

# Swiss Steel Group

## Supplier Code of Conduct

Principles of behavior for Suppliers of the Swiss Steel Group

### 1 Preamble

The Swiss Steel Group is a global integrated steel group and world-leading provider of high-quality, high-grade steel long products and special steels. With production and distribution companies in many countries across five continents, the Swiss Steel Group supplies customers wherever they operate.

All sourcing processes of the Swiss Steel Group are governed by our corporate values, with adherence to applicable laws, respect for human dignity, health and safety at work, responsibility and integrity in business dealings and the responsible, careful use of limited resources being key elements. These principles apply across national borders and represent a central point of guidance for our business activities. We therefore expect all of our business partners, including all suppliers and subcontractors, to likewise abide by our principles of behavior and to live up to their particular responsibilities.

This Supplier Code of Conduct defines the basic requirements placed on suppliers, including subcontractors, of the Swiss Steel Group as regards their responsibilities towards their stakeholders and the environment. The Swiss Steel Group expects all its suppliers to share the principles which are expressed in this Supplier Code of Conduct and which constitute an important component of supplier selection and evaluation. Moreover, Swiss Steel Group expects its suppliers to replicate these standards further down the supply chain.

The Swiss Steel Group reserves the right to reasonably modify the requirements of this Code of Conduct where necessary or appropriate. In such event, the Swiss Steel Group expects all its suppliers and subcontractors to accept such reasonable modifications upon notification.

### 2 General principles of behavior, laws and regulations

All suppliers of the Swiss Steel Group commit themselves to live up to their social responsibility as regards all of their business activities.

All our suppliers will conduct their business in line with the applicable domestic and international laws. We therefore expect our suppliers and subcontractors to be familiar and comply with all applicable laws, regulations, contractual agreements and generally recognized standards relevant to their business conduct. Business partners must be treated fairly and contracts must be adhered to.

Furthermore, a fundamental principle of the supplier's corporate policy will be equal treatment of all employees. The Swiss Steel Group encourages its suppliers to exercise diversity with respect to their employees as well as their decisions to select subcontractors. Suppliers will ensure that their employees are not harassed in any way and not subject to discriminatory treatment based on characteristics such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any other unlawful criterion under the applicable national and international laws.

### **3 Ethics in business dealings**

To comply with their social responsibilities, suppliers are expected to conduct their business dealings in an ethical manner and to act with integrity. This includes the following aspects:

#### **3.1 Competition and anti-trust law**

Our suppliers are committed to free and fair competition and will conduct their business in line with fair competition and in accordance with all applicable anti-trust laws.

#### **3.2 Business integrity, corruption and gratuities**

Suppliers are expected not to engage in or tolerate any form of corruption, extortion or embezzlement. Suppliers will not offer or accept bribes or other unlawful incentives to or from their business partners. Likewise, suppliers are expected not to offer to employees of the Swiss Steel Group gratuities or any other kind of personal benefit resulting from the relationships with the suppliers.

#### **3.3 Confidential Information and Privacy**

Suppliers will safeguard confidential information of the Swiss Steel Group and ensure that such information is not passed on to third parties or in any other form made public without the express prior approval of the Swiss Steel Group. In addition, suppliers will safeguard that all employees' and business partners' privacy is protected.

#### **3.4 Identification of Concerns**

Suppliers will provide means for their employees to report concerns or potentially unlawful activities in their workplace. Suppliers will treat such reports confidential and investigate such reports, including taking corrective action where necessary.

### **4 Human rights, health & safety and the environment**

Suppliers are expected to protect the human rights of their employees and to treat them with dignity and respect. This includes the following aspects:

#### **4.1 Rejection of child labor**

The Swiss Steel Group strictly rejects child labor in its supply chain. Suppliers must avoid any form of child labor in their business operations in accordance with the International Labor Organization core labor standards and the United Nations Global Compact principles. The Swiss Steel Group, hence, will not tolerate suppliers who employ children under the age of 15 or under the legal minimum working age.

#### **4.2 Rejection of forced labor**

The Swiss Steel Group vehemently opposes any form of forced labor or the exploitation of workers, in particular as regards children and young people. Suppliers must not utilize forced, bonded or indentured labor or involuntary prison labor.

### **4.3 Freedom of Associations**

The Swiss Steel Group expects its suppliers to be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers will respect the rights of their employees to associate freely, join labor unions, seek representation, join works councils and engage in collective bargaining. Suppliers will not discriminate employees who act as workers' representatives.

### **4.4 Fair working conditions, health and safety**

The Swiss Steel Group expects its suppliers to take responsibility for the health and safety of their employees. This includes, in particular, controlling hazards and taking the best reasonably possible precautionary measures against accidents and occupational diseases; providing training and ensuring that employees are educated in health and safety issues; and providing for a reasonable occupational health and safety management system.

Suppliers shall provide their employees with a workplace free of inhumane treatment, sexual harassment, corporal punishment, mental or physical coercion or verbal abuse, or the threat of any such treatment. Suppliers are also expected not to unfairly terminate any employment contract.

Suppliers are expected to provide their employees with fair and competitive compensation and benefits which aim at providing an adequate standard of living for employees and their families. Compensation will be paid to employees in a timely manner and must comply with the applicable national wage laws and ensure an adequate standard of living. Unless otherwise provided by local laws, deductions from basic wages as a purely disciplinary measure will not be permitted.

Working hours for suppliers' employees must not exceed the maximum set by the applicable national laws.

### **4.5 Protecting the environment**

The Swiss Steel Group regards the protection of the environment and the climate as an important element of its business dealings. Suppliers are therefore expected to act in accordance with all applicable national and international standards regarding the protection of the environment and the climate, to minimize environmental pollution and make continuous improvements in environmental protection; and to set up or use a reasonable environmental management system.

## **5 Compliance with this Code of Conduct**

Suppliers are expected to implement and to document the implementation of management systems to facilitate compliance with all applicable laws. Suppliers are further expected to promote continuous improvement with respect to the expectations set forth in this Code of Conduct.

## **6 Disclaimer**

This Code of Conduct does not give any third party any enforceable legal right against Swiss Steel Holding AG or its related companies. The Code of Conduct is subject to amendment.

**CONFIRMED BY:** *date*

*name/signature*