

# Nikkei MC Aluminum America, Inc. Responsible Sourcing Raw Material Policy

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## Document Control

Document Owner	Nikkei MC Aluminum America, Inc.
Management Representative	Compliance Director / Sustainability Lead
ASI Alignment	ASI Performance Standard – Responsible Sourcing
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Review Cycle	Annual
Approval Authority	Executive Leadership

## Revision History

Revision	Date	Description of Change	Author	Approver
0	2025-10-1	Initial controlled release – standardized document structure	Compliance Department	Executive Leadership

## Responsible Sourcing Raw Material Policy

### Statement of Intent

Nikkei MC Aluminum America is committed to responsible sourcing practices that uphold the highest standards of safety, environmental stewardship, and ethical conduct across our supply chain. Our objective is to deliver high-quality aluminum products with minimal environmental and social impact while maintaining transparent and respectful relationships with our stakeholders. This policy reflects our core principles of Safety, Integrity, and Sustainability and applies across all operations and supply chain partnerships.

### Due Diligence

Nikkei MC Aluminum America conducts due diligence processes to identify, assess, and mitigate environmental, social, and governance (ESG) risks within our raw material supply chain. This includes:

- Evaluating supplier compliance with sustainability, human rights, and legal requirements.
- Implementing proactive and corrective measures to reduce risk.
- Conducting periodic reviews and supplier audits to ensure ongoing compliance.

### Scope

This policy applies to all suppliers, contractors, and business partners providing raw materials or related services to Nikkei MC Aluminum America.

### Supplier Principles - Safety

Suppliers must:

- Provide a safe and healthy workplace for all employees.
- Comply with all relevant local, state, and federal safety regulations.
- Continuously improve workplace health and safety systems.

### Supplier Principles - Environment

Suppliers must:

- Minimize environmental impacts by reducing emissions, waste, and resource consumption.
- Comply with all environmental regulations.
- Promote recycling, material efficiency, and sustainable resource management.
- Implement energy-efficient processes and conservation measures.

### Supplier Principles - Human Rights

Suppliers must:

- Respect and uphold human rights for all workers and communities.
- Prohibit child labor, forced labor, and human trafficking.

- Ensure non-discrimination based on race, color, religion, gender identity, sexual orientation, disability, or other protected status.
- Respect the rights of Indigenous peoples and local communities.
- Avoid sourcing from conflict-affected and high-risk areas in line with our Conflict Minerals Policy.

#### Supplier Principles - Labor Rights

Suppliers must:

- Ensure fair treatment of employees without harassment, abuse, or discrimination.
- Provide compensation and benefits in compliance with applicable laws.
- Respect working hour regulations, public holidays, and annual leave requirements.
- Recognize employees' rights to freely associate and join legally authorized organizations.

#### Supplier Principles - Legal Compliance

Suppliers must:

- Adhere to all applicable U.S. federal, state, and international laws.
- Maintain systems to ensure compliance and accurate documentation of operations.
- Seek legal guidance where obligations are unclear.

#### Supplier Principles - Fair Competition and Anti-Corruption

Suppliers must:

- Conduct business with integrity and transparency.
- Comply with anti-corruption, anti-bribery, and fair competition laws, including the U.S. Foreign Corrupt Practices Act.
- Avoid conflicts of interest and maintain ethical governance standards.

#### Stakeholder Complaints and Grievances

Nikkei MC Aluminum America encourages open communication regarding concerns related to this policy. Stakeholders may raise complaints, grievances, or requests for information through:

- Customer Service Department: [Insert Contact Information]
- Anonymous Reporting: [Insert confidential reporting mechanism or web link]

All concerns will be addressed promptly, fairly, and in confidence.

#### Review and Revision

This policy will be reviewed annually and revised as necessary to reflect evolving industry standards, regulatory requirements, and stakeholder expectations.