

This Supplier Code of Conduct for Suppliers / Business Partners has the goal of ensuring that our suppliers, consultants, and business associates (“**Business Partners**”) share and promote our fundamental values in ethics and sustainability principles. We have the expectation that our Business Partners will comply with the principles of this Supplier Code of conduct and will correspondingly promote these principles within their own supply chain.

Business ethics and anti-corruption

Business Integrity

SIDMA STEEL SA expects from its Business Partners to adhere to the highest standards of ethical conduct in every aspect of their business, including relationships, practices, sourcing and operations, and to not engage in any form of corrupt practices, including but not limited to extortion, fraud, money laundering and bribery.

Improper Actions

SIDMA STEEL SA expects that its Business Partners avoid behavior or action that would be an offense under any applicable laws relating to corruption and bribery.

Fair Business and competition

Our Partners are obliged to perform their business activities in accordance with all applicable antitrust, competition and fair practice trade.

Labour and Human Rights

Equal opportunities

SIDMA STEEL SA expects that its Business Partners to provide equality of opportunity and treatment, and not to apply or accept any forms of discrimination in hiring and employment practices on grounds of race, colour, religion, gender, sexual orientation, age, physical ability, nationality, social or ethnic origin, participation in an association or marital status criteria.

Child and forced labour

SIDMA STEEL SA expects from its Business Partners do prohibit child labour. Business Partners are required to employ only workers who meet the respective applicable minimum legal age requirement in the

country of operation. **SIDMA STEEL SA** expects from its Business Partners to reject any form of forced or compulsory labour.

Harassment

Business Partners of **SIDMA STEEL SA** must treat their employees with dignity, equality, and respect, ensuring a work environment free of incidents of discrimination or harassment.

Health and Safety at work

Business Partners of **SIDMA STEEL SA** will ensure a healthy and safe and secure working environment for their employees. They are also required to maintain systems / procedures for recording, reporting, investigating, monitoring, and managing incidents related to health and safety at workplaces. Business Partners of our Company are required to implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers return to work.

Environmental Protection

Licenses and permissions

Our Business Partners are required to maintain all required environmental permits and registrations and to follow the operational and reporting requirements of such permits.

Pollution prevention, resources consumption and waste management

SIDMA STEEL SA expects from its Business Partners to make continuous improvements with respect to environmental emissions as well as energy and resources management. Our Business Partners shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions.

Compliance with Laws

Our Business Partners must comply with all applicable laws and regulations concerning their businesses and the products and services that they provide.

Supplier / Partner Confirmation

I, the undersigned, certify that on behalf of the company

I have read and understood the policies and principles described in this Code of Conduct for Suppliers.

Legal Name of Entity :

Name and job title of Signatory:

Signature and Company's stamp:

Date:

Disclaimer - Validity of the Code of Conduct

SIDMA STEEL SA keeps the right to make reasonable changes to the requirements of the present Code of Conduct for Suppliers, which will result from relevant changes in the Code of Conduct and Business Ethics of the Company. In this case, the Company will notify its Suppliers / Partners and expects that they will accept these reasonable changes.