

JW Aluminum Modern Day Slavery Statement 2025

May 2026



Our vision is WIN. We are the leading aluminum rolled products company in the world. We do this by developing our people, improving our processes and delivering value to the marketplace. All of this is to improve our financial performance and secure our future. Our target behaviors are: embrace change, Think and act like an owner, we are one team, practice

In this annual Modern Slavery Statement, we reaffirm our commitment to combating modern slavery as an integral part of our ongoing efforts to enhance human rights within both our internal operations and our supply chain. We recognize the importance of transparency, accountability, and proactive measures in addressing this critical issue.



JW Aluminum's position on Modern Slavery aligns closely with our cultural values and establishes a framework for expected behaviors among all team members and partners, regardless of their level. It outlines how we embody our WIN culture, perform our business activities, and engage with one another, our partners, and the environment, with a particular focus on social, environmental, and governance principles.



Through rigorous assessments and continuous improvement, we strive to ensure that our practices not only comply with legal standards but also reflect our core values of respect and integrity for all individuals involved in our business.



This Statement covers JW Aluminum's operations and supply chain for 2025 FY. It applies to all facilities and corporate operations. It was reviewed and approved by Executive Leadership on [date]

JW Aluminum, established in 1979 and headquartered in Charleston, South Carolina, is a privately owned company specializing in the production of flat rolled aluminum products.

With a steadfast commitment to safety and ethics, approximately 500 dedicated teammates work to ensure a sustainable future for all stakeholders associated with the business.

As a significant player in American manufacturing for over four decades, JW Aluminum focuses on producing infinitely recyclable aluminum sheets and foils. These products are integral to various applications, including essential building products and HVAC components that contribute to the comfort and safety of homes.

Our operations are exclusively within the United States, reinforcing our commitment to supporting the local economy and adhering to U.S. manufacturing standards.

Plant Locations



Core Markets



Building
Products



HVAC/R
Fin Stock



RV & Cargo

300+ Million Pounds Shipped Annually

At JW Aluminum, our WIN culture serves as the foundation of our operations and interactions. WIN stands for ****Work, Innovate, and Nurture****, encapsulating our commitment to excellence in every aspect of our business.

Work: We believe in the power of teamwork and diligence. Each member of our team is encouraged to take initiative, collaborate effectively, and contribute to the shared goals of the organization. Our teammates take ownership of their roles, ensuring that we collectively deliver high-quality products and services.

Innovate: We are dedicated to continuous improvement and creativity in our processes. By fostering an environment where new ideas are welcomed and explored, we drive innovation that enhances our operations and meets the evolving needs of our customers. Our focus on innovation allows us to stay competitive in the aluminum industry and ensures we are always looking for better solutions.

Nurture: We prioritize a supportive and respectful workplace culture that values diversity and inclusion. By nurturing our workforce, we empower individuals to grow both personally and professionally. This commitment to fostering talent and skills development not only helps our team members thrive but also strengthens our organization.

Culture



The WIN culture is not just a statement; it is a guiding principle that influences our decision-making, strategic planning, and day-to-day operations. It reflects our dedication to conducting business with integrity and accountability, maintaining high standards, and consistently seeking ways to develop our people and improve our processes. By embodying these values, we aim to create a positive impact on our teammates, customers, and the communities we serve, ensuring long-term success and sustainability for JW Aluminum.

JW Aluminum takes pride in its long-standing partnerships with our suppliers. Most of our products and services are obtained from domestic sources, with the remainder imported from Canada, Europe, Mexico, and Australia.

We procure products and services essential for our manufacturing processes and operational support. For manufacturing, our sourced products include primary aluminum and scrap aluminum, such as painted siding, MLC, foil, UBC, fin stock, EC wire, and extrusions. The services we utilize for manufacturing may involve contractors, consulting services, utilities, and more.

Our centralized procurement team oversees the acquisition of the bulk of our products and services.

To support our operations, we source products like IT equipment, manufacturing machinery, and distribution network essentials, among other items. Additionally, the services we require to support operations encompass cleaning services, security, consulting services, and various corporate and operational needs.

Responsible Sourcing Policy

JW Aluminum partners with suppliers who share our desire to build and maintain a responsible supply chain that reflects our environmental, social, and governance values.

PARTNER

- Provide a safe and healthy working environment for the team.
- Adhere to all applicable laws, rules, regulations and requirements.
- Run the business with ethics, integrity and transparency.
- Take responsibility to avoid conflicts of interest.
- Navigate supply chain risks.
- Ensure all human and labor rights are protected.
- Respect the environment.



Governance & Framework



JW Aluminum has a formal governance structure with senior leadership oversight, auditing mechanisms and programs including the review and reporting of Modern Slavery.

JW Aluminum's Governance structure and its statements are supported by a policy set. The policies outlined below are those most relevant to managing Modern Slavery risks.

Policy	Purpose
JW Governance Policy	JW Aluminum uses this governance policy to drive ethical, accountable, and transparent business practices. It outlines the principles, policies, and approach we take to manage risk and operate responsibly
Code of Conduct	The Code of Conduct and Ethics (the "Code of Conduct" or the "Code") sets forth the expectations of how we live WIN, conduct business, and interact with each other and our business partners. We are a business of businesspeople committed to a culture of teamwork and continuous improvement to Secure the Future for teammates and customers.
Equal Employment Opportunity and commitment to diversity.	JW Aluminum recognizes the importance of equal opportunity and diversity in the workplace and values the contribution of all teammates regardless of gender, age, ethnicity, disability, sexual orientation, cultural background, and other immutable characteristics. These policies aim to ensure that the work environment is free from discrimination, harassment and bullying and that everyone respects and value the diversity in our workplace.
Human Rights Policy	JW Aluminum is committed to abiding by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.
Child Labor Policy	As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in the exploitation of children and helps end it to the best of our ability.
Human Trafficking Policy	JW Aluminum strictly prohibits teammates, subcontractors, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, procuring commercial sex acts using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labor from a person by threats of serious harm to that person or another person, among others.
Responsible Sourcing Policy	JW Aluminum partners with suppliers who share our desire to build and maintain a responsible supply chain that reflects our environmental, social, and governance values.
Supplier Conduct Policy	Our JW Vision requires that we work only with Suppliers who can consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own. This commitment is reflected in our Supplier Conduct Policy that sets out the minimum standards of behavior we require of our Suppliers
Supplier Trading Agreement	The content of the Supplier Conduct Policy is included in our Purchase Order Terms and Conditions. Acceptance of our purchase order constitutes acceptance of the Supplier Conduct Policy.

JW Aluminum is committed to assessing significant suppliers to identify risks & opportunities across our supply chain through its partnership with EcoVadis



JW Aluminum’s risk assessment methodology:

Step 1

Risk mapping of all partners based on inherent country and industry risks that has a filtered Labor and Human Rights theme for a modern slavery focus.

Step 2

Trustworthy evaluation of high inherent risk partners to assess residual risks and gain substantiated knowledge of incidents (360° Watch). Actions are prioritized through the Modern Slavery Dashboard.

Step 3

Use collaborative tool to act directly from the Modern Slavery Dashboard and implement corrective actions. Includes self-learning platform with courses on modern slavery topics.

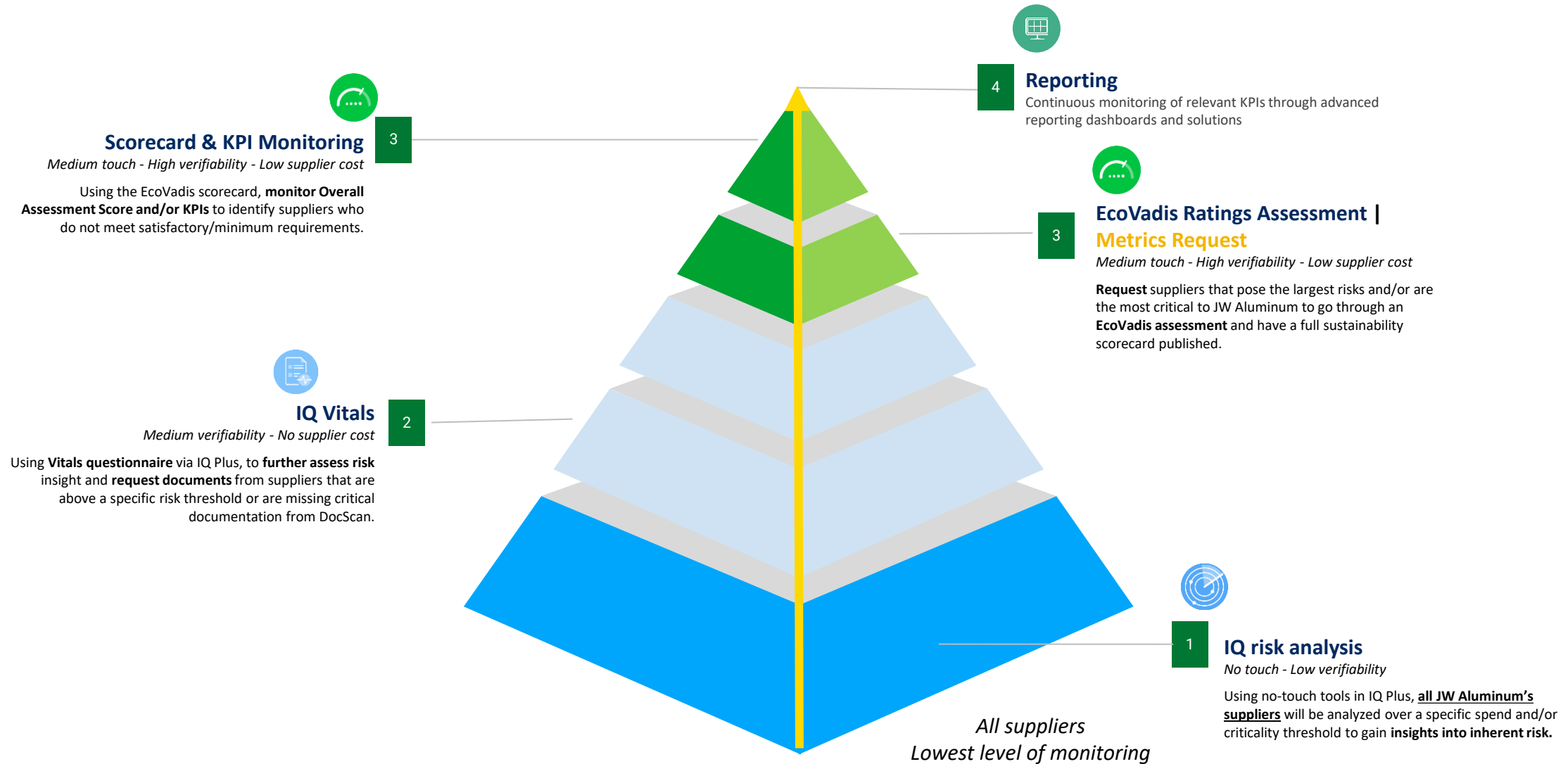
Step 4

Continuous monitoring of relevant KPI's through advanced reporting dashboards and solutions within the EcoVadis platform



If a potential modern slavery concern is identified, JW Aluminum will prioritize worker safety, protect against retaliation, investigate promptly, require corrective action where appropriate, and provide or cooperate in remediation. Potential remediation may include repayment of recruitment fees, correction of wage or document-retention practices, supplier corrective action plans, escalation to senior leadership, or responsible disengagement where remediation is not achieved.

JW Aluminum's EcoVadis Strategy



Internal Risk Assessment

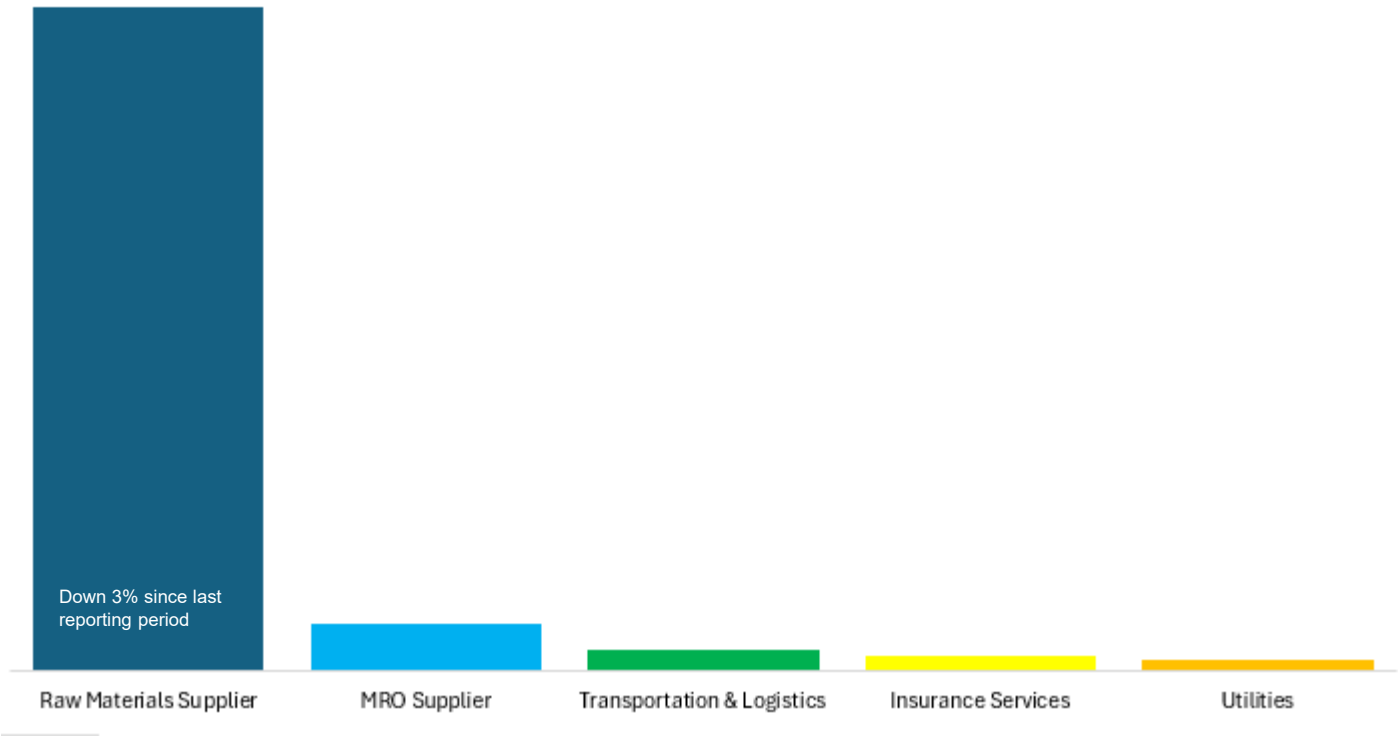


Risk	Description	Finding	Our Risk Exposure
1	Contract workers directly engaged	JW's workforce is 100% permanent.	LOW
2	Workers under the age of 18	JW does not hire workforce under the age of 18.	LOW
3	Migrant Workers	JW does not have any teammate under a temporary worker status.	LOW
4	Seasonal Workforce	JW operations are not seasonal and is not considered in hiring practices. Turnover is consistent during the reporting period.	LOW
5	Freedom of Association	JW respects freedom of association although none of our locations operate under bargaining agreements.	LOW
6	External Auditing	All JW facilities are certified to ISO9001 Quality Standard and ASI Performance Standard V3	LOW
7	Operational Sector Risk	JW does not operate in any high-risk sectors	LOW
8	Services directly engaged	JW relies on services including recruitment, legal, cleaning services, property maintenance, waste disposal and equipment maintenance. Recruitment, construction and cleaning services are considered particularly high risk, but none of these are sourced outside the United States, thus lowering the risk.	LOW
9	Grievance Mechanism	JW Aluminum has a grievance mechanism in place and has had zero complaints made regarding human trafficking or modern slavery	LOW
10	Disclosure of Instances	JW Aluminum has not identified any instances of modern slavery or sourcing from CAHRAs within its organization or supply chain	LOW

Risk Assessment – Supply Chain Overview



Consistent with previous reporting period data, JW Aluminum’s largest procurement segment feeding its manufacturing business remains the purchase of raw materials namely scrap aluminum. US suppliers accounted for 94% of the raw material purchased and 87% of total procurement. Primary aluminum accounted for 10.86% and 31.12% of raw material consumption for the MTH and RSV facilities, respectively.



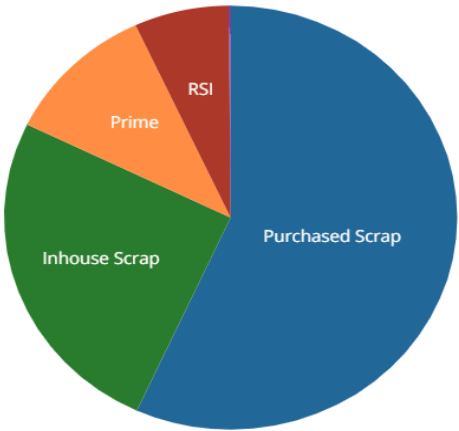
*Last reporting period data: Q1 2022 – Q2 2023

**Data collected is for FY 2025. JW purchase and supplier sources are consistent from year to year. Thus, an update of purchasing values and supplier data will be provided every two years, with the next refresh of this information in 2027

MTH Raw Material Consumption

Purchased Scrap	56.79%
Inhouse Scrap	25.45%
Prime	10.86%
RSI	6.77%
Hardener	0.12%

Primary Aluminum (Prime) consumption increased .35% since last reporting period



RSV Raw Material Consumption

Prime	31.12%
Purchased Scrap	28.95%
Inhouse Scrap	24.68%
RSI	14.88%
Hardener	0.37%

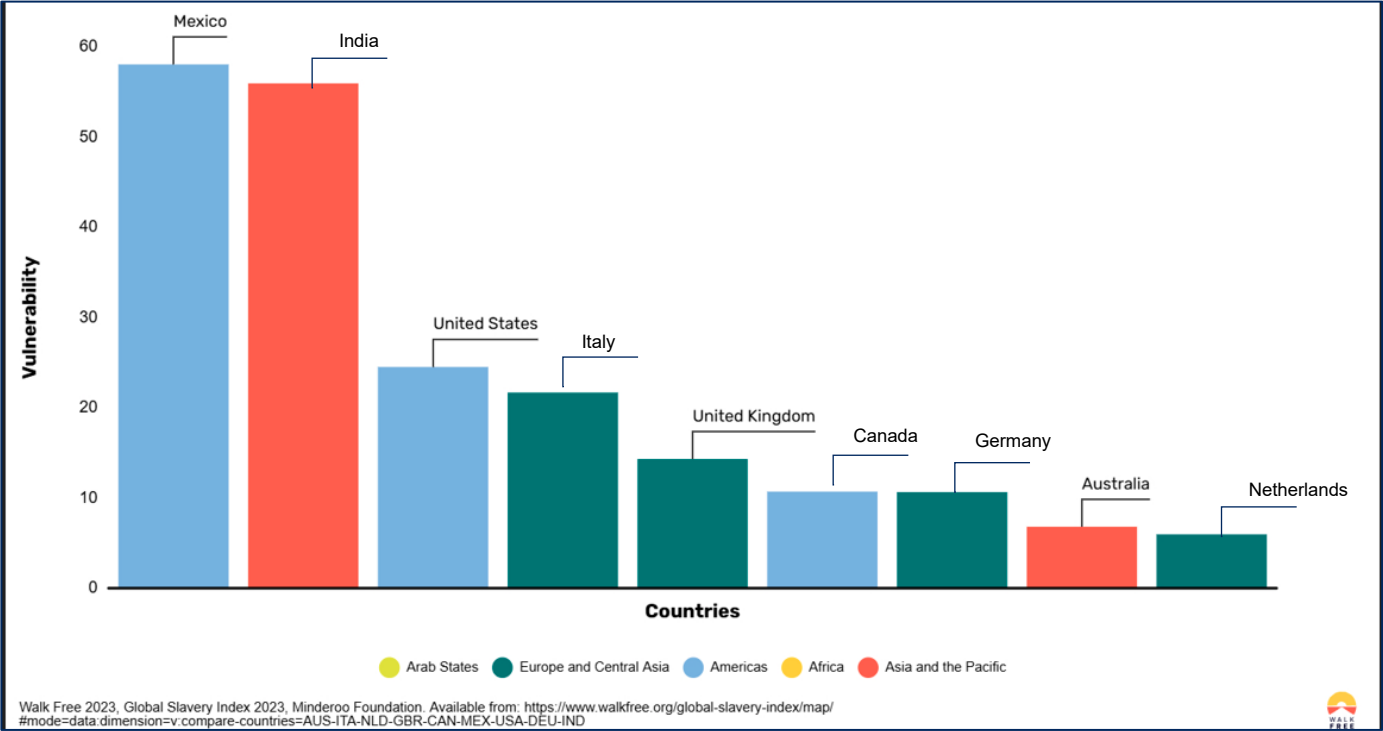
Primary Aluminum (Prime) consumption decreased 1.34% since last reporting period



Risk Assessment - Global Slavery Vulnerability Index



As part of our due diligence process, JW Aluminum utilizes reports and tools available at <https://www.walkfree.org/global-slavery-index/> to assess how our supply base measures up to addressing modern slavery.



Country	% of Total Spend	# of Suppliers	Global Slavery Vulnerability Index
AUSTRALIA	0.0021%	1	6.8
INDIA	0.0020%	1	56
GERMANY	0.0002%	1	10.7
NETHERLANDS	0.0545%	1	6
ITALY	0.9449%	2	21.7
UNITED KINGDOM	0.0932%	4	14.3
MEXICO	0.0076%	3	58.1
CANADA	.0231%	1	10.7
UNITED STATES	98.8723%	638	24.5
Total	100%	652	

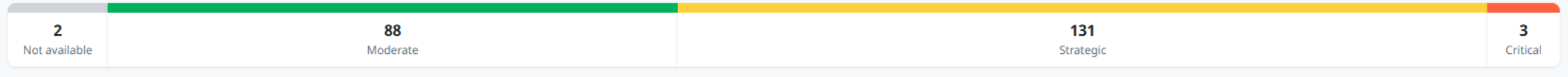
The weighted average Vulnerability Index (weighted on \$ spend) is 24.45

JW Aluminum’s Overall Supply Chain Risk

- **Direct operations risk:** low, based on U.S.-based operations, permanent workforce, no under-18 workers, no identified cases.
- **Supply chain inherent risk:** variable, with higher inherent risk in imported suppliers, primary aluminum, mining-linked inputs, cleaning/security, recruitment, and contractors.
- **Residual risk:** reduced through EcoVadis screening, policies, PO terms, grievance mechanisms, and supplier engagement.

Index Range	Risk Level
0-20	Very Low
21-40	Low
41-60	Medium
61-80	High
81-100	Very High

Results overview of suppliers JW Aluminum is monitoring in the EcoVadis platform



In 2025, JW Aluminum broadened our assessment scope and began assessing its supply chain through partnership with EcoVadis.

The program analyzes modern slavery risk levels and suggests action priorities aligned with the focus areas of the modern slavery regulations.

When viewing through Modern Slavery lens, actions are adjusted to focus specifically on the partner’s risk levels in the Child Labor, Forced Labor & Human Trafficking and Supplier Social Practices criteria allowing us to focus on suppliers with the most significant impact on our supply chain.

The action priority is calculated in 2 steps:

- MS Risk Calculation – 70%**
- Takes into consideration the supplier’s country and industry risk levels for Child Labor, Forced Labor & Human Trafficking and Supplier Social Practices criteria, as these are the risk areas the modern slavery regulations typically focus on.
- Partner’s Procurement Risk Calculation – 30%**
- Reflects our business relationship with this partner.

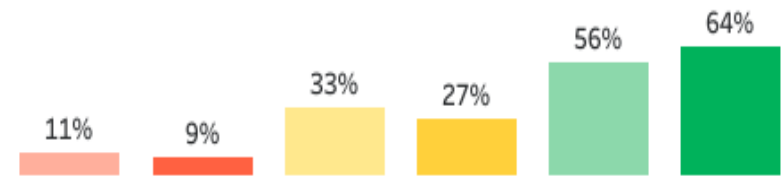
Critical	Strategic	Moderate	Not Available
Environmental or Labor Risk is Very High	Environmental and Labor Risk are a Combination of High and Medium Low to Very Low	Environmental and Labor Risks are a Combination of Medium Low and Low to Very Low	•Environmental and Labor Risk – Undefined
Or	Or	Or	
Environmental and Labor Risk are High	Environmental and Labor Risk are a Combination of Medium High with Medium High to Very Low	Environmental and Labor Risk are a Combination of Low and Low to Very Low	
Or	Or	Or	
Environmental and Labor Risk are a Combination of High and Medium High	Environmental and Labor Risk –Medium Low	Environmental and Labor Risk are Very Low	



Ratings Vitals

Number of partners by priority

out of 11 filtered partners



Comparison period

2025-01-01 – 2025-12-31

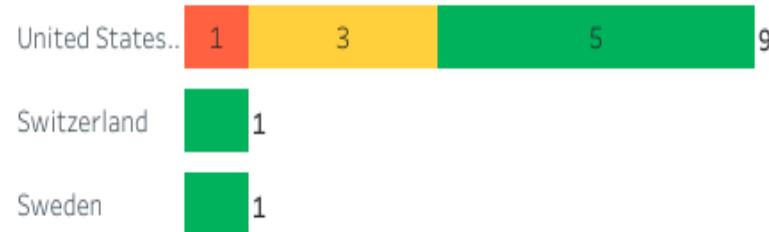
Scorecard validity



Number of partners by

out of 11 filtered partners

Country



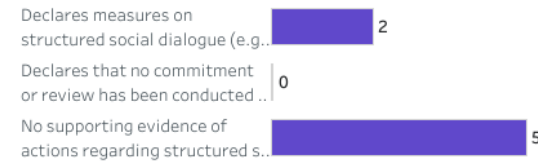
High priority Medium prior... Low priority

Improvement areas (affecting the priority level)

Partners with i...



Additional warnings (not affecting the priority level)



Actions and Effectiveness



Risk Area	Description	Mitigation Strategy	Effectiveness
Supply Chain	Suppliers and subcontractors may engage in forced labor or exploitative practices.	Conduct thorough due diligence, including assessments of suppliers through EcoVadis platform. Suppliers attest to adhering to our Supplier Conduct Policy.	Suppliers were alerted via email of our Supplier Conduct Policy and the need for assessments of their practices. The content of the Supplier Conduct Policy is included in our Purchase Order Terms and Conditions. Acceptance of our purchase order constitutes acceptance of the Supplier Conduct Policy. Primary Aluminum suppliers were invited to undergo in depth rating assessments for Modern Slavery and CAHRA sourcing due diligence. 100% of new contracts contained Modern Slavery and CAHRA clauses 100% of new suppliers accepted Supplier Conduct Policy
Raw Material Sourcing	Mining of raw materials (e.g., bauxite, aluminum) may involve child labor or other abuses.	Source materials from suppliers who adhere to responsible sourcing standards.	For 2025, JW Aluminum assessed 224 suppliers. Of those assessed, 6 were suppliers of primary aluminum. No suppliers showed evidence of sourcing from CAHRAs. For primary aluminum suppliers, JW Aluminum requests information on country of origin, smelter/refiner source, CAHRA exposure, and supplier due-diligence practices. Where smelter-level information is incomplete, JW will continue supplier engagement and document improvement actions.
Supplier Relationships	Long-standing relationships may obscure issues related to supplier practices, including labor violations.	Conduct regular supplier assessments and encourage transparency in labor practices. Establish feedback mechanisms for suppliers to report issues.	JW monitored supplier risk and suggested improvement actions through the EcoVadis platform. This was reviewed and updated quarterly by the Responsible Sourcing Team. Suppliers had direct line of contact with their procurement owner and had access to our online reporting mechanism. JW has assessed its major suppliers of primary aluminum for modern slavery risk as well as sourcing from CAHRAs. 34% of supplier spend screened in EcoVadis platform; 45 medium high-risk to very high-risk suppliers assessed. 11 critical suppliers rated. No suppliers showed evidence of sourcing from CAHRAs. 62 action items activated.
Domestic vs. Imported Suppliers	Domestic suppliers may have higher compliance rates, but imported goods from regions with weaker regulations may pose risks.	Assess imported suppliers for compliance with labor standards. Implement a risk-based approach for monitoring international suppliers.	JW has established a risk-based approach to supplier assessments utilizing key indicators important to the business – Spend and Criticality.
Specific Product Sourcing	Sourcing primary aluminum and scrap materials may involve sectors known for labor exploitation (e.g., mining).	Ensure traceability of materials and demand certifications that guarantee ethical sourcing practices. Conduct due diligence on sourcing practices for key materials.	For 2025, primary aluminum accounted for 10.86% and 31.12% of raw material usage for MTH and RSV facilities, respectively. JW Aluminum continued its efforts to reduce the number of prime suppliers in the chain to further mitigate risk. For primary aluminum suppliers, JW Aluminum requests information on country of origin, smelter/refiner source, CAHRA exposure, and supplier due-diligence practices. Where smelter-level information is incomplete, JW will continue supplier engagement and document improvement actions

Actions and Effectiveness



Risk Area	Description	Mitigation Strategy	Effectiveness
Service Providers	Contractors and consulting services may inadvertently utilize exploitative labor practices.	Include clauses in contracts that require compliance with labor rights. Vet service providers for their labor practices before engagement.	The content of the Supplier Conduct Policy is included in our Purchase Order Terms and Conditions. Acceptance of our purchase order constitutes acceptance of the Supplier Conduct Policy.
IT and Manufacturing Equipment	Suppliers of equipment may operate in regions with known labor abuses.	Verify labor practices when sourcing machinery and equipment. Engage with vendors who adhere to ethical labor standards.	The Procurement function follows the Principles of Sustainability and Social Responsibility of the Institute for Supply Management. JW has assessed the risk of 107 MRO suppliers YTD. 20 were found to have medium high, 47 were found to have medium low, 35 were found to have low, a 5 had very low risk of modern slavery.
Cleaning and Security Services	Providers of cleaning and security services may employ vulnerable workers who are at risk of exploitation.	Implement a code of conduct for service providers and require training on modern slavery for all contractors and service providers.	JW has issued a Code of Conduct which has been communicated to service providers. These expectations are reviewed at service orientation and annually thereafter. 100% of contractors and service providers completed annual training
Labor Recruitment	Recruitment practices may exploit workers or involve trafficking in persons.	Partner with reputable recruitment agencies that comply with ethical hiring practices. Provide training on fair recruitment.	JW has tasked its HR department with partnering and monitoring the hiring process of and recruitment agencies that we partner with. These agencies are required to meet JW Aluminum's standard of recruiting process.
Temporary and Migrant Workers	These workers may be at higher risk of exploitation and lack awareness of their rights.	Offer training programs on workers' rights and provide access to support services for migrant workers.	JW Aluminum requires all teammates and contractors to complete an annual code of conduct training that reviews expectations on worker's rights. 100% of teammates and contractors/service providers completed annual training
Internal Policies and Training	Teammates may not be aware of modern slavery issues or the company's stance against it.	Implement training programs on modern slavery and ethical practices for all teammates.	Teammates are given annual code of conduct training that reviews the company's stance on modern slavery. The policies are also available throughout our facilities for teammates to access. 100% of teammates and contractors/service providers completed annual training
Community and Local Engagement	Local communities may lack resources or protections against exploitation in labor practices.	Engage with community organizations to promote awareness and establish support systems for vulnerable groups Provide complaints resolution mechanism to ensure open communication, engagement, and reporting of misconduct.	Facilities partner with their local Chamber of Commerce to engage and support their community. Complaint received and logged through www.jwaluminum.com "Contact Us". 3 reports received; 1 substantiated; 0 modern slavery-related; 2-day average closure time

Our commitment extends beyond compliance; we are dedicated to fostering an environment where dignity and respect are paramount.

We encourage all stakeholders, including suppliers, teammates, and customers, to join us in this critical mission. By working together, we can make significant strides towards a future free from modern slavery and uphold the fundamental rights of every individual.

Moving forward, JW Aluminum will continue to:



- Monitor our progress, refine strategies, and hold ourselves accountable to our responsible sourcing commitment.
- Monitor and engage suppliers to promote ethical labor practices and support improvement efforts.
- Training our teammates to recognize and respond to signs of modern slavery