



Sustainability Report

2024

Issued By: Mark Kirby

James Street Steel

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Sustainability Report 2024

Doc Ref: JSS-SMS-018-RS
Issue Date: 28/02/2025.
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Revision: 1.00

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Introduction.

Sustainable Development is an approach to growth and human development that aims to meet the needs of the present without compromising the ability of future generations to meet their own needs. The aim is to have a society where living conditions and resources meet human needs without undermining planetary integrity. Sustainable development aims to balance the needs of the economy, environment, and society.

At James Street Steel, we believe that sustainability is not just a corporate responsibility but a fundamental commitment to the planet and future generations. Our dedication to sustainable practices permeates every aspect of our operations, from the sourcing of raw materials to the delivery of our products to customers. As part of our commitment to our sustainable business practices and transparency James Street Steel has compiled this report to communicate key performances in 2024.

1 Our Sustainability Framework

Our sustainability framework as noted by **Figure 1: Sustainability Framework** is a structured approach that helps James Street Steel manage, assess, and report on our environmental, social, and economic impacts in a consistent and strategic manner. It provides guidelines for integrating sustainability principles into business operations and decision-making processes.



Figure 1: Sustainability Framework

Our value to our stakeholders can be summarized as follows:

1.1 Vision ZERO

We continually improve our systems and aspire to ZERO incidents, injuries, and environmental footprint.

1.2 Our Environment

We strive to continually reduce emissions, energy, water, and material intensity.

1.3 Compliance and Integrity

We ensure that legal compliance, integrity, and ethical conduct are the foundations in our operations.

1.4 Our People

We develop our employees by helping them grow. We provide safe workplaces, care for employees' well-being, and foster their involvement and participation.

1.5 Value for Society

We engage in the communities where we operate.

1.6 To Our Employees

Through ensuring fair remuneration, development, health & safety, training, progression, and rewarding career opportunities.

1.7 To Customers

Through supplying quality products and services.

1.8 To Suppliers and Business Partners

Through employment and profits, fair relationships, leadership, and support in reducing our environmental footprint.

1.9 To Society and the Local Community

Interaction in communities, volunteering, donations.



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2 Management Systems

We continue to manage and continually improve on our range of management systems. In 2023 we added ISO14001:2015, and in 2024 we added ISO45001:2018 certification to the list of certifications we hold and continue to improve all management systems through ongoing knowledge and experience.

<p>CERTIFICATE OF APPROVAL</p> <p>Quality Management System Certification</p> <p>Page 1 of 2</p> <p>This is to certify that James Street Steel at its establishment at Unit 611 Greenogue Business Park, Rathcoole, Co.Dublin, Ireland has been approved by the Authority to the following management system standard using the processes and procedures registered with the Authority:</p> <p>BS EN ISO 9001:2015</p> <p>Scope of certification: Quality Management System Certification as stated on the attached appendix</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1539 NEXT APPROVAL: February 2018 ISSUE DATE: 04 July 2023 EXPIRY DATE: 03 July 2026</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>APPENDIX TO CARES CERTIFICATE NO. 1539</p> <p>JAMES STREET STEEL UNIT 611 GREENOGUE BUSINESS PARK, RATHCOOLE, COLDUBLIN IRELAND</p> <p>Quality Management System Certification</p> <p>Page 2 of 2</p> <p>CPAS - ISO 9001:2015 QMS only</p> <p>Scope of certification: Processing of steel reinforcement products.</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1539 NEXT APPROVAL: February 2018 ISSUE DATE: 04 July 2023 EXPIRY DATE: 03 July 2026</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>CERTIFICATE OF APPROVAL</p> <p>Product Conformity Certification - BS 8666 and related activities</p> <p>Page 1 of 3</p> <p>This is to certify that James Street Steel at its establishment at Unit 611 Greenogue Business Park, Rathcoole, Co.Dublin, Ireland has satisfied the Authority that it operates a quality management system that complies with the requirements of BS EN ISO 9001 and the relevant CARES Quality and Operations Assessment Schedules. Where appropriate, and as listed below, it has further satisfied the Authority that it manufactures and/or supplies products that conform with the stated product standards and is entitled to use the CARES marks on its products using the processes and procedures registered with the Authority.</p> <p>Scope of certification: Processing of steel reinforcement as stated on the attached appendices</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 14044 NEXT APPROVAL: 29 April 2012 ISSUE DATE: 01 January 2023 EXPIRY DATE: 31 December 2025</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>
<p>APPENDIX TO CARES CERTIFICATE NO. 140404</p> <p>JAMES STREET STEEL UNIT 611 GREENOGUE BUSINESS PARK, RATHCOOLE, COLDUBLIN IRELAND</p> <p>Product Conformity Certification - BS 8666 and related activities</p> <p>Page 2 of 3</p> <p>SRC-Appendix 02 Processing and supply of bar, coil and fabric</p> <p>Scope of certification: Processing of steel reinforcement to BS 8666:2020. Stocking and distribution of BS 4449:2005, BS 4482:2005 and BS 4483:2005.</p> <p>Any rebar welded at this location is NOT covered by the CARES Steel for the Reinforcement of Concrete Scheme.</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 140404 NEXT APPROVAL: 29 April 2012 ISSUE DATE: 01 January 2023 EXPIRY DATE: 31 December 2025</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>APPENDIX TO CARES CERTIFICATE NO. 140404</p> <p>JAMES STREET STEEL UNIT 611 GREENOGUE BUSINESS PARK, RATHCOOLE, COLDUBLIN IRELAND</p> <p>Product Conformity Certification - BS 8666 and related activities</p> <p>Page 3 of 3</p> <p>SRC-Appendix 08 Mechanical coupling</p> <p>Scope of certification: Application of Arcon Taper Threaded Couplers to CARES Appendix TA1-B using BS 4449:2005 goods BS008 in the size range 12 to 32mm in accordance with Technical Approval report TA1-B:2015.</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 140404 NEXT APPROVAL: 29 April 2012 ISSUE DATE: 01 January 2023 EXPIRY DATE: 31 December 2025</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>CERTIFICATE OF APPROVAL</p> <p>Environmental Management System Certification</p> <p>Page 1 of 2</p> <p>This is to certify that James Street Steel at its establishment at Unit 611 Greenogue Business Park, Rathcoole, Co.Dublin, Ireland has been approved by the Authority to the following Management System standard using the processes and procedures registered with the Authority:</p> <p>BS EN ISO 14001:2015</p> <p>Scope of certification: Environmental Management System Certification as stated on the attached appendix</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1888 NEXT APPROVAL: January 2024 ISSUE DATE: 09 January 2024 EXPIRY DATE: 08 January 2027</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>
<p>APPENDIX TO CARES CERTIFICATE NO. 1888</p> <p>JAMES STREET STEEL UNIT 611 GREENOGUE BUSINESS PARK, RATHCOOLE, COLDUBLIN IRELAND</p> <p>Environmental Management System Certification</p> <p>Page 2 of 2</p> <p>EMS 17F - Processing of steel reinforcement products</p> <p>Scope of certification: Processing of steel reinforcement products</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1888 NEXT APPROVAL: January 2024 ISSUE DATE: 09 January 2024 EXPIRY DATE: 08 January 2027</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>CERTIFICATE OF APPROVAL</p> <p>Occupational Health and Safety Management System Certification 45001</p> <p>Page 1 of 2</p> <p>This is to certify that James Street Steel at its establishment at Unit 611 Greenogue Business Park, Rathcoole, Co.Dublin, Ireland has been approved by the Authority to the following Management System standard using the processes and procedures registered with the Authority:</p> <p>BS ISO 45001:2018</p> <p>Scope of certification: Occupational Health and Safety Management System Certification on the attached appendix.</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1167 NEXT APPROVAL: 19 December 2024 ISSUE DATE: 19 December 2024 EXPIRY DATE: 18 December 2027</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>	<p>APPENDIX TO CARES CERTIFICATE NO. 1947</p> <p>JAMES STREET STEEL UNIT 611 GREENOGUE BUSINESS PARK, RATHCOOLE, COLDUBLIN IRELAND</p> <p>Occupational Health and Safety Management System Certification 45001</p> <p>Page 2 of 2</p> <p>OHSAS 17F - Processing of steel reinforcement products</p> <p>Scope of certification: Processing of steel reinforcement products</p> <p>This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority. This certificate is uncontrolled when printed. To check the validity of this certificate please scan the above QR Code with the CARES Cloud App or contact us on +44 1752 450000.</p> <p>CERTIFICATE NUMBER: 1947 NEXT APPROVAL: 19 December 2024 ISSUE DATE: 19 December 2024 EXPIRY DATE: 18 December 2027</p> <p>SEARCH FOR UK CERTIFICATION AUTHORITY FOR REFERRING TO THIS</p> <p>UKAS</p>

3 Responsibility

3.1 Ethics and Compliance

The purpose of our Code of Conduct is to clearly define the ethical principles, standards, and expectations that govern behaviour within James Street Steel. It serves as a guide for employees, managers, and leadership on how to act with integrity, uphold legal and regulatory requirements, and contribute to the overall ethical culture of the James Street Steel.

3.2 Anti-Bribery and Anti-Corruption

James Street Steel is committed to conducting our business with the highest level of integrity, transparency, and fairness. We have zero tolerance for bribery, corruption, or unethical conduct in any form. Our core values are rooted in ethical decision-making, respect for legal requirements, and fostering a culture of honesty and accountability. Our Supplier Code of Conduct and policies sets out our commitments to working against corruption and bribery.

3.3 Regulatory Compliance

We are committed to regulatory compliance and ethical behaviour across all areas of our business and operations. We are regularly inspected by various regulatory authorities, certification bodies and customers. Any findings during these inspections are addressed and used to support continuous improvement in the management reviews. Regular internal audits of key functions (e.g., EHS audit, quality audit) provide both oversight and governance. We have implemented a certified ISO 9001, ISO 14001 and ISO 45001 systems, which include oversight of regulatory requirements.

3.4 Responsible Sourcing

James Street Steel is committed to sourcing products and materials in a way that respects human rights, promotes environmental sustainability, and supports ethical business practices across our supply chains. Our Responsible Sourcing process is aligned with the Organisation for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct.

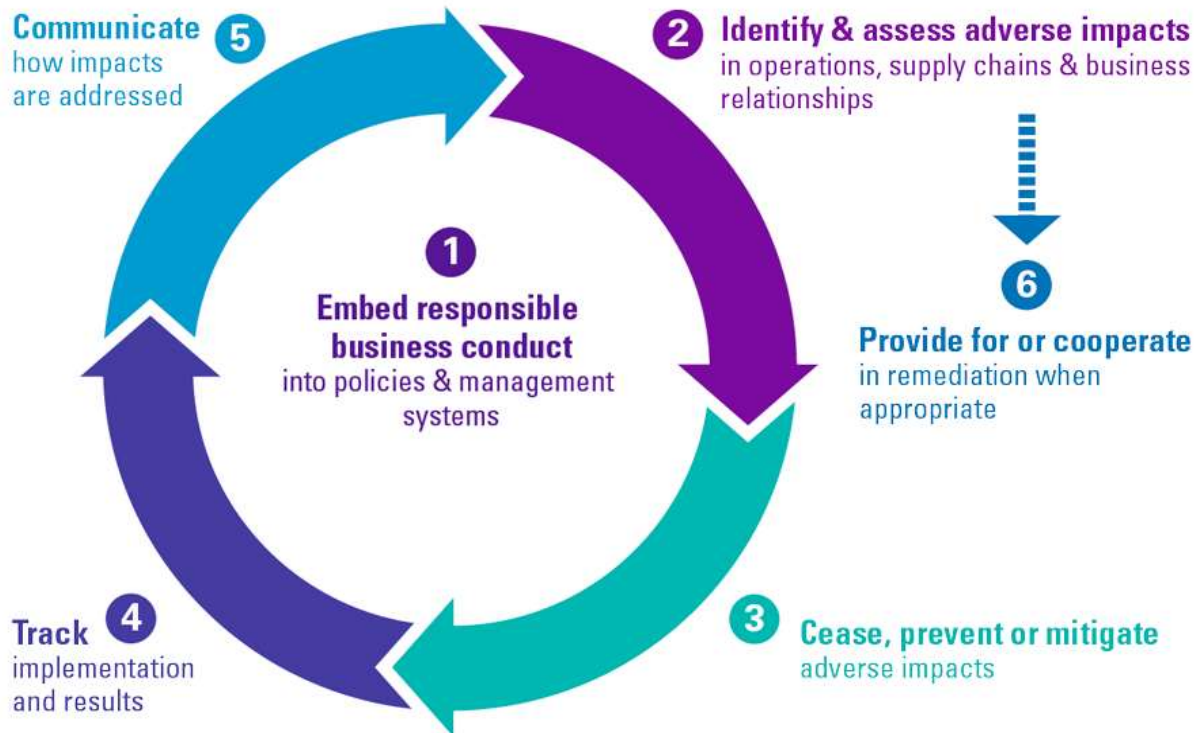


Figure 2: Supplier Chain Due Diligence

4 Environmental Stewardship

4.1 Energy

Energy consumed at our site is the largest contributor to our climate-relevant emissions. We therefore concentrate efforts to reduce GHG emissions on increasing energy-efficiency measures at our sites.

In 2024, 100% of the electricity we consumed was procured and sourced from renewable sources.

Phase 1 of our LED lighting upgrade, replacing our existing high intensity halogen lights to low energy LED lights took place in 2024 with Phase 2 planned for 2025. solar panel programme has been planned for 2024.

In 2024, all office and welfare lights were changed to LEDs with motion sensors to reduce the amount of time lights were in use.

4.2 Reducing Carbon Footprint:

We are committed to reducing our carbon footprint over the next decades, both from our own operations and from our supply chain. We are continually focused on building robust processes upon which to deliver our target of net zero GHG. Our target is to achieve net zero GHG by 2050.

We are working with partner suppliers to procure fossil free steel over the coming years and to keep procuring 100% of our electricity needs from renewable sources.

GHG emissions from purchased goods and services, business travel, upstream and downstream transportation, waste disposal, employee commuting, etc. are all contributors to our Greenhouse Gas Emissions. We plan to engage with our suppliers with the largest contribution to GHG footprint to capture their actions and plans to reduce GHG emissions. Business travel, employee commuting and downstream distribution have been identified as comparatively minor contributors to the total GHG emissions.

4.3 Waste Management:

James Street Steel is committed to our waste reduction principles and to treating and disposing of all waste materials in full compliance with local regulations and international standards. The waste management system and performance at our site are both subject to regular inspections and audits.

All our waste is managed by third parties that have been approved by the relevant authorities and disposed of at approved waste facilities. Waste generated for 2024 is reported in the attached KPI analysis.

4.4 Water Conservation:

Although James Street Steel is not a significant water user, we recognise the importance of minimising consumption of water on site.

James Street Steel aims to act responsibly and comply with all relevant legislation on conserving water and managing water supplies on site.

5 Social Responsibility

We are committed to making a positive impact on the world by incorporating social responsibility into every aspect of our business. We understand that our success is not only measured by profits but by the lasting, positive contributions we make to our communities, the environment, and society as a whole.

Our people are central to the success of our business, and we offer many opportunities for our employees to improve their skills, build on their experience and grow their careers. We provide them with safe workplaces, care for their wellbeing and encourage their involvement in creating a positive and inclusive working environment and culture.

We are committed to giving back to the communities where we live and work. Through our community engagement efforts, we engage in a range of initiatives to deliver benefits to our many stakeholders, including the communities in which our employees and their families live. By cultivating relationships and engaging with people in our communities, we create sustainable value at a local level across our network.

5.1 Employee Well-Being

High occupational health and safety standards are the basis for assuring the safety, health and wellbeing of our people, our customers and other stakeholders who attend our sites. We regularly monitor health and safety regulations, industry standards and other best practices to meet our obligations and aim for compliance through regular internal and external audits.

Prioritised employee health and safety through comprehensive training programs and adherence to strict safety protocols. Enhanced employee benefits to support the well-being of our workforce.

We're committed to helping our employees unlock their full potential, through ongoing learning opportunities and mentorship programmes. We recognize that when employees are well-cared for, they are more engaged, productive, and loyal.

5.2 Community Engagement

At James Street Steel, we believe in being a responsible corporate citizen and actively contributing to the communities where we live, work, and do business. We are committed to using our resources, expertise, and partnerships to make a meaningful, positive difference in the lives of individuals and communities, both locally and nationally. Our community engagement efforts are integral to our mission and are built on the principles of sustainability, inclusion, and social responsibility. Our community partners include:

5.3 Diversity and Inclusion

We commit to uphold the values of diversity and inclusion and to actively work toward building a workplace culture where all employees feel supported, valued, and included. This commitment is not just a statement, but a call to action that will guide every aspect of how we operate, from recruitment to leadership to community engagement. Our Code of Conduct states that we do not tolerate any discrimination, harassment or bullying for any reason. This also applies to our business partners (both direct and indirect) throughout our supply chain.

5.4 Employee Recruitment, Retention and Development

James Street pledge to maintain a commitment to employee recruitment, retention, and development that reflects our core values. By fostering a culture of inclusivity, continuous learning, and support, we will ensure that our employees are equipped to succeed and feel valued within our organization. We are dedicated to helping our employees reach their career goals while contributing to the company's success.

6 Supply Chain Sustainability

Our goal is to create a sustainable and resilient supply chain that drives positive impact across environmental, social, and economic dimensions. By working with our suppliers, we aim to reduce our ecological footprint, enhance social equity, and promote long-term value creation for all stakeholders. We believe that a sustainable supply chain is a competitive advantage and will contribute to our growth and reputation as a responsible business leader.

6.1 Sustainable Sourcing

We prioritize building long-term partnerships with our suppliers to promote mutual growth, stability, and shared success. This includes fair pricing agreements, timely payments, and providing the necessary support to help our suppliers improve their sustainability practices.

We aim to reduce supply chain costs through smarter sourcing strategies, waste reduction, and the optimization of logistics. Our goal is to balance economic efficiency with environmental and social responsibility, ensuring that sustainability does not come at the expense of profitability.

We aim to include local suppliers in our supply chain, particularly those who align with our sustainability goals. By supporting small and local businesses, we reduce transportation emissions and contribute to the local economy.

6.2 Product Innovation

Our commitment to ethical product innovation includes full transparency in the sourcing of raw materials. We provide clear and accurate information about the origins of the materials used in our products, allowing consumers to make informed choices and trust that our products align with their values.

7 Future Goals

At James Street Steel, we remain steadfast in our commitment to sustainability and will continue to set ambitious goals to further reduce our environmental footprint, enhance social responsibility, and promote sustainable practices throughout our supply chain. Key objectives for the coming years include:

- Allocation and investment of resources to improve production – equipment, facilities, and management processes.
- Achieve CARES SCS and BES6001 certifications, demonstrating our unwavering dedication to responsible sourcing.
- Phase 2 of our lighting refit program – changing from high energy halogen lights to LED lights.
- Roll out of our “Project Green” waste awareness program.
- Diverting as much Bulky waste and mixed recycling to other waste streams – Organic, Cardboard.
- Sustainable Awareness training for all employees.
- Enhancing diversity and inclusion efforts to create a more equitable and inclusive workplace.
- Collaborating with suppliers to further improve supply chain transparency and sustainability.
- Working with key suppliers to reduce our carbon footprint.
- Increase our commitment to community engagement in 2025.

8 Conclusion

As we reflect on the progress made in our sustainability journey, it is clear that James Street Steel remains committed to integrating sustainability into every facet of our business. Over the past year, we have made significant strides in reducing our environmental impact, enhancing social responsibility, and driving innovation across our supply chain and product offerings. Through our dedication to sustainable sourcing, product innovation, and continuous improvement, we are laying the foundation for a more sustainable and responsible future.

However, we acknowledge that sustainability is a continuous journey, not a destination. While we are proud of the achievements detailed in this report, there is always more work to be done. We are committed to furthering our efforts to reduce carbon emissions, minimize waste, promote ethical practices, and support the communities we serve. Our goals for the future are focused on deepening our sustainability initiatives, increasing collaboration with stakeholders, and fostering innovations that will help address the most pressing environmental and social challenges of our time.

Appendix A – Materiality Matrix

Reporting Period (e.g. Year 2022)			
<i>Note: If equivalent materiality documentation is available this criterion is met. Please provide a link to any alternative documentation</i>			

For each impact establish its significance to both external and internal stakeholders. When determining significance, consider the science and the context behind each, informed by stakeholder opinion and scientific research, international consensus. Indicate the ability of the organisation to influence performance relating to each. Prioritise the issues using the scale shown. More information on the concept of Materiality can be found in the Global Reporting Initiative (GRI) Standards.

Material Aspects										
Material Aspects		Ability to influence (high/low)		Material Aspects		Ability to influence (high/low)				
Water Use			Low	Stable Employment			High			
Contribution to Diversity and Stability of the Local Economy			High	GWP and GHG emissions			High			
Pursuing Innovation			Low	Transport			High			
Air emissions			Low	Safe and Healthy Working Conditions			High			
Fair payment practices			High	Energy Use			High			
Local purchasing			High	Waste			High			
Supporting SME's			High	Primary Material Use and Materials Efficiency			High			
Fair wages			High	Human Rights			High			
Workers' Conditions			High	Slave Labour			High			
				Child Labour			High			
				Skills and Training			High			
				Health and Safety performance			High			

Environmental
Social
Economic
Sustainability impacts of the organization
(Confirm the range of impacts, adding any missed, Copy and Paste into matrix according to your evaluation of importance)
<small>The range and priority of these impacts is informed by stakeholder views that are gained through systematic, inclusive, internal and external engagement at all levels of the organisation. This engagement needs to consider science and fact as well as opinion.</small>
<small>Ensure this is an open process that considers any new or emerging aspects and importance changes, e.g. as science shows risks are better understood or as ways to manage them have been found and performance has improved. Ask the question "What has changed from last year?"</small>
Biodiversity
Eco-toxicity
Emissions to water
Renewable Energy use
<i>Please add these and any other environmental issues to be mapped onto materiality matrix</i>
Community relations
Gender Equality
Diversity
Fair wages
Workers' Conditions
Freedom of Association
<i>Please add these and any other social issues to be mapped onto materiality matrix</i>
<i>Please add these and any other economic issues to be mapped onto materiality matrix</i>

less <---- Importance to Delivering Organisations Strategy -----> more

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Appendix B – Maturity Matrix

Maturity Matrix Worksheet					
Data Collection/Reporting Period (e.g. Year 2022)					
You may want to refer to the characteristics for each practice in Table A1 'Sustainable Development maturity matrix for continual improvement of organizations seeking certification of their products' in BS 8902:2009					
Sustainability Principles	Practices (Please add any additional practices that are relevant to your approach to sustainability management)	Characteristics of the approach to sustainability in developing organizations			Objectives & Plan(s) / Programme(s)
		Maturity			
		Ad-hoc engagement, an informal approach to stakeholders in relation to these Practices. Limited understanding of the implications of the Practices on business priorities and decision making.	Policies and approach documented and well understood. Accountable party identified and responsible implementing roles/tasks resourced, trained and operational. Certified or uncertified management systems in place to manage the Practices. Demonstrable performance improvements.	Engaged plus: Proactively using sustainability to drive innovation into the organization at every level to deliver improved performance. Company success is viewed in broader terms than financial returns only. Proactive and negative impacts on our natural capital, wellbeing, local communities and economic contribution should be considered and built into all decision making. Science and context based transition plans and targets are in place that define a pathway towards sustainable and responsible operations. Performance improvements aligned to the context and scientific pathways.	
		Immature	Engaged	Proactive and Learning	
Inclusivity	Stakeholder identification and mapping		Stakeholder map part of the IMS - Needs and Expectations of interested parties		This process is in its infancy. As the process matures the goal is to move to being proactive.
	Open engagement in various formats for various stakeholders	Company Website, Customer and supplier visits			Website to be updated with Sustainability policies and 2024 sustainability report.
	Stakeholder issue identification		Stakeholder issues identified as part of the IMS - Needs and Expectations of interested parties		Stakeholder surveys to be implemented
	Communication of organization response to issues raised		Stakeholder responses available upon request		Stakeholder surveys to be implemented
 / Additional practice				
 / Additional practice				
 / Additional practice				
Integrity	Leadership shown - clear Accountabilities documented		Leadership shown as part of the IMS - Needs and Expectations of interested parties		Achieve CARES SCS and BES6001
	Code of Conduct adopted		Code of conducts adopted		Induction and awareness training to be updated to include sustainability
	Integrity risks identified and managed		Risks identified and managed but not integrated with Sustainable Management System		Risks to be integrated into SMS
 / Additional practice				
 / Additional practice				
 / Additional practice				
Stewardship	Sustainable development culture	Employee Inductions, Toolbox Talks			Sustainability to be included in induction and Awareness training
	Responsible/Sustainable Supply chain approach adopted	Responsible sourcing policy in place			Supplier assessment in regards to sustainability to be developed
	Systematic Environmental Management		Environmental Management an integral part of our operations		Continue to enhance the IMS
	Systematic Social Management	Social Responsibility Policy in place			Policy to be published on our website
	Systematic Economic Management		Good economic management in place		
	Skills and training			Competency and training matrices in place	continue to develop core skills of all employees
	Career development		Commitment to continuously develop and retain employees		
 / Additional practice				
 / Additional practice				
 / Additional practice				
Transparency	Identify appropriate metrics/KPIs	KPI's in place as part of this workbook			Keep monitoring KPIs
	Monitor performance	KPI's in place as part of this workbook			Keep monitoring KPIs
	Publicly report management practices and performance		IMS Management Reviews in place		Include an SMS Management Review
	Review performance		Management review, set and review objectives		Annual Management Reviews with more if necessary
 / Additional practice				
 / Additional practice				
 / Additional practice				

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Appendix C – Stakeholder Engagement

Interested Parties	Type	Reason for Interest	Needs and Expectations of Workers and other Interested Parties	Needs and Expectation of Organisation	Power/ Interest Matrix
Customers	External	<ul style="list-style-type: none"> Direct recipient of organization products/services 	<ul style="list-style-type: none"> Requirement for excellent quality and services. Competitive pricing. Requirement for rapid and targeted customer support. Where necessary, extra general supports and advice over and above day-to-day requirements. Meeting customer quality, technical, environmental, and health & safety standards. Compliance with customer specifications and legislative requirements. 	<ul style="list-style-type: none"> Customer satisfaction Good level and long-term relationships 	Manage Closely
External Providers	External	<ul style="list-style-type: none"> Provide supporting services or/raw material to organisation 	<ul style="list-style-type: none"> Receive clear procurement information to allow for timely and accurate supply of products and services. Timely payment for supplied products and services. Accurate and timely feedback re supplier quality and service. Rapid feedback of any issues arising from defective supplier product or service. 	<ul style="list-style-type: none"> Loyalty of external providers Provide rebar on time without any defects 	Manage Closely

Interested Parties	Type	Reason for Interest	Needs and Expectations of Workers and other Interested Parties	Needs and Expectation of Organisation	Power/ Interest Matrix
Accreditation and Statutory Bodies	External	<ul style="list-style-type: none"> Assess conformity of the company against ISO standards 	<ul style="list-style-type: none"> Continually meet the accreditation requirements of ISO9001:2015, ISO14001:2015, ISO45001:2018 and CARES appendices 2 & 8. Continually meet relevant sector requirements. Continually meet the HSA safety, health, and welfare at work regulations. Meeting all other regulatory and statutory requirements. 	<ul style="list-style-type: none"> Customer recognition Reliable with minimum cost 	Manage Closely
Tax, Banking, Insurance and Local Authorities	External	<ul style="list-style-type: none"> Dictate controlling regulations that impact on organisation product/services. Provide credit facility to the organisation. Cover the risk factor of the organisations plan, machinery, products, and people 	<ul style="list-style-type: none"> Be continually tax, insurance, and vat compliant. Be continually compliant with any local authority charges or requirements. Always adhere to any relevant bank agreements. Effective risk management of the HSEQ 	<ul style="list-style-type: none"> Develop business support policies. Timely provide business running finance Timely payment of insured sum in case of any incident 	Manage Closely
Society	External	<ul style="list-style-type: none"> Failure of organisation products could impact on public safety 	<ul style="list-style-type: none"> Minimise impact of company activities on the public or environment. 	<ul style="list-style-type: none"> Significant improvement in local environment 	Monitor



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Interested Parties	Type	Reason for Interest	Needs and Expectations of Workers and other Interested Parties	Needs and Expectation of Organisation	Power/ Interest Matrix
Owners (Shareholders)	Internal	<ul style="list-style-type: none"> Investment in organisation 	<ul style="list-style-type: none"> Profitability/dividends Good financial and legal compliance Avoidance of fines or penalties 	<ul style="list-style-type: none"> Good working atmosphere Develop and implement good business policies. 	Keep Satisfied
Employees	Internal	<ul style="list-style-type: none"> Responsible for realization of organization product 	<ul style="list-style-type: none"> Proper health and safety working conditions. Continuation of job Ensure a reasonable return/wage and conditions for workforce. Ensure ongoing work and development opportunities for workforce. 	<ul style="list-style-type: none"> Loyalty with organisation Concentration on work Give 100% output 	Keep Satisfied



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Appendix D – Key Performance Indicators (KPIs)

Stakeholder Complaints & Prosecutions	2024	Objective
Total number of ethical, environmental, social and economic incidents recorded and reported to an external Regulator in the data collection/reporting period.	0	Maintain at 0 for 2025
Total number of ethical, environmental, social and economic incidents that resulted in the issuance of enforcement and/or prohibition notices by an external Regulator in the data collection/reporting period.	0	
Total number of ethical, environmental, social and economic incidents that resulted in a successful prosecution by an external Regulator in the data collection/reporting period.	0	
Total number of ethical, environmental, social and economic complaints recorded and reported to an external Regulator in the data collection/reporting period.	0	
Total number of ethical, environmental, social and economic complaints that resulted in the issuance of enforcement and/or prohibition notices by an external Regulator in the data collection/reporting period.	0	
Total number of ethical, environmental, social and economic complaints that resulted in a successful prosecution by an external Regulator in the data collection/reporting period.	0	



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Material Efficiency	2024	Objective
Total tonnes of raw materials used over year (Billet, Reinforcing bar and/or coil)	18641 kgs	
Total tonnes of finished product	18401 kgs	
Material Efficiency	98.71	Maintain above 96% for 2025

Energy Intensity	2024	Objective
Total energy including fuel, electricity, heating, cooling, steam or all other energy sources	602.10	
Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	18401 kgs	
Energy Intensity	.03	Maintain for 2025

Renewable Energy	2024	Objective
Total energy including fuel, electricity, heating, cooling, steam or all other energy sources	602.10	
Total renewable energy produced directly on site or purchased as certified renewable energy and/or contribution of renewable energy purchased from national grid.	602.10	
Renewable energy as a proportion of total energy used	100%	Maintain for 2025



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Waste Recycled	2024	Objective
Total quantity of Waste recycled including refractory, graphite electrode, skull, steel crop, steel-offcut, scrap rolls, copper mould, waste oil, tyre, batteries/accumulators, packing waste (wood / plastic / paper-cartoon) and all other recycled waste.	24653 kgs	
Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	18401 kgs	
Waste recycled	1.34	Increase in 2025

Waste to Landfill	2024	Objective
Total quantity of Waste to landfill including general waste, hazardous waste, non-hazardous waste, inert waste and by-products if they are not reused or recycled.	0	
Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	18401 kgs	
Waste to landfill	0%	Maintain for 2025



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Waste to Incineration	2024	Objective
Total quantity of Waste to incineration including hazardous waste (e.g. medical waste, waste oil) and by-products if they are not landfilled, reused or recycled.	12100 kgs	
Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	18401 kgs	
Waste to incineration	0.66	Decrease for 2025

Fair Wages	2024	Objective
Total average number of employees and permanent contractors (if any) employed with minimum wage set by national legal standard at all sites during the data collection/reporting period.	0	Maintain for 2025
Total average number of employees and permanent contractors (if any) employed at all sites during the data collection/reporting period.	26	
Minimum Wage Rate	0	

Gender Equality	2024	Objective
Percentage split in gender of total workforce expressed as %Male/%Female	92%/8%	Maintain / Increase in 2025



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Gender Pay Equality	2024	Objective
Average (median) income of men	35321	REDUCE GAP
Average (median) income of women	22538	
Gender Pay Gap	36%	

Employee Grievance System	2024	Objective
Total number of grievances about social impacts (e.g. Human Rights, Worker's Conditions, Fair Labour Conditions...etc) resolved through formal grievance system at all sites during the data collection/reporting period.	0	Maintain for 2025
Total number of grievances about social impacts (e.g. Human Rights, Worker's Conditions, Fair Labour Conditions...etc) filed through formal grievance system at all sites during the data collection/reporting period.	0	
Grievance Resolution Rate	0	

Lost Time Injury Frequency Rate	2024	Objective
Total number of lost time injuries of employees and permanent contractors (if any) during the data collection/reporting period - LTI	1	Decrease for 2025
Total number of work hours of employees and permanent contractors (if any) during the data collection/reporting period - WH	36008	
LTIFR	27.77	



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Skills and Training Development	2024	Objective
Total number of training hours provided by the organisation in the reporting period to its employees and permanent contractors (if any) in the data collection/reporting period.	464	Maintain for 2025
Total average number of employees and permanent contractors (if any) employed at all sites during the data collection/reporting period.	26	
Number of training hours per employee-contractor	17.85	

Contribution to Diversity and Stability of the Local Economy (Local Employment)	2024	Objective
Local Employment Rate	100%	Maintain for 2025

Pursuing Innovation	2024	Objective
Total innovation and investment expenditure in the data collection/reporting period.	99729	
Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	18401 Kgs	
Pursuing Innovation Rate	5.42%	Maintain for 2025

Fair Treatment of Suppliers	2024	Objective
Total number of complaints against the company by suppliers at all sites during the data collection/reporting period. Do not include quality complaints from customers. This KPI is for complaints from suppliers only.	0	Maintain for 2025