

# Supplier Code of Conduct



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## The purpose, application and objectives of the code

This Code of Business Partnership (the Code) has been adopted to ensure that Metinvest Group (also Metinvest/Company) and its Partners establish truly fair business relationship.

Metinvest takes a firm stand on good business conduct and adheres to international business conduct guidelines. In our relations with partners, we intend to apply exceptionally fair, open and ethical methods of cooperation.

### The purpose of the Code



The purpose of the Code is to establish clear standards of compliance with ethical principles and business requirements that should guide both existing Partners and new potential Suppliers.

### The Code's Application

- This Code applies to all Metinvest Partners, as well as their employees, representatives, subcontractors and other individuals and entities.
- Metinvest's partner (hereinafter: "Partner"/"Supplier") is an individual or legal entity providing products or services to Metinvest Group.
- The Company hopes that all of our Partners will become familiar with the law and comply with them, as well as meet high standards of business ethics, including this Code.

### The Code's Objectives:

- determining, on the basis of common values, the criteria for the fair conduct of Partners as well as Metinvest's employees in relation to Partners;
- identifying and preventing any misuses and abuses of office, as well as related potential risks;
- developing a unified culture of interaction based on high ethical standards, maintaining an atmosphere of trust, respect and decency;
- forming a focus on balanced development and social responsibility when interacting with Partners.

## 1. Respect and focus on cooperation

Metinvest respectfully communicates with partners, and strives to observe agreements.

### In order deliver on the principle, we at Metinvest:



ensure a working environment free from any form of harassment, discrimination on the basis of race, colour, gender, age, religion, ethnic or national origin, physical disability or other distinguishing factors, whether it is the harassment of one worker by another, or harassment by the Employee Partner, or vice versa;



provide our Partners exclusively with truthful information about products, services and prices, as well as do not make false statements about the products and services of competitors;



if we cannot deliver on our promises on time, we notify our colleagues and partners in a timely manner and offer possible solutions.

### In order to deliver on the principle, we expect partners to:



respect other Partners and build their communication based on the principles of civility and understanding;



provide a working environment to the employees free of any form of harassment, discrimination on the basis of race, colour, sex, age, religion, ethnic or national origin, on the basis of physical disability or other distinguishing grounds, whether it is the harassment of one employee by another, or harassment by the employee of the partner, or vice versa;



conduct business operations with the Company openly and at a high professional level;



respect all commitments and agreements;



encourage cooperation and teamwork;



avoid using unverified information.

## 2. HSE

We do our job complying with health and safety regulations; we seek to prevent pollution.

### In order deliver on the principle, we at Metinvest:



make every effort to ensure a healthy and safe working environment, conduct regular checks to eliminate any unsafe conditions or behaviour, as well as their causes;



develop programs to ensure the safety and health of our employees;



mandate Metinvest employees and contractors to apply personal protective equipment and to comply with the established rules of occupational safety in the performance of work duties while on the territory of enterprises;



operate in accordance with the health, safety and environmental legislation;



systematically invest in environmental projects and human potential;



seek to address social and environmental risks through effective managementsystems.

### In order to deliver on the principle, we expect that the Partners will (including cases, when on the territory of Metinvest enterprises):



ensure that employees are safe and healthy;



comply with all health and safety regulations, including the mandatory use of personal protective equipment, work-wear and work shoes;



prevent safety incidents and injuries of employees;



prevent people from being present at production sites in a state of alcoholic or drug intoxication;



comply with environmental requirements, and prevent environmental pollution by its actions or inaction;



adopt a proactive approach to environmental issues, implement initiatives to promote environmental responsibility, and contribute to proliferation of technologies that help saving the environment and support application of rational methods of realizing product lifecycles.

### 3. Confidentiality

#### In order deliver on the principle, we at Metinvest:



ensure protection of private and personal information about our employees, Partners and comply with the confidentiality obligations taken in accordance with the requirements established by applicable law;



Use data, information and documents relevant to the Company (owned by it) strictly for the purpose, and disclose them to the employees and contractors of the partner only in the scope necessary to fulfil the obligations to Metinvest, provided that such persons adhere to the confidentiality of the information provided to them.

#### In order to deliver on the principle, we expect partners to:



respect confidentiality in accordance with applicable law and agreements;



use with utmost care and not disclose information that constitutes trade secrets or has other protected regime under the law or contract with Metinvest;



be guided by the legal rules on cybersecurity, data protection and countering the legalization of illegal proceeds that are in effect in the countries, regions or states in which they operate;



in the case of public speeches in the media, as well as at events involving the media and at the mention of the Company or in interaction with the Company, only managers or authorized representatives of the Partner shall be allowed to make such speeches to voice only limited and reliable information regarding the Company.

## 4. Compliance with the law and the Code of Ethics

The company condemns all forms of corruption, fraud and requires openness, integrity and honesty in all areas of activity. The company strives to be an example in matters of ethics, work environment and equality..

### In order deliver on the principle, we at Metinvest:



do not accept or offer gifts, special attention signs, services or participation in entertainment programs, if they put or can put the host in a dependent position;



seek to avoid situations that could potentially cause a conflict of interest, including a situation in which an employee of the Company carries out paid activities in favour of Customers, Suppliers or Competitors;



intend to inform all Metinvest employees about the Company's rules and principles of interaction with Partners (including their familiarization with the provisions of the Code of Ethics <https://metinvestholding.com/en/about/ethic>, as well as this Code);



reserve the right to disqualify Suppliers for a certain period of time or indefinitely in case of unfair business conduct with the enterprises of the Metinvest Group. The criteria for disqualification are established centrally and published on the official website of Metinvest <https://metinvestholding.com/en/procurement>;



provide an opportunity for potential participants of prequalification and/or supplier selection to file a complaint against the actions (inaction) of the Tender Committee/Procurement Organizer in the event of disagreement with the decision to choose the Supplier to the Appeals Committee of the Group at [appeal@metinvestholding.com](mailto:appeal@metinvestholding.com)

### In order to deliver on the principle, we expect partners to:



comply with current legislation and Metinvest Business Partnership Code in the area of procurement;



abide the laws, where non-compliance may have negative consequences for cooperation with Metinvest;



stand against corruption, both on their part and from the part of Metinvest employees;



avoid engaging in any kind of unfair competition, both individually and jointly with others;



report all violations of Metinvest's Procurement Principles and Code of Ethics to the Trust Line: by e-mail [trustline@scm.com.ua](mailto:trustline@scm.com.ua), or by filling an electronic form at <https://www.scm.com.cy/trust-line> or by phone 0800 60 07 00 or +38044 224 72 32;



adhere to principles similar to those of the Metinvest Code of Ethics.

## 5. Social Responsibility

In all areas of work, we adhere to the principles of sustainable development. We protect and respect human rights and assess the impact of our work on local communities. We realize that success in business is inextricably linked to improving social welfare and the quality of life of individuals.

### In order deliver on the principle, we at Metinvest:



employ our people in accordance with the law, pay wages on time and in full in accordance with the law and with the payment of all relevant taxes;



do not use child labour and forced labour; we do not allow working conditions that can be considered atrocious or abusive;



are continuously improving, acquiring new knowledge to improve the overall efficiency and development of the Company, as well as professional and personal growth of employees;



invest in social projects to improve the quality of life of people in the cities of our presence;



publish regular reports on our website <https://metinvestholding.com/> regarding our performance in the field of sustainability, as well as the Company's economic, social and environmental impact.

### In order to deliver on the principle, we expect partners to:



share our values and do business in accordance with high ethical standards;



consider the impact on the environment, economy and society;



prevent the use of child and forced labour, as well as physical or other forms of abuse of employees;



officially employ the employees with decent working conditions and pay pursuant to the legislation currently in force;



discourage activities that do not correspond to this Code and as well as abuse of office for personal gain;



act responsibly and conscientiously;



inform employees working with our Company about the rules and principles of this Code.