

# MSSL POLICY STATEMENT: CORPORATE RESPONSIBILITY

#### **General Principles**

This Policy statement describes the main principles of Marcegaglia Stainless Sheffield Limited in relation to sustainable development of economic, environmental, and social goals.

- We shall maintain compliance with applicable laws and regulations, our Code of Conduct and other company policies and instructions.
- We shall strive to create value for the company, society, and the environment.
- We will continuously improve our performance, products, and operations.
- We shall maintain continuous and open dialog with key stakeholders and acknowledged other interested parties. We will share knowledge of best practices, technologies, and product stewardship throughout the Marcegaglia business.
- We shall require our business partners, suppliers, and subcontractors to adhere to cascaded policies, specifications, and requirements.

### A Safe and Healthy Workplace

- We shall prevent accidents and occupational ill health.
- We all accept that everyone is responsible for their and their colleague's safety.
- Safety shall be prioritised over all other considerations.
- We will always operate safely and comply with established safety principles.
- We shall improve our working environment and implement occupational health activities to prevent occupational diseases and promote the well-being of our employees.
- We shall maintain ISO-45001 certification.

## **Environmental Responsibility**

- We are committed to responsible production.
- We shall continuously monitor energy use, input material, recycling, and carbon emissions.
- We shall comply with the requirements of CBAM reporting.
- We will develop our production process for optimised energy and material efficiency, maximise
  the recycled content of our steel, and minimise waste to landfill by recycling our by-products.
- We shall maintain ISO-14001 certification and implement proactive, risk-based environmental management to prevent incidents and reduce waste, pollution, emissions to air and discharges to water, and harmful impacts related to noise and vibration.

# Social Responsibility

- We shall understand the impact of our business on local, national, and global communities.
- All employees will be treated in a fair and equal manner.
- We shall foster diversity and create a work environment that allows all team-members to contribute and to develop. We expect employees to value diversity and different cultures.
- We will not tolerate behaviour that is abusive, discriminatory, intimidatory or constitutes any form of harassment.
- We shall implement a Human Rights Policy in alignment with UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work.



#### **Corporate Conduct Commitment**

- We believe that responsible and ethical business is the best foundation for success.
- We shall implement effective risk management and capitalise on identified opportunities.
- We shall operate with a sustainable supply chain that complies with conflict mineral reporting requirements and appropriate EU import regulations.
- We shall conduct business with high integrity and transparent governance principles.
- We shall comply with applicable laws, regulations, and our commitments and policies.
- We shall follow the established measures to ensure fair and open competition, compliance with applicable trade sanctions. We condemn corruption and bribery of any kind.
- We shall not make donations or be involved with any political parties or groups.
- We recognise that our decisions might have a major impact on communities, our personnel, and local suppliers and service providers.
- · We shall maintain accessible document management systems.
- We shall maintain ISO-9001 certification.

### **Employee Responsibility**

- We recognise that our employees are our most important asset and value their contributions.
- We will implement processes to ensure that we have sufficient suitably qualified personnel to meet obligations and achieve our business goals.
- We shall set SMART objectives and maintain a performance dialogue.
- We shall provide clear instructions, rules and guidelines for daily decisions and actions.
- · We shall provide learning and development opportunities.
- We shall listen to employees and maintain robust communication channels.
- As a condition of employment, all employees will comply with the requirements of MSSL Policies, the Code of Conduct, and the production site Integrated Management Systems.
- Managers are responsible for ensuring operational compliance with our public and internal
  policies and instructions, including risk identification and data reporting.
- Employees shall be encouraged to report concerns and we are committed to a strict non-retaliation policy for those who report a potential violation in good faith.

Liam Bates

President, Long Products

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