



Give Steel

# Supplier Code of Conduct

## Summary:

Give Steel Supplier Code of Conduct is elaborated and updated based on our ongoing materiality assessment and due diligence. The Policy stipulates the relevant ESG themes that suppliers are to follow and the responsibilities they have in order to be able to provide goods and services to Give Steel. For example, the policy includes Health & Safety, workers employed via third parties, human and workers' rights, as well as forced and child labour. The policy is elaborated according to the UNGPs, including the ILO-convention and OECD Guidelines for multinational enterprises.

Relation to IRO-analysis: Health & Safety, discrimination and Geopolitical tensions, raw materials and CO2. The action plans on each theme are monitored regularly and at least once a year.

Key Stakeholders: Suppliers and local communities

Stakeholder engagement: due diligence and action plans

Highest responsible: CEO

## 1. Introduction

Sustainable development is a main target for Give Steel. Social sustainability is a part of our DNA. We care about our workers and the environment. This is why we work with our impact on society, through our social bottom line and CO2 reduction targets under Science Based Targets-initiative (SBTi). We continually work for a higher degree of social sustainability in the industry, in general. When assessing and addressing our impacts on society around us, we cannot solely set the scope to ourselves, because our activities go far beyond the production in Brande, Denmark.

We recognize the need for traceability and transparency throughout our value chain. Therefore, we work together with our suppliers to minimize negative impacts of our activities. We do this as a part of Give Steel's compliance to European regulation under the EU taxonomy, EU standards and EU directives such as CSRD and CSDDD, which is a legal obligation as well as a target in our business strategy.

Give Steel Supplier Code of Conduct applies to all critical suppliers regardless of their position in the product life cycle value chain, including sourcing of raw materials, processing and production to the end-of-life stage disposal and/or recycling of materials.

## 2. Due diligence as a Control Mechanism

Give Steel offers a continuous and thorough due diligence process as the relevant management system for responsible purchasing practices to ensure respect for human rights, the environment and good governance. In doing this, we refer to standards for responsible business conduct as required in the EU Taxonomy and the Corporate Sustainability Reporting Directive (CSRD), related to the UN Guiding Principles for Human Rights, and the OECD guidelines for Multinational Companies as crucial steppingstones for business activities.

In terms of compliance to Give Steel Code of Conduct, suppliers are liable for their respective supply chains. As such, we expect our suppliers to exert responsibility for their supply chains regarding the material substance matters as stated below. We strongly urge suppliers to conduct due diligence on material substance matters throughout scope 1, 2 and 3. This ranges everything from internal energy use and working conditions in scope 1 to transport and emissions from our suppliers in scope 2 and 3. We value a collaborative approach to sustainability, and thus foster continuous dialogue within our buyer-supplier relationships.

In case of significant changes in sourcing or transportation supply chain structure of supplier, Give Steel must be informed hereof in order to modify the sustainability evaluation of the supplier. Lastly, the supplier and Give Steel A/S are urged to continually clarify any risks and opportunities for improvement in the relationship.

Based on Give Steel's sustainability strategy encompassing the three bottom lines of environment, social, and financial, we conduct and expect our suppliers to document and conduct due diligence on the following material matters:

### 2.1 Environmental Concerns

- **2.1.1 GHG-emissions:** At Give Steel we strive to create a more sustainable future through improving our GHG-emissions from production. We have joined the Science Based Targets-initiative enacting the Paris Agreement on climate change and expect our suppliers to provide any necessary documentation to reach this goal as well as deploy energy efficient design methods, production processes and minimize all kinds of waste, regardless of supplier type and placement in the upstream-downstream value chain.
- **2.1.2 Biodiversity and Ecosystems:** We recognize the importance of assessing and mitigating any negative impact on biodiversity and ecosystems that may arise as a consequence of our activities. We work towards including biodiversity in Give Steel's ESG portfolio, and expect our suppliers to respect the environment in their respective sites and local areas.
- **2.1.3 Pollution:** We expect our suppliers to prevent or mitigate negative impacts related to pollution of air, water and soil, especially in our supply chain. This entails avoiding or phasing out hazardous materials, avoiding incidents and emergency situations, and if and when they occur, controlling and limiting their impact on the environment and/or society.

## **2.2 Human Rights Including Workers Rights**

- **2.2.1 Human Rights:** Give Steel and Suppliers alike shall engage in mitigating any potential or actual negative impact on human rights, including workers' rights as stated in the International Bill for Human Rights and the ILO-convention. This principle is operationalized through the UN Guiding Principles for Human Rights from a risk-based approach. Furthermore, it is mandatory that all our suppliers and their suppliers comply with local labor law and regulations applicable in the country in which goods are produced and/or services carried out. For example, we do not tolerate forced labor or child labor in our supply chain.
- **2.2.2 Health and Safety:** Suppliers shall ensure good, safe and healthy physical and psychological working conditions in all lines of work in the company. It is essential to Give Steel that our suppliers behave according to the procedures defined by safety rules stipulated by law or requested by Give Steel. No employees must be forced to work under unworkable or unsafe conditions such as extreme heat or other extreme weather situations, lack of safety or similar conditions. We also expect responsible behavior in relation to colleagues, equipment and machinery.
- **2.2.3 Diversity, equality and inclusion:** We do not discriminate based on ethnic background, gender, religion, disabilities, sexual orientation, pregnancy, membership of a union, political affiliation or age. We expect suppliers to work actively towards ensuring equal treatment of workers

according to their job description and abilities. We expect suppliers to mitigate and if relevant remediate any discriminatory practices, should they occur.

- **2.2.4. Expropriation and Indigenous Rights:** We recognize the risks throughout our supply chains pertaining to the steel industry regarding potential breaches of indigenous rights to land ownership. All suppliers must follow local law and through our due diligence process, we do our best to help suppliers not to contribute, directly or indirectly, to unlawful relocation or expropriation of local communities and indigenous groups. Activities on indigenous land should be conducted with due diligence and according to the UN prior, free and informed consent-framework with information provided in local as well as indigenous languages. We expect our suppliers to be aware of these issues and conduct an inclusive and fair process.

## 2.3 Governance

- **2.3.1 Regulation:** Give Steel and suppliers strive to comply with all national, local and international laws related to the sustainability matters mentioned in Give Steel Supplier Code of Conduct, all the way through our supply chains. We further **expect suppliers to be able and willing to provide data for regional reporting requirements**, e.g. CBAM, EU Taxonomy, Corporate Sustainability Reporting Directive (CSRD) and Corporate Sustainability Due Diligence Directive (CSDDD).
- **2.3.2 Tax:** Give Steel expects Supplier to use best efforts to ensure compliance with applicable tax law and regulations within the jurisdictions of the geographical location of operation and with consideration and foresight given to tax law developments and international initiatives. For example, we encourage full transparency and do not accept deliberate tax evasion.
- **2.3.3 Corruption and bribery:** We do not tolerate corruption, bribery or money laundering, and strictly expect our suppliers to refrain from engaging in such activities, in line with the framework elaborated in the United Nations Convention against Corruption. We follow all international sanctions and legal requirements in terms of conflict zone sourcing. We are fully aware of the issues related to conflict related zones, and we expect our suppliers to respect these principles and develop corrective action plans in case of any violation of international sanctions.
- **2.3.4 Technology:** Give Steel expects suppliers to support the development and implementation of technologies that make sustainability practices more efficient, e.g., to ensure greener production and increase data sharing and reporting of sustainability matters. Furthermore, IT security is a material issue to Give Steel. We expect that any personal, official, business related and confidential information is treated responsibly when dealing with our company. We also expect our suppliers to

properly protect any information they may come across during and after a business relationship.

- **2.3.5 Competition:** In line with national and regional legislation, we prohibit any illegal price-fixing agreements and other collusive agreements on essential terms, rates, fees, charges and conditions between competitors. Cartel agreements are strictly prohibited by law, and for a good reason.

### 3. Supplier Responsibilities

3.1 Supplier will confirm that it has read and agrees with the demands set out in Give Steel Supplier Code of Conduct.

3.2 Supplier will communicate Give Steel Supplier Code of Conduct to all relevant staff, managerial or non-managerial, and will arrange any necessary training. Give Steel's contact person is responsible for the implementation of Give Steel Supplier Code of Conduct, and we expect any doubts or potential risks to be cleared with the supplier's top management.

3.3 Risk management is materialized through documentation from suppliers as well as sub suppliers. Give Steel reserves its right to plan and execute audits at sub supplier level in case of sub supplier being assessed as high risk. Deadlines for delivery of documentation are set in relation to the specific procurement order. Any costs related to the elaboration and administration needed for obtaining documentation cannot be put on Give Steel. Given reasonable notice, Supplier will provide Give Steel adequate and accurate records related to labor standards and working conditions as well as environmental matters.

3.4 Supplier will continuously evaluate its sub suppliers in terms of detecting any negative impact. In case sub suppliers violate Give Steel Supplier Code of Conduct, Supplier is obliged to inform Give Steel immediately and take action to resolve the violation.

3.5 Supplier will create systems for efficient sustainability performance management and engage its workforce in these.

3.6 Supplier will implement a grievance mechanism with adequate procedures for assessing and addressing any complaints that may be directed at the Supplier.

3.7 If relevant, Supplier will develop, implement and track corrective action plans or other initiatives including training and capacity building, on its own and/or in collaboration with Give Steel representatives.

3.8 Supplier will continuously interact with workers and external stakeholders on improving sustainability matters and documentation practices in the workplace and adjacent community.

3.9 Reporting on supply chain links and sustainability performance is viewed as a natural part of the collaboration and Give Steel may ask Supplier for results of any tracking and corrective action plans.



#### 4. Feeling challenged?

Any deliberate failure to meet the Give Steel Supplier Code of Conduct must be discussed with Give Steel to avoid a violation of trust. Failure of dialogue may ultimately call for disciplinary action. In case you feel challenged, please discuss your concern with your contact person at Give Steel, and we will provide information and guidance on due diligence procedures to ensure future cooperation.

In case the issue cannot be solved through dialogue and due diligence, Give Steel reserves its right to end the business relationship immediately.

Evaluation of Suppliers commitment to Give Steel Code of conduct, is mandatory and ongoing. In case Supplier questions the relevance of specific requirements in Give Steel Code of conduct, feel free to contact us for a further discussion.

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Signature, Power to Bind, Supplier

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Date

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Signing Company