



C. SUPPLIER CODE OF CONDUCT

Steelcon is committed to upholding the highest standards of ethical behavior and compliance throughout our operations and supply chain. This Supplier Code of Conduct outlines our expectations for suppliers in areas including human rights, working conditions, business ethics, and more. Suppliers are expected to adhere to these principles and ensure that their operations align with Steelcon's values and standards.

1. Human Rights and Working Conditions

1.1 Child Labour and Young Workers

- Suppliers must not engage in or support child labour.
- Workers under the age of 15 (or the local minimum age for employment, whichever is higher) must not be employed.
- Young workers, if employed, must be given tasks appropriate for their age and not be exposed to hazardous conditions.

1.2 Wages and Benefits

- Suppliers must pay wages that meet or exceed local legal requirements or industry standards, whichever is higher.
- Benefits must comply with local laws and regulations.

1.3 Working Hours

- Suppliers must comply with local laws on working hours, including overtime.
- Employees should have regular, defined hours and adequate rest periods.

1.4 Modern Slavery

- Suppliers must not engage in or support any form of modern slavery, including forced or compulsory labour and human trafficking.
- All employment must be voluntary, and workers must be free to leave their employment following reasonable notice.

1.5 Ethical Recruiting

- Recruitment practices must be transparent, fair, and non-exploitative.
- All workers should receive clear, accurate information about the terms of their employment.

1.6 Freedom of Association and Collective Bargaining

- Suppliers must respect the rights of employees to freely choose to join or not join associations, unions, or other worker organizations.
- Employees should be free to engage in collective bargaining without fear of retaliation



1.7 Non-Discrimination and Harassment

- Suppliers must provide a work environment free from discrimination and harassment based on race, color, gender, sexual orientation, religion, disability, or any other characteristic protected by law.
- All workers should be treated with respect and dignity.

1.8 Women's Rights

- Suppliers must uphold the rights of women to equal opportunities and fair treatment in the workplace.
- Measures should be in place to prevent gender-based discrimination and harassment.

1.9 Diversity, Equity, and Inclusion

- Suppliers are encouraged to promote diversity, equity, and inclusion within their workforce.
- Policies should be implemented to support a diverse and inclusive working environment.

1.10 Rights of Minorities and Indigenous Peoples

- Suppliers must respect the rights of minority and indigenous communities, including their cultural and land rights.
- Any impact on such communities should be addressed with their informed consent.

1.11 Land, Forest, and Water Rights and Forced Eviction

- Suppliers must respect the rights of local communities regarding land, forests, and water resources.
- Forced evictions or displacement of communities are strictly prohibited.

1.12 Use of Private or Public Security Forces

- If security forces are used, they must be managed responsibly and in compliance with applicable laws and international standards.
- Suppliers must ensure that security forces do not engage in human rights abuses.

1.13 Health and Safety

- Suppliers must provide a safe and healthy working environment in accordance with local laws and regulations.
- Appropriate measures must be in place to prevent workplace hazards and ensure worker safety.

2. Business Ethics

2.1 Anti-Corruption and Anti-Money Laundering

- Suppliers must not engage in or tolerate any form of corruption or money laundering.
- All transactions and records must be conducted transparently and legally.

2.2 Data Protection and Data Security



- Suppliers must ensure that personal data is protected and handled securely in accordance with applicable data protection laws.
- Adequate measures must be in place to safeguard against data breaches and unauthorized access.

2.3 Financial Responsibility (Accurate Records)

- Suppliers must maintain accurate and complete financial records and reports.
- All financial transactions must be documented and reflected accurately.

2.4 Disclosure of Information

- Suppliers must provide accurate and complete information regarding their business practices and operations as required by Steelcon and applicable laws.

2.5 Fair Competition and Anti-Trust

- Suppliers must engage in fair competition and avoid any practices that would undermine market competition or violate anti-trust laws.

2.6 Conflicts of Interest

- Suppliers must avoid situations where personal or financial interests conflict with their responsibilities to Steelcon.
- Any potential conflicts of interest must be disclosed and managed appropriately.

2.7 Counterfeit Parts

- Suppliers must ensure that all parts and materials supplied are authentic and meet specified standards.
- Measures must be in place to prevent the supply of counterfeit or substandard parts.

2.8 Intellectual Property

- Suppliers must respect and protect intellectual property rights and confidential information.
- Unauthorized use or disclosure of Steelcon's intellectual property is prohibited.

2.9 Export Controls and Economic Sanctions

- Suppliers must comply with all applicable export control laws and economic sanctions.
- Any restrictions or requirements related to trade must be adhered to.

2.10 Whistleblowing and Protection Against Retaliation

- Suppliers must have mechanisms in place for employees to report concerns or violations confidentially.
- Retaliation against employees who report misconduct or violations is prohibited.

3. Environmental Standards

3.1 GHG Emissions Reporting

- Suppliers must regularly report GHG emissions in accordance with recognized standards and provide evidence of emissions reduction initiatives.



3.2 Energy Efficiency

- Suppliers should implement energy-efficient practices and technologies. Regular audits and reporting on energy usage and improvements are required.

3.3 Renewable Energy

- Suppliers are encouraged to use renewable energy and demonstrate efforts to transition away from non-renewable sources.

3.4 Decarbonisation

- Suppliers must develop and implement a decarbonisation strategy, with clear targets and progress reports.

3.5 Water Quality, Consumption & Management

- Suppliers must manage water quality and consumption effectively, and implement measures to minimize impact on water resources.

3.6 Air Quality

- Suppliers should monitor air emissions and adopt practices to reduce pollutants, in compliance with relevant regulations.

3.7 Responsible Chemical Management

- Suppliers must manage chemicals properly, including storage, usage, and disposal, in line with best practices and legal requirements.

3.8 Sustainable Resources Management

- Suppliers should ensure that resources are sourced sustainably and implement practices to reduce resource wastage.

3.9 Waste Reduction

- Suppliers must adopt waste reduction strategies and demonstrate efforts to minimize waste in their operations.

3.10 Reuse and Recycling

- Suppliers should implement recycling programs and reuse materials wherever possible, in line with applicable regulations.

3.11 Animal Welfare

- Suppliers involved in animal products must adhere to high standards of animal welfare, ensuring humane treatment throughout the supply chain.

3.12. Biodiversity, Land Use, and Deforestation

- Suppliers must avoid activities that lead to deforestation and habitat destruction. They should support biodiversity conservation efforts.

3.13 Soil Quality



- Suppliers should adopt practices that prevent soil degradation and promote soil conservation.

3.14 Noise Emissions

- Suppliers must manage noise emissions in accordance with local regulations and implement measures to minimize noise impact.

3.16. Upstream Supplier Management

- Suppliers must manage their upstream suppliers to ensure compliance with similar environmental standards.

Compliance and Monitoring

Steelcon reserves the right to monitor compliance with this Code of Conduct and conduct audits as necessary. Suppliers are expected to cooperate with Steelcon's efforts to ensure adherence to these standards.

By adhering to this Supplier Code of Conduct, suppliers contribute to the ethical and responsible operation of Steelcon. We value our partnerships and are committed to fostering a supply chain that upholds these standards.