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At **James Street Steel**, we are committed to maintaining a supply chain that is not only efficient and cost-effective but also ethical, responsible, and sustainable. This Ethical Supply Chain Management Policy sets out the principles and practices we follow to ensure that our supply chain partners uphold the same high standards of integrity, respect for human rights, and environmental responsibility that we do. Our goal is to build and maintain long-term relationships with suppliers who share our values and commitment to ethical business practices.

Scope

This policy applies to all suppliers, contractors, and business partners involved in the production, supply, and delivery of goods and services to **James Street Steel**. It covers all aspects of the supply chain, including procurement, production, transportation, and disposal of goods.

Policy Principles

1. Commitment to Ethical Business Practices

James Street Steel requires all suppliers and partners to adhere to the highest ethical standards in their business operations. This includes conducting business honestly, with integrity, and in compliance with all applicable laws and regulations, including those related to labour, human rights, anti-corruption, and environmental protection.

2. Respect for Human Rights

We are committed to ensuring that all individuals involved in our supply chain are treated with dignity and respect. We expect all suppliers to uphold and protect the human rights of their employees, prohibiting discrimination, forced or child labour, harassment, and exploitation in any form. Suppliers must provide a safe, fair, and supportive work environment, with appropriate compensation and working hours in compliance with applicable labour laws.

3. Environmental Responsibility

James Street Steel is dedicated to minimising our environmental impact, and we expect the same commitment from our suppliers. Suppliers must adhere to all relevant environmental regulations and work to reduce their environmental footprint by adopting sustainable practices. This includes reducing waste, conserving resources, and limiting emissions throughout the supply chain.

4. Anti-Corruption and Fair Competition

We have a zero-tolerance policy toward bribery, corruption, and unethical business practices. Suppliers must not engage in any form of corruption or bribery, and they must comply with all applicable laws regarding anti-corruption and fair competition. We expect our suppliers to conduct their business dealings with transparency, fairness, and honesty.

5. Transparency and Accountability

We believe in transparency in all aspects of our supply chain. Suppliers are expected to provide accurate, honest information about their operations and their compliance with the standards set forth in this policy. We may conduct audits, request

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documentation, and assess supplier performance to ensure that ethical standards are being met. Suppliers are expected to be open and responsive to these reviews and to take corrective actions if necessary.

6. Health and Safety Standards

The health and safety of workers in the supply chain are a priority. Suppliers must provide a safe working environment, with policies and practices in place to prevent accidents, injuries, and exposure to harmful conditions. This includes providing necessary training, protective equipment, and ensuring compliance with all local health and safety laws and standards.

7. Support for Local Communities

We encourage our suppliers to support the well-being of the communities in which they operate. This includes promoting local employment, investing in community development, and respecting the rights and traditions of local populations. We also encourage suppliers to engage in fair trade practices and seek ways to contribute to social and economic development.

8. Continuous Improvement and Collaboration

James Street Steel is committed to continuously improving the ethical standards of our supply chain. We will work collaboratively with suppliers to help them understand and meet the expectations outlined in this policy. We will provide support, share best practices, and promote capacity-building initiatives to improve supplier practices over time.

9. Compliance and Monitoring

All suppliers must comply with the principles outlined in this policy. We may periodically review and monitor supplier performance through audits, site visits, and other mechanisms. If any supplier is found to be in violation of this policy, we will work with them to address the issue. If corrective actions are not taken or violations are not rectified, we reserve the right to terminate the business relationship.

Supplier Expectations

By engaging with **James Street Steel**, all suppliers, contractors, and partners acknowledge and agree to adhere to the standards and practices outlined in this Ethical Supply Chain Management Policy. Suppliers are expected to:

- Uphold ethical and legal standards in their operations.
- Provide accurate documentation and disclose relevant information.
- Support continuous improvement and take corrective actions when necessary.
- Collaborate with **James Street Steel** to address any ethical, environmental, or social concerns.

Governance and Responsibility

The implementation and enforcement of this policy are the responsibility of senior management at **James Street Steel**. We will designate a team to monitor compliance with this policy and ensure that our supply chain is aligned with our ethical expectations. Suppliers will be informed of any changes to this policy, and ongoing communication will be maintained to support mutual understanding and collaboration.

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Conclusion

James Street Steel is committed to building and maintaining a supply chain that reflects our values of integrity, sustainability, and respect for human rights. Through the implementation of this Ethical Supply Chain Management Policy, we strive to create a responsible, transparent, and ethical supply chain that supports long-term success for our organisation and the communities we impact.

Signature: 
James Street Steel Managing Director

Date: 31/01/2025