

# Kaiser Aluminum Supplier Code of Conduct

## Introduction:

Kaiser Aluminum Corporation has been a leading producer of semi-fabricated aluminum products for over 75 years. Our customers around the world look to Kaiser to deliver highly engineered solutions for their most demanding aerospace, packaging, general engineering, and automotive applications. At Kaiser, we are driven by our core values and believe that being “best in class” signifies we are a:

- Preferred investment
- Preferred supplier
- Preferred employer
- Preferred customer
- Valued corporate citizen.

We are committed to conducting business in an ethical and responsible manner across all our operations while respecting the rights of all individuals and conserving the environment. We expect these same commitments to be shared by our Suppliers.

Therefore, this Supplier Code of Conduct (this “Code”) reflects our expectation that any company or entity that sells products or services to Kaiser which are defined hereafter as “Suppliers” to act in accordance with the principles and guidelines reflected in this policy.

We expect all our Suppliers to respect the following policies and to require the same from their supply chain. In the event Kaiser Aluminum determines that a Supplier’s efforts to comply with the principles reflected in this policy have been deficient and the Supplier fails to cooperate in developing and implementing reasonable corrective actions, Kaiser Aluminum reserves the right to take appropriate steps including discontinuing purchases from the Supplier.

We expect our Suppliers to conduct business in a manner that is consistent with the requirements outlined in this Code, our [Code of Business Conduct and Ethics](#), our [Human Rights Policy](#), our [Conflict Minerals Sourcing Policy](#), and our [Environmental Policy](#).

Our Senior Leadership Team, with oversight from our Board of Directors, administer this Code and review the Code annually to help ensure alignment with evolving social and environmental issues impacting the company supply chain.

Kaiser will provide access to our Supplier Code of Conduct through our corporate website to ensure our Suppliers and other stakeholders are informed relative to our supply chain expectations. In the future, we will provide opportunities for Supplier engagement and information sharing to help assess Supplier alignment with this policy and other sustainability related matters.

**Compliance with laws and regulations:**

Kaiser expects Suppliers to conduct their business in compliance with all applicable federal, state, provincial and local laws, ordinances, and regulations including those on labor, human rights, conflict minerals and the environment, and those that prohibit any form of corruption and/or bribery.

**Labor:**

*Discrimination and harassment:* Suppliers are expected to provide equal opportunity in all aspects of employment and not tolerate discrimination or harassment of any kind based on characteristics protected under applicable federal, state, provincial and local laws. Sexual harassment and derogatory comments based on racial or ethnic characteristics or sexual orientation, and similar types of harassment are strictly prohibited.

*Working hours and wages:* Suppliers are expected to operate their business in conformity with local employment laws including wages, benefits, overtime, and work hour limitations.

*Child and forced labor:* Suppliers will not use or source products or services from entities associated with child labor or forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

*Health and safety:* As part of Kaiser's corporate value of being a "Preferred Employer", we are committed to the health of our employees and providing a safe work environment. In turn, Suppliers are expected to do the same and comply with all applicable health and safety work regulations. In addition, Suppliers are expected to promote a work environment for all employees that is free from all forms of inhumane treatment, harassment, or abuse.

*Collective Bargaining and Freedom of Association:* Suppliers are expected to respect the rights of their employees to form, join, or not join legal labor unions or authorized associations and organizations without fear of reprisal, intimidation, or harassment.

**Human Rights:**

Kaiser Aluminum is committed to respecting, protecting, and promoting fundamental human rights consistent with our values. It is our responsibility to ensure that our relationships are conducted in a manner that is respectful and protects human rights of our employees, suppliers, customers, and stakeholders and are guided by the principles of the International Bill of Human Rights (the Universal Declaration of Human Rights and the two international covenants) and the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work as they apply to our business and the operation of our North American based facilities.

Kaiser expects its Suppliers to manage relationships consistent with our company [Human Rights Policy](#) and [Code of Business Conduct and Ethics](#) to help ensure that Suppliers are:

- Promoting an equitable workplace, prohibiting harassment and violence in any form, and a commitment to providing a safe workplace.

- Providing equal employment opportunities to all applicants and prohibiting discrimination of any kind based on characteristics protected under applicable federal, state, provincial and local law including discrimination based on race, color, religion, sex, national origin, sexual orientation, gender identity or expression, age, disability, pregnancy, or veteran status.
- Ensuring compliance with all laws upholding fair employment practices and human rights.
- Respecting employee rights to free association and collective bargaining.
- Providing a confidential reporting process where employees can report concerns and implementing a due diligence process to investigate and address employee concerns that are reported.

### **Conflict Minerals:**

Kaiser is committed to only purchasing materials that do not contain conflict minerals (including tin, tantalum, gold, or tungsten) originating from the Democratic Republic of the Congo (DRC) countries. Consistent with Kaiser's [Conflict Minerals Sourcing Policy](#), Kaiser expects Suppliers to provide materials that do not contain conflict minerals originating from DRC countries. Any Supplier that provides Kaiser Aluminum with materials that contain or potentially contains gold, tin, tungsten and/or tantalum is required to provide Kaiser Aluminum with a claim of assurance that the products/materials provided have been manufactured using minerals sourced from conflict-free 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 verify the sourcing of conflict-free minerals and ensure compliance with Kaiser Aluminum's sourcing requirements.

Kaiser Aluminum will evaluate direct Suppliers based on their potential conflict mineral exposure. Suppliers are expected to respond to survey requests in a timely manner, including but not limited to the country of origin or smelters and refiners of gold, tin, tungsten and/or tantalum contained in the materials supplied to Kaiser Aluminum, and with full disclosure following the specific instructions provided in the survey.

### **Environment:**

Our Suppliers play an important role in helping our company and our customers create a more sustainable world. Suppliers are expected to do their part to ensure:

- Compliance with all applicable environmental laws, regulations and permits.
- Environmental management systems are in place to help control air emissions, control waste and wastewater discharge and safeguard communities.
- Practices are implemented to reduce the use of energy, water, and other resources to support conservation goals.

We are committed to working closely with Suppliers to increase efficiencies and reduce our collective environmental footprint across the value chain.

**Reporting Concerns:**

Kaiser maintains an anonymous vehicle to report concerns or complaints. Our compliance feedback program, InTouch, is available to Suppliers as well as customers, other third parties, and employees. InTouch is designed to allow individuals to make a confidential/anonymous report of issues that they believe may potentially be in violation of Kaiser Aluminum's Code of Business Conduct and Ethics, Human Rights and/or Supplier Code of Conduct policies or any laws or regulations related to our operations without fear of retaliation and consistent with applicable laws and regulations regarding whistleblower protection. Every report made through InTouch is confidential and fully investigated. Appropriate and timely actions are taken when our investigations determine that corrective actions are warranted. InTouch can be contacted toll-free at 1-866-204-9793 or by email at [info@getintouch.com](mailto:info@getintouch.com).