

# Nikkei MC Aluminum Modern Slavery Statement

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## Document Control

Document Owner	Nikkei MC Aluminum America
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## Revision History

Revision	Date	Description of Change	Author	Approver
0	2025-12-01	Initial release – standardized formatting and document control	Sustainability / Compliance Team	Executive Management

## Modern Slavery Statement

### Introduction

Nikkei MC Aluminum (the “Company”) has a zero-tolerance approach to human trafficking and modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships by implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking are not taking place anywhere in our own business or supply chain.

### Purpose

Human trafficking and modern slavery are serious human rights challenges that afflict vulnerable groups on a global scale. This policy is designed to communicate and ensure the Company’s zero-tolerance approach to human trafficking and modern slavery.

### Scope

Nikkei MC Aluminum is a supplier of aluminum with headquarters in Columbus, Indiana, USA. Together with its global subsidiaries and affiliates, the organization operates primarily in North America.

This policy applies to all colleagues of the Company worldwide to the extent consistent with applicable local legal requirements, policy, business need, and practice. To the extent there is any conflict between this policy and any local policy, the local policy shall prevail.

### DEFINITIONS

**Human trafficking:** Arranging or facilitating the travel of another person so that the person may be exploited. It is irrelevant whether or not that person has consented to travel. The exploitation need not actually have taken place.

**Exploitation:** Slavery, servitude or forced or compulsory labor; sexual exploitation, in particular, but not limited to prostitution and sexual offenses involving children; the removal of organs, otherwise than as properly approved by relevant authorities; securing services or other benefits/advantage by force, threats or deception; and securing services from children or anyone who is mentally or physically ill or disabled, where it is reasonable to expect that someone without the relevant vulnerability would have refused.

Modern Slavery Legislation: All applicable laws related to the prevention of slavery, including but not limited to the United Kingdom's Modern Slavery Act of 2015, Australia's Modern Slavery Act of 2018, Canada's Fighting Against Forced Labor and Child Labor in Supply Chains Act of 2023, and the United States' Trafficking Victims Protection Act (2000), Trafficking Victims Reauthorization Act and the Customs and Facilitations and Trade Enforcement Reauthorization Act of 2009.

## RESPONSIBILITY

The prevention, detection, and reporting of modern slavery in any part of the Company's business or supply chain is the responsibility of all colleagues.

It is the responsibility of the Company to ensure the implementation of this policy and any related local policies in all applicable locations.

It is the responsibility of managers at all levels to ensure that those reporting to them understand and comply with this policy and any related local policy.

Colleagues are expected to help the Company provide a workplace that is free from any violations of this policy. It is therefore the responsibility of each colleague to promptly raise any concerns about a violation or possible violation of this policy and/or any related local policy.

## Policy

It is the Company's policy to oppose human trafficking and modern slavery vigorously. Accordingly, the Company is undertaking steps, including the following:

The Company does not and will never tolerate human trafficking or modern slavery in any aspect of its own work.

The Company will collaborate with other organizations as needed to present a united front against human trafficking and modern slavery in its broader working environment.

The Company will support colleagues as needed to be aware of the risks of human trafficking and modern slavery and to act appropriately when any such risk is detected, including by providing appropriate training on this policy and its requirements, pursuant to applicable legal requirements and local practices.

The Company will endeavor to include provisions in supplier contracts to similarly prohibit the use of forced, compulsory, or trafficked labor, and expects that its suppliers will hold their own suppliers to the same high standards.

The Company may terminate its relationship with individuals or organizations who do not comply with this policy, subject to applicable legal requirements.

#### REPORTING AN INCIDENT

Incidents involving possible violations of this policy must be reported immediately. The colleague may choose first to report the incident to the colleague's immediate supervisor or next level manager. Supervisors and managers are required to report all such incidents to Human Resources. If, for any reason, the colleague is unable or reluctant to report the incident to supervisory personnel, the colleague should report the incident to Human Resources.

Any report of a possible violation of this policy will be investigated in a manner consistent with applicable local law and policy and appropriate to the nature of the reported violation. Confidentiality will be maintained throughout the investigation to the extent consistent with conducting an adequate investigation and taking appropriate corrective action, and to the extent consistent with applicable local law and policy. The Company encourages openness and will support anyone who raises a genuine concern in good faith under this policy, even if it turns out to be mistaken.

Retaliation against an individual for reporting possible violations is strictly prohibited and will be subject to disciplinary action, up to and including termination.