

Code of Responsible Sourcing

1. Mission:

We are committed to producing steel that is safe and sustainable. To achieve this goal, we work closely with our suppliers to:

- Maintain a lean supply chain that supports our corporate sustainability initiatives.
- Ensure sourcing solutions meet the needs and expectations of customers, regulators, and wider stakeholders.
- Ensure that our company, our suppliers, and our stakeholders benefit from long-term value creation and reduced risk.

To achieve these objectives, we will set responsible sourcing standards, collaborate, innovate, and embed responsible sourcing into our business processes.

2. Introduction:

We communicate our Code for Responsible Sourcing to our suppliers and ask them to meet the minimum health and safety, human rights, ethical, and environmental standards listed below. It is important to us that our suppliers work with us to identify and develop continuous performance improvements to our responsible sourcing programme. The purpose of this Code is to ensure that our suppliers adopt sustainable business practices.

Our supply chain includes everything we purchase and use to run our operations, such as raw materials, services, products, shipping, and logistics. Responsible Sourcing is a key principle in our procurement approach and is given systematic consideration alongside factors such as price and quality.

3. Scope:

This Code applies to all our suppliers and contractors and their affiliates and applies to all products and services that we purchase. 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. Implementation:

We 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 program and practices to ensure they contribute to our responsible sourcing vision.

5. Expectation from Suppliers

Suppliers are strongly encouraged to collaborate with us 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.

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5.1. Health and Safety

We are 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. We request our suppliers to eliminate all work-related injuries on their workforce or community, and to meet the standards of our companies Sustainability Policy.

5.2. Human Rights

We respect all human rights, of employees and local communities, and is committed to promoting these principles to its suppliers, as set out in our Human Rights Policy. We request our suppliers to develop and implement policies and procedures to ensure respect for 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 prohibit 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

We are committed to apply fair, ethical, and transparent business practices. We will not buy materials and services that do not comply with national or international laws and conventions. We are committed to using raw materials of legal and sustainable origin and will not source 'conflict minerals' and requests our suppliers to maintain and enforce a company policy requiring adherence to ethical business practices by adopting the responsible sourcing principles.

5.4. Environmental Stewardship

We are committed to making steel more sustainable. To achieve this goal, we use our 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.

We request are 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 our companies Sustainability Policy.

6. Documentation and Monitoring

On request, we require our suppliers to:

- Complete a self-assessment questionnaire based on this Code.
- Provide us or our 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 our supplier relationship management and evaluation procedure. We 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.

We will work with its suppliers in addressing gaps identified. We reserve 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

We will periodically review this Code and the implementation program, with respect to its suitability and effectiveness.

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