

Conflict Minerals Sourcing Policy

In August 2012, the United States Securities and Exchange Commission (the “SEC”) issued final rules implementing the provisions of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”). Section 1502 of the Dodd-Frank Act imposes new reporting requirements on companies who manufacture, or contract to manufacture, products that uses Conflict Minerals, which is defined as cassiterite (from which tin is derived), columbite-tantalite (coltan, the mineral from which tantalum is extracted), gold, wolframite (from which tungsten is derived), and any other minerals determined by the Secretary of State to be financing the conflict in the Democratic Republic of Congo and its adjoining countries, including the Republic of Congo, the Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda (collectively, the “DRC Countries”). Compliance with this policy facilitates our ability to comply with the Dodd-Frank Act and our SEC reporting requirements.

Kaiser Aluminum will only purchase materials that do not contain Conflict Minerals (including tin, tantalum, gold or tungsten) originating from the DRC countries. In support of Kaiser Aluminum’s policy on Conflict Minerals, suppliers are expected to supply Kaiser Aluminum materials that do not contain Conflict Minerals originating from the DRC Countries. Any supplier that supplies Kaiser Aluminum with materials that contain Conflict Minerals must provide Kaiser Aluminum with a certification that the minerals do no originate from the DRC countries.

Suppliers are expected to adopt policies and management systems with respect to Conflict Minerals and to require their suppliers to adopt similar policies and systems. Kaiser Aluminum expects suppliers to establish their own due diligence program to ensure compliance with Kaiser Aluminum’s sourcing requirements. In the event Kaiser Aluminum determines that a supplier’s efforts to comply with this policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Kaiser Aluminum reserves the right to take appropriate actions including terminating any contractual commitments with, and discontinuing purchases from, the supplier.

Kaiser Aluminum will survey direct suppliers as a part of our conflict minerals due diligence program. Suppliers are expected to respond in to survey requests in a timely manner, including but not limited to the country of origin or smelters and refiners of Conflict Minerals contained in the materials supplied to Kaiser Aluminum, and with full disclosure following the specific instructions provided.

Only the EVP – Legal, Compliance and Human Resources may waive a provision of this policy and any waiver must be in writing.