate continual improvement in our capabilities to create value for our associates, customers, and employees by maintaining leadership positions in product quality, customer service, cost, safety, and environmental performance. For us to be recognized as the best in the world at what we do, Logan Aluminum must conduct all of its activities in accordance with our core values. This commitment must be shared as our values are reflected by our employees, products, interaction with our communities and supply chain.

Our reputation depends on every Logan Aluminum employee acting honestly and with integrity, as well as our supply chain partners conducting themselves in the same manner. This Logan Aluminum Supplier Code of Conduct (this “Code”) outlines the expectations of Logan Aluminum for how its suppliers will conduct their businesses in an ethical and responsible manner. Every Logan Aluminum supplier is expected to agree to the terms of this Code and uphold this Code in all of its business operations.

There are multiple benefits to having a supplier code of conduct, not only for our company, but also for our suppliers. This should help all businesses within the supply chain meet a common level of governance, management, and transparency. If effectively implemented, you will be able to:

- Better understand and manage the environmental, economic, and social risks of your business
- Demonstrate to consumers and other stakeholders’ ethical behavior and good governance
- Protect your company’s reputation and brand value
- Realize efficiencies across your supply chain and in your operations to reduce costs of energy, inputs, and transportation, improve health and safety practices and increase labor productivity
- Create more sustainable products and services to both meet your customers’ and business partners’ growing needs and remain competitive in the changing market.

Thank you,

Amy Ferrell

Logan Aluminum Procurement Manager

SUSTAINABILITY APPROACH:

With customers all over the world, Logan Aluminum has a global presence that requires a global approach. We work with our customers to create products that are useful to society across their life cycle, have a low carbon footprint, and ensure End-of-Life recyclability. We strive to ensure our manufacturing systems are managed in a sustainable way, continuously improving our environmental, social, and economic performance.

Through this initiative, Logan Aluminum commits to the Ten Principles of the UN Global Compact, which address human rights, labor standards, environmental protection, and anticorruption ideals. The Global Compact principles are shown below and are a critical component of the Logan Aluminum Supplier Code of Conduct. For more information on the UN Global Compact, go to: www.unglobalcompact.org.

Ten Principles of United Nations Global Compact

HUMAN RIGHTS

Principle 1: Business should support and respect the protection of internationally proclaimed human rights

Principle 2: Make sure they are not complicit in human rights abuses

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the rights to collective bargaining

Principle 4: The elimination of all forms of forced and compulsory labour

Principle 5: The effective abolition of child labour

Principle 6: The elimination of discrimination in respect of employment and occupation

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: Undertake initiatives to promote greater environmental responsibility

Principle 9: Encourage the development and diffusion of environmentally friendly technologies

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

LEGAL COMPLIANCE:

Logan Aluminum is committed to ensuring that our operations are in compliance with government regulations. Just as we hold ourselves to these standards, we expect our suppliers to adopt and embrace them as well. Therefore, **all suppliers are expected to adhere to the following standards, and any behavior that deviates from them will not be tolerated:**

- Comply with the laws and regulations of the countries in which they operate
- Not tolerate any forms of corruption, including extortion and bribery, as well as any payment or benefit that may influence government officials, other regulatory bodies or violate the law

LABOR & HUMAN RIGHTS:

Logan Aluminum seeks to ensure that its operations respect and support fundamental human rights and **we expect our suppliers to do the same, which include the following:**

- Promote equal opportunities for a treatment of its employees, irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex, age, pregnancy, ancestry, medical condition, marital status, gender identity or genetic information
- Respect the personal dignity, privacy, and rights of each individual
- Not force any person to work against his or her will; Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or personal harassment or unlawful discrimination
- Prohibit behavior, including gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative
- Provide fair remuneration and guarantee the applicable national statutory minimum wage
- Comply with the maximum number of working hours set forth by laws
- Recognize, to the extent legally permitted, the right of free association of employees, and not discriminate in favor or against members of employee organizations or trade unions

ABOLITION OF CHILD LABOR:

Logan Aluminum does not employ workers younger than the legally permissible age of employment. Logan Aluminum refrains from employing workers under the age of 16. Logan Aluminum expects its suppliers to adhere to these limitations in support of the prohibition against child labor. **Logan Aluminum suppliers are expected to:**

- Employ no workers under the age of 16, except interns and apprentices managed under close supervision who will not undertake any type of work which is likely to jeopardize their health, safety, or morals.

HEALTH & SAFETY:

The health and safety of our employees is a priority in our daily business and operations, whether in our offices or our plants, and we expect our suppliers to also make this a priority for their own employees and supply chain. **Logan Aluminum suppliers are expected to:**

- Advance the health and safety in its employees
- Control hazards and take precautionary measures against accidents and occupational diseases
- Provide training to help ensure that its employees are educated in health and safety issues
- Manage and address occupational health and safety issues with appropriate systems and processes

ENVIRONMENTAL PROTECTION:

At Logan Aluminum, our operations adhere to global standards in managing the environmental impacts of our company and its operations. We also understand the importance of finding innovative ways of improving the overall life cycle of our products to reduce greenhouse gas emissions and usage of energy, water, and other resources, and increase recyclability to reduce landfill waste. We expect our suppliers to have necessary systems in place to minimize the impact of their operations and products on the environment and maintain compliance with government regulations. **Logan Aluminum suppliers are expected to:**

- Act in accordance with the applicable local and international legal standards governing environmental protection
- Minimize environmental impacts and make continuous improvements in environmental protection, specifically with respect to waste, waste use, air emissions, energy use, use of natural resources and disposal of hazardous materials
- Manage and address environmental issues with appropriate systems and processes
- Provide environmental and other sustainability data to Logan Aluminum as requested

SUPPLY CHAIN:

While we as a company can strive to implement the standards outlined in this Code within our own operations and require our suppliers to do the same, we also ask that your company requires its suppliers to adopt similar standards. By seeking to influence the adoption of responsible guidelines and standards within your supply chain, **we can work together to make a positive impact on society and expect our suppliers to do the following:**

- Use reasonable efforts to promote compliance with the Logan Aluminum Supplier Code of Conduct with its supply chain
- Comply with the principles of non-discrimination with respect to supplier selection and treatment

APPLICATION & ENFORCEMENT:

The Logan Aluminum Supplier Code of Conduct applies to all suppliers of Logan Aluminum Inc. and its subsidiaries and affiliates to the extent permitted by applicable law. **Logan Aluminum will ensure supplier compliance to this Code through:**

- Self-assessment – questionnaire/survey
- Supplier audits
- Inspections

NOTE: Any potential audit and/or inspections should only occur if previously communicated and agreed upon with supplier.

In case any violation of this Code is identified, the applicable supplier may, at the discretion of Logan Aluminum, be given time to re-mediate the violation with the assistance of Logan Aluminum where possible. If the violation is not addressed in an effective way and within a clear timeframe that is acceptable to Logan Aluminum, Logan Aluminum reserves the right to terminate our business relations with the violating supplier.

The most current version of the of the Supplier Code of Conduct and additional information that may be useful for you to ensure compliance to this Code is available at www.logan-aluminum.com/resources/

SUPPLIER ACKNOWLEDGEMENT & ADHERENCE TO LOGAN ALUMINUM SUPPLIER CODE OF CONDUCT:

The undersigned acknowledges that it has read and understands the Logan Aluminum Supplier Code of Conduct and agrees to adhere to the provisions of the Logan Aluminum Supplier Code of Conduct.

Supplier Name: _____