

REAL ALLOY



RESPONSIBLE ALUMINUM



REAL ALLOY

SUSTAINABILITY REPORT 2023

About this report



This report covers REAL ALLOY's operations, using the Aluminum Stewardship Initiative (ASI) Performance Standard for guidance, with its three main sections for Environment, Social, and Governance. Data provided in this report is for the calendar year 2023, unless stated otherwise.

REAL ALLOY is a North American business, with production facilities in the United States, Canada, and Mexico. The headquarters is in Beachwood, OH.

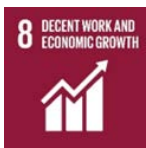
This report refers to the United Nations Sustainable Development Goals (SDGs), which are a global framework for discussing and creating action to address sustainability concerns. There are 17 SDGs. REAL ALLOY has selected 5 SDGs that most align to the company's mission and opportunity to impact. These goals are:



Goal 3: Good Health and Well-being



Goal 5: Gender Equality



Goal 8: Decent Work and Economic Growth



Goal 12: Responsible Consumption and Production



Goal 13: Climate Action

More information can be found at [THE 17 GOALS | Sustainable Development \(un.org\)](https://www.un.org/sustainabledevelopment/)



FOREWORD

Embracing the concept of sustainability means demonstrating responsibility for our stakeholders.

For our owners, we have a responsibility to deliver value. For our employees, we aim to offer reliable employment, fair working conditions, and a safe work environment. For our customers, we are responsible for the quality of our products and services, meeting requirements for alloy type, chemistry, quantity, and time of delivery. Additionally, we recognize our responsibility to prevent the waste of natural resources and energy as well as to carefully manage our emissions and releases to the environment. These are mere starting points for a long journey. But we see our entire industry transforming from being cost-orientated to sustainability-orientated - a transformation demanded by both society and customers.

At REAL ALLOY, our mission is to capture the inherent economic value of recycled aluminum by offering environmentally responsible processing solutions. We understand today's imperative for sustainable resources and are proud to supply our customers with high-quality recycled aluminum. In comparison to primary aluminum, the production of our alloys requires much less energy and results in only about 5% of the CO2 emissions by volume.



Terrance J. Hogan
PRESIDENT AND CEO



To demonstrate commitment to sustainability, REAL ALLOY became a Production and Transformation member of ASI in November 2019. Following certification of our Coldwater, Michigan facilities to the ASI Performance and Chain of Custody standards in 2022, we certified our 11 remaining melting and milling facilities to the ASI Performance Standard in 2023. ■



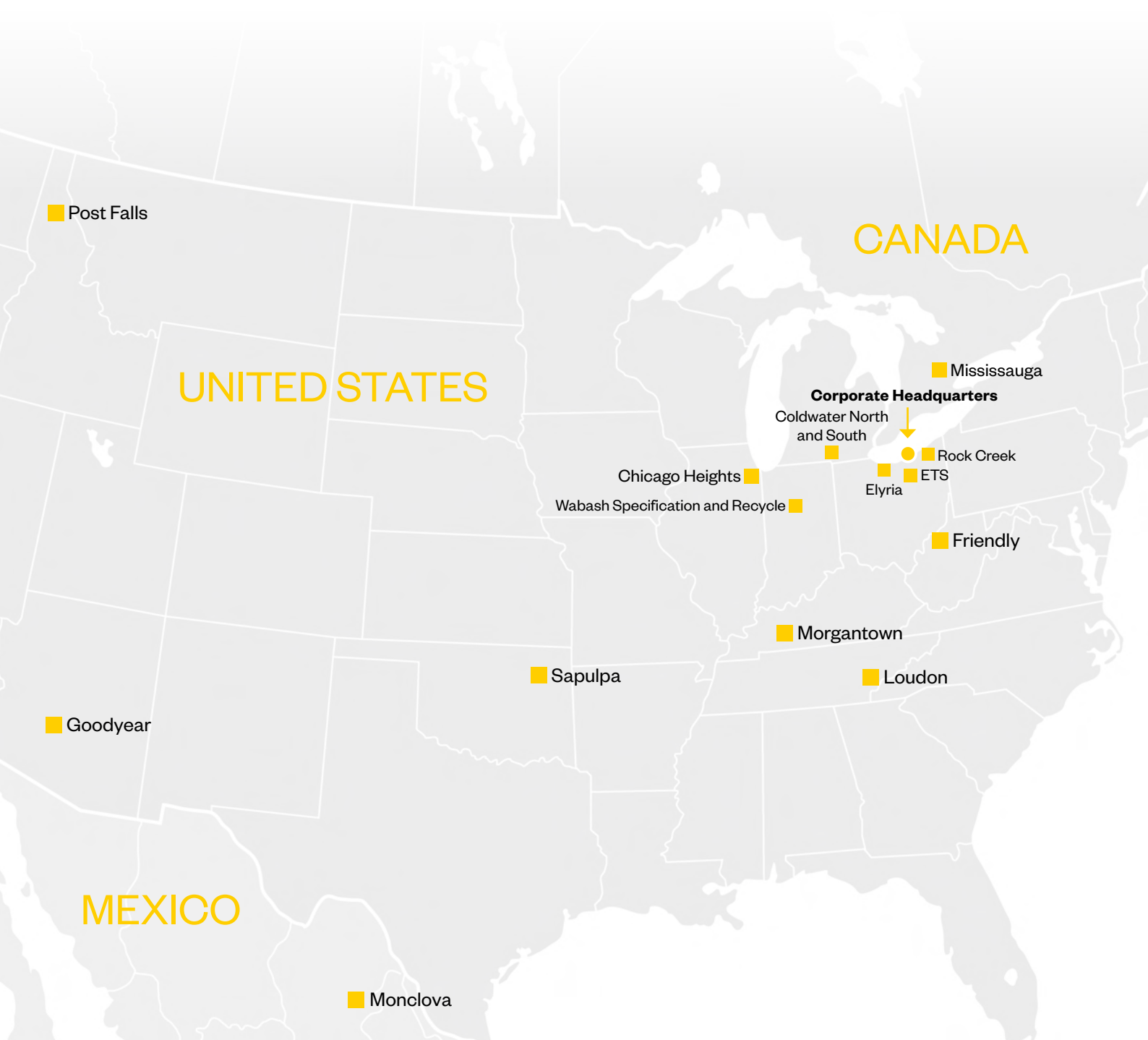
REAL ALLOY

OUR PROFILE

REAL ALLOY is a leader in third-party aluminum recycling and specification alloy production. We convert aluminum scrap and by-products into reusable aluminum metal for a growing number of applications across various industries.

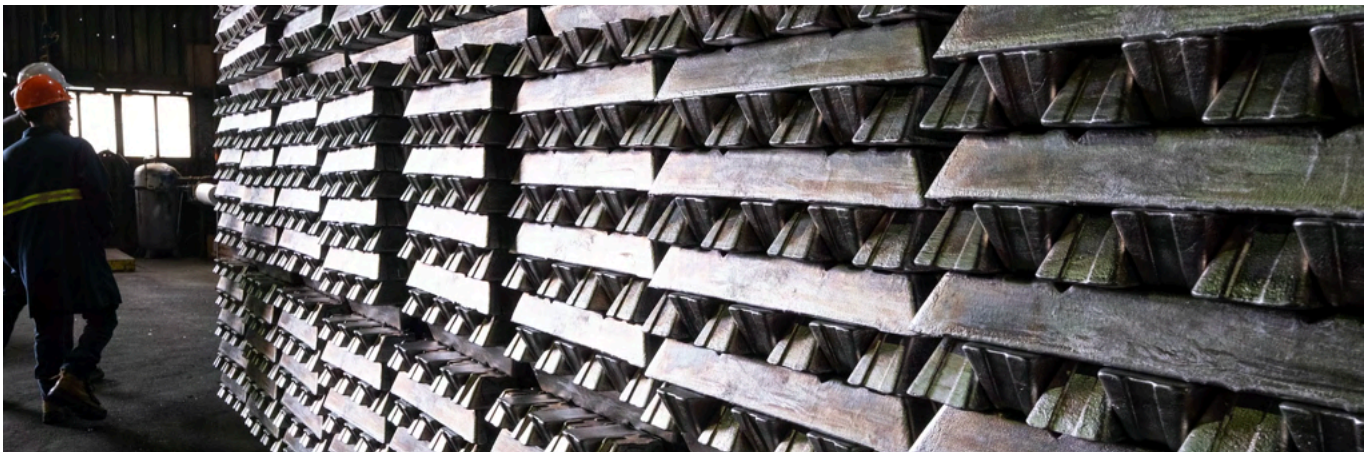
Our customers can choose from an extensive range of cast and wrought alloys made from aluminum scrap and metal, delivered to their door in the form of molten metal, Recycled Secondary Ingots (RSI), small ingots, or cones. Advanced technologies enable us to process a large variety of scrap types.

With sixteen production facilities in three countries in North America, REAL ALLOY is ideally positioned to respond to the needs of an increasingly recycling-conscious world. ■






OUR VALUES

REAL ALLOY's employees are spread across sixteen production sites and the headquarters, yet they are all united by the REAL ALLOY mission: to responsibly capture the inherent economic value of aluminum recycling solutions. We share a passion for excellence and are committed to integrity and accountability. At each site, our teams foster an environment of trust and empowerment, where good ideas are encouraged, and setbacks are viewed as learning opportunities. We are motivated by a strong sense of responsibility towards our colleagues, customers, suppliers, and communities.



Our values define what we stand for. In addition, our policies provide a framework and set clear expectations on an ethical and responsible approach to business, not only for all our managers and employees, but also for our suppliers. They describe how we operate and what we expect from ourselves. Among these REAL ALLOY policies are:

-  **CODE OF CONDUCT**
-  **THE HEALTH, SAFETY, ENVIRONMENT, AND QUALITY (HSEQ) POLICY**
-  **THE SUSTAINABLE SUPPLY CHAIN POLICY**

Respect for human rights, including women's rights and labor rights, is important to our corporate culture. We have a clear commitment to legal compliance and strictly oppose any form of discrimination, harassment, child labor or forced labor, or any other un-ethical behavior. By joining the ASI in November 2019, we have made a clear commitment towards sustainability.

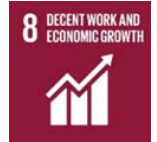
To this end we have strengthened our organization by allocating additional resources to both sustainability and environmental services. ■



“Sustainability means meeting the needs of today while preserving a healthy future for our children. Recycling is foundational to the sustainability of the aluminum value chain, and enables the circular economy. REAL ALLOY is committed to improving the environmental and social impacts of our operations as we embrace a sustainable vision with our customers.”

Terrance J. Hogan
PRESIDENT AND CEO

BUSINESS INTEGRITY



We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior processes and performance, never through unethical or illegal business practices.

LEGAL COMPLIANCE

It is our strong commitment to comply with all applicable international, national, and local laws and regulations. Our practices conform to generally accepted industry standards. We obtain, maintain, and keep up to date all applicable permits, certificates, licenses and registrations.

ANTI-CORRUPTION

REAL ALLOY expects its employees, contractors, and business partners to refrain from unethical or illegal business practices such as offering or receiving any bribes, preferential benefits, and kickbacks. The laws to adhere to include the U.S. Foreign Corrupt Practices Act ("FCPA" as well as all applicable anti-corruption laws in each country of business activity. Anti-corruption laws, as well as the REAL ALLOY Code of Conduct, prohibit offering or giving anything of value, directly or indirectly, to any government official to influence decisions or the performance of official functions to obtain or retain business or secure an improper advantage.

CODE OF CONDUCT

In our > [Code of Conduct](#), we detail how we expect our employees to act responsibly and in compliance with the law. REAL ALLOY's Code of Conduct references human rights, including women's rights, and labor rights. We are committed to providing a work environment that is free of unlawful discrimination and harassment. REAL ALLOY expects all employees to treat one another with respect, dignity, and professionalism.

The Company will not tolerate discrimination or harassment in any form directed toward employees, applicants, contractors, customers, suppliers, or others based on an individual's race, color, religion, sex, age, national origin, disability, or any other characteristic protected under applicable law. →



LEADERSHIP AND MANAGEMENT

LEADERSHIP

REAL ALLOY's > Management Team under the leadership of the President and CEO, sets the targets for the organization, including quality, health & safety, environment, energy, sustainability, and financial and operational performance. An integrated management system based on ISO 9001 supports our continuous improvement efforts on any business aspect. It also facilitates compliance with legal requirements and other commitments and generates relevant information for regular performance review by the management team.

ENVIRONMENTAL AND SOCIAL GOVERNANCE

REAL ALLOY is committed to sound environmental management and practices. Our personnel must comply with environmental requirements applicable to our operations and obtain environmental permits when required. Any waste materials created from our operations must be disposed of following all applicable national and state requirements. All employees are required to actively contribute to an environmentally compliant and safe workplace by following safety, health and environmental rules and practices, and immediately reporting all incidents that may impact people or the environment. All employees have stop work authority if they believe they or others are at risk while at work.

REAL ALLOY wants it clearly understood that all directors, officers, employees, and agents are expected to adhere to the company's > **Code of Conduct**. Those who violate the standards of the code are subject to disciplinary action, up to and including termination of employment.

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS

Excelling in our business and meeting commitments to stakeholders can only be achieved by deploying structured, proven, and well monitored management systems. By joining ASI, the scope of the management system has been extended to cover sustainability topics. We continually look to improve the way we work, and our employees are always committed to delivering the right result. Sharing best practices among teams and different sites around our organization, performing structured process analyses, and applying Lean Six Sigma tools helps REAL ALLOY capture and inspire creativity and innovation.

The effectiveness and appropriateness of the management systems are reviewed and monitored through regular structured meetings involving all levels of the company. General business and operations reviews, and dedicated HSEQ and project management reviews, are complemented by cross-functional meetings.

These follow standardized reporting formats and are, where necessary, amended by ad hoc reports and information to senior management and all responsible managers of operational and functional units.



RESPONSIBLE SOURCING

For REAL ALLOY, embracing the concept of sustainability means showing our customers that we are responsible for the Environmental, Social, and Governance impacts of our products and operations. The full scope of these impacts includes any contributions from our supply chain. Our commitment to responsible sourcing requires us to ensure our suppliers uphold sustainability standards in their businesses.

REAL ALLOY's > **Supplier Sustainability Policy** was developed according to industry guidelines, particularly those provided by ASI. The policy outlines our expectations for how suppliers conduct their businesses in a responsible and ethical manner. It covers the following principles:

- Ethics and Compliance
- Human Rights and Labor Rights
- Safe Work Environment
- Environmental Impacts
- Hazardous Chemical Management
- Data Protection

IMPACT ASSESSMENTS

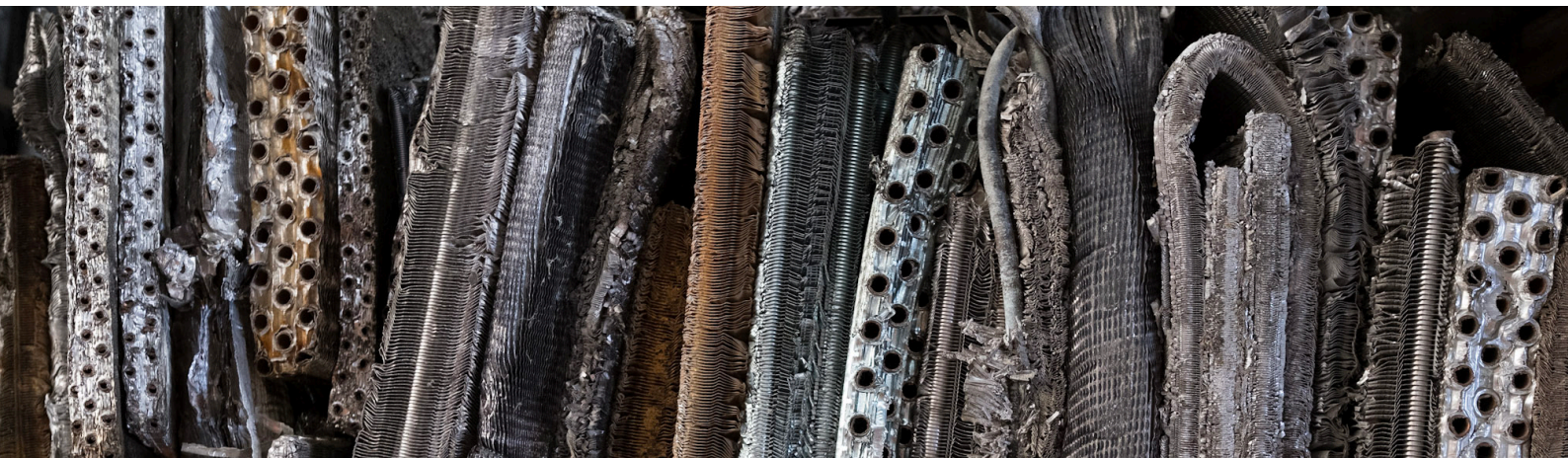
It is essential for REAL ALLOY to evaluate all relevant environmental, social, and cultural aspects when planning a new project or modifying existing facilities. Therefore, these evaluations are being integrated into our project management process.

EMERGENCY RESPONSE PLAN

All sites have plans in place based on their local legal requirements which define their responses to emergency situations, including those which could cause harm to humans or the environment. These plans are aligned with the local external emergency services, such as fire and police departments.

INFORMATION SECURITY

It is the goal of REAL ALLOY to implement IT policies, procedures, and controls that protect the company's information assets, including personal information of employees, customers, and other business partners. A strong security position is maintained through the application of robust controls, data ownership responsibilities, and maintenance of the security infrastructure. Additionally, REAL ALLOY provides monthly refresher training to employees on a variety of Information Security topics. ■





TRANSPARENCY

REAL ALLOY's corporate culture embodies the principles of transparency and respect for others. Our ability to operate efficiently and sustainably in the North American market requires consistent and professional communication. We adhere, therefore, to the principles of transparency, honesty and accountability when interacting with our stakeholders.



This 2023 Sustainability Report aligns to the reporting requirements detailed by ASI

STAKEHOLDER COMPLAINTS, GRIEVANCES AND REQUESTS FOR INFORMATION

REAL ALLOY is committed to building a culture of trust where stakeholders are comfortable to ask questions, raise concerns, and report suspected violations. Internally, concerns and complaints can be raised with the employee's supervisor, or the HR and Legal departments. REAL ALLOY also maintains a compliance hotline, hosted by an external party, where employees can anonymously raise any concern.

Grievance mechanisms are important to the relationship between REAL ALLOY's operations and its surrounding communities. Grievances may be of any kind, including social and environmental issues. REAL ALLOY strives for easy addressability – to solve issues before they become bigger problems. Meetings with local stakeholders, such as neighbors, local politicians, and citizen associations should allow a continuous exchange of information in both directions. Stakeholders may contact any production site or our corporate headquarters to raise grievances, using the contact information available on our website. Grievances are internally routed to the appropriate function and level to be addressed. ■



MATERIAL STEWARDSHIP

Aluminum is a light material with a high degree of strength. It is corrosion-resistant, an excellent conductor of heat, and easily molded and processed. These qualities make aluminum suitable for intelligent product solutions and commercial applications.

In the mobility sectors especially, aluminum allows for light weight solutions, therefore saving emissions and energy in the use of vehicles, trains, and aircraft. The unique properties of aluminum are unaffected by the recycling process, so aluminum can be reused countless times with no loss of quality. Best of all, the recycling process for aluminum is significantly more energy and CO₂ efficient than its primary production, requiring only about 5 percent of the energy. This makes recycling of aluminum a must-do in terms of sustainability.

REAL ALLOY makes an important contribution towards a circular economy by recycling aluminum into new input materials for industrial production, preserving natural resources and energy.



REAL ALLOY has the knowledge, experience, and technical equipment to recycle a large variety of input materials, whether generated from production processes, or available as post-consumer scrap. These include turnings, cuttings, foils, shredded scrap, skimmings, and drosses. They can be converted into different shapes and quality grades to meet the needs of a broad variety of industry segments. We deliver these highly versatile alloys in molten and solid forms.

Molten aluminum is delivered directly to the customer in specially designed crucibles. This reduces metal losses due to oxidation and helps our customers save significant amounts of energy that they would otherwise require to melt solid input material. Just-in-time molten metal delivery also reduces production complexity for our customers and helps them improve their process efficiency. Solid aluminum is produced to meet customer requirements for quality and chemical specifications, while also presenting a low CO₂ footprint.



REAL ALLOY is a member of various trade associations within the aluminum recycling industry. This includes memberships with the Aluminum Association (TAA), the Recycled Materials Association (ReMA), and the American Foundry Society (AFS).

Members of the management team and internal experts participate in committees and task forces, engage in relevant discussions, and contribute to sharing and learning efforts. We report data and information to these associations to support industry-wide efforts toward improved transparency and sustainability.

ENVIRONMENTAL LIFE CYCLE ASSESSMENT

Recycling of aluminum existed long before the circular economy became a major trend. Used aluminum parts, alloys and scrap are not only too valuable to dispose of, but they are also great for reprocessing and reusing. Recycling aluminum is much more efficient than producing it from raw materials. Remelting consumes only about 5 percent of the energy needed for primary production. In addition, aluminum loses none of its properties through recycling. This has two advantages; the metal retains its value and can be infinitely reprocessed. Recycled alloys are therefore the logical choice for environmentally conscious customers who want greater efficiency in their metal supply. With decades of experience, state-of-the-art technologies, and the constant development of new and environmentally friendly processes, REAL ALLOY can provide the best possible aluminum recycling solutions, while consuming as little energy and as few additives as possible. The low-energy footprint, in comparison with primary metals, has also reduced the carbon footprint of our metal.

Recycled aluminum is therefore ideal for all customers aiming to reduce the carbon and climate impact in their supply chain. As a member of the Aluminum Association REAL ALLOY actively participated and contributed to TAA's work around a Life Cycle Assessment (LCA) for aluminum.

PRODUCT DESIGN

A growing number of customers across all industry segments are demanding metal based on low CO₂ footprints. Together with customers, REAL ALLOY not only explores suitability and availability of possible recyclable materials, but also discusses specification of products, their applications, and opportunities for reducing energy and carbon intensity.

COLLECTION AND RECYCLING OF PRODUCTS AT END-OF-LIFE

Reclaiming aluminum scrap from waste streams and returning it as a resource into the value chain is the essence of aluminum recycling and the core of REAL ALLOY's business model. Recycling is key to the supply of low CO₂ metal. For aluminum, typical end-of-life (EOL) scrap types include used beverage cans (UBC), window profiles, aluminum siding, construction waste, shredded automobiles, or market scrap.

REAL ALLOY offers long-standing experience, the required know-how and state-of-the-art technology for sourcing and processing these scrap types. We are familiar with the main challenges around processing such scrap, such as contamination from other materials or varying alloy compositions in scraps from different uses. Our sampling and testing routines are designed to tightly control the remelting process and product quality. ■



ENVIRONMENT

As a recycler of aluminum scrap, our business model revolves around resource efficiency, environmental protection, and energy management. The focus of our operations is reclaiming valuable metal from waste and returning it back into the value chain.

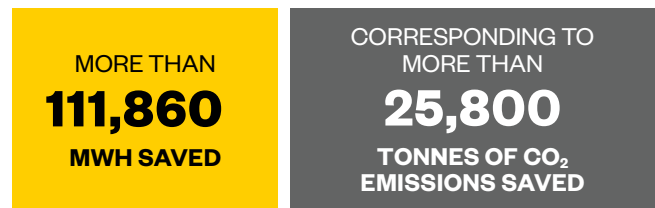
Careful scrap management, sophisticated blending, advanced production technology, and strict quality control allow us to achieve maximum recoveries of high-quality recycled light metal alloys with the least possible demand on energy and other resources. The environmental impact of our business activities is regularly and comprehensively monitored and documented through internal programs.

There are substantial energy savings associated with our recycling of aluminum scrap and drosses in 2023, where we produced over 604,000 metric tons of aluminum alloys. Compared to the average carbon footprint of primary aluminum used in North America (7.2 kg CO₂/kg Al for Scopes 1 and 2, according to TAA, The Environmental Footprint of Semi-Fabricated Aluminum Products in North America, Life Cycle Assessment Report 2022), the aluminum recycled by REAL ALLOY in 2023 saved more than 4,100,000 metric tons of CO₂ emissions.



Additional energy savings result from the shipment of liquid aluminum; with every kilogram of liquid aluminum delivered, the customer saves approximately 1.19 kWh of energy that would otherwise have to be spent on heating and melting the aluminum (based on 25% thermal efficiency).

In 2023, we delivered more than 94,000 metric tons of aluminum in liquid form, saving our customers more than 111,860 MWh of energy.



The supply of liquid aluminum also promotes resource efficiency in another important way. When solid aluminum is melted, typically about 1 percent of the metal is lost through re-oxidation to aluminum oxide. Our supply of liquid aluminum to our customers reduces not only energy consumption and CO₂ emissions, but also saves actual material which would have been lost if our customer had to remelt solid aluminum. In 2023, our customers retained approximately 940 metric tons of aluminum by taking advantage of liquid deliveries.

GREENHOUSE GAS EMISSIONS

Addressing climate change, a major global challenge, is an important issue for REAL ALLOY. We seek to reduce our CO₂ emissions and the carbon footprint of our products. Our focus on these issues is consistent with increasing demands from the general public, policy makers and our customers, for transparency and firm action.

For REAL ALLOY, CO₂ emissions are generated primarily from the use of natural gas in furnaces, heating stations, and other similar equipment. Therefore, the reduction of natural gas consumption has the largest impact on our CO₂ emissions.





Since natural gas usage represents the overwhelming part of our energy cost, reducing our usage is also an important driver for the financial success of our company. REAL ALLOY personnel, in cooperation with other aluminum and supplier organizations, are investigating the possibility of using Hydrogen gas as a carbon-free energy source for melting aluminum. While adoption of this technology is many years away, the groundwork for a greener future is being laid today. (Peterson et al., “Considerations for Using Hydrogen as a Fuel in Future Low-Carbon Casthouses”, Light Metal Age, February 2023, pp. 22-29)

Compared against our emission levels in 2005, our total emission levels in 2023 were approximately 40 percent lower. We certainly need to continue our efforts to further improve. In January 2022, we therefore set ourselves a mid-term target:

2026

By 2026, REAL ALLOY will improve the energy efficiency and reduce the CO₂ intensity of its operations by 12.5 percent, compared against a 2021 baseline.

The second year into this 5-year goal faced challenges while the program is still developing. Though minor efficiencies have been implemented, volume fluctuations have limited improvement. The Scope 2 intensity was based on eGRID data provided by the Environmental Protection Agency, where grids serving REAL ALLOY facilities have had little improvements in carbon intensity in the past 2 years.

2022 data is being used as it is the most recent available.

(Emissions & Generation Resource Integrated Database (eGRID), 2022. <https://www.epa.gov/egrid>.)

We assess all options for improving the efficiency of our consumption of relevant energies, including natural gas, electric power, and transportation fuels. This assessment includes all furnace and burner operations, electrical drives (especially bag house fans or compressors), combined heat and power generation (CHP), the use of industrial waste heat, the sourcing of renewable electricity, optimized transportation routing of vehicles, and optimized just-in-time material flows.

ENERGY USE AND CO₂ INTENSITY

Our greenhouse gas emissions are represented as CO₂-equivalent emissions, covering scope 1 (direct emissions from the use of fossil fuels in our own installations and equipment) and scope 2 (emissions from externally sourced electricity), as defined in the [Greenhouse Gas Protocol](#).

Scope 1 covers emissions from the use of natural gas as well as diesel or propane consumption by our forklifts, wheel loaders, and internal mobile equipment. Scope 2 covers purchased electricity. The data are based on information from REAL ALLOY’s accounting systems. The emission factors are taken from the Environmental Protection Agency.

REAL ALLOY is laying the groundwork to understand major Scope 3 emissions categories and calculations. →

GREENHOUSE GAS VERIFICATION

REAL ALLOY has had 2023 greenhouse gas values independently verified by a third party, using limited assurance procedures.

EMMISSIONS DATA	Natural Gas Used	Electrical Power Used	Natural Gas	Electrical	Mobile Equipment	Total CO ₂ Generated	Carbon Intensity - Out
Plant	(KCF)	(MWh)	(mT CO _{2e})	(mT CO _{2e})	(mT CO _{2e})	(mT CO _{2e})	(mT CO _{2e} /mT Al - out)
Corporate HQ	808	54	44	25	-	69	-
Chicago Heights	175,793	5,684	9,651	2,594	45	12,291	0.39
Coldwater North	390,327	13,145	21,429	7,301	39	28,769	0.67
Coldwater South	262,619	8,615	14,418	4,785	54	19,257	0.35
Elyria	539	942	30	430	9	469	0.03
Friendly	53,402	6,045	2,932	2,759	61	5,691	0.15
Goodyear	116,997	2,801	6,423	990	38	7,413	0.24
Loudon	332,697	6,048	18,265	2,576	64	20,904	0.31
Macedonia (ETS)	1,242	36	68	16	1	85	-
Mississauga	316,310	4,773	17,365	119	104	17,589	0.47
Monclova	322,605	5,991	17,711	2,539	42	20,292	0.51
Morgantown	618,046	19,308	33,930	8,223	121	42,274	0.38
Post Falls	140,847	3,522	7,732	968	27	8,700	0.24
Rock Creek	215	509	12	232	1	245	0.04
Sapulpa	168,288	2,992	9,239	1,324	36	10,599	0.29
Wabash Recycling	16,106	3,576	884	1,632	38	2,554	0.12
Wabash Spec	1,037,864	17,561	56,978	8,014	85	65,078	0.64
Real Alloy Totals	3,954,705	101,604	217,113	44,530	639	262,282	0.38



EMISSIONS TO AIR

Emissions to air from REAL ALLOY's operations consist mainly of:

- Particulates generated from handling dusty materials prior to processing and residuals generated after process controls
- Products of combustion from the natural gas combustion processes
- Hydrogen chloride (HCl) and hydrogen fluoride (HF) derived from the flux (chloride and fluoride salts) used in our furnaces and from organic contaminants in some scraps
- Chlorine (Cl₂), used to refine our metal according to customer specifications
- Traces of dioxins and furans (PCDD/PCDF) from the thermal treatment of scrap which is contaminated with organics

All raw material pre-processing activities and furnace operations are configured with particulate control devices (i.e., fabric filter baghouses) to capture dust, acid gases, chlorine, and dioxin furans. Each of our facilities operates within the requirements of its applicable permits for air emissions. REAL ALLOY facility emission data is reported to state and/or federal agencies in accordance with the site-specific air operating permit reporting requirements and community right-to-know reporting requirements.

DISCHARGES TO WATER

Our water consumption is primarily the use of water for sanitary purposes. Only small quantities of water are used for cooling purposes at our production sites. All cooling process water is lost to evaporation. Each location manages storm water in accordance with state National Pollutant Discharge Elimination System (NPDES) permit programs. All locations utilize best management practices to minimize or prevent the discharge of pollutants to storm water.

OTHER EMISSIONS

In addition to emissions to air, REAL ALLOY's operations may cause local noise and odor emissions, especially in plants handling and generating salt slag. REAL ALLOY maintains strict hearing protection requirements for employees and visitors in high noise environments. We also measure noise sources from our operations and make equipment adjustments or install enclosures or other noise reduction techniques to minimize noise levels at the fence line of our operations. REAL ALLOY is sensitive to their neighbors and community. All locations have thorough preventative maintenance programs for pollution control equipment to ensure effective operation. Contingency plans are in place to immediately address any upset condition that may impact the surrounding community.

SPILLS

In 2023, REAL ALLOY did not experience any significant spills of oil, diesel, or other water endangering liquids into sewage systems or waters of the state. REAL ALLOY did experience some minor spills to impervious surfaces within the manufacturing buildings or outside storage areas. These minor spills were detected quickly and contained via immediate response action. →

WASTE MANAGEMENT

REAL ALLOY's business model centers on recovering value from aluminum scrap that would otherwise go to waste. Recycling these materials is fundamental to our sustainability proposition.

The vast majority of REAL ALLOY's input material is scrap:

- Production scrap – like drosses, skimmings, turnings, foil and sheet scrap, casting scraps, etc.
- Post-consumer scrap – like used beverage cans (UBC), scrap from construction applications, shredded automobiles, etc.

In 2023, we treated a total of approximately 790,000 metric tons of scrap and drosses, and 372,000 metric tons of material to our milling processes. Our milling processes prevented over 24,000 metric tons of aluminum from going to landfill.

Roughly 60 percent of the waste generated in REAL ALLOY's operations consists of salt slag from our rotary furnaces. The slag consists of salt (a mixture of NaCl and KCl), aluminum oxide and small amounts of other metal oxides and metal compounds. We recycle our salt slag when economically and logistically feasible, with the remaining material going to landfill.

Another waste type we manage is filter dust. Filter dust is generated by our filter systems, which control and reduce the emissions from our operations to legally permissible levels according to our permits. The majority of the filter dust is landfilled.

REAL ALLOY intermittently produces small amounts of hazardous waste, generally as a result from certain scrap types that customers ask us to process. Any hazardous waste is handled and disposed of following all state and/or federal regulatory requirements.

DROSS

All our drosses are recycled internally, either at the site where they are generated or at another REAL ALLOY site.

BIODIVERSITY

All REAL ALLOY sites have a long-standing industrial history, located in areas which have been used for industrial purposes for many decades. Their operating permits are based on national and local laws and regulations. This legal framework was designed and issued taking account of all possible environmental impacts, including the impact on biodiversity from emissions to air, water and waste.

None of our operations involve new land use. With most of our operations sourcing scrap from local or regional sources, the introduction or spreading of alien species represents a minimal risk. Overall, our impact on biodiversity is defined and minimized by our operation within the given permits and regulatory framework. ■



WATER and WASTE	Water In	Water Out	Hazardous Waste	Non-Hazardous Waste
Plant	(Gallons)	(Gallons)	(mT)	(mT)
Chicago Heights	8,161	-	-	2,230
Coldwater North	5,504,000	-	-	772
Coldwater South	3,442,000	-	-	3,336
Elyria	106,971	-	-	108
Friendly	217,663	-	-	83,581
Goodyear	3,772,000	-	-	23,968
Loudon	228,770	-	-	24,133
Macedonia (ETS)	176,540	-	-	167
Mississauga	4,595,501	-	3	816
Monclova	5,251,738	-	11	10,186
Morgantown	6,088,577	-	376	174,829
Post Falls	504,100	-	34	12,911
Rock Creek	125,672	-	-	393
Sapulapa	3,617,000	-	-	17,891
Wabash Recycling	121,987	-	-	92,372
Wabash Spec	9,589,663	-	-	1,582
REAL ALLOY Totals	43,350,344	-	424	449,276





As a recycling company, REAL ALLOY delivers on a unique set of environmental and social responsibilities. Caring for people and communities is as important as protecting the planet. Our policies are designed to uphold the highest ethical standards.

HUMAN RIGHTS

Respect for human rights, including women's rights and labor rights, are foundations of our corporate culture. We have a clear commitment to legal compliance and strictly oppose any form of discrimination and harassment, child labor or forced labor or any other un-ethical behavior. All our plants are located in the United States, Canada, or Mexico. All these countries maintain the highest human rights standards in their legal frameworks and are signatories to the relevant human rights related declarations of the United Nations. We also expect our business partners and our suppliers to fully observe human rights.



We conducted a structured human rights compliance self-assessment, using the United Nations Global Compact Self Assessment tool.

We have no indication of material or systematic non-compliances with our Code of Conduct or human rights in general.

LOCAL COMMUNITIES

Our processes and management decisions take environmental requirements and standards into consideration, as well as stakeholder concerns and the demands of the market. REAL ALLOY pursues an open information policy and works closely with the relevant government agencies and associations. We are similarly committed to maintaining a dialogue with the public, our suppliers, customers, and other contractual partners. In new projects as well as in ongoing operations, we continuously assess our impact on the surrounding communities. We do so to offer transparency and insights into the activities of our various sites and related environmental considerations. This transparency is a prerequisite for sustaining an asset of immense value for REAL ALLOY: the support and trust of the communities we operate and live in.

Grievance or complaint mechanisms are important to better understand the impact of REAL ALLOY's operations in its surrounding communities. Grievances may be of any kind, including social and environmental issues. We strive for easy addressability – to solve issues before they become bigger problems. Meetings with local stakeholders, such as neighbors, local politicians, citizen associations, and the media, help safeguard a continuous exchange of information in both directions.



OUR EMPLOYEES

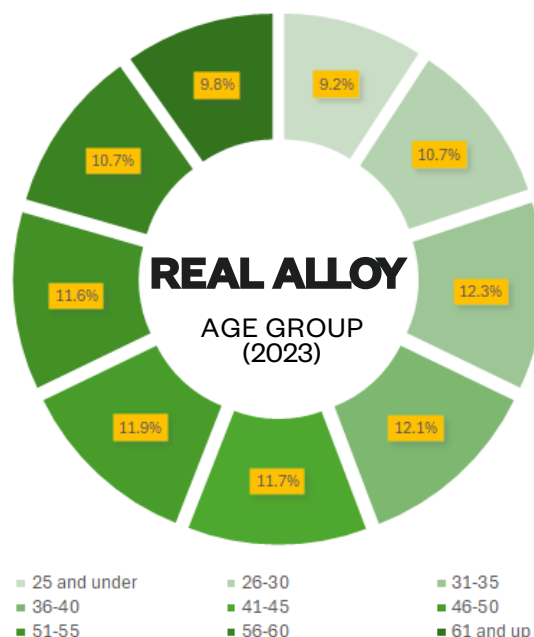
Our more than 1000 employees are the key to our success. They deliver on our responsibilities to our stakeholders. Their knowledge and capabilities are a prerequisite for being successful, both for them as individuals as well as for REAL ALLOY as a company. Training and qualification are therefore integral parts of our daily business. Health and safety, environmental protection, and responsible use of resources are regular training topics just like good operating practices for all our production equipment. This is part of our effort to provide a good and safe working environment. It also supports our attractiveness as an employer and helps retain talented people in a highly competitive labor market.

NON-DISCRIMINATION

We fill our job vacancies exclusively according to ability, potential, and performance. We do not tolerate discriminatory behavior when we hire new employees or in our daily interaction with each other. We aim to develop the full potential of our employees, regardless of external circumstances. To do so, we want to identify and remove barriers in our thinking and in our processes. We are convinced that a diversified workforce and an open and appreciative company culture are important success factors in a globalized world.

IN THE FIELDS OF...

- **...genders:** Our goal is to continually increase the share of female representation at all levels of the organization. We support the career development of women at all levels. In 2023 the proportion of women in leadership roles was 21 percent.
- **...cultures:** Cultural diversity is a part of everyday working life at Real Alloy. Awareness of different value systems and their influence on our daily behavior helps to meet the challenges of our teams.
- **...generations:** We encourage learning across all generations. We promote knowledge transfer and a change of perspective between experienced and less experienced employees. Demographic analysis helps us to understand the challenges we may be facing in the future and plan activities to prevent any workforce shortage.



SOCIAL DIALOG AND EMPLOYEE REPRESENTATION

We are committed to communicating openly with our employees and their representatives, and pursuing a constructive dialog. Our goal is to inform them early on about important issues. As a result, we are positioned to successfully face challenges and changes in society, the economy and politics in order to remain competitive and sustainable in the future.

FAIR PAYMENT

Appreciation of our employees is an important element of our company culture and enables us to ensure our long-term and sustainable business success. For this reason, it is important to recognize our peoples' performance through appropriate remuneration. The compensation systems for our employees are based on legal requirements, market data and existing collective agreements. Overtime is paid out according to local legal requirements. REAL ALLOY has implemented various incentive programs to help align performance to business strategy. We strive to maintain equal pay for equal work, with no discrimination due to gender, race, or other protected status.

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

Our policies and procedures clearly state the recognition of the principle of freedom of association and the right to join employee organizations.

CHILD LABOR

There is no employment of workers under the age of 18 years. The hiring of minors (under 18 years) is not allowed in any position.

FORCED LABOR

REAL ALLOY neither engages in nor supports the use of forced labor. We do not engage in or support human trafficking either directly or through any employment or recruitment agencies. Practices such as withholding personal property, passports, wages, training certificates, work permits or any other document for inappropriate reasons are not acceptable. We do not tolerate slavery and forced or compulsory labor and human trafficking, as referenced in our [Supplier Sustainability Policy](#).

	2021	2022	2023
Percentage of women employed in relation to the whole organisation	12%	12%	13%
Percentage of women in leadership positions (excluding board of directors)	22%	20%	21%





HEALTH & SAFETY

REAL ALLOY’s management and employees place the utmost importance on the protection of health and safety. REAL ALLOY deploys a management system that is founded on the ISO 45001 framework.

The system includes a set of standards and elements that establish clear expectations for health and safety processes and activities and supports a continuous improvement approach through various monitoring and accountability activities.

We incorporate occupational health and safety considerations into all our operational activities and decisions. “Zero injuries” is our ultimate goal and the driver of our ongoing efforts to continuously improve our health and safety performance, which have so far resulted in injury rates that are lower than the secondary aluminum industry’s average. 2023 performance is consistent with other top-tier safety performers in the industry. Beyond the immediate efforts regarding safety in the workplace, we also promote safe practices and behaviors outside of work and offer programs for preventative health care and well-being.

The safety performance across the business improved from previous year results. Better execution of the Real Alloy OH&S system at multiple locations resulted in fewer incidents and injuries that were more minor in nature. Our system is based on strong foundational principles that focus on risk assessment, risk control, and the group and individual responsibilities that integrate risk-based thinking and decision making into all tasks, projects and strategic planning.

OH&S BENCHMARK and RESULTS		
Organization	IIR	DAWR
BLS Secondary Smelting (2022)	4.11	2.17
REAL ALLOY (2021)	2.05	0.88
REAL ALLOY (2022)	1.27	0.45
REAL ALLOY (2023)	0.96	0.61

REAL ALLOY

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