

WHISTLEBLOWER POLICY.



INTRODUCTION

The Oryx Stainless Group is an internationally leading group for the trade and processing of scrap metal as a raw material for stainless steel production. Our customers include producers of long and flat stainless steel products worldwide. On the supplier side, we have a broad, continuously expanding, international procurement base.

The Oryx Stainless Group is committed to honest and fair business conduct. We expect our entire staff to adhere to high standards. Any suspicious misconduct should be reported as soon as possible. The aim of this policy is to uncover any criminal actions within the Oryx Stainless Group that might otherwise remain concealed. The possibility of anonymity ensures that employees who report concerns will not face any negative consequences for their employment relationship.

This policy is intended, within the framework of the Oryx Sustainability Compass and the accompanying guidelines, such as the Oryx Social Standard and the Oryx Employee Code of Conduct and the Supplier Code of Conduct, to establish the conditions for reporting potential compliance violations to specific individuals or through an electronic whistleblowing system. In doing so, this policy aims to ensure sufficient consideration of the legitimate interests of the company, the whistleblowers, the individuals affected by the report, and the general public.

WHAT IS A WHISTLEBLOWER?

A whistleblower is someone who helps to identify and prevent misconduct or hazards related to our business activities by making a report. This includes all unlawful, abusive, and criminal activities, as well as any violation of legal obligations, to the extent that the regulations serve to protect life, limb, health, or employees. General complaints or inquiries regarding product and warranty issues are not included.

SETUP

We have decided to capture reports orally or in writing using the digital whistleblower solution of Aderhold Rechtsanwaltsgesellschaft mbH ("Aderhold"). These reports can be reviewed by a trusted attorney from Aderhold as well as the reporting office representatives / reporting officers (together, the "whistleblower office"). The whistleblower office should propose to the management, as soon as possible and no later than three months, what measures to take for an appropriate response in case of unacceptable behaviour.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

We want to encourage openness and will support whistleblowers in reporting incidents falling under this principle, even if they later prove to be unfounded.

Whistleblowers should not fear reprisals for reporting such incidents. Anyone who believes they have been disadvantaged should promptly inform the reporting officer(s) or the management for uncovering misconduct. If the matter is not resolved through this process, a formal complaint should be filed.

Whistleblowers must not be threatened or subjected to any form of retaliation. Those involved in such actions will face employment law measures. In certain cases, whistleblowers also have the right to file a claim for damages in a labour court.

Conversely, if we find that a whistleblower has knowingly made false allegations or for personal gain, the whistleblower must also expect employment law measures. In cases of doubt, relevant issues should therefore not be presented as fact, but rather as presumption, assessment, or as statements made by others.

HOW DOES THIS WORK IN DETAIL?

1. Reporting and processing deadline

Exclusively for whistleblower purposes, we have established a telephone hotline and web solution with Aderhold, through which any employee, business partner (service provider, supplier, etc.) can report business-related legal violations openly, either by name or anonymously. These channels are as follows:

Phone (Germany): +49 800 3800 999
Phone (International): +49 69 9999 8839
(Mo.-Fr.: 09h00-17h00 CET)



Link: <https://app.whistle-report.com/report/e63f8145-e87c-4ab7-89df-970c1a108abf>

Or via: <https://www.oryx.com/en/whistleblower-hotline/>

Each report will be carefully and thoroughly investigated. In the case of an anonymous report, it is imperative to provide comprehensive information regarding the relevant circumstances. Additionally, if further details come to light after submitting an anonymous report, individuals may contact the whistleblower solution again (by phone or through the whistleblower system). Furthermore, the reporting officer may contact individuals for inquiries using the chat function of the whistleblower solution.

The reporting officer will document the reported information, including the date of the report, the nature and circumstances of the alleged violation, and if applicable, the name(s) of the individual(s) responsible for the alleged infringement. If a contact address is provided by the reporting individual, the reporting officer will send an acknowledgment of receipt within 7 days.

Every report should receive a response within an additional three months. In cases of particularly serious violations, the reporting officer will promptly initiate investigations and take all necessary measures to prevent identified criminal behaviour.

Throughout the handling of reports, obligations arising from data protection laws will be adhered to, and reports will be kept particularly confidential (on a "need-to-know" basis). Reports will be automatically deleted six months after receipt unless further action is deemed necessary.

2. Reporting Obligations

The reporting officer shall accompany each received report with a brief statement, clearly outlining the investigative actions taken, whether the suspicion communicated in the report

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has been substantiated or unsubstantiated, and the measures taken to rectify the violation. If the reported violation is of fundamental significance, jeopardizes the company's financial interests, or pertains to the company's business or risk policy, it shall be brought to the attention of all company executives. They, in consultation with the reporting officer, shall decide on the steps to be taken (e.g., filing a criminal complaint, reporting to customs).

3. Reports against the Reporting Officer(s)

In cases where the report is directed against the reporting officer(s) themselves, the whistleblower may address their complaint directly to the management in written or oral form, anonymously. The relevant member of the management will decide on the next steps.