

حديد الإمارات أركان emirates steel arkan

1. Our Mission :

Emirates Steel Industries PJSC and Arkan Building Materials PJSC (collectively 'Emirates Steel Arkan' or 'ESA') is committed to the production of safe and sustainable steel products. In support of this goal, we will work together with third parties including suppliers, consultants, stakeholders & business partners (Suppliers) to:

- Operate and maintain a lean supply chain that supports our corporate policies and objectives.
- Develop sourcing solutions in line with customer, regulatory and wider stakeholder needs and expectations, as well as Emirates Steel Arkan ethics.
- Create long-term value and reduce risks for our business, operations and our Suppliers to the best interest of all related parties.

We will achieve these objectives by setting responsible sourcing standards, by collaborating, innovating and embedding responsible sourcing into our business processes and by applying the highest standards of business ethics.

2. Introduction :

The Suppliers' Code of Conduct (Suppliers' Code) sets forth the standards of conduct & describes the minimum expectations in the areas of business ethics that Suppliers are expected to comply during the provision of goods and services. We strongly engage with our Suppliers in constructive improvements about how together we can promote sustainable business & are keen to give recognition to those who implement them. Fundamental to the code is an expectation that all Suppliers that undertake any work with, or for Emirates Steel Arkan operate in full compliance with the laws and regulations in relevant areas of their business. ESA expects all existing and new suppliers to commit to the Code. Suppliers are required to check their contracts, agreements & purchase orders as they may contain additional obligations or higher standards than those set out in this code. Suppliers can refer www.emiratessteelarkan.com to ensure they are complying with the latest version of the Code.

3. Our Commitment to Suppliers :

Through the Suppliers' Code of Conduct, Emirates Steel Arkan will:

- Collaborate: Work with Suppliers to improve social (including health, safety and human rights), environmental and ethical standards. This will include joint assessments, such as site visits, etc., to evaluate performance against the Suppliers' Code.
- Support : Assist Suppliers to identify activities which may fall below the requirements of the Suppliers' Code and work towards achieving improved conditions in a timely manner, as per the needs of Emirates Steel Arkan.
- Prioritize : Focus attention on those parts of the supply chain where there are higher risks of not meeting the Suppliers' Code requirements and where the maximum improvement can be achieved with continuous enhancement.
- Respect : Always conduct our business in a fair, objective, transparent and professional manner. This includes treating Suppliers' employees working at our premises with the same workplace practices as our own staff.

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- Promote : Act as an advocate for responsible supply chain practices and ethical standards within our industry.
- Communicate and train: ensure that all Emirates Steel employees are aware of the Suppliers' Code and the ones responsible for purchasing are properly trained.
- Improve: Regularly review our responsible sourcing program and practices to ensure they contribute to our vision.

4. What we require from our Suppliers :

- How to behave and treat others
- How to protect our assets
- Ethical Commitments in business
- How to report your Concerns

i) How to behave and treat others

- **Human Rights** – ESA respects all human rights of its employees and local communities, and is committed to promoting these principles to its Suppliers and their workforce, as set out by our human rights standards.
ESA requests its Suppliers to develop and implement policies and procedures to ensure respect of all human rights in business, their relations with employees and their supply chain. ESA fosters a work environment in which contribution of each individual is equally valued. Any form of discrimination, harassment, intimidation, violence, abusive or offensive behavior of any kind is not tolerated. Suppliers are urged to follow UAE's cultural standards, respectful language & all applicable UAE labour laws related to working hours & living conditions. Maintaining such an environment is the responsibility of everyone who works for or with ESA. ESA firmly stands against any forms of forced and compulsory labor, and do not seek to exploit in anyway the services of child, under-aged, slave or trafficked labour. Our Suppliers must always comply with ILO Declaration on Fundamental Principles and Rights at Work whether stipulated in relevant applicable laws, human rights standards or this Suppliers' Code. Where local laws forbid suppliers from upholding certain aspects of this Code or the human rights requirements, they should comply with the local laws while seeking to respect human rights.
- **Health, Safety and Environment** - ESA is committed to working towards a goal of zero accidents and injuries, as well as general wellbeing in the workplace and beyond. This is endorsed by the H&S policies and procedures that promote our philosophy of Safe Sustainable Steel. The responsibility for maintaining the Health, Safety and Environment standards is shared by all Employees and Suppliers by following the health, safety and environmental policies and requirements, eliminating all work-related injuries & reporting any potential incidents or hazards. Perform work safely and follow any communicated work standards. Working under the influence of illegal drugs or alcohol is not tolerated.
- **Environmental Stewardship** : ESA is committed to protect the environment & encourages Suppliers to adhere relevant environmental authority guidelines.
ESA is committed to making steel products more sustainable. In order to achieve this goal, ESA uses its expertise in steel and mining to develop cleaner processes, aims to minimize the impact on the environment.

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We seek to work with Suppliers that are committed to the same objectives and follow best practices in environmental management, waste reduction, recycling and other environmental solutions.

- **Working with Third Parties** - Business relationships with external parties (such as suppliers, consultants, customers, etc.) are established to support ESA in managing its activities effectively. Any third parties working with ESA would need necessary approvals & respect the applicable laws, regulations and compliance standards, including the ethical commitments set out in this Code.

ii) How to protect our assets

- **Safeguarding Company Assets** - Everyone who holds, controls, manages or supervises company assets has a duty to care for them while maximizing the efficiency of their use to the benefit of ESA and its stakeholders. ESA's assets (including but not limited to its fixed assets, financial resources, equipment or materials) have been entrusted to Employees & Suppliers to enable achievement of business goals. Necessary security policies need to be followed, ensuring transparent documentation supporting any costs and expenses and do not engage in unnecessary, extravagant or improperly approved purchases.
- **IT Resources and Cybersecurity** - All persons utilizing, supervising or having access to ESA IT resources have the responsibility to protect and use the company's IT resources for business purpose in line with the law, IT security and internal policies. Be aware of cybersecurity threats (e.g., viruses/ trojans, hacking attempts, phishing, password leaks) and comply with all IT security requirements in the company. Report any unusual activity or suspected IT risks to your IT team immediately. Do not use information and communication technologies, including networks, to carry out hostile activities or acts of aggression, pose threats to national peace and security or proliferate information regarding weapons or related technologies.
- **Records, Documents and Controls** - It is the responsibility of all Suppliers working with or representing ESA to ensure integrity of financial and non-financial information. Upon request, we require our Suppliers to provide ESA or its representatives with copies of all relevant information, co-operate and use reasonable endeavors to ensure that their sub-contractors do the same and demonstrate the efforts being done in accordance to the Code.

iii) Ethical commitments in business :

ESA is committed to apply fair, ethical and transparent business practices and standards at all times. ESA takes a zero - tolerance approach to unethical practices & does not procure goods and/or services that do not comply with national and/or international laws and conventions. ESA is committed to using raw materials of legal and sustainable origin, and will not entertain 'conflict minerals'.

ESA requests its Suppliers to maintain and enforce a company policy and procedures requiring adherence to ethical business practices, adopting the principles of this Suppliers' Code of Conduct and ESA's Ethical and Anti-Corruption Guidelines. In particular, ESA requests its Suppliers to conduct business in an ethical manner by :

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- Refraining from any and all forms of fraud, corruption, extortion and/or bribery, and specifically ensuring that business dealings and relationships are dealt with integrity and transparency;
- Complying with applicable anti-bribery and other relevant laws for giving and receiving gifts, entertainment and hospitality (“GHE”) to any employees of ESA (including their families) in an attempt to influence business decisions. These obligations extend to any third parties acting in cooperation or on behalf of ESA (e.g., agents, consultants, brokers, other commitments to customers (including ESA’s employees, Public officials etc.). Any suspected practices or offer, solicit, give or receive any improper payments or bribes, outside business involvement either directly or indirectly need to be reported using any of the Whistleblowing channels available in ESA;
- Adhering to Anti-Trust, Anti-Money Laundering and relevant Competition laws, and appropriately address any risk of breaching them. The Supplier shall not engage in any form of corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage. Supplier shall abide by all applicable anticorruption laws and regulations of the countries in which it operates;
- Disclosing immediately to ESA information regarding potential Conflicts of Interest relating to their activities as an ESA supplier, including disclosure of any financial interest an ESA employee may hold in their business or personal relationship including a family member with anyone in ESA;
- Protecting all confidential information of ESA and its respective business partners at all times. Never discuss confidential information with third parties without signed non-disclosure agreements and /or confidentiality clauses in the relevant agreements. Do not release any external statements or communication on behalf of or referencing ESA to media or the public;
- Respecting Intellectual property (“IP”) of ESA, including copyrights, know-how, patents, trademarks and trade secrets, company physical access, IT security policies and procedures, as well as any IP of third parties in use at ESA;
- Adhering to relevant domestic & international trade laws.
- Trading activities of insiders are strictly regulated and breaching these requirements, that is using the “inside” information for trade (either directly or by co-operating with others) is illegal.
- Abiding by Emirates Steel Arkan ethical standards and all applicable laws.

ESA will work with its Suppliers in assessing Suppliers’ compliance with the requirements of this Suppliers’ Code & addressing any identified gaps. ESA reserves the right to disengage from Suppliers that do not meet the requirements of this Code or who cannot provide or commit to an improvement plan. In case where you believe that a contravention of this code has been committed by an Emirates Steel Arkan employee or another stakeholder, you may raise such matter in confidence using the following Whistle Blower Channels:

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iv) How to report Concerns :



Email:
es.compliance@emiratessteel.com



Web-based speak-up platform:
<https://emiratessteel.ethix360ae.com>
(Available in 60+ languages)



Toll-Free No.
800 065 12062
(Available in Arabic & English Languages - 24/7)

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6. Emirates Steel Arkan is entitled to review this Suppliers' Code and the implementation program, with respect to its suitability and effectiveness.

As the representative of the Supplier here stated, I hereby acknowledge I have read and understood the contents of this Code.