

1. Our mission:

CONARES is committed to the production of Safe Sustainable Steel. In support of this goal, we will work with our suppliers to:

- Operate a lean supply chain that supports our corporate sustainability policy.
- Develop sourcing solutions in line with customer, regulatory and wider stakeholder needs and expectations.
- Create long-term value and reduce risk for our business, our suppliers and our stakeholders.

We will achieve these objectives by setting responsible sourcing standards, by collaborating, innovating and embedding responsible sourcing into our business processes.

2. Introduction:

CONARES's Code for Responsible Sourcing ("Code") communicates how we will work with our suppliers, and asks them to meet the minimum health and safety, human rights, ethical and environmental standards set out below. We encourage our suppliers to work with us to identify and develop ongoing performance improvements to our responsible sourcing programme. We hope that this Code will promote sustainable business practices by our suppliers.

CONARES define its supply chain as the goods and services purchased for, and utilized in, its operations. This includes primary input materials such as Billets, fuels, Cast iron rolls, refractory's, energy, industrial and professional services and products, shipping and logistics. Responsible Sourcing is a key principle in CONARES's procurement approach, and is given systematic consideration alongside factors such as price and quality.

3. Scope:

This Code applies to all of CONARES's suppliers and contractors and their affiliates and applies to all products and services that

CONARES purchases. We strongly encourage our suppliers to promote the requirements of this Code within their own supply chain, and will give recognition to suppliers who do this.

4. Our commitment to suppliers:

To implement the Code, CONARES will:

- Collaborate: Work with suppliers to improve social (including health and safety and human rights), environmental and ethical standards. This may include joint assessments, such as site visits, to evaluate performance against the Code.
- Support: Assist suppliers to identify activities that fall below the requirements of the Code and work towards achieving improved conditions in a timely manner.
- Prioritize: Focus attention on those parts of the supply chain where the risk of not meeting the requirements of the Code is highest and where the maximum improvement can be made.
- Respect: Conduct our business with suppliers in a fair, objective, transparent and professional manner. This includes treating suppliers' employees working at our premises with the same workplace practices as our own staff.
- Promote: Act as an advocate for responsible supply chain practices within our industry.
- Communicate and train: Ensure that all our employees are aware of the Code, and that those responsible for purchasing are appropriately trained.
- Improve: Regularly review our programme and practices to ensure they contribute to our responsible sourcing vision.

5. What we expect from our suppliers

Suppliers are strongly encouraged to collaborate with CONARES to identify further opportunities to improve responsible business

practices in the areas of health and safety, human rights, ethics and environmental stewardship along the supply chain.

5.1. Health and safety:

CONARES is committed to working towards a goal of zero accidents and injuries, as well as general wellbeing in the workplace and beyond. This is endorsed by the Sustainability Policies and Procedures that promote our philosophy of Safe Sustainable Reinforcing Steel. CONARES requests its suppliers to eliminate all work related injuries on their workforce or community, and to meet the standards of CONARES's Sustainability Policy.

5.2. Human Rights:

CONARES respects all human rights, of employees and local communities, and is committed to promoting these principles to its suppliers, as set out in CONARES's Human Rights Policy. CONARES requests its suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses, and those of their suppliers. The supplier must always comply with the most demanding requirements, whether relevant applicable laws, the Human Resources Policies and Procedures or this Code. Where local laws prohibits the supplier from upholding certain aspects of the Code or the Human Resources Policies and Procedures, the supplier should comply with local laws while seeking to respect human rights.

5.3. Ethics:

CONARES is committed to apply fair, ethical and transparent business practices.

CONARES does not buy materials and services that do not comply with national or international laws and conventions.

CONARES is committed to using raw materials of legal and sustainable origin, and will not source 'conflict minerals'.

CONARES requests its suppliers to maintain and enforce a company policy requiring adherence to ethical business practices, adopting the responsible sourcing principles of CONARES.

5.4. Environmental stewardship:

CONARES is committed to making steel more sustainable. To achieve this goal CONARES uses its expertise in steel to develop cleaner processes and aims to minimize the impact on the environment. We seek to work with suppliers that are committed to the same objectives and follow best practices in environmental management, including energy and resource efficiency, biodiversity management, waste reduction and recycling.

CONARES requests its suppliers to maintain effective policies, processes and procedures to manage their environmental impact and to operate their business in a manner that meets the standards of CONARES Sustainability Policy.

6. Documentation and monitoring

On request, we require our suppliers to:

- Complete a self assessment questionnaire based on this Code.
- Provide CONARES or its representatives with copies of all relevant information, to co-operate and to use reasonable endeavors to ensure that their sub-contractors do the same.
- Demonstrate what efforts they are making to meet the requirements of the Code.

The Code forms an integral part of CONARES supplier relationship management and evaluation procedure. CONARES will take a risk based approach in assessing suppliers'

compliance with the requirements of this Code. Monitoring may take the form of self assessments, site visits, and follow up on remediation plans.

CONARES will work with its suppliers in addressing gaps identified. CONARES reserves the right to disengage from suppliers that do not meet the requirements of this Code or who cannot provide or commit to an improvement plan.

7. Review

CONARES will periodically review this Code and the implementation programme, with respect to its suitability and effectiveness