

FIGHTING AGAINST FORCED AND CHILD LABOUR

2023 JOINT REPORT BY

KAISER ALUMINUM CANADA LIMITED,

KAISER ALUMINUM FABRICATED PRODUCTS, LLC,

AND

KAISER ALUMINUM WARRICK, LLC



1. Introduction

This joint report is the first disclosure issued pursuant the Fighting Against Forced Labour and Child Labour in Supply Chain Act (the “Act”) by the following entities:

- Kaiser Aluminum Canada Limited, an Ontario, Canada corporation (“KACL”),
- Kaiser Aluminum Fabricated Products, LLC, a limited liability company organized under the laws of the State of Delaware, United States (“KAFP”), and
- Kaiser Aluminum Warrick, LLC, a limited liability company organized under the laws of the State of Delaware, United States (“KAW”).

This joint report covers the annual reporting period from January 1, 2023 to December 31, 2023 and provides a summary of the policies and actions implemented by KACL, KAFP and KAW (collectively, the “Reporting Entities”) to assess and manage risks associated with forced or child labor.

The Reporting Entities are driven by their corporate values of being a preferred investment, a preferred supplier, a preferred employer, a preferred customer, and a valued corporate citizen and believe that being “Best in Class” means doing the right thing and conducting business in a safe, ethical, and responsible manner. This involves respecting the rights of individuals and standing firmly against the use of forced labor, including child labor and all forms of human trafficking. Through their Code of Business Conduct and Ethics, as well as Human Rights Policy and Supplier Code of Conduct, the Reporting Entities expect their respective employees, suppliers, contractors, agents, and other business partners to uphold this commitment and adhere to the expectations within the policies, as well as all applicable laws and regulations, as they apply to the protection of human rights.

2. Structure, Activities and Supply Chains

Business

The Reporting Entities are direct and indirect operating subsidiaries of Kaiser Aluminum Investments Company, a company incorporated under the laws the State of Delaware, United States (“KAIC”). KAW is also a subsidiary of KAFP. The Reporting Entities manufacture and sell semi-fabricated specialty aluminum mill products for specific end market applications such as aerospace and high-strength, packaging, general engineering products, automotive extrusions, and other products tailored to specific industry applications.

Governance

Each of the Reporting Entities is committed to promoting fair business practices and a culture of accountability, responsibility, and ethical behavior. The Reporting Entities are required to comply with all their policies, processes and procedures, in addition to all applicable laws. The executive leadership and board of directors or managers of the Reporting Entities actively oversee and support their long-term growth and sustainability through the development and execution of their long-term business strategy, balanced capital allocation and effective risk management, including matters pertaining to human rights and supply chain risk management.

Supply Chain

As semi-fabricated aluminum manufacturers, the supply chain of the Reporting Entities involves acquiring aluminum for processing and fabrication into aluminum products, as well as acquiring additional supplies and materials for use in their operations. The Reporting Entities’ direct suppliers are mostly confined to suppliers across North America, with some supplies (primary aluminum and

other alloys and manufacturing equipment) originating from manufacturers within locations such as the European Union, Australia, and the United Arab Emirates. For example, in 2023, approximately 80% of all primary aluminum purchased for the Reporting Entities' operations was sourced from North America and Australia, with 100% of primary aluminum for KACL originating from Canada and the U.S. However, the Reporting Entities' Supplier Code of Conduct establishes the expectations for suppliers of the Reporting Entities in terms of their compliance with ethical and responsible business practices as outlined in the Supplier Code of Conduct, including the prohibition of forced and child labor, and the expectation of the Reporting Entities that their suppliers will require the same from their supply chain.

In addition, each of the Reporting Entities has principal processes and practices in place to assess the integrity of their direct suppliers; however, with most supplies originating from locations across North America, which are not inherently susceptible to forced or child labor, the Reporting Entities believe the risk of sourcing from questionable suppliers is very low. Nonetheless, as the Reporting Entities have enhanced their supplier risk assessment and due diligence programs over time and expect to gain more visibility into supplier practices and the suppliers' compliance with laws and regulations protecting human rights.

3. Policies and Due Diligence Processes

As previously discussed, each of the Reporting Entities follows policies and processes that work towards managing potential risks associated with both environmental and social-related issues, including risks related to supplier ethical business practices.

Corporate Policies

The Reporting Entities are (i) committed to respecting, protecting, and promoting fundamental human rights consistent with their corporate values, (ii) recognize the fundamental importance of human dignity and equality 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 their businesses and operations, (iii) communicate this policy to their respective employees as part of their annual Code of Business Conduct and Ethics training, and (iv) expect their respective employees, suppliers, contractors, agents, and other business partners to uphold this commitment.

In addition to the Code of Business Conduct and Ethics, the Reporting Entities have implemented other policies that align with the protection of human rights, such as their Human Rights Policy, Supplier Code of Conduct and Conflict Minerals Sourcing Policy.

Due Diligence Processes

Each of the Reporting Entities has several processes and procedures in place to strengthen the policies that have been implemented to ensure the protection of human rights and minimize the risk of sourcing from suppliers engaged in forced and/or child labor activities. Below is a summary of the due diligence processes the Reporting Entities currently have in place to help manage human rights related risks.

- ***Supplier Terms and Conditions***

The Reporting Entities' standard supplier terms and conditions of purchase incorporate clauses that require suppliers to comply with their Supplier Code of Conduct and Human Rights Policy, as well as all applicable laws.

- ***Conflict Minerals Sourcing/Reporting***

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) imposes reporting requirements on public companies who manufacture, or contract to manufacture, products that use conflict minerals, which is defined as cassiterite (from which tin is derived), columbite-tantalite (coltan, the mineral from which tantalum is extracted), gold, wolframite (from which tungsten is derived), and any other minerals determined by the Secretary of State to be financing the armed conflict or mined using forced labor in the Democratic Republic of Congo and its adjoining countries, including the Republic of Congo, the Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda (collectively, the “DRC Countries”). In connection with the conflict minerals reporting rules, the Reporting Entities adopted a Conflict Minerals Sourcing Policy that prohibits the Reporting Entities from purchasing conflict minerals originating from DRC Countries. In support of the Conflict Minerals Sourcing Policy, the Reporting Entities conduct annual internal due diligence reviews across operations to confirm that that any conflict minerals used in their production process have not originated from any of the DRC Countries. Any direct supplier that supplies the Reporting Entities with materials that contain conflict minerals must provide a certification confirming that the materials do not originate from DRC Countries.

- ***InTouch Confidential Reporting***

The Reporting Entities also provide their respective employees, suppliers, agents, business partners and other stakeholders an anonymous vehicle to report concerns or complaints. The compliance feedback program, InTouch, is designed to allow employees and others to make a confidential/anonymous report of issues that they believe may potentially be in violation of the Code of Business Conduct and Ethics, Human Rights Policy, Supplier Code of Conduct Policy or any laws or regulations related to their operations without fear of retaliation. Every report made through InTouch is investigated and appropriate remediation actions are taken if warranted.

4. Risk Management of Forced and Child Labor in Supply Chain

The enterprise risk management of the Reporting Entities is reviewed at least annually. The topics of discussion include, among other things, the governance structure and compliance training of the Reporting Entities. As previously discussed, because the direct suppliers of Reporting Entities are mainly confined in North America, the Reporting Entities do not consider forced and child labor a high risk with respect to its direct suppliers.

No risks of forced and child labor have been identified amongst the Reporting Entities’ direct suppliers and, as noted, the Reporting Entities’ Supplier Code of Conduct establishes the expectations regarding the prohibition of forced and child labor, and the expectation of the Reporting Entities that their suppliers will require the same from their supply chain. In addition, the Reporting Entities have a compliance feedback program, InTouch, that employees, suppliers and third parties can utilize to report concerns, including concerns regarding the use of forced and/or child labor.

5. Remediation Measures

To date, none of the Reporting Entities has identified any specific occurrence(s) where the use of forced and/or child labor has taken place within its operations or amongst its direct suppliers, and

therefore has not been required to implement any specific remediation measure or remediation of income loss. The Reporting Entities will continue to monitor employee and supplier compliance to their policies, as well as providing the necessary training and/or communication to ensure their employees and suppliers understand their expectations, including the prohibition against the use of forced and/or child labor.

6. Employee Training

In 2023, the Reporting Entities conducted mandatory training via a virtual platform to communicate employee responsibilities and accountabilities under their Code of Business Conduct and Ethics, Human Rights Policy and Supplier Code of Conduct. This training further promoted the use of the InTouch compliance reporting process to report concerns.

7. Effectiveness Measures

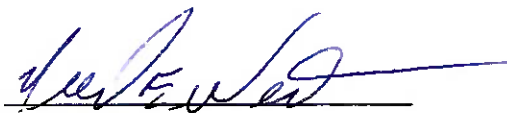
While not aware of any issues or concerns, none of the Reporting Entities has yet established a formalized process or program to formally evaluate the effectiveness of their due diligence or risk management processes related to human rights violations within their supply chains. Over time, as the Reporting Entities continue to develop and advance their programs, they expect to gain additional visibility and transparency across their supply chains to help continue to monitor supplier business activities and report on progress.

8. Approval and Attestation

This report was approved by the board of directors of KACL on behalf of KACL, by the board of managers of KAFP on behalf of KAFP and by the board of managers of KAW on behalf of KAW.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

For clarity, I have provided the attestation above in my capacity as a director, manager and officer of each of the Reporting Entities and not in a personal capacity.



Neal E. West

Director and Executive Vice President and Chief Financial Officer

I have the authority to bind Kaiser Aluminum Canada Limited, Kaiser Aluminum Fabricated Products, LLC and Kaiser Aluminum Warrick, LLC.

May 31, 2024