

Code of Conduct of Social Accountability for Suppliers of Aperam Stainless Services & Solutions Poland Sp. z o.o.

In every aspect of its operations, Aperam Stainless Services & Solutions Poland Sp. z o. o. is guided by principles of social accountability and is committed to uphold the highest ethical standards in business activities, including cooperation with suppliers and subcontractors. We expect our partners to apply the standards specified in this Code of Conduct, and we also expect that our partners will require the same standards from their suppliers and subcontractors. This Code of Conduct for Suppliers is based on eight basic requirements of Social Accountability, described below:

1. Child Labor

Suppliers and Subcontractors will not employ children below 16 years of age. In case of employing young workers, Suppliers and Subcontractors shall protect those employees from performing any work that threaten their life and health, including mental health as well as ensuring that working conditions fully comply with the requirements of labor law. In addition, a 10 hour working time of young workers, including school activities and any commuting, shall be respected.

2. Forced Labor

Suppliers and Contractors will not use or support any form of forced labor or human trafficking. Suppliers and Contractors shall ensure that no employment fees or costs are borne in whole or in part by workers. We require that each employed worker has the freedom to make decisions regarding the choice of his employer.

3. Health and Safety

Health and Safety are Aperam's highest priorities since many years. Therefore, we expect that also our Suppliers and Subcontractors will provide safe working conditions and reduce security threats as well as prevent injuries and occupational diseases, and will maintain records of actions taken. Suppliers and Subcontractors will ensure their staff receive: regular training and instruction in safety, personal protective equipment adequate to the needs, appropriate sanitary-hygienic conditions, access to drinking water, suitable spaces for meal breaks and the right to leave the workstation in case of danger without the agreement of a supervisor.

4. Freedom of Association & Right to Collective Bargaining

We expect our suppliers and subcontractors to respect the right of workers to associate. People associated in a manner compliant with the law will not be discriminated or harassed. If the crew is represented by the crew representatives, the crew representatives are treated with respect and their opinion is taken into account when making decisions about working conditions.

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5. Discrimination

All forms of discrimination, we find unacceptable, and we fight them with determination. We also expect the same from our Suppliers and Subcontractors.

6. Disciplinary practices

No physical punishment or mental harassment of employees is allowed. Suppliers and Subcontractors shall take the necessary steps to prevent any instances of intimidation, abuse or exploitation of workers. Suppliers and Subcontractors do not take any deposits from their employees, nor the employees sign any promissory notes.

7. Working hours

We expect our Suppliers and Subcontractors to comply with law regulations on working time. We expect respecting the labor law regarding overtime, which can only apply to exceptional and short-term factors related to your business.

8. Remuneration

Suppliers and Subcontractors will provide their workers a decent wage for work done in accordance with the applicable regulations. Suppliers and Subcontractors will ensure that the employment relationship is consistent with the letter of the law and is not unfavorable for the employee.

Aperam Stainless Services & Solutions Poland Sp. z o. o. has the right to verify and evaluate the compliance of Suppliers / Subcontractors with the principles set out in this Code, within the law.

If any of the Supplier / Subcontractor fails to comply with the principles described above, Aperam Stainless Services & Solutions Poland Sp. z o. o. will require taking up and documenting appropriate improvement actions. No such action within 12 months of non-compliance will result in the deletion of Suppliers or Subcontractors from the List of Qualified Suppliers.

We encourage our Suppliers and Subcontractors to continually improve and develop management systems in accordance with the principles of Social Accountability.