

CELSA NORDIC

Policy on responsible business conduct



Purpose and goal

The policy on Responsible Business Conduct is drafted in accordance with the Norwegian Transparency Act (2021) section 4 (1) litra (a) and relevant parts of OECD Due Diligence Guidance for Responsible Business Conduct (04/2019).

We are committed to our values of **honesty, teamwork, perseverance, humility, groundbreaking approach** and **passion**. CELSA Norway consider these values to be a prerequisite for a responsible business conduct that respects people, society and the environment.

The policy articulates our commitments to the principles for responsible business and implementation of due diligence in own operations, our supply chain and other business relationships.

The requirement applies to CELSA Armeringsstål AS and CELSA Steel Service units in Nordic ("CELSA^"). CELSA are subsidiaries of CELSA Group. CELSA Group is a leading family company in Europe in the production of low-emission circular steel.



COMMITMENT, ANCHORING AND MANAGEMENT

CELSA acts in accordance with The United Nations Guiding Principles on Business and Human Rights (UNGP) and OECD Guidelines for Multinational Enterprises. As a group, we are members of UN Global Compact and apply to its 10 principles. In particular, we have identified the following rights as essential to our business: [..].

The board of directors of CELSA Norway has reviewed and approved this policy, and it is anchored at the top management. We execute the management of this policy regularly in accordance with internal routines, and our work is supervised by Head of Sustainability.

RESPONSIBLE BUSINESS CONDUCT IN OWN OPERATIONS

CELSA group undertakes a **groundbreaking approach to sustainability**, and we are **passionately** committed to the health, safety and development of our employees and communities in which we operate. In order to achieve our ambitious goals, CELSA group has established the Code of Ethics and Professional Conduct, which applies to all companies within the group. It sets a high ethical standard and general principles for employers, local communities, business partners and the environment. We have top priority on health and safety, and we work with **perseverance** to promote a workplace without any type of discrimination or harassment.

The principles and management of responsible business conduct in our own operations are [in most aspects] covered by the Code of Ethics and Professional Conduct. In addition, CELSA Norway perform in accordance with the Norwegian Working Environment Act (2005) and Equality and Anti-Discrimination Act (2017).

RESPONSIBLE BUSINESS CONDUCT IN SUPPLY CHAIN AND OTHER BUSINESS RELATIONS

CELSA expect all suppliers and business partners to respect fundamental human rights and to provide decent conditions of work. On this basis, we have established a Supplier Code of Conduct to state our expectations towards our suppliers.

Ensuring our core values in our supply chain is of great importance to us. We consider compliance with our ethical values as a fundamental prerequisite for building successful business relationships and a strong teamwork.

Thus, when selecting suppliers, we will consider compliance with the Supplier Code as a crucial determinant.

Relevant suppliers will be subject to a screening process, and will be requested to complete a self-assessment regularly. Suppliers may be asked to reaffirm compliance with the Supplier Code periodically. In addition, the Supplier must be available for audits, questions and further reviews upon request.

As a part of our responsible business conduct, we perform assessments of our supply chain and business partners. Our due diligence is based on a materiality analysis, where all suppliers are categorized based on link to core business and potential high risk. We use different tools for mapping risk, and we identify both actual and potential adverse impact. The due diligence process will be performed regularly, and otherwise in case a significant risk occurs.

If the due diligence identifies risk for actual or potential adverse impact, we will assess adequate measures and actions in dialogue with the supplier or stakeholder in question. All measures are reviewed to assess if further action is required. We will provide for or cooperate in remediation and compensation where required.

Identified adverse impact or potential risk are reviewed and reported in our annual transparency statement. CELSA Norway comply with requests for information from stakeholders in accordance with the Transparency Act.

