

TRIALCO ALUMINUM, LLC

CHILD LABOR, FORCED LABOR, AND MODERN-DAY SLAVERY PROHIBITION POLICY

WHEREAS, TrialCo is committed to conducting its business in an ethical, lawful, and socially responsible manner;

WHEREAS, TrialCo recognizes its responsibility to respect human rights and uphold fair and humane labor practices in all aspects of its operations and business relationships;

WHEREAS, TrialCo is dedicated to preventing child labor, human trafficking, forced labor, and all forms of modern-day slavery, and to complying with all applicable local, state, federal, and international labor and human rights laws; and

NOW, THEREFORE, TrialCo adopts this Child Labor, Forced Labor, and Modern-Day Prohibition Policy to establish clear standards, expectations, and procedures to ensure ethical labor practices throughout its operations and supply chain.

1. **Purpose and Commitment.** TrialCo maintains a zero-tolerance policy toward child labor, human trafficking, forced labor, and modern-day slavery in any form. This policy establishes TrialCo's standards to prevent, identify, and address labor practices that violate human rights and dignity.

2. **Scope.** This policy applies to all TrialCo employees, officers, directors, temporary workers, contractors, subcontractors, suppliers, vendors, and any other business partners acting on TrialCo's behalf, regardless of location.

3. **Prohibited Practices.** TrialCo strictly prohibits the following practices in its operations and business relationships:

3.1. **Child Labor.** The use of child labor in violation of applicable minimum age laws, working hour restrictions, or safety regulations is prohibited. No person shall be employed under the legal minimum working age, and young workers may not be assigned hazardous or inappropriate work.

3.2. **Forced Labor and Modern-Day Slavery.** Modern-day slavery includes any situation in which a person is forced to work through coercion, threats, debt, retention of identity documents, restriction of movement, or abuse of power. Prohibited practices include, but are not limited to forced or involuntary labor, bonded or indentured labor, debt bondage, human trafficking, servitude or exploitation of any kind, and the withholding of wages, identity documents, or personal property as a condition of employment.

4. **Compliance with Laws and Regulations.** TrialCo complies with all applicable local, state, federal, and international laws related to labor standards and human rights, including but not limited to, all United States federal and state child labor laws, anti-human trafficking laws, employment and wage laws, Federal Acquisition Regulation (FAR) requirements, where applicable, and international labor standards where TrialCo operates or sources goods and services.

5. Responsibilities.

5.1 **Employees.** All employees are expected to comply with this policy and report any known or suspected violations promptly.

5.2 **Management.** Managers are responsible for enforcing this policy, promoting awareness, and ensuring appropriate corrective actions are taken when concerns are raised.

5.3 **Suppliers and Business Partners.** Suppliers, contractors, and business partners are expected to uphold the principles of this policy and comply with all applicable labor and human rights laws. TrialCo reserves the right to audit, investigate, or terminate relationships with any party found to be in violation of this policy.

6. **Reporting Concerns and Non-Retaliation.** Employees and business partners are encouraged to report concerns or suspected violations of this policy to Human Resources, management, or through TrialCo's reporting channels. Reports may be made without fear of retaliation. Retaliation against any individual who raises a concern in good faith is strictly prohibited and will result in disciplinary action.

7. **Investigations and Corrective Action.** All reported concerns will be promptly and thoroughly investigated. If violations are confirmed, TrialCo will take appropriate corrective action, which may include disciplinary action, up to and including termination, termination of supplier or contractor relationships, remediation measures and the notification of appropriate authorities where required by law.

8. **Policy Administration.** This policy is administered by TrialCo Human Resources. TrialCo may update this policy as needed to reflect changes in law, regulation, or business operations.