

Corporate Policy Manual

Supplier Code of Conduct

Effective: May 8th, 2024

Approved by the Audit Committee of Swiss Steel Holding AG

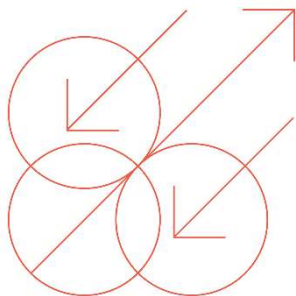




**Swiss
Steel**
Group

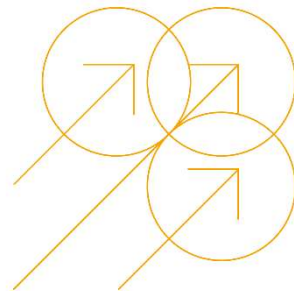
Steel is our backbone, our DNA. It's what we do best to contribute to shaping a sustainable future. And so we are teaming up – with each other, with customers and suppliers. Together we are designing ever better steel solutions with highest quality and profound passion. Our drive, expertise and care make us powerful in consulting, development, production and services.

Together. For a future that matters.



Curious.

We are leading experts in what we do, always curious to learn. We expand our knowledge, innovate and take action – in dialog with each other and with our customers.



Active.

We are passionate about progress, actively encouraging and challenging ourselves to realize tangible improvements. Step by step. Together – for our customers and for ourselves.



United.

We care for each other and work together with mutual respect and trust – always anticipating and appreciating the perspectives, goals and challenges of our customers and our colleagues.

Message from the Board of Directors and the Executive Management team

Swiss Steel Group is convinced that conducting business with the highest standard of ethics, integrity and sustainability is a prerequisite for long-term economic growth. Our strong brand and the high quality of our products have firmly established our reputation in the market, making us widely recognized as one of the best. This achievement is largely due to the dedicated efforts of our employees¹ worldwide.

To continue our successful transformation and ensure compliance with industry-leading standards, the Board of Directors and the Group Executive Board of Swiss Steel Group have taken the decision to introduce a new Supplier Code of Conduct. This comprehensive document outlines the principles, that must be adhered to by all our suppliers worldwide.

In line with the UN Guiding Principles (UNGPs) and OECD Guidelines for Multinational Enterprises (MNEs) as well as the latest regulations and standards, we have placed particular emphasis on important subjects such as anti-corruption, antitrust and supply chain risks.

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.

Through our new Supplier Code of Conduct, we aim to share our ethical, integrity and sustainability standards with our suppliers. Swiss Steel Group expects not only all its suppliers to abide by the Swiss Steel Group Supplier Code of Conduct, but to share the principles which are expressed in this document with their respective supply chain.

This document constitutes an important component of supplier selection and evaluation and reflects the commitment that Swiss Steel Group and its business partners want to collectively support for a better future.

Emmenbrücke, May 8th, 2024



CEO Swiss Steel Group
Frank Koch



VP Procurement
Peter den Dikken

¹ The term "employee" is used here regardless of gender. It includes all employed persons, including persons employed by temporary employment agencies, as well as members of the Board of Directors and Management Board.

² "Managers" are "employees" within the meaning of the above definition who hold a management position. Due to their special position, their responsibility for the implementation of our Code of Conduct is explicitly emphasized at various points in the Code of Conduct.

³ For the purposes of this document, "Swiss Steel Group" includes Swiss Steel Holding AG, all subsidiaries of Swiss Steel Holding AG, shareholdings and joint ventures.

⁴ Disclaimer: This Code of Conduct does not give employees or third parties any enforceable legal claim against Swiss Steel Holding AG or its affiliated companies. We reserve the right to make changes to the Code of Conduct

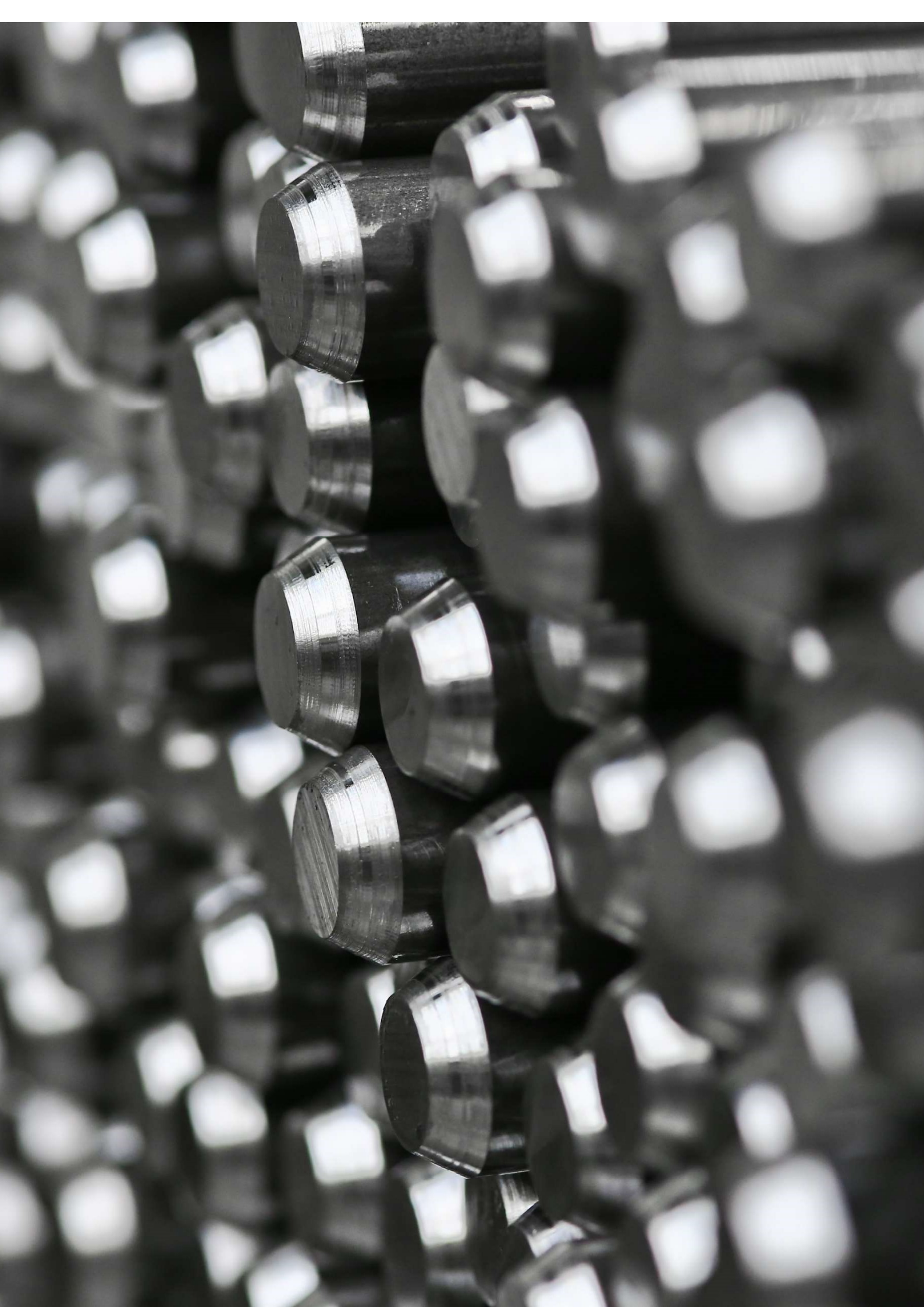


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1 Suppliers' responsibility: Governance & Management System

1.1 Compliance with applicable laws and internal guidelines

Swiss Steel Group operates its business in accordance with applicable laws and international standards such as [UN Guiding Principles \(UNGPs\)](#) and [OECD Guidelines for Multinational Enterprises \(MNEs\)](#). Our Group expects the same level of ethics and compliance from its business partners, including suppliers and subcontractors.

Therefore, Swiss Steel Group expects before entering a business relationship with a supplier, to confirm the acceptance of our Supplier Code of Conduct. Our suppliers are free to present an equivalent alternative to which they demonstrably adhere covering all the subjects mentioned in the Swiss Steel Group Supplier Code of Conduct.

1.2 Cascade Swiss Steel Group values and standards in your supply chain

We know that within our supply chain we have a large diversity of business partners in terms of activities (service or material provider), size (local or international companies), locations, and corresponding inherent risks. We therefore understand that resources and processes to achieve the below measures may differ, however we do expect our business partners to implement and follow the spirit of this supplier code of conduct within their organization to the extent applicable to the type of activity undertaken by the business partner's operations.

This document is important to us as our Supplier Code of Conduct shows the values that our Group wants to exhibit worldwide in matters of human rights, environment, ethics, and anti-corruption. We promote and apply these values internally; they are also of utmost importance for our employees, management, and shareholders. Thus, we expect our business partners (customers, suppliers, supply chain in general, agents) to abide by the values and principles mentioned below and to take all measures and implement controls to ensure their supply chain is duly aligned with our standards.

Suppliers shall implement effective management systems and a governance structure to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the principles set out in this Supplier Code of Conduct. This includes the following aspects:

Whistleblower line available to employees and third parties: Supplier shall provide to their employees and third parties options to report concerns or potentially unlawful activities in the workplace. Any report should be treated in a confidential manner. Suppliers will investigate such reports and take corrective action if needed, in accordance with legal requirements. Rights of whistleblowers and the accused must be protected.

Risk assessment: Suppliers shall implement mechanisms to regularly identify, evaluate and manage risks in all areas addressed by this Supplier Code of Conduct such as Human rights, Environment, Anti-corruption and Trade compliance. This evaluation must be conducted on supplier's own operations and on its direct suppliers. Furthermore, in the risk assessment of their supply chain the country and activity of the suppliers must be taken into consideration.

Define and formalize standards, train, and communicate regularly with your employees to ensure awareness: Suppliers shall take appropriate measures such as policies development, procedures implementation, and training rollout to allow managers and employees to gain an appropriate level of knowledge and understanding of the applicable principles of this Supplier Code of Conduct, the applicable laws and regulations and generally recognized standards.

Set controls for detection of non-compliance: Suppliers shall develop, a management system and implement controls to prevent and detect existing breach or potential breach to this Supplier Code of Conduct and share incident documentation upon mutual agreement. In addition, the supplier shall take appropriate measures to prevent, violation's repetitions.

Supplier code of conduct communication and distribution: Suppliers shall replicate the principles set in this Supplier Code of Conduct further down the supply chain and make sure that corresponding controls are set in place.

1.3 Audits

We regularly review our suppliers' compliance with the principles and requirements by our suppliers as part of a due diligence process to identify, reduce and avoid risks in the supply chain. In this context our business partners grant us the right to verify compliance with these principles, which they confirm by accepting this Code of Conduct for Suppliers. This includes but not limited Swiss Steel Group right to take reasonable measures to control compliance via questionnaires, interviews, or audits.

1.4 Sanctions

The Supplier Code of Conduct is one of the most important documents within our company, as it outlines the standards, we expect from all our suppliers and their respective supply chain. It also describes the commitments we give as a company to our shareholders and business partners on how we conduct our business and how our suppliers act. Swiss Steel Group reserves the right to (1) terminate the business relationship without notice and (2) assert further claims under civil law, in the event of a serious breach of this Supplier Code of Conduct.

1.5 Speak up

At Swiss Steel Group, we expect all our employees to raise an alert and to speak up when they have:

- a concern or question about our Code of Conduct or the applicable laws.
- a suspicion that our Code of Conduct or the applicable laws have been breached.
- a concern about a practice that may not be in line with our Code of Conduct or applicable laws.

We encourage such reporting from our employees and all our business partners (customers, suppliers and any other third party). For this purpose, our Group has invested in multiple communication channels to enable everyone to reach out to us.

Our Speak Up Line platform is available on our [Swiss Steel Group website](#) and we have placed posters at all our sites for our employees, contractors and third parties. The alerts received are analyzed confidentially by the Ethics Steering Committee (Head of Corporate HR, Compliance, Internal Audit and Legal), which defines the actions to be taken on a case-by-case basis.

We are committed to protecting whistleblowers and do not tolerate any form of discrimination against anyone who, in good faith, reports (possible) violations of the Code of Conduct or the laws. Any actual or threatened discrimination against employees or third parties will be sanctioned as a serious violation of our Code of Conduct and Supplier Code of conduct.

2 Human Rights

Swiss Steel Group expects its suppliers and their respective supply chain providers to respect and promote the rights of their employees and the local community including ethnic minorities, treating them fairly and with dignity. Ensuring rights of employees in alignment with the local, international laws is critical for Swiss Steel Group across its entire supply chain. Swiss Steel Group is particularly vigilant with the raw material origin ensuring that it is extracted in alignment with the [U.S. Dodd Frank Act](#) avoiding conflict mineral.

Equal opportunities, prohibition of discrimination:

- Respect human dignity, reject all forms of discrimination, and value diversity, promote different ways of thinking, varied perspectives, and openness.
- Treat their employees within our supply chain fairly, with dignity and with respect independently of their ethnic or national origin, gender, ideology, religion, age, disability, sexual orientation, skin color, political views, social background, or any other characteristics.
- Strictly forbid harassment.

Right of association and Collective Bargaining Law:

- Support their employees in exercising their rights as employees to form, join and leave associations or organizations to promote the protection of employee interests.
- Clearly forbid any form of discrimination against employees who actively represent employee rights.

Rejection of child labor, forced labor and security force:

- Respect, protect and promote regulations to protect children's rights and human rights.
- Strictly forbid child (below 15 years old) labor, forced labor, exploitation of employees or any form of modern slavery as well as all forms of human trafficking.
- Ensure their employees fulfill their work duties voluntarily (and not based on threats of direct or indirect violence or intimidation).
- Ban the commissioning or use of security forces to protect a business project involving torture or harm to life or limb.
- Obligate security service providers to respect all internationally recognized human rights and related environmental rights.

Fair working conditions, health & safety:

- Observe and adhere to relevant health & safety standards, guidelines, and regulations.
- Promote health & safety measures, control hazards and take the best reasonably possible precautionary measures against accidents and occupational disease at their workplaces and sites.
- Foster the reporting of unsafe behavior and situations by employees (near miss reporting) and track and continuously improve health & safety performance.
- Conduct regular inspections and audits to eliminate any dangerous conditions or behavior and their causes.
- Provide clean, secured and safe (with suitable fire prevention) accommodation, meeting basic needs of employees, when applicable.

Working Hours, Wages and Benefits

- Employees working hours will not exceed the maximum set by the applicable national law.
- Unless otherwise provided by local laws, deductions from basic wages as a disciplinary measure will not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis).
- Provide your employees with fair and competitive compensation and benefits. Compensation and benefits should aim at providing an adequate standard of living for employees and their families.
- Employees will be paid in a timely manner.

Local Community

- Promote responsibility for the communities you operate in.
- Listen to the concerns of local residents and provide for healthy and safe living conditions.
- The support of local job creation, local sourcing, education provisioning and infrastructure development is encouraged.

Conflict Minerals

- Suppliers are expected to ensure that products supplied to Swiss Steel Group do not contain metals derived from minerals or their derivatives that originate from conflict regions and directly or indirectly finance or benefit armed groups.
- There is a clear statement from the supplier to the effect of ensuring a conflict-free supply chain and there are Processes in place to ensure reasonable due diligence and disclosure procedures to identify whether suppliers use conflict minerals.
- Track information throughout the supply chain guaranteeing that sourced materials do not contain minerals from a [conflict region 3TG \(tin, tungsten, tantalum, and gold\) and Cobalt](#), complying with human rights standards.

3 Integrity

Swiss Steel Group expects its suppliers and their respective supply chain providers to respect and promote integrity standards, preventing corruption, money laundering, etc. Working with highest ethical standards is of the highest importance for Swiss Steel Group across its entire supply chain.

Fair Competition and Antitrust:

- Business is in line with fair competition laws and in accordance with all applicable anti-trust laws
- Support free and fair competition practices and reject practices of any kind that may limit competition (such as cartels, setting barriers to entering a market, concerted practices with competitors, etc.).

Conflicts of interest:

- Clearly explain the risks of conflicts of interests to their employees asking them to immediately withdraw from any business decision and report them.
- Disclose and report to Swiss Steel Group any situation that could constitute a conflict of interest, such as Swiss Steel Group's employees having professional, private and/or significant financial advantages or interests in any of your company's businesses (direct supplier). Report to the Compliance team: compliance@swisssteelgroup.com.
- **PEP** and **Public Official** must be managed with the utmost care with Conflict of interest, Corruption and Bribery matters.

Anti-corruption and bribery:

- Reject and don't tolerate any form of corruption, extortion or embezzlement.
- Don't offer or accept bribes or other unlawful incentives to/from their business partners.
- Don't offer to Swiss Steel Group employees' gifts or any other kind of personal benefit resulting from the business relationships.
- Taking measures to prevent and detect any corruption or bribery, including employee trainings focusing on main company risks and employees most exposed.
- Implement controls specifically on contacts with government agencies and their representatives,
- Set thresholds and review controls for donations, sponsorships, gifts, entertainment, and hospitalities for private individuals (customers, suppliers, etc.) and public officials.
- Any gifts or hospitality offered must be given in a legitimate business context and be reasonable, proportionate, and modest in economic value. Swiss Steel Group employees are not allowed to accept any gifts, entertainment, hospitality and any other kind of benefits that intend to make the recipient feel that the giver expects something in return from the Swiss Steel Group employee or its business partner.

Anti-money-laundering:

- Conduct business with partners with a legitimate business purposes and funds sources.
- Set measures to prevent money laundering activities and review any unusual situations.

Trade compliance:

- Respect international and national trade law regulations particularly sanctions, embargoes, and export control regulations
- Implement screening of third parties (banks, customers, vendors, etc.) or equivalent measures to prevent transactions with sanctioned third parties, breach of embargoes or export control regulations.
- Raise the awareness and train the relevant employees on those subjects.

4 Products, Assets, Data and Information

Swiss Steel Group expects its business partners including suppliers and subcontractors to protect Swiss Steel Group Products, Assets, Data and Information with utmost care.

Protecting Swiss Steel Group assets and intellectual property:

- Protect Swiss Steel Group property and assets treating assets with the utmost care.
- Treat confidential Swiss Steel Group information, such as but not limited to product specifications, and ongoing research and development projects with precautions against leak or theft.
- Safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.
- Don't use Swiss Steel Group's name or marks of our affiliates or products in publicity or advertising without Swiss Steel Group's prior written consent.

Swiss Steel Group employee's personal data protection and data security in general:

- Protect and secure personal data of Swiss Steel Group employees, within the framework of the applicable laws.
- Collect, process transfer, and use Swiss Steel Group employee's personal data only to the extent necessary for a specific, defined, and authorized purpose.
- Prevent Swiss Steel Group employee's personal data access by unauthorized persons.

Product safety regulations

- Label products properly and communicate product-handling requirements.
- Provide the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need. This includes product information, safety data sheets, notification or registration confirmations, uses and exposure scenarios.
- Share pro-actively and transparently information about the health, safety, and environmental aspects of your Products with Swiss Steel Group.

5 Environment

Swiss Steel Group expects its suppliers and entire supply chain to have a systematic approach to environmental management and to comply with all relevant national and international standards (such as, but not limited to the [Minamata](#) and [Basel](#) conventions, the [Stockholm Convention on Persistent Organic Pollutants](#), and regulation of chemicals).

Sustainable production and environmental protection are among Swiss Steel Group's top priorities and an important element of its business dealings.

Resources and energy:

- Systematically track consumption of energy, raw materials, water and other resources.
- Ensure continuous efficiency improvement and responsible consumption.
- Prefer the use of energy from low carbon sources over fossil fuels where available and possible.

Fostering a circular economy and sound waste management:

- Maximize recycling and avoid the use of primary materials and natural resources wherever possible.
- Minimize the generation of waste and prefer recovery operations to disposal.
- Manage waste with great care and only work together with professional, qualified and authorized third parties.

Reducing emissions:

- Suppliers of greenhouse gas emission intensive products or services shall track their emissions on Company and Product level including upstream activities and share them with Swiss Steel Group upon request.
- Develop ambitious reduction targets to limit global temperature rise to 1.5°C, in line with the Paris Agreement.
- Monitor and continuously reduce emissions to air, soil and water.
- Act on spillages and leaks without delay, both for immediate resolution and on systematic improvement.
- Regularly challenge and update emergency response plans.

Ethics in production:

- Prevent non-compliant or contaminated materials from entering production processes.
- Strictly follow all applicable laws including the use, correct labelling, safe handling, intentional and unintentional generation, and disposal of potentially hazardous substances and materials.
- Identify and minimize potential negative impact of operations and products on the environment incl. biodiversity.

6 Contact

If you have any questions about this document, please contact the Corporate Compliance team.

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