

# **CODE OF CONDUCT**





Logan Aluminum management strives to conduct its business with high integrity and professionalism.

Because Logan Aluminum is a joint venture owned by two competing companies, both who serve the aluminum can sheet market, special attention must be given to information and how that information is used.

During the course of normal business activities, information will come your way that must be treated confidentially and not shared. Information relative to one joint venture partner should never be shared with the other joint venture partner unless the information is available to the general public.

The Logan Aluminum Code of Conduct (Code) provides general guidelines about business situations and does not take precedence over specific policy documents. The Code is not meant to address every question or every concern. It is important that questions and concerns that are not specifically addressed in the Code be brought forward for discussion.

Logan Aluminum is a principle-based organization, and the Logan Principles are a critical element of our work system. This Code and the policies described in the Code are not intended to replace the Logan Principles. The principles serve as the foundation for how we make decisions, provide a tool to monitor our own behavior and are the preferred method of operating our business. The Logan Principles are listed on page 6.

If there are any questions from any stakeholders concerning the intent or the specific application of this Code, please bring those forward to the appropriate leader or manager at Logan Aluminum. The President of Logan has overall responsibility for communication, implementation, and execution of the Logan Aluminum Code of Conduct.

Any questions related to the Code can be forwarded to him by calling 270-755-6000.

If you ever feel unsure about where to go for help or are uncomfortable using the resources identified in the Code, you are encouraged to call the Logan Aluminum toll free resource line. It is **1-855-270-8477**. The purpose of the ethics hotline is to answer questions and respond to concerns about compliance, ethics and the requirements described in the Code.

Logan Aluminum also has an Open-Door Policy for all team members. This means that every Manager's door is open to every team member to surface concerns including the President, Plant Manager, Human Resource Manager, and CFO as well. The purpose of the open-door policy is to encourage open communication, feedback, and discussion about any matter of importance to a team member free from retaliation.

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# INTRODUCTION

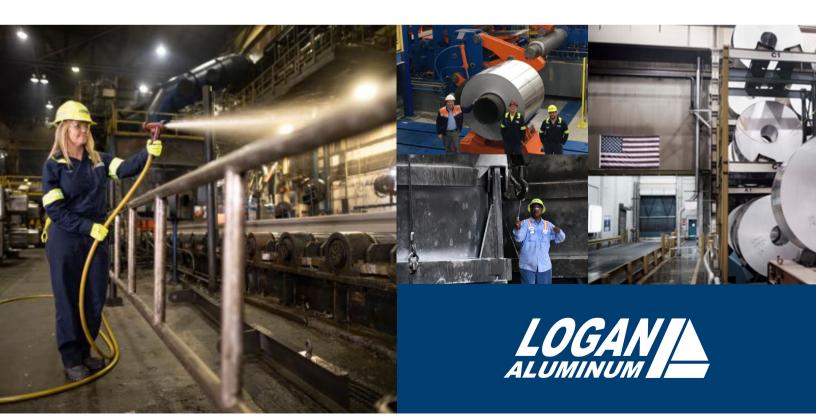
# **Guidance Only; Judgment Required**

This Code does not provide an answer to all questions or spell out the appropriate reaction for every situation which may arise; it is only a general guide by which employees are expected to conduct business on behalf of Logan Aluminum. You may need to refer to other policies or procedures for further guidance on appropriate action. When the proper course of action is unclear, or if you are uncertain about an action's propriety, you should consult with your team leader. In addition, Logan Aluminum's Team Member Relations Representatives can provide insight into the proper implementation of this Code.

# **Application to Team Members and Others**

The principles included in the Code apply to all Logan Aluminum team members, including leased team members, trainees, service providers and consultants. Team members are required to read, understand, and follow the Code. In this regard, you may be asked periodically to affirm your understanding of Logan's policies, including updated versions of policies. Most policies can be viewed online from your workstation.

The Code is not just for team members. All suppliers and other third parties are equally expected to adhere to the Code in all their dealings with or on behalf of the Company. To ensure a general awareness of the Code, a copy will be maintained on Logan Aluminum's intranet under the Human Resources homepage. Logan Aluminum's policy is to require adherence to the Code by every joint venture partner and related company in which it participates. The principles set forth in the Code are universal, so we should insist upon their application within these organizations.



# **General Obligations of Team Members**

Team members are responsible to submit a full and immediate disclosure of any business or financial interests which they or members of their immediate families have at the time of hire, or acquire during employment, which create or appear to create a possible conflict with the Company's interest.

# **Failure to Comply**

Failure to comply with the guidelines and policies contained within this Code can result in disciplinary action, termination of employment, and/or the initiation of appropriate legal action.

## **Attestation**

On an annual basis, all Logan Aluminum team members will be asked to confirm their compliance with the Code through Pure Safety training.

There is nothing more important than our safety.

Treat all resources like management resources.

We expect to employ mature, responsible people.

Success of the individual and the organization are interdependent.

Continuous improvement is paramount.

We have a participative business, not a permissive business.

Back-to-face confrontation is not acceptable.

We are accountable for our actions and our words.

Specific decision-making boundaries exist within the organization.

We exist in a dynamic business environment.

Employees are accountable for understanding and supporting business decisions.

# LOGAN PRINCIPLES

# **BUSINESS STANDARDS**

# ACT OBJECTIVELY AND IN LOGAN ALUMINUM'S BEST INTERESTS



# **Conflicts of Interest**

You may not engage in any activity, or become involved in any arrangement, directly or indirectly, which will conflict with, or may be reasonably viewed as conflicting with your responsibilities to Logan Aluminum. A conflict of interest may arise from your involvement, or another person acting on your behalf, in certain business or personal activities that may currently, or potentially, conflict with your duties at Logan Aluminum.

A conflict may exist regardless of your intent. It is important to avoid even the appearance of a conflict of interest. If you believe that you are, or may become, involved in a conflict of interest, you should immediately contact your team leader or team member relations representative to discuss the situation in an effort to avoid the conflict. Ownership of securities of a supplier or competitor amounting to less than one percent of the class shares outstanding need not be reported.

# To avoid situations involving conflicts of interest, team members must:

- Select and deal with suppliers, customers and other persons doing or seeking to do business with Logan Aluminum in a completely fair and objective manner without favor or preference based upon your personal financial considerations.
- Not engage in any direct financial, managerial, or other relationship with any supplier, customer, competitor, or regulatory agency that could give rise to an actual or potential conflict of interest or an appearance of a conflict of interest.
- Not engage, directly or indirectly, in competitive activities, divert a business opportunity from Logan Aluminum, deprive Logan Aluminum of a business opportunity, or improperly use or disclose confidential information of Logan Aluminum. Doing so might impair or appear to impair your ability to make objective and fair decisions on behalf of Logan Aluminum.
- Not accept from or give to any supplier, customer, or competitor any gift or entertainment except as permitted under the section below entitled "Gifts and Gratuities."
- Not do business with a close relative or business entity with which the team member or a relative is associated, except where such dealings are on arm's-length terms and have been fully disclosed to senior management.

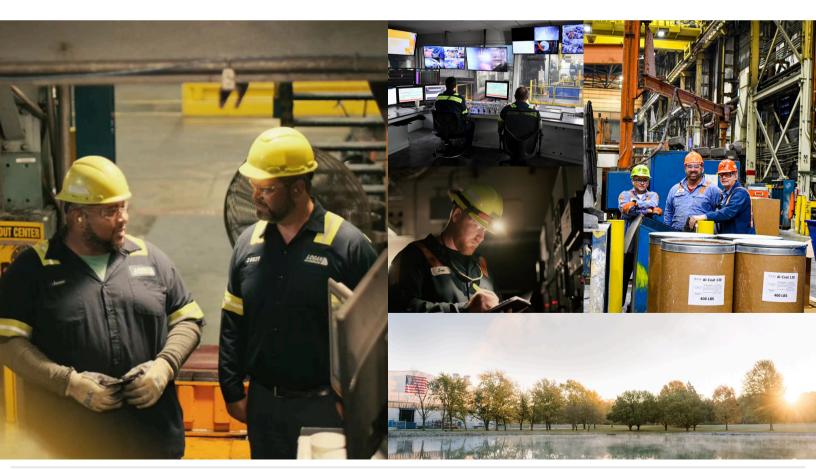
# **Gifts and Gratuities**

Gifts and other forms of special benefits to or from customers, suppliers, or competitors, of Logan Aluminum can raise ethical and legal questions that could potentially embarrass or damage Logan Aluminum. Therefore, caution is required when dealing with such matters. It is your responsibility to ensure that acceptance of meals, refreshments, or entertainment is proper and could not reasonably be construed in any way as an attempt to secure favorable treatment from you. No gifts of money should ever be accepted.

Any gift or favor should not be accepted if it is considered more than "ordinary social amenity". "Ordinary Social Amenity" shall mean items whose dollar value does not exceed \$50.00 and will be consumed in a reasonable time period. Any offer of gifts or favors of more than \$50.00 in value should be immediately reported to your team leader and returned with a letter explaining that acceptance is contrary to company policy.

Offers to team members for participation in social events sponsored by vendors, suppliers, contractors, and competitors or for the use of facilities owned by same requires the prior approval by the President. Examples of such events are dinner parties, golf outings or tournaments, fishing trips, and other athletic events which constitute normal practices, though discretion and prudent judgment should be exercised in all cases.

If you question the appropriateness of a gift, contact your Team member Relations Representative immediately as to the existence, nature, and value of the gift.



# PROMOTE A DESIRABLE WORK ENVIRONMENT



Logan Aluminum is guided by principles of non-discrimination and respect for the human rights and individual liberties of all citizens and seeks to provide a working environment that recognizes these core principles.

We value the diversity found in our team members, customers, suppliers, and others. All team members are expected to conduct themselves in a manner that assures that customers, suppliers, and fellow team members are treated with respect, fairness, and dignity.

Logan Aluminum will take good faith action to recruit, hire, train, evaluate, promote, assign, transfer, layoff, recall or terminate without respect to age, sex, color, race, creed, national origin, religious persuasion, marital status, sexual orientation, political belief, disability, veteran or draft status, or other status protected by applicable law.

# No Harassment in the Workplace

We are strongly committed to the principle of fair employment, and as such it is our policy to provide team members a work environment that is free from all forms of discrimination, intimidation, or harassment. In recognition of each person's individual dignity, racial, ethnic, religious, sexual, and other prohibited harassment of our team members will not be tolerated. This includes inappropriate verbal or physical conduct or otherwise creating an intimidating, offensive, abusive, or hostile work environment.

If you have a question, concern or complaint of discrimination, including harassment, based on race, color, sex, religion, age, national origin, handicap or disability, veteran status, or other protected status, you are encouraged to bring the matter to the immediate attention of your team leader. If you feel uncomfortable discussing an issue with your team leader, or if you reasonably believe that your team leader should not be present during the first step of the resolution process, or that you cannot bring the matter to the attention of your team leader or Unit Manager directly, contact your Team member Relations Representative for assistance.

A team member may also contact any Manager including the President, Plant Manager, Human Resource Manager, and CFO at any time per our Open-Door Policy without the fear of retaliation.

# No Retaliation

Any team member, who in good faith seeks advice, raises a concern, or reports a misconduct is following this Code – and is doing the right thing. Logan Aluminum will not tolerate retaliation against that person. We take claims of retaliation seriously. Allegations of retaliation will be investigated, and appropriate action taken.

Anyone responsible for reprisals against individuals who report suspected misconduct or other risks to the business will be subject to disciplinary action up to and including dismissal.

# No Unreasonable Expectation of Team member Privacy

Logan Aluminum respects team members' privacy and will maintain only the necessary personnel information required by law in order to execute its activities. At the same time, we need to ensure an efficient work environment. Team members should have no expectation that communication using Logan business tools is private in the workplace.

We reserve the right to review your business tool usage, including without limitation voice mail, telephone, internet, or e-mail, for any reason. Team members should be aware that there might be times when Logan may examine team member workspaces or property on Logan premises

# **Properly Use Electronic Mail and Internet**

Each team member is responsible for the maintenance and protection of data, files, and other materials – such as software and hardware belonging to Logan Aluminum. Each team member is also responsible for any electronic data or files he or she sends to others.

Electronic mail is not completely secure and can be subject to interception or may create a permanent registration. Any message forwarded through electronic mail can be printed by the receiving party and sent to third parties. In addition, it will likely remain in the Company computers for a significant period of time. Therefore, Logan team members must use the same care, concern, precautions, and ethics when sending a message through electronic mail as they would in their handwritten communications.

Business tools, including without limitation the internet, intranet, Company telephones or e-mail, should be used for business purposes, although we recognize there will be situations where the use of business tools in connection with personal affairs, family emergencies or outside activities that raise the civic profile of the company (e.g., participation in the American Aluminum Association) are not inappropriate. Any use should not interfere with work duties or violate Company policies, including prohibited use relating to gambling, pornography, chain letters and solicitation.

# No Alcohol or Drugs in the Workplace

It is our policy to prohibit the unauthorized use, possession, dispensation, distribution or manufacture of a controlled substance or alcohol in any Logan Aluminum facility, including parking lots, vehicles on our premises or in use for our business, or any customer or supplier's facilities. Performing or attempting to perform any Company business, whether on our premises or not, while under the influence of any controlled substance or alcohol is also prohibited, and may result in disciplinary action, up to and including termination. Note: For purpose of this policy, "controlled substance" means any drug that is not legal or legally obtained, or for a drug that is legally obtainable over-the-counter or by prescription, a drug that is not used for the purpose for which it was intended or is being used in excessive dosages.



# PROMOTE RESPECT FOR ENVIRONMENT, HEALTH, SAFETY AND SECURITY

# No Damage to the Environment

It is our policy to manage our business in an environmentally responsible manner and to comply with all environmental laws and regulations.

You are required to maintain an environmental awareness concerning the activities you perform and to conduct those activities in a manner that fully complies with all environmental laws and regulations.

You are further required to immediately report to your team leader or your ESS representative any event you witness which may result in noncompliance with any environmental law or regulation (e.g., leakage, unlawful emissions, and the like).

# Health, Safety and Security

It is also our policy to provide a safe and healthy environment for our team members and visitors to our premises.

To this end you must conduct operations in a manner that meets applicable health and safety laws and regulations and comply with the company's standard operating procedures in matters affecting the environment, health, and safety.

Weapons of any type are not permitted beyond any secured gates, or while an team member is engaged in activities on behalf of the Company.

Additionally, you are required to immediately report any and all incidents, injuries, occupational illness, unsafe conditions, or practices to your team leader.



# **Properly use Company Assets**

You are individually responsible for ensuring that Logan Aluminum property that you use or come in contact with as part of your work is not damaged, misused or wasted. You also have a duty of care to report the abuse of Logan property by others.

# Protect Confidential Information and Intellectual Property

You must not disclose trade secrets, customer lists, special methods of operation, technical data, data on products or processes, vendor or purchase price lists, cost strategies, pricing, marketing or services, private financial reports and information related to divestment, mergers, or acquisitions, or any other information that is of value to our business.

Confidential Information is generally business or technical information not generally available to the team member population as a whole or to third parties, and which may have been developed or specifically acquired by Logan Aluminum. It includes "market sensitive" material which could affect the decisions of our owners. Information from team member personnel records or customer records is also confidential and protected by various privacy laws. Such information should only be provided with appropriate management approval.

Software, whether purchased or internally developed, and the intellectual property rights represented by software are also valuable Logan Aluminum assets. All intellectual property must be protected and managed in compliance with all applicable company requirements, restrictions, and laws, including software licensing requirements. Such licensing agreements may prohibit copying or distributing such software for Company or personal use. We must also protect the confidential information and intellectual property rights of third parties.

In view of the importance of confidential information and intellectual property in the operation of Logan's business, it is essential that you observe the following rules:

- Be careful about the places where you discuss Logan Aluminum affairs related to confidential information (e.g., airplanes or other public places).
- Do not disclose or use any Logan Aluminum confidential information to your own benefit or advantage.
- Enter into our form of confidentiality agreement with Company outsiders (including Logan Aluminum consultants) before discussing any Logan Aluminum confidential information.
- Pay attention to market information when seeking information on competitors in order to be in compliance with ethical principles (i.e., don't be a spy).
- In case you receive any offer to review confidential information, be sure that both parties have clearly understood and accepted the terms under which such information will be received; and
- Discuss with Team Leaders or Unit Managers any non-requested offer of confidential information, in order to establish whether or not the information can be accepted or must not be received. This is particularly important in case you have reasons to believe such information could have been improperly obtained or sent by accident.

For further information on Team member Invention and Confidentiality issues please refer to the copy of the agreement that you signed upon becoming employed by Logan Aluminum.

# **Keep Good Books and Records**

Failure to keep accurate and complete records is not only contrary to Logan policy but also may be unlawful. There is never a justification or an excuse for falsifying records or misrepresenting facts. Such conduct may constitute fraud and can result in civil and criminal liability for you and Logan Aluminum.

# In relation to Logan Aluminum's books of account and records, you must:

- Ensure all transactions are properly authorized and accurately and completely recorded.
- Follow all laws, external requirements, and company processes for reporting information.
- Ensure that no undisclosed or unrecorded account fund or asset is established or maintained.
- Cooperate fully with our internal and external auditors, provide them with accurate information and on request allow them unrestricted access to staff and documents (subject to legal constraints).
- Show financial integrity in submitting or approving expense claims.

# **ENGAGE IN ETHICAL INTERACTIONS WITH GOVERNMENT**

# **Political Activity**

Logan Aluminum recognizes team members' rights to participate as individuals in the political process, in ways that are appropriate to the various jurisdictions in which team members reside. However, you must be careful to make clear that you do not represent the company as you participate in the political process.

Legislation generally restricts the use of corporate funds to support political parties. As a result, the general policy of Logan Aluminum is to not make contributions of funds or property of Logan Aluminum to support or assist the candidacy of any person seeking elective office, unless approved in advance by the President in accordance with legal requirements.

To avoid any appearance of Logan Aluminum making a direct or indirect corporate contribution to a candidate, a team member may not work on behalf of a candidate's campaign during regular business hours nor at any time use Logan Aluminum's facilities or property for that purpose or in any way infer Logan Aluminum's support for the candidate by their actions.

# **Practice Ethical Government Relations**

For Logan Aluminum, government relations shall include all agreements with governments, its agencies, and officials in both local and national jurisdictions all over the world. Although uses and customs can vary from country to country, there's only one way we will deal with any government – in accordance with the ethical standards.

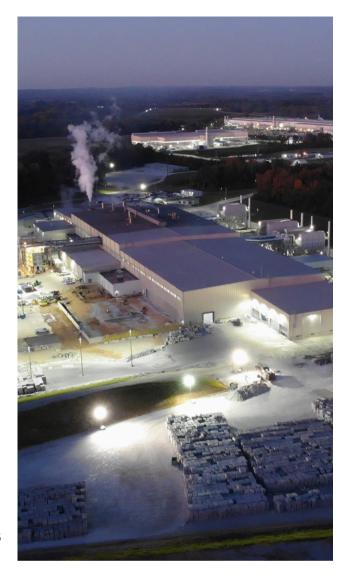


# **No Obstruction of Government Investigations**

Logan Aluminum must cooperate with any lawful solicitation of information on the part of any government. In doing so, Logan Aluminum must guarantee its fundamental legal rights, such as to be represented by a lawyer, when appropriate. Consequently, if a governmental authority requires information or access to a Company file, it is important that the matter be first discussed with Logan Aluminum's attorneys.

When submitting information to any authority, we must take measures necessary to protect its confidentiality. In many countries, information included in government files is available to the public on demand. Although the purpose of such laws is to promote an open and responsible government, they also permit Logan Aluminum competitors to acquire information related to the Company.

Care must be exercised before information can be destroyed. Most information obtained or created during the course of normal work can and should be destroyed if it no longer serves a business purpose. Certain other information is required to be maintained for a fixed period of time by regulatory agencies or for other reasons. It is a crime for individuals to conceal or destroy documents if it is done with the intent of impeding a governmental investigation or in contemplation that there may be a governmental investigation. Accordingly, if a government investigation is initiated or contemplated, all documents relevant to the subject matter of the investigation must be preserved.



# **No Corrupt Practices; Comply with Export Controls**

Logan Aluminum is committed to ethical business practices around the world. If you conduct business for Logan Aluminum, you are expected to comply with all applicable laws and regulations governing such transactions. You must be aware of any restrictions applicable to hosting a government team member so as not to compromise in any way the parties concerned or Logan Aluminum.

Logan Aluminum may not hire a governmental team member to provide any service, except by means of a written agreement entered into with the relevant government setting forth the nature of the services to be provided. We should be careful so that services provided can not be misunderstood as a means of making improper payments. It is forbidden in some countries to hire a government team member to do any kind of work.

Foreign "corrupt practices" laws makes it a crime to directly or indirectly offer, promise to pay or pay money or anything of value to foreign government officials, parties or political candidates for the purpose of influencing the acts or decisions of such officials in order to obtain business or obtain any improper advantage. All Logan Aluminum officers, team members and agents must keep accurate and truthful records reflecting payments and transactions for all foreign and domestic business activities.

Various laws govern trade between the host country and foreign countries and prohibit host country companies and their foreign subsidiaries from doing business with certain countries, agencies, and individuals. Similar export control restrictions limit the export of certain goods, technology and software to certain countries or individuals. As these laws and regulations vary by country and type of goods, team members engaged in business transactions outside of the United States of America should obtain advice prior to engaging in such activities.



# **DEAL FAIRLY WITH THIRD PARTIES**

# **Use Ethical Marketing, Purchasing and Sales Practices**

It is part of Logan Aluminum's policy to operate with integrity in all aspects of its business and to conduct its commercial transactions in a fair and equitable manner.

Such policy extends to sales or purchases of services (such as banking, consulting, advertising, engineering, and maintenance services), as well as to sales and purchases of goods and tangible products.

All advertising, marketing and publicity efforts are important to maintain our reputation and image. Therefore, any and all marketing information, fact, event, or act must comply with the principles set forth herein and may not contain misleading and/or incorrect information.

# In marketing and customer account activities, we must:

- Treat all third parties fairly and honestly.
- Elaborate clearly and concisely all product estimates and future delivery forecasts, which will be subjected to changes according to the respective supply and needs.
- Never offer or receive improper payments or gifts to or from any person related to sales or purchase of products or services, even if you risk losing business opportunities; and
- Be aware of concerns related to product responsibility and, where applicable, notify Logan Aluminum customers of any danger inherent to products we sell.

# **Comply with Competition and Antitrust Law**

It is our policy to compete vigorously, aggressively, and fairly, in accordance with applicable antitrust and competition laws and regulations. These laws can be very complex. In general, we must compete without any anticompetitive understandings or agreements with our competitors, suppliers, dealers and/ or customers.

# Actions that may violate the antitrust laws include:

- Suggesting a product or commodity must be resold at or within any particular price or range.
- Limiting where, to or by whom something can be sold or marketed.
- Providing different information about a similar request for quotation/proposal to competing bidders.
- Participating in actions by any trade association or other industry group regarding membership restrictions, data collection or sharing of information about prices, pricing policies, marketing expansion, cut-back plans, costs, earnings, credit or billing practices, or business practices of competitors, customers or suppliers. If you are present at a meeting or informal gathering when these discussions start, leave, and report the incident.

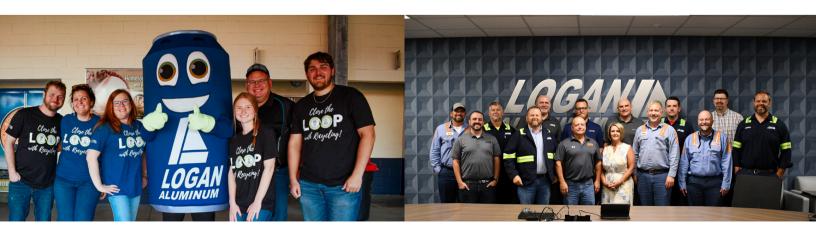


# Other Considerations

- You should avoid discussions or agreements with competitors (even informal ones) regarding prices, terms or conditions of sales, credit or billing practices, costs, profits (or profit margins), market shares, bids, requests for proposals, intent to bid (or not to bid) for a particular customer's business, intent to do business (or not) with particular suppliers or territories, or plans to build or expand existing capacity.
- You should maintain our independence of judgment in all issues concerning pricing, marketing, purchasing, and selling of all products and services. Avoid inaccurate or misleading statements about competitors, suppliers, customers, or their offerings. We succeed by offering quality products and services, not by attempting to prevent anyone from entering a market, or by disparaging any competitor, supplier or customer or trying to "put them out of business.
- Our purchasing decisions are based on fair and objective criteria, not on whether a supplier agrees to use our
  goods and services. Do not suggest to suppliers that purchasing decisions depend on the supplier's use of our
  goods or services or that failing to do business with a subsidiary or affiliate could jeopardize business with the
  parent company; however it is not a violation of this policy to make decisions that support the industries in which
  we and our competitors participate (e.g., the selection of a hotel convention site dependent upon the hotel
  owner's use of beverage can rather than plastic bottles, or its commitment to recycle aluminum materials, etc.)
- When taking part in joint venture and industry associations that may involve competitors, restrict communications
  to those actually required to lawfully conduct the joint undertaking.
- You should report illegal activity and unethical conduct. Neither Logan Aluminum nor any of its team members
  may retaliate against any person for providing information reasonably believed to be truthful, to any law
  enforcement officer relating to the commission or possible commission of a crime.
- Because Logan Aluminum is a joint venture, extreme care must be taken to not disclose any information concerning either joint venture partner to the other in terms of customers, locations, specifications, products, services, delivery, or any other information that is not publicly known.

Antitrust laws are vigorously enforced. Failure to comply with antitrust or competition laws could result in heavy fines or imprisonment in criminal cases, and high damage awards and injunctions in civil cases.

Team members should seek the advice of the Office of the President who can refer to appropriate legal counsel when confronted with business decisions that involve significant risks of antitrust exposure for Logan Aluminum or individual team members.







# **No Insider Trading**

In the course of your duties, you may become privy to "inside information" within the meanings of applicable securities laws. This means material, non-public information that might have an effect on either joint venture partner if the information were publicly known. You should also be aware that the same prohibition against insider trading applies to trading in the stock of our customers, suppliers, or any other company if you have inside information about them. Team members are strictly prohibited from providing inside information to other person (including family members and friends) as this information might influence their trading activities or financial transactions.

Examples of such "inside information" may include: expansion plans, major management changes, future dividend rates, current or future earnings projections, the execution or termination of material contracts or projects, mergers, acquisitions or divestitures, non-disclosed financial reports, the increase or reduction of dividends regularly paid, material plans of capital expenditure or material changes in such plan, material modifications to the composition of the senior management or board of Logan Aluminum, any offer relating to the acquisition of Logan Aluminum or other change in control of events or other such material matters.

# Responding to Inquiries from the Press and Others

We have established policies for responding to inquiries from the press and from others legitimately seeking information about us. It is important that team members not attempt to answer such inquiries unless authorized to do so. Overall, our intention is to maintain a spirit of cooperation while always acting in Logan Aluminum's best interest and in accordance with applicable law. Therefore, all inquiries from the media should be directed to the President, Plant Manager or HR Manager.

# No Fraud, Theft, Kickbacks or Similar Conduct

Our team members may not engage in any scheme to defraud anyone out of money, property, or honest services. Any act of an team member that directly or indirectly involves theft, fraud, embezzlement, misappropriation, or wrongful conversion of any property, including that of Logan Aluminum or any of its team members, suppliers, or customers, is expressly prohibited. No team member shall make any false written or verbal statement involving any Logan Aluminum business or activity.

You may NOT accept personal commissions, fees, loans, or any other form of payment arising from any transaction or business activity directly or indirectly involving Logan Aluminum. No team member will accept, provide, attempt to provide, or offer to provide a kickback to anyone for any reason.

These "payments" or "kickbacks" may include but may not be limited to money; fees; commissions; loans; gratuities; lavish trips, entertainment, recreation, personal services, accommodations; or any other form of value.



# **Cooperate with Independent Auditors**

Logan Aluminum management is responsible for the accuracy and completeness of Logan Aluminum financial statements

The independent auditor's report is dependent upon a thorough understanding of Logan Aluminum's financial reporting system and the information generated by it as well as the judgments and assumptions of our management. This understanding is developed in part from discussions with our team members and management.

Accordingly, it is critical that our independent auditor receive complete and truthful information and otherwise the full cooperation of our team members.

Logan Aluminum insists that those team members who provide information to Logan Aluminum's independent auditor do so in a way that is accurate and complete. It is a crime for individuals to take any action designed to mislead or coerce the independent auditor for the purpose of making the Company's financial statements materially misleading.

### Other Policies

In certain cases, your position and responsibilities may require further guidance in certain areas of expected conduct. Accordingly, you may need to consult additional sources containing policies and procedures through the Team member Relations Office. A partial listing of policies and procedures is included in Appendix A.

# **APPENDIX A**

- E.R. Policies and Procedures
  - ER PROCEDURE 005 Violence in the Workplace
  - ER PROCEDURE 009 Reporting Thefts & Dishonest Acts Procedure
  - ER POLICY 004 Workplace Harassment Policy
     ER POLICY 010 Conflict of Interest Policy

  - ER POLICY 013 Electronic Communications Policy
  - ER POLICY 024 Drug and Alcohol Abuse Policy
  - Internet 1 Internet Usage
- Supply Management Internal Control Procedures
  - ICP 024 Contract Review Procedure
  - ICP 026 Purchases from Team members
- Supply Management Purchasing Policies Procedures
  - P 060 Conflict of Interest
  - P 100 Professional Standards
- IS Internal Control Procedures
  - ICP 013 Electronic Communications Policy