

Board of Directors Decision No. 10/2024**Code of Conduct for Business Partners**

Following the meeting of the Board of Directors of VÍTKOVICE STEEL, a.s. of 27. 5. 2024

I d e c l a r e

*** Code of Conduct for Business Partners,**

(hereinafter referred to as the „Code“), which is attached as Annex No. 1 to this Decision.

In connection with

I p r o v i d e

to technical directors, heads of department and managers of production departments

- 1 to ensure demonstrable familiarization of all employees managed by organizational the „Code“ issued by this Decision

to all employees of VÍTKOVICE STEEL, a.s.

- 2 follow the „Code“ issued by this Decision as a binding standard of conduct.

Gestor: Ing. Žaneta Giel Sigmundová, 200.3

Distribution sheet: in electronic form – all employees of VÍTKOVICE STEEL, a. s.

Approved:

Ing. Radek Strouhal
.....
Member of the Board of Directors

Date of approval: 27 May 2024

Effective date: 1 June 2024

Code of conduct for business partners

Introduction

This Code of Conduct for business partners (hereinafter referred to as the "Code") contains standards that are business partners of the trading company VÍTKOVICE STEEL, a.s. (hereinafter referred to as the "Company") are obliged to comply with the implementation of contractual relations with the Company. The objective of the Code is to ensure that the Company's business partners comply with the Company's value chain based on meeting high standards in the areas of ethics, working conditions, human rights and environmental protection. The Code is an integral part of the Company's general terms and conditions.

1. Ethics and integrity

Business partners are required to comply with all applicable and effective laws and regulations in the countries where they operate.

Any form of fraud, corruption, bribery or undue influence is strictly prohibited.

Business partners are obliged to respect intellectual property rights and restrictions related to non-public information of the Company.

2. Working conditions and human rights

Business partners are required to respect basic labor rights, including the right to free association, collective bargaining and fair wages.

Any form of child labor or forced labor is prohibited.

Business partners are obliged to ensure safe and healthy working conditions for their employees.

Discrimination based on race, gender, religion, sexual orientation, age or other protected characteristics is not permitted.

3. Environmental protection

Business partners are obliged to strive to minimize the negative impacts of their activities on the environment, including reducing emissions, energy and water consumption, minimizing waste and using recycling, the extent of which they are obliged to document if necessary at the request of the Company.

Business partners are obliged to handle waste and chemicals safely and ensure their disposal in accordance with valid and effective legal regulations.

Suppliers are required to monitor and report key environmental indicators to ensure transparency and continuous improvement of their operations.

4. Carbon footprint

The company requires full cooperation from its business partners in the matter of declaring the data needed to report the carbon footprint, and the business partners undertake to provide such cooperation.

In the supply chain, especially in relation to the Carbon Border Adjustment Mechanism (CBAM), if the supplied goods are subject to a legal obligation to report a carbon footprint when purchased from outside the EU.

5. Minerals from non-conflict sources

It is the Company's policy not to use materials manufactured using mineral resources originating in the conflict zone of the Democratic Republic of the Congo and adjacent areas. These are the so-called conflict minerals – tin, tungsten, tantalum and gold. The Company's business partners are required to provide the Company with a statement that the goods supplied by them do not contain these conflicting materials.

6. Product Safety

The company declares the safety of its products based on meeting the requirements of Directive 2011/65/EU of the European Parliament and of the Council (RoHS2) on the restriction of the use of certain hazardous substances in electrical and electronic equipment, and declares that its products do not contain perfluoroalkyl and perfluoroalkyl substances and that asbestos and radioactivity in its products do not exceed the limits established by valid and effective legal regulations. The Company's business partners, specifically suppliers of input material and goods for the Company's production, are obliged to provide the Company with information that may have an impact on the Company's declaration described.

7. Compliance and Control

Business partners are obliged to allow the Company to carry out audits and inspections, if necessary, in order to confirm compliance with the obligations specified in the Code. In case of detection of irregularities or violations of the Code, business partners are obliged to immediately take corrective measures to ensure compliance.

In serious cases of violation of the Code or repeated violations of the Code, the Company is entitled to terminate the contractual relationship with the business partner.

8. Cooperation and Improvement

The business partner is obliged to be open to cooperation with the Company for the purpose of improving ethical, social and environmental practices and is obliged to provide the data required for data reporting according to the ESRS standards based on the CSRD directive of the European Union, if requested by the Company.

The company supports its business partners in finding innovative ways to increase sustainability and reduce the environmental impact of their activities.