



Human Rights and Labour Conditions Policy

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At **James Street Steel**, we are committed to respecting and upholding the fundamental rights of all individuals involved in our operations. This Human Rights and Labour Conditions Policy outlines our approach to ensuring that human rights are respected in all our business practices, and that our employees, contractors, and suppliers are treated fairly, ethically, and with dignity.

Our goal is to foster a working environment that supports the well-being, rights, and equality of all individuals, while adhering to international standards on human rights, including the United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO) conventions.

Scope

This policy applies to all employees, contractors, and suppliers working directly or indirectly with **James Street Steel**, including those in our supply chain, operations, and any subsidiaries or affiliates. It covers all aspects of human rights and labour conditions, including workplace safety, non-discrimination, and freedom of association.

Policy Principles

1. Respect for Human Rights

James Street Steel is committed to respecting the human rights of all individuals. We oppose any form of discrimination, harassment, or exploitation in our workplace and supply chain. This includes upholding rights related to freedom of expression, freedom of association, and the right to participate in decisions that affect individuals' lives and work.

2. Non-Discrimination and Equal Opportunity

We promote diversity, equity, and inclusion at all levels of our organisation. Discrimination based on race, colour, gender, sexual orientation, age, disability, religion, nationality, or any other status is strictly prohibited. We will provide equal opportunities for all employees and ensure fair treatment in recruitment, hiring, promotions, and compensation.

3. Child and Forced Labour

James Street Steel strictly prohibits the use of child labour and forced or bonded labour in any form. All employment relationships will be based on freely chosen employment, and all workers must be of legal working age as defined by applicable local laws and international standards.

4. Fair Wages and Working Hours

We are committed to providing fair wages that meet or exceed industry standards and comply with all local laws regarding minimum wages, benefits, and compensation. We ensure that our employees have reasonable working hours, and that overtime is voluntary and compensated in accordance with applicable labour laws.

5. Health, Safety, and Well-being

We are dedicated to providing a safe and healthy work environment for all employees. This includes implementing procedures to prevent accidents, injuries,



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and health risks in the workplace. We will ensure that employees have access to the necessary protective equipment, training, and resources to perform their tasks safely.

6. Freedom of Association and Collective Bargaining

We respect employees' rights to form, join, or not join trade unions or other organisations and to engage in collective bargaining without fear of retaliation. We will actively engage with workers' representatives to ensure that their rights are protected, and their voices are heard in decisions that affect them.

7. Prevention of Harassment and Abuse

James Street Steel is committed to providing a workplace free from harassment, bullying, and any form of abuse, including physical, sexual, or verbal abuse. We maintain strict policies for reporting and addressing incidents of harassment, ensuring that all complaints are taken seriously and investigated thoroughly.

8. Responsible Supply Chain Management

We are committed to extending this policy to our supply chain and business partners. We expect all suppliers, contractors, and third parties we work with to adhere to similar human rights and labour standards. We will conduct due diligence and regular assessments to ensure our partners are meeting these expectations.

9. Grievance Mechanism and Reporting

We have established clear channels for employees, contractors, and suppliers to report concerns or grievances related to human rights and labour conditions. These channels are designed to ensure confidentiality, prevent retaliation, and allow for the prompt investigation of complaints.

10. Training and Awareness

We will provide regular training and awareness programs to all employees to ensure they understand their rights and obligations under this policy. We will also educate our suppliers and partners about our human rights expectations and work together to improve labour conditions throughout our operations.

11. Continuous Improvement and Monitoring

We will regularly review our human rights and labour practices to ensure that they remain effective and aligned with evolving standards and regulations. We will monitor compliance with this policy, conduct regular audits, and take corrective actions where necessary.

Compliance with Legal Requirements

James Street Steel will comply with all applicable local, national, and international laws and regulations regarding human rights and labour conditions. We will adhere to international frameworks, including the United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation's (ILO) core labour standards.

Governance and Accountability

The responsibility for implementing this policy lies with senior management, and we will designate a team to monitor and report on compliance with this policy. Any violations of this policy will be addressed in accordance with our internal procedures, and individuals found in breach of these principles will face appropriate action.

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Conclusion

James Street Steel is dedicated to creating a workplace that supports the dignity, well-being, and rights of every individual. Through the implementation of this Human Rights and Labour Conditions Policy, we strive to ensure that all individuals involved in our business activities are treated with respect, fairness, and equality.

We will continue to review and improve our practices to ensure that we uphold the highest standards of human rights and labour conditions in every aspect of our operations.

Signature:  _____ Date: 31/01/2025

James Street Steel Managing Director