

# Supplier Code of Conduct

## Introduction

This Supplier Code of Conduct objective is to ensure that our suppliers, contractors, consultants, and business associates (“**Business Partners**”) share and promote Sideral Steel fundamental values in ethics and sustainability principles. Sideral Steel require their Business Partners to comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within their own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as their environmental, social, and ethical performance, either performed by the Company or by third parties associated with the Company. The participation of Business Partners in the sustainability assessment is considered essential for the business relation with Sideral Steel as sound sustainability practices are expected from all our Business Partners.

### 1. Business ethics and anti-corruption

#### Compliance

Business Partners are required to comply with all applicable local laws and regulations, including those of the countries in which they operate. Business Partners should have a formal system to establish rules and indicators, keep records and trigger corrective actions, in case of legal breaches or any violations of this Code, endorsed by senior management of the Supplier. Business Partners shall at any moment and upon request of Sideral Steel, be able to disclose information and performance indicators on business activities, labor, health and safety, and environmental practices.

#### Business integrity

Business Partners are required to adhere to the highest standard of ethical conduct in every aspect of their business, including relationships, practices, sourcing, and operations, as well as not engaging in any form of corrupt practices, including but not limited to, extortion, fraud, bribery and money laundering.

#### Improper actions

Business Partners are required to avoid behavior or actions that would be an offense under any applicable law relating to corruption and bribery.

#### Fair business and competition

Business Partners are required to conduct their business activities in accordance with all applicable antitrust, competition, and fair trade practice laws and regulations. They are also required to respect all applicable economic sanctions, trade laws and restrictions as imposed by the EU, the UN or other national and supranational bodies or governments including, but not limited to, extortion, fraud, counterfeit, bribery and money laundering. Business Partners will disclose to the Company all available information about possible conflicts of interest.

#### No improper advantage

Business Partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

### 2. Labour and human rights

#### Equal opportunities

Business Partners are expected to provide equal opportunity and treatment and not apply any form of discrimination in hiring and employment practices on grounds of race, color, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status.

Business Partners are expected to respect local communities related to their operations, their respective land, forest and water rights and any related culture, religion, and indigenous rights. Business Partners should promote a healthy and safe living environment, support local job creating and sourcing, stand against forced evictions and avoid any health and safety concerns, including air pollution, noise and or other nuisances

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#### Child and forced labor

Business Partners are required to prohibit child labor. Business Partners are required to employ only workers who meet the respective applicable minimum legal age requirement in the country of operation.

Viohalco companies require from their Business Partners to reject any form of forced or compulsory labor.

#### Harassment

Business Partners are required to treat employees with dignity, equality and respect, and not with harassment or discrimination.

#### Safe working conditions

Business Partners will ensure a healthy, safe and secure working environment for their employees. Business Partners are required to maintain a system for all personnel to report health and safety incidents, as well as a system to investigate, track, and manage such reports. Business Partners are required to comply with all applicable health and safety laws and regulations, and to implement where necessary corrective action plans to mitigate risks, provide necessary medical treatment, along with facilitating workers' return to work.

#### Working hours, wages and benefits

Business Partners shall follow all applicable laws with respect to working hours, wages and benefits. Overtime shall be compensated at the prevailing overtime rates.

#### Freedom of association and collective bargaining

Business Partners are expected to recognize and respect the right of employees to join or not to join labor unions, associations, or any other lawful organization, and to comply with all relevant applicable local and national laws.

#### Conflict minerals

Business Partners are expected to take measures to ensure that no minerals/raw materials are being used (manufactured or procured) which are considered conflict raw materials. Upon request, Business Partners shall provide country of origin information for the listed minerals.

Any direct or indirect support to public or private security forces who operate illegally in mining, transportation or any other related upstream action is reason for immediate suspension of business relationships.

### 3. Environmental protection

#### Licenses and permissions

Business Partners are required to comply with all required environmental permits, approvals and registrations and to follow the operational and reporting requirements of such permits.

#### Pollution prevention, resource consumption and waste management

Business Partners are expected to make continuous improvements with respect to environmental emissions as well as energy and resource management. Business Partners shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater, and air emissions.

#### Greenhouse Gas Emissions and Energy Consumption

Business Partners should look for cost effective methods to improve energy efficiency and to minimize their energy consumption, including greenhouse gas emissions.

Business Partners are expected to promote decarbonization initiatives, reducing their direct and indirect CO<sub>2</sub>e emissions, through the use of

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renewable sources of energy and utilization of secondary materials. The Company expects transparency in terms of their own emissions as well as those of their suppliers and encouraged to set reduction targets.

## Product content restrictions

Business Partners are required to adhere to all applicable laws, regulations regarding prohibition or restriction of specific substances, including labeling for recycling and disposal, e.g. REACH regulation, RoHS restrictions, CE marking etc.

## Biodiversity protection

Business Partners are expected to protect and support actions of preservation of natural ecosystems, forests and animals.

## 4. Personal data protection

Business Partners are required to respect the personal data protection and undertake the appropriate measures according to the provisions of the General Data Protection Regulation 679/2016 of the European Union and the national implementation law 4624/2019. Aiming the attunement with the international standards and best practices, Business Partners should establish strict procedures for the protection of personal data throughout its spectrum of activities.

Business Partners are required to respect intellectual property rights, including those of the Company, and have in place appropriate measures to protect all confidential information provided.

## 5. Integrity Hotline

All Business Partners have the right and obligation to draw the organization's and the companies' attention to circumstances indicating prospective illegal behavior. Notifications and complaints may be made anonymously, in accordance with the relevant Whistleblowing mechanism. Reporting individuals will not be subject to reprisals or retaliation of any kind.

Every report received through the Integrity Hotline at the Company's website is to be investigated thoroughly and discretely, by specially appointed senior executives who consult directly when a critical indication appears. All cases will be assessed in an independent and transparent manner, securing impartiality.

Business partners are also encouraged to provide all stakeholders with access to mechanism(s) to raise concerns relating to violations (or suspicion of) on any parts of the Code of Conduct. All employees that report a concern should be protected from any form of retaliation.

## Supplier acknowledgement

I, the undersigned, on behalf of the company  
..... acknowledge to have read  
and understood the terms and conditions expressed in the Supplier  
Code of Conduct and confirm that the company adheres and commits to  
compliance with the Code

Company Name: \_\_\_\_\_

Signer's name and title:  
\_\_\_\_\_

Signature and stamp:

Date: \_\_\_\_\_

### Validity of the Code of Conduct

Sideral Steel reserve the right to reasonably change the requirements of this Supplier Code of Conduct due to changes to the Company's Code of Conduct and Business Ethics. In such an event, Sideral Steel will inform their Business Partners and expect them to accept those reasonable changes.

