



Responsible Supply Chain Policy

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I. Introduction

At Superior Industries ("Superior"), responsible business practices are an important guiding principle. Their significance continues to grow, particularly in light of increasing supply chain challenges and disruptions. Responsible supply chain management supports our sustainability goals and long-term business resilience.

Our ***Supplier Code of Conduct*** sets out the minimum standards we expect from all suppliers worldwide. It covers human rights, fair labor practices, health and safety, environmental protection, ethical business conduct, and compliance with applicable laws and internationally recognized standards.

II. Purpose

This Policy supports the ***Supplier Code of Conduct*** by explaining how we apply it within our organization. Responsible supply chain management requires ongoing due diligence to identify social, environmental, and ethical risks and address them in a timely and proportionate manner. We are committed to improving our approach as risks and expectations evolve.

III. Scope

This Policy applies to all Superior business units and regions.

IV. Responsible Supply Chain Framework

Our approach follows internationally recognized guidance, including the *OECD Due Diligence Guidance for Responsible Business Conduct*, the UN Global Compact's *Supply Chain Sustainability – A Practical Guide for Continuous Improvement*, and the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*.

Building on these frameworks, Superior supports internationally recognized human rights principles, including the UN Guiding Principles on Business and Human Rights (UNGPs), and seeks to identify, prevent, mitigate, and account for adverse human rights impacts within its supply chain.

1. Management System Implementing a robust system comprised of policy commitment, clearly defined responsibilities, supplier engagement, and a grievance mechanism.	2. Risk Assessment Conducting a risk-based evaluation across our global supply chain to detect actual and potential adverse impacts	3. Risk Management Developing and implementing a strategy to respond to identified risks through tailored mitigation plans	4. Audit Carrying out or relying on independent audits of supply chain due diligence practices	5. Reporting Transparently reporting on supply chain due diligence policies and practices
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1. Management System

Superior is developing an internal management system to support supply chain due diligence. The system includes the following elements:

- 1) **Commitment** - this Policy sets out our overall commitment to a responsible supply chain. For mineral sourcing, it is supported by our Policy for Conflict-Affected and High-Risk Areas (CAHRA).
- 2) **Collaboration** - Purchasing and Sustainability functions work closely together and communicate openly at both strategic and operational levels.
- 3) **Capabilities development** – Superior provides appropriate training and resources. All Purchasing department employees will be trained on this Policy within six months of its implementation.
- 4) **Supplier engagement** - we work directly with targeted suppliers to map the supply chain and identify and assess ESG risks. This helps us collect reliable information and clearly communicate our sustainability expectations.
- 5) **Grievance mechanism** - we provide an independent, third-party reporting channel, [EthicsPoint - Superior Industries](#), for employees, suppliers, and external stakeholders. It can be used to report concerns about human rights, environmental risks, or unethical behavior in our supply chain.

2. Risk Assessment

Superior applies a risk-based approach to determine which suppliers are prioritized in our due diligence efforts and to define the appropriate level of engagement. Due to the nature of our business, **Aluminum suppliers** are treated as a separate category subject to the highest requirements.

Beyond aluminum suppliers, Superior classifies suppliers into **Critical** and **Non-Critical** groups based on business importance and ESG risk exposure. This distinction is based on a combination of business importance and ESG risk factors:

- Strategic and business continuity – suppliers whose disruption would significantly affect production and/or customer delivery (economic perspective)
- High-impact sectors – suppliers operating in energy or carbon-intensive industries or those whose materials or services significantly influence Superior’s environmental footprint (environmental perspective)
- Geographical risk exposure - suppliers located in regions with higher human rights risks including forced labor, child labor, widespread sexual violence, and support to non-state armed groups (social perspective)

Since 2025, Superior has been working with Drive Sustainability¹ on the phased implementation of a supplier sustainability assessment process. Targeted suppliers are requested to complete the industry-standard Sustainability Self-Assessment Questionnaire (SAQ). Suppliers are selected based on the materiality and risk criteria described above. The evidence-based assessment helps Superior evaluate supplier sustainability maturity, identify improvement opportunities, and support due diligence requirements.

¹ Drive Sustainability is a global automotive industry initiative focused on improving sustainability in the supply chain.

In line with applied risk-based approach, the classification of suppliers subject to the assessment is reviewed periodically. The group of targeted suppliers may therefore change as the underlying classification criteria evolve and supplier risk profiles are reassessed. Relevant factors may include changes in supplier size, location, scope of operations, and the nature of the goods or services provided.

Superior may request information regarding the origin of raw materials and sub-tier suppliers where necessary to support customer, regulatory, or due diligence requirements.

3. Risk Management

The risk assessment process may reveal “red flags” - indicators of potentially high-risk practices or non-compliance that require prompt review, investigation, and mitigation.

When red flags are identified, Superior will respond with a clear plan focused on preventing or reducing negative impacts. We may use additional evaluation or third-party verification, to confirm the risk and decide on the right course of action. Suppliers identified as presenting elevated ESG risks may be required to implement a corrective action plan with defined milestones and timelines. Superior may monitor progress and request evidence of implementation.

Depending on the severity of the risk, we may continue working with the supplier while addressing the issue, temporarily suspend business, or end the relationship as a last resort.

We recognize that challenged of supply chain risk management continues to evolve rapidly. Our ambition is to improve transparency and oversight across the supply chain and continue strengthening processes to cease, prevent, and mitigate actual and potential negative impacts.

4. Audit

Deployed measures are proportionate to the assessed risk level. Where possible, Superior relies on recognized third-party audit programs to support the credibility of the due diligence process while avoiding duplication of audit efforts. Primary aluminum suppliers are required to maintain valid Aluminum Stewardship Initiative (ASI) certification, which includes independent audits against ASI standards covering governance, environmental, and social responsibility topics. For targeted critical suppliers, Superior may also require external validation, such as ISO 14001 and ISO 45001 certifications, to assess alignment with environmental and occupational health and safety standards.

Where feasible and necessary, especially when red flags are identified, we may conduct our own targeted assessments or request ad-hoc third-party audits to verify compliance with the Superior Supplier Code of Conduct. Records relating to supplier assessments, due diligence activities, audits, and corrective actions shall be maintained in accordance with applicable record retention requirements.

5. Communication

Superior is committed to transparency in supply chain due diligence. We monitor our performance against defined goals and give stakeholders clear information on how we uphold our standards across the supply chain. Superior will report publicly each year on how this Policy is implemented.

V. Purchasing accountability

Purchasing is the main function engaging with suppliers and therefore plays an important role in implementing sustainability requirements across the supply chain through the following actions:

- a. Adhere to Superior's Code of Conduct, ensure supplier acknowledgment of the Supplier Code of Conduct, and promptly report any known misalignment with either Code.
- b. Integrate sustainability clauses into supplier contracts to ensure formal alignment with environmental, social, and ethical requirements.
- c. Work closely with the Sustainability team to evaluate supplier practices, including assessments of international standards (e.g., ISO 14001, ISO 45001) and relevant industry certifications.
- d. Balance commercial competitiveness with sustainability principles during supplier selection. Prioritize partners with strong sustainability performance and recognized certifications to contribute to supply chain resilience and transparency.
- e. Participate in supply chain mapping to identify sub-tier suppliers and increase visibility into the origin of materials
- f. Support supplier ESG assessments by facilitating communication with suppliers, providing necessary context and following up on identified gaps.
- g. Contribute to the ongoing improvement of the management system by providing operational feedback to ensure this policy remains effective and practical.

Close cooperation between Sustainability and Purchasing helps make sure responsible practices are built into key procurement processes, including:

- Supplier onboarding process
- RFQs and sourcing events
- Contracting and renewals
- Supplier performance management

VI. Conflict minerals

Over the past decade, companies, non-governmental organizations, and governments have paid increasing attention to “conflict minerals” from the Democratic Republic of Congo (DRC) and the surrounding region. These materials — tin, tantalum, tungsten, and gold (3TG) — can enter global supply chains, and their extraction or trade may illegally support armed groups or be linked to human rights abuses in that region.

Superior requires suppliers to operate in a way that respects labor and human rights, including sourcing minerals that do not directly or indirectly finance armed groups. In response to Section 1502 of the Dodd-Frank Act, Superior reviewed its own operations for the use of gold, tin, tantalum, tungsten, and their non-derivative forms: cassiterite, columbite-tantalite, and wolframite. These minerals are not intentionally used in, nor do they remain in, our products, although tungsten may be used in certain production processes.

Based on its due diligence and country-of-origin inquiry, Superior has not identified sourcing from Conflict-Affected and High-Risk Areas that would directly or indirectly finance armed groups. We also require all smelters in our supply chain to be listed as conformant on the Responsible Minerals Initiative (RMI) Conformant Smelter list.

VII. EUDR Compliance

Superior confirms that the aluminum rims it manufactures for motor vehicles (CN chapter 87, in particular 8708 70 – road wheels and parts and accessories) are outside the scope of Regulation (EU) 2023/1115 (EUDR). As a result, they are not subject to EUDR obligations.

Packaging materials used in the process, including wooden pallets (CN 4415) and adhesive tapes, are used only to secure, protect, and transport the rims. They are not marketed or sold separately and are classified together with the rims under European Commission guidance and the General Rules for the Interpretation of the Combined Nomenclature. Therefore, they are not “relevant products” under the EUDR.

Based on the Company's current assessment of Regulation (EU) 2023/1115 and applicable guidance, the Company's aluminum wheel products are outside the scope of the EUDR and are therefore not currently subject to EUDR due diligence obligations.

VIII. Grievance Mechanism

Superior provides an independent reporting channel operated by a third-party provider. Employees, suppliers, and stakeholders can use this channel to raise concerns about supply-chain practices, including possible human rights violations, environmental risks, unethical behavior, or non-compliance within our supplier network. All reports are treated confidentially, handled with care, and followed by appropriate corrective actions. Superior prohibits retaliation against any individual who raises a concern in good faith or participates in an investigation. There are several ways to report non-compliance:

1. Complete the online form at [EthicsPoint - Superior Industries](#)
2. Call the Ethics Hotline at:
 - United States: 1-855-208-3106
 - Germany: 0-800-180-7071
 - Mexico: 001-800-266-0293
 - Poland: (0) 800-005-678

These resources are available at all times, free of charge, in local languages.

IX. Final notes

The Executive Leadership Team oversees this Policy and makes sure it is reviewed at least every five years. It may be reviewed sooner if changes in the business, supply chain, or regulations affect material environmental, social, or governance risks, or if a significant gap is found in our due diligence process.

Stakeholders are encouraged to read this Policy along with Superior's *Supplier Code of Conduct*. The Policy is publicly available on the Superior's website.

X. Appendix A - Responsible Supply Chain Targets

#	Aluminum suppliers	Target	Year
1	Suppliers signing Supplier Code of Conduct	100%	2027
2	Suppliers signing contract including sustainability clause	100%	2027
3	Suppliers that have gone through a sustainability assessment	100%	2027
4	Suppliers that have gone through an on-site audit	30%	2030
5	Suppliers with ISO 14001 certification	100%	2027
6	Suppliers with ISO 45001 certification	100%	2027
7	Share of ASI-certified primary aluminum by volume	100%	2027
8	Increase sourcing of recycled aluminum vs 2025 baseline	by 40%	2030
	Critical suppliers	Target	Year
1	Suppliers signing Supplier Code of Conduct	100%	2027
2	Suppliers signing contract including sustainability clause	100%	2027
3	Suppliers that have gone through a sustainability assessment	90%	2027
4	Suppliers with ISO 14001 certification	100%	2027
5	Suppliers with ISO 45001 certification	30%	2028
	Non-critical suppliers	Target	Year
1	Suppliers signing Supplier Code of Conduct	100%	2028

DOCUMENT HISTORY

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