

Nikkei MC Aluminum Environmental & Social Policy

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Nikkei MC Environmental and Social Policies

Company Profile

Nikkei MC Aluminum, founded in 1989, is a secondary aluminum manufacturer located in Columbus, IN. Nikkei MC specializes in producing high-quality aluminum alloys by combining recycled scrap with primary aluminum, delivering products that meet rigorous environmental and engineering standards. Our manufacturing processes are designed to minimize environmental impact while maximizing material integrity and customer value.

Social Policy General Information

Management Sponsorship

Nikkei MC's organizational structure enables effective management of the social impacts associated with its operations. The company's Vice President of Human Resources serves as the Social Management Representative (SMR), possessing the authority, responsibility, and resources needed to implement and maintain Nikkei MC's social management processes.

Purpose

Nikkei MC aims to establish a system that upholds high standards for Human Rights, Indigenous Peoples' Rights, and Labor Rights. The system is reviewed annually and updated to reflect developments in international best practices. Additional policies and procedures are detailed further in the Nikkei MC Employee Handbook.

Risk Assessment

Every two years, Nikkei MC conducts a Human Rights Assessment covering potential risks related to Human Rights, Discrimination, Child Labor, Contract Labor, Women's Rights, Indigenous Peoples' Rights, Freedom of Association, Collective Bargaining, Forced Labor, Disciplinary Practices, Communication and Engagement, Remuneration, and Working Hours. After each assessment, risk ratings are assigned, and mitigation strategies are developed to address identified impacts.

Human and Labor Rights

Nikkei MC is committed to upholding fundamental human rights in alignment with international standards. The company promotes respect for human rights across all operations and encourages partners, including contractors, suppliers, and other business affiliates, to do the same. Upholding these principles supports the sustainability of both the company and the surrounding communities.

Nikkei MC prohibits the employment of individuals under the age of 18 and promotes women's rights, anti-discrimination practices, and protections against forced labor and

child labor. Every employee shares responsibility for maintaining a workplace free from discrimination and harassment.

These standards draw on the following frameworks:

United Nations Guiding Principles on Business and Human Rights

UN Convention on the Elimination of All Forms of Discrimination Against Women (1979)

Title VII of the Civil Rights Act of 1964

Universal Declaration of Human Rights

ILO Declaration of Fundamental Principles and Rights at Work, and Conventions 138, 182, 105, 29, and Protocol 29

Trafficking Victims Protection Act (TVPA), Title 18

Fair Labor Standards Act of 1938

Non-Discrimination

Nikkei MC is committed to eliminating all forms of workplace discrimination. Any practice that limits equal opportunity based on race, color, national origin, gender, sexual orientation, pregnancy, age, disability, religion, genetic information, marital status, family responsibilities, or political/union affiliation is considered discriminatory.

Referenced standards include:

Age Discrimination in Employment Act (1967)

Genetic Information Nondiscrimination Act (2008)

Americans with Disabilities Act (1990) and ADA Amendments Act (2008)

U.S. Equal Employment Opportunity Commission Standards

Equal Pay Act (1963)

ILO Conventions C100 and C111

Rehabilitation Act (1973)

Vietnam Era Veterans' Readjustment Assistance Act (1974)

Family and Medical Leave Act (1993)

Worker's Rights

Nikkei MC complies with all applicable federal and state labor laws, as well as International Labor Organization guidelines, particularly concerning compensation, working hours, family leave, disciplinary practices, and the right to organize or engage in collective bargaining. Additional information is available within the company's Employee Handbook.

These practices draw on:

Fair Labor Standards Act (1938)

Family and Medical Leave Act (1993)

ILO Declaration of Fundamental Principles and Rights at Work (1998)

National Labor Relations Act (1935)

Indigenous Peoples Rights

Although Nikkei MC does not operate on Native American Reservations or Tribal Lands, the company is committed to fostering respect for Indigenous Peoples globally. Nikkei MC complies with all applicable regulations regarding Indigenous rights and acknowledges the cultural and historical significance of Indigenous groups in the United States.

Guiding frameworks include the Indiana Native American Indian Affairs Commission (INAIAC), the American Declaration on the Rights of Indigenous Peoples, USAID guidelines on Free, Prior, and Informed Consent, and cultural and heritage protection standards. International frameworks include ILO Convention 169 and the UN Declaration on the Rights of Indigenous Peoples.

Stakeholder Complaints, Grievances, and RFIs

Nikkei MC maintains a structured process for addressing complaints, grievances, and requests for information from employees, supply chain partners, and community stakeholders. The company's complaint resolution mechanism integrates feedback from frontline supervisors through senior leadership.

Reporting channels include:

Nikkei MC Compliance Director: (812-341-1141 x149)

Nikkei MC Vice President, Human Resources: (812-341-1141 x123)

Nikkei MC Anonymous Submissions: Nikkei MC Corp.

Indiana Department of Environmental Management: +1 (800) 451-6027

City of Columbus Code Enforcement (non-environmental): +1 (812) 376-2500

OSHA: +1-847-803-4800

EEOC: +1-800-669-4000

EPA Complaint Hotline

Occupational Health and Safety

As an aluminum re-melt operation, Nikkei MC places high importance on its Environmental Health and Safety (EHS) management system. The company believes every worker has the right to a safe and healthy workplace and maintains an EHS Manual that exceeds OSHA requirements and follows ILO Conventions 155 and 176.

The EHS Manual includes:

EHS Policy

Joint Plant Safety Committee

Personal Protective Equipment

Risk Assessments, Inspections, and Maintenance

Safe Work Procedures

Task-Specific Safety Training

Safety Awareness Programs

Enforcement of Safety Guidelines

Injury and Illness Reporting

Correction of Unsafe Acts and Conditions

Accident/Incident Investigation

Emergency Response Procedures

Employees must stop work immediately if they feel unsafe and notify a supervisor.

Local Communities

Nikkei MC respects the rights and interests of local communities and is committed to operating without harming natural resources or community well-being. The company supports communities through employment, sponsorships, and volunteer activities, including youth sports programs and local police and fire departments.

Communication and Engagement

Nikkei MC provides ongoing training on employee benefits, safety procedures, strategy, and job responsibilities. The company uses a grievance procedure outlined in its Employee Handbook and Collective Bargaining Agreement.

Environmental Policy General Information

Management Sponsorship

Nikkei MC's organizational structure supports the effective management of environmental impacts related to aluminum scrap melting and rolling operations. The company has designated its Environmental Health and Safety (EHS) Director as the Environmental Management Representative (EMR). This individual is equipped with the necessary authority, resources, and responsibility to implement and sustain Nikkei MC's environmental management processes.

In addition to overseeing the Environmental Management System (EMS), the EMR is also responsible for leading the development of the Aluminum Stewardship Initiative (ASI) program. To further support these efforts, Nikkei MC has established an internal Sustainability Steering Committee (SSC), which plays a key role in advancing ongoing sustainability initiatives. Additional information about the SSC can be found in the SSC Charter.

Purpose

Nikkei MC stands in alignment with the United Nations' efforts to address and reduce the impacts of global climate change. To support this commitment, Nikkei MC has established an Environmental Management System (EMS) that outlines the processes used to identify and mitigate the organization's environmental impacts. The purpose of this manual is to provide an overview of the methodology.

Scope

This management system applies to Nikkei MC Aluminum and the directors, officers, and employees within.

Environmental Policy

Purpose

As a dedicated advocate for environmental protection, Nikkei MC is committed to sustaining and expanding environmentally responsible practices across its manufacturing operations. This policy establishes the company's environmental principles, objectives, and overall approach. Nikkei MC strives to provide customers with high-quality aluminum ingots that meet their needs while safeguarding the health and safety of employees, the community, and the environment.

The company recognizes the environmental impacts associated with its activities and products, as well as its responsibility to support customers with solutions that uphold strong environmental stewardship. Nikkei MC also acknowledges the critical role that global organizations play in advancing sustainable development and preserving natural resources for future generations. Therefore, the company's focus on value creation, melting efficiency, and material competitiveness must align with both environmental considerations and stakeholder expectations.

In support of these commitments, Nikkei MC has implemented this policy to guide ongoing assessment and reduction of environmental impacts associated with its ingot processes.

Policy Component

Legal Framework

Nikkei MC actively supports a legal and management framework that upholds sustainable practices. The company's actions are guided by applicable laws and the environmental standards it has adopted to prevent pollution and reduce adverse environmental impacts. This framework is intended to provide all stakeholders with a clear understanding of the organization's environmental objectives while establishing an ethical, financially responsible approach to risk management.

Nikkei MC also recognizes that true responsibility requires accountability, and that meaningful environmental stewardship demands a commitment that extends beyond current regulatory requirements. This philosophy is embraced across the organization—from the board of directors to the hourly production team.

Industrial Management System

Nikkei MC's environmental program requires establishing systems that ensure compliance and drive continuous improvement in environmental performance. All operations are expected to conduct their activities in ways that promote pollution prevention and the efficient use of energy and natural resources. To support ongoing improvement, each production facility sets specific strategies and targets, with performance regularly benchmarked to identify opportunities for further enhancement and corrective action.

Output Reduction Plan

Nikkei MC is committed to reducing its environmental footprint through continuous improvements in production processes, with a focus on minimizing raw material use, increasing energy efficiency, and lowering emissions. The company aims to:

decrease energy consumption by optimizing production efficiency;

reduce greenhouse gas emissions and other pollutants;

limit raw material use by increasing the recycling input ratio and adopting environmentally responsible packaging;

lower fresh water consumption in production processes and prevent the discharge of hazardous substances that could impact water resources;

reduce waste generated through manufacturing activities;

minimize impacts on natural habitats and biodiversity in the areas surrounding its production facilities

Emergency Action Plan

Nikkei MC maintains a robust Emergency Action Plan (EAP) that aligns with U.S. and international environmental protection standards. The plan defines best-practice procedures for mitigating impacts in the event of an environmental emergency. Additional details about these procedures can be found in Nikkei MC's EAP documentation.

Employee Involvement

Each of Nikkei MC's employees is responsible for conducting their daily activities in a manner that is protective of the environment and in full compliance with all applicable regulations and company procedures. All employees are provided with information regarding these procedures and regulations during the onboarding and refresher training.

Sourcing Strategy

Nikkei MC expects all participants in its value chain to comply with applicable domestic and international regulations, follow industry best practices, and implement measures that align with this Policy. The company will conduct due diligence on its primary scrap supply streams to evaluate regulatory and ethical risks, including those related to environmental stewardship, human rights, conflict-affected and high-risk areas, and anti-corruption or bribery concerns.

Integrated Life Cycle Analysis

Nikkei MC supports ongoing evaluation of environmental impacts related to aluminum semi-fabrication. This assessment covers the entire lifecycle of semi-fabrication activities, from melting to rolling. To gather accurate and meaningful data, Nikkei MC works with the U.S. Aluminum Association (AA) to provide quantified information that helps identify impact areas and opportunities for improvement.

Impact Management

Nikkei MC sees an opportunity to improve the environmental performance of its production processes through detailed impact analysis and effective mitigation systems. These tools help the company successfully manage and implement innovative solutions that lead to process improvements.

Nikkei MC's Sustainability Report provides stakeholders with regular updates on key metrics, performance goals, and other information related to the company's environmental initiatives.

Environmental Code of Conduct

Nikkei MC conducts all operations responsibly to ensure the protection of the environment. To uphold this commitment, every employee must understand the expectations outlined in Nikkei MC's Environmental Policy and act in alignment with those principles.

Guidelines

Carry out daily activities in a way that protects the environment and fully complies with all departmental regulations and company procedures.

Conserve resources by applying waste management practices that emphasize waste minimization, reuse, recovery, and recycling where appropriate.

Maintain awareness of the environmental impacts associated with one's work

Risk Assessment Protocol

To effectively assess the environmental impacts of its operations, Nikkei MC follows a Risk Assessment Protocol. This protocol is conducted by the EHS Director or their designee and is guided by the following principles:

Identify hazards;

Determine the potential for harm;

Identify and implement corrective measures;

Monitor the effectiveness of those measures;

Review and improve processes and corrective actions as needed.

Environmental Life Cycle Assessment

Nikkei MC does not maintain internal resources to conduct its own cradle-to-gate analysis; however, it remains committed to supporting the U.S. Aluminum Association (AA) in its Life Cycle Assessment (LCA) research.

Sustainability Reporting

Nikkei MC's governance strategy includes a transparent sustainability reporting system that monitors and benchmarks the cradle-to-grave environmental impacts of its operations. The company's annually updated report may include data on air emissions, greenhouse gas (GHG) output, waste disposal, significant spills, and water consumption.

Greenhouse Gases (GHGs) and Energy Use

Nikkei MC gathers monthly energy consumption data from its utility provider to track overall usage. To estimate greenhouse gas (GHG) emissions for each furnace, the company uses EPA-standardized emission factors in accordance with the Greenhouse Gas Protocol methodology.

Nikkei MC is committed to achieving further reductions in its greenhouse gas (GHG) emissions. Key components of this effort include:

Process improvements

Clean energy sourcing

Technology innovation

Air Emissions

Under the emissions reporting rule, 326 IAC 2-6, facilities that exceed specified emission thresholds are required to report their actual emissions of certain pollutants either annually or every three years. The reported information is used for planning, trend analysis, air quality modeling, and billing purposes. Reported data includes the facility's name, plant identification number, and emissions of key criteria pollutants, which include Volatile Organic Compounds (VOC), Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), and Particulate Matter with a diameter of less than 10 microns (PM₁₀).

Spill and Leak Management

Nikkei MC regularly monitors for potential spills and leaks. Please see Nikkei's Spill Prevention, Control, and Countermeasure (SPCC) plan for more information.

Dross

Nikkei MC continually pursues alternatives to the direct landfilling of dross and works to maximize aluminum recovery through both internal and external dross treatment processes.