

The present code of conduct formalizes the Erasteel group willingness to strengthen its commitments and expectations when addressing sustainable development and ethics issues related to purchasing.

This document is in line with Erasteel's Corporate social responsibility CSR¹ roadmap, its ethics charter and its values.

Through this code of conduct, Erasteel, details its expectations toward suppliers and commits itself to implementing best practices in sustainable purchasing. This code of conduct is also consistent with Erasteel's external commitments, particularly with respect to relations with local or regional suppliers, especially small and medium sized businesses².

Erasteel's Purchasing function contributes to the Company's creation of value and its sustainable economic performance. Considering the Purchasing function's role, **we urge our suppliers, contractors and their respective subcontractors (all herein referred to as "suppliers") to work with Erasteel to identify improvement opportunities in their CSR practices.**

In this context, the chapters below are intended to outline Erasteel's requirements and expectations toward supplier in terms of sustainable development and ethics, divided in three chapters:

Working conditions, environment and business ethics.

For Erasteel, compliance with these requirements is a deciding factor when choosing and establishing its business relationships.

¹ Corporate Social Responsibility

² For example, in France, Innovative SME charter, Sustainable supplier relations charter

1. HUMAN RIGHTS AND WORKING CONDITIONS

Human rights

Erasteel requires its Suppliers to respect Human rights as recognized by the Universal Declaration of Human Rights, the ILO's Fundamental Conventions and any other applicable local, national and international regulations, as well as the principles details in its policy.

In particular, Erasteel shall rule out any contractual relations with Suppliers that are known not to comply with regulations in terms of forced labor, child labor, minimum working age, discrimination, violence or which are complicit in terms of violations in these areas.

Health and safety

Erasteel has adopted a Health Policy and a Safety Policy. Erasteel expects its Suppliers to comply with standards equivalent to its own and, in particular, to provide their employees with a work environment that meets applicable health and safety standards and manages the impact their activities have on the health of local populations.

Labor law

Erasteel requests its suppliers to comply, wherever they operate, with all applicable local legal provisions as regards to labor law, particularly those concerning legal working hours and minimum wages.

2. ENVIRONMENT

In accordance with its CSR roadmap and Environmental Policy, Erasteel expect its Suppliers to control their activities' impact on the environment and comply with all applicable regulations. Erasteel requests its Suppliers to draw inspiration from the best international practices in this area, particularly by setting up an environmental management system.

Energy and environmental impact

Erasteel requests that its suppliers implement actions to improve their energy efficiency and reduce their greenhouse gas emissions and other environmental impacts.

Natural resources and biodiversity

Erasteel requests that its Suppliers optimize their use of natural resources and water and limit their impact on biodiversity and water resources.

Emissions and waste management

Erasteel requests that its Suppliers manage emissions and discharges associated with their activities, including those linked to the generation and management of waste by detailing their environmental policy. This must highlight an approach and a desire to reduce energy consumption, greenhouse gas emissions and limit the impact of natural resources.

Erasteel encourages programs aimed at minimizing waste generation, particularly hazardous waste, and at implementing all forms of reuse and recycling.

Erasteel will be able to request its Suppliers at least once a year their CSR approach, environmental policy as well as their improvement indicators.

Products regulations

Erasteel requests that its Suppliers comply with the market access and product regulations in force and attach the greatest importance to the knowledge and management of the toxic impact of the products they use.

Erasteel requests that the provided equipment or product do not contain, in a concentration above 0.1% (in weight percentages), substances included in the Candidate List as defined in article 59.1 of REACH regulation (CE) N° 1907/2006 and does not contain substances included in EU directive 2015/863/EU RoHS in a concentration above levels indicated.

3. BUSINESS ETHICS

Under its Ethics Charter, Erasteel has adopted principles aimed at protecting the integrity of its activities. These principles are as follows:

Corruption and conflicts of interest

Erasteel condemns all forms of corruption and prohibits any situations entailing a conflict of interest involving its employees and Suppliers. Continuation of the Group's relationships with its Suppliers shall be conditional on the latter refusing any corrupt act or money-laundering, any situation of conflict of interest and any other breach of the legal provisions applicable in the countries in which they operate. Regarding gifts and invitations, the transparency rule applies in all circumstances: gifts received or offered as part of a business relationship are reported to management and authorized in accordance with the conditions set out in the Group Policies in force at Erasteel.

Respect of competition rules

Erasteel L has pledged to comply with competition regulations and expects the same of its Suppliers. The Group has established procedures specifically aimed at ensuring the respect of the equality of treatment of Suppliers, and that all purchasing decisions are based on an objective and comparative assessment of the Suppliers' integrity and reliability. All its procurement decisions are based on the criteria of price, quality, performance, lead times and the suitability of the proposed services for the Group's needs. Furthermore, the Group strictly complies with regulations which prohibit any agreement, concerted practice or abuse of a dominant position in the market concerned, where its suppliers are concerned.

Respect of confidentiality and patent rights

Erasteel considers the respect of confidentiality and patent rights one of its main priorities. The information that the Suppliers share with the Group will be treated with due respect and used only for authorized purposes. Erasteel expects its Suppliers to make the same commitments.

Product traceability and conflict minerals

Erasteel requests that its Suppliers ensure that materials and products delivered to Erasteel are of legal origin and can be traced properly, particularly for raw materials.

Erasteel systematically requests from all its suppliers of conflicts minerals 3TGs (Tin, Tungsten, Tantalum and Gold) or Cobalt, to resort only to conformant³ smelters or refiner.

Transparency and publishing non-financial information

Erasteel has obligations and has made commitments on transparency and the publication of non-financial information. The Group expects its Suppliers to implement the same practice in their contractual relations with Erasteel and their own stakeholders.

4. COMMITMENT OF SUPPLIERS AND SUBCONTRACTORS

When managing relations with its Suppliers, Erasteel's Purchasing Managers may verify, namely through evaluations and/or audits, that the above principles and rules are being observed. If necessary, Erasteel will take any appropriate measures following these verifications.

Erasteel is convinced that this code of conduct's provisions is a sound way to improve its overall performance and that of its Suppliers and is aware of the efforts that some of them will have to make in order to comply with these provisions. In this context, Erasteel is willing to support any Supplier that undertakes an improvement process, to the extent of its possibilities. By accepting the principles of this code of conduct, Erasteel suppliers and subcontractors undertake to support Erasteel in the deployment of its CSR roadmap and agree to be assessed by Erasteel on the principles set forth above.

Finally, Erasteel also expects its Suppliers to do their utmost to pass on equivalent provisions throughout their own value chain.

³Conformant to the RMI assurance process (RMAP)

Company name	Name and title of the signing officer	Date	Signature

Chief purchasing officer

Victor PERSSON, 01 oktober 2023

Victor PERSSON

Conflicts Minerals Policy

This policy formalizes the Erasteel group commitments toward conflict minerals procurement and its willingness to achieve and monitor a completely “conflict-free” minerals supply-chain. It comes in addition to the other CSR and Ethical due diligences that are conducted by Erasteel.

As defined by section 1502 of the Dodd Frank Wall Street Reform and Consumer act, “Conflict Minerals” refers to specific minerals, also known as the “3TGs” (Tin, Tantalum, Tungsten and Gold), originating from or being transported through the Democratic Republic of the Congo (DRC) and its nine adjoining countries, and which may be directly or indirectly financing armed groups engaged in conflicts resulting in serious social and environmental abuses.

This conflict minerals policy may see its perimeter extended to other regions and countries if the European union or any other applicable jurisdiction decides to update its conflicts area and high-risk area definition or provide a list of such areas.

In line with its human right policy and its supplier code of conduct, Erasteel fully supports the intent of the Dodd Frank act and the European Union Regulation 2017/821 to eliminate the social and environmental harm brought by the use of Conflict Minerals and any funding that supports armed groups in the DRC region.

This policy is systematically shared with our prospects and suppliers of conflicts minerals to inform them of our requirements and expectations on the matter.

1. COMMITMENTS

Erasteel commitments

Erasteel does not directly source 3TGs from mines, smelters or refiners, nevertheless we are working toward ensuring to all our stakeholders that all the 3TGs used in our production processes come from conflict-free sources and did not support or fund conflicts within the Democratic Republic of Congo or its adjoining countries.

Therefore, we are committed to:

- > Identifying and listing all our Tin, Tantalum, Tungsten, and Gold suppliers to target and monitor our efforts accordingly.
- > Requesting these suppliers to work towards ensuring that any 3TGs supplied to Erasteel originates from Conflict Free Sources. To comply with our request of conflict free sources, suppliers will be required to:
 - Complete the latest version of the Conflict Minerals Reporting Template (CMRT) proposed by the Responsible Minerals initiative⁴ ("RMI") for the datasheets: Declaration, Smelter List (if applicable) and product List.
 - Pass this reporting requirement through their own supply chain to determine the source of the minerals, at least up to the smelter or refiner.
 - Supply from smelters or refiners validated as conformant under the Responsible Minerals Assurance Process ("RMAP"), proposed by RMI.
- > Suspending or terminating engagement with suppliers after failed attempts at mitigation, remediation or non-conformance with Erasteel policy.
- > Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of 3TGs based in the covered countries.
- > Collaborating with third party on cross-industry efforts, such as RMI, to support responsible and conflict-free 3TGs supply chains.

2. MEASURES

Five-step framework

To respect its commitments and identify, prevent, mitigate and, when appropriate, remediate risks associated with 3TGs, Erasteel developed and integrated the Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain, recommended by the OECD⁵.

Five-step documentation

The integration of the OECD five-step framework led to the definition or review of the following documents and tools that will be made public to all stakeholders on Erasteel's website and will help to monitor our conflict minerals supply chain in adequation with our commitments:

Step 1: Establish strong company management systems

- > Erasteel "Conflict Minerals" policy
- > Erasteel supplier code of conduct
- > Erasteel grievance mechanism

Step 2: Explore risks in the Supply Chain

Step 3: Design and implement a strategy to respond to identified risks

Step 4: Carry out independent third-party audit of smelter's due diligence practices

- > Erasteel conflict minerals due diligence procedure

Step 5: Report annually on Supply Chain due diligence

- > Erasteel conflict minerals annual report

Grievance mechanism

The Erasteel grievance mechanism allows interested internal or external parties to raise concerns about the circumstances of mineral extraction, trade, handling and export in a conflict affected or high-risk area. They can raise their concerns regarding human rights violations such as child labour, forced labour, or modern slavery in Erasteel Supply Chain. Available worldwide in the thirteen main languages spoken in the Group, the service is outsourced to ensure full transparency, confidentiality and protection for whistleblowers.

<http://www.responsiblemineralsinitiative.org>

⁵ <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>