

ENVIRONMENTAL POLICY

Introduction

Our approach to managing all matters relating to the environment touch on each of our corporate values – being a preferred investment, preferred supplier, preferred employer, preferred customer and valued corporate citizen. By focusing on our values, we manage our business for long-term success in a manner that is environmentally responsible.

Inherently sustainable and infinitely recyclable, our products are part of the carbon solution and efforts to limit global warming to below a 2° C threshold by 2050 by facilitating increased fuel efficiency and light-weighting of aircraft, passenger vehicles and light-trucks and a broad range of general industrial applications.

We will continue our efforts to increase our use of recycled scrap to produce secondary aluminum which results in less than 10% of the greenhouse gases associated with primary aluminum production and reduces our purchase of primary aluminum. Our research and development will continue to focus on enhancing the quality of our products and producing our products to even tighter specifications which further enhance their machinability and reduce waste throughout the value stream.

We will play a significant role in achieving a future low carbon economy and support emissions reductions pathways that utilize dependable, energy efficient manufacturing and technology innovations. While increasing operating efficiencies and our use of aluminum scrap, we will continue to identify and invest in new initiatives to reduce the carbon intensity of our products and actively evaluate new technologies as they become available.

In addition to promoting the inherent sustainability and infinite recyclability of our products, our short and long-term initiatives, strategies and investments will continue to include:

- Developing new products, processes, and capabilities, as well as making investments, that increase our manufacturing and energy efficiency
- Implementing practices to reduce carbon emissions, electrical consumption and water use
- Increasing our use of scrap/recycled aluminum and participation in closed loop scrap programs to reduce our use of more carbon intensive primary aluminum
- Identifying opportunities to invest in our facilities to enable them to reduce consumption or to purchase cleaner power
- Purchasing the primary aluminum required by our operations from lower carbon sources
- Participating in customer light weighting to achieve greater fuel efficiency and correspondingly reduce carbon for our customers
- Working with our customers to develop beverage and food container packaging using new or different alloys to reduce the carbon footprint of our products

- Working closely with our suppliers to increase efficiencies and reduce environmental impacts throughout the value chain and actively source lower carbon raw material
- Actively monitoring the development of existing and future technologies that have the potential to reduce the natural gas required to melt aluminum scrap and produce secondary aluminum

Process and Oversight

Reducing our environmental impact will continue to be part of our ongoing business and investment planning process. While our senior leadership teams oversee the execution of our initiatives and strategies and receive updates throughout the year, our board reviews and approves our key initiatives and strategies and is updated at least quarterly on material changes or developments. At least one full board meeting each year is focused on enterprise risk management, which includes our approach to environmental matters and compliance. In addition, our board ESG Committee provides more focused oversight of our ESG activities and strategic initiatives while our board Audit Committee reviews our financial statements, including our environmental accruals and the factors impacting our accruals.

Engagement

We will continue to expand our engagement with environmental groups, state and local government agencies, and industry and business peers to increase awareness and understanding of environmental issues and concerns. In addition, we will continue to engage with key stakeholder groups on critical issues, including environmental best practices, industry specific environmental opportunities, issues and concerns and developing technology. We will engage candidly and constructively with our stakeholders, respond to questions and concerns about our environmental initiatives and the impact of our operations on the environment and integrate relevant feedback and recommendations into our strategic planning process.

Compliance

Compliance, including environmental compliance, is an important part of the foundation upon which we operate and is implicit in our values. Our employees live in the communities where we operate and we want them to be proud members of those communities. We will continue to strive to be a valued, responsible corporate citizen and an active member of our industry and our communities.

Environmental Management System

We will maintain an environmental management system (EMS) which allows us to organize, review and adjust our environmental goals and requirements; analyze our environmental impacts; effectively manage our legal requirements; monitor and measure progress in achieving environmental objectives; and ensure the awareness of our employees with our EMS, this Policy and our expectations. Our senior leaders will be proactively involved in our environmental compliance activities and engage in an ongoing dialogue to ensure our commitment to environmental stewardship is a focus throughout the company. In addition, we expect each of our facilities to comply with ISO 14001 environmental management system standards to better equip our employees and facilities with the information, tools and support they need to comply with environmental laws, regulations and our internal standards.

Energy

Energy efficiency will continue to be a key consideration for all of our investments and capital projects. Our goal is to continue to reduce our energy consumption and reduce the energy intensity and carbon footprint of our products by investing in and improving our manufacturing efficiency and promoting the efficient use of energy and material resources. We are committed to continuing to explore opportunities to responsibly increase our use of dependable renewable energy and decrease our reliability on non-renewable and more carbon intensive energy sources.

Climate Change & Greenhouse Gas Emissions

We will continue to play a significant role in achieving a future low carbon economy and support emissions reductions pathways that utilize dependable, energy-efficient manufacturing and technology innovations. We will continue to improve our emissions-intensity and to actively evaluate new technologies as they become available. We will also continue to increase our efficiency and reduce our carbon intensity through ongoing investments to facilitate our ability to meet or exceed our carbon reduction targets.

While producing secondary aluminum generates less than 10% of the greenhouse gases associated with the production of primary aluminum, natural gas is currently required to melt aluminum scrap and primary aluminum and the primary source of our Scope 1 emissions. We will continue to monitor the development of new technology that will allow us to reduce, eliminate or mitigate the impact of our use of natural gas. We will also continue to identify opportunities to reduce our Scope 2 emissions by reviewing our network of suppliers and to identify providers using dependable renewable energy sources as the source of supply available to us continues to develop and evolve. Because our Scope 3 emissions are primarily attributable to the primary aluminum we purchase to make our products, we will continue to identify opportunities to increase our use of aluminum scrap and purchase lower carbon primary aluminum as it becomes available and the primary aluminum industry continues to evolve.

We are committed to global efforts to reduce global warming and believe our path to 2050 will require a combination of clean and reliable power grids, new carbon free technologies for melting and heating aluminum, cost effective carbon capture and storage, a circular economy for scrap, green prime for purity and responsible legislation that does not result in the leakage of manufacturing, jobs and carbon to areas with less efficient manufacturers with larger carbon footprints. As we move forward, we expect to monitor, support and participate in each of these efforts.

Air Quality

In addition to reducing carbon emissions, we recognize that reducing other emissions is vital to achieving cleaner air and a more sustainable future. These emissions, which include volatile organic compounds, nitrogen oxides, particulate matter and other pollutants, are regulated where we operate. Our approach to controlling and minimizing these emissions will not only be driven by the applicable regulatory requirements, but also by our own internal air management standards. Even where we may not be required to do so, we will continue to monitor and reduce these emissions through process controls with a focus on improving manufacturing efficiencies that reduce the carbon intensity of our products.

Water

We understand that water is not just an essential component of the manufacturing process, but a critical resource in the communities where we operate and where our employees live. While we consume very little water manufacturing our products (slightly above the evaporation rate), our casthouses represent our largest users of water and we will continue to work diligently to minimize our water usage and maximize our use of recycled water. Our operations which represent our largest users of water will administer facility specific water management plans and pursue internal targets to continue to reduce water usage.

Waste and Spill Management

Our overall waste and spill management strategy will continue to focus on reducing higher-volume waste and the minimal volumes of waste we generate that have the potential to significantly impact the environment. Our primary objectives will continue to be: eliminating or minimizing our manufacturing waste at the source, finding alternative uses and recycling options for what we do generate and managing the safe disposal of what remains through proper and responsible disposal alternatives.

Dross, which forms in aluminum melting furnaces when molten metal becomes oxidized, is our largest waste byproduct by volume. We will use third party processors and converters to recycle our dross to recover the aluminum content and safely dispose of the remaining material. The remaining waste generated from our manufacturing processes is required to be inventoried, stored, accumulated, labeled and inspected in accordance with applicable regulatory obligations and our EMS.

Our off-site transportation and waste management vendors must be compliant with not only regulatory obligations, but also our own internal policies. To further lower our potential environmental impact, our policies will continue to require all commercial treatment, storage and disposal facilities and recyclers to be audited and approved before they can receive our waste and approved vendors to be re-audited every one to five years depending on perceived or potential risk. We will strive to prevent spills and releases at and from our facilities. If a spill does occur, we will respond quickly and effectively to minimize any impact.

Each of our facilities will adhere to the European Union's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation and actively seek substitutions for chemicals that the regulation deems substances of very high concern.

Value Chain

We value our relationships with our suppliers. Our suppliers are our partners and play an important role in helping our customers and us create a healthier and more sustainable world. We are committed to working closely with suppliers to increase efficiencies and reduce environmental impacts throughout the value chain. As our approach to managing our carbon footprint continues to evolve, we will continue to gain a better understanding of emissions in our supply chain.

This Environmental Policy reflects our corporate values, defines how we operate and reflects our expectations of our employees as they pertain to the environment.