

SOCIAL STANDARDS .



TABLE OF CONTENTS

TABLE OF CONTENTS	2
PREAMBLE	3
IMPLEMENTATION APPROACH	4
1. WORKING HOURS, SALARIES, AND VACATION ENTITLEMENTS	5
2. CAREER MANAGEMENT & TRAINING	6
3. DIVERSITY, DISCRIMINATION, AND HARASSMENT	7
4. CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING	8
5. CONFLICTS OF INTEREST AND CORRUPTION	9
6. HEALTH AND SAFETY	10
7. CUSTOMERS, SUPPLIERS, AND SERVICE PROVIDERS	12
8. DATA PROTECTION AND INFORMATION SECURITY	13
9. SUSTAINABLE PROCUREMENT POLICY	14
10. COMPLAINTS AND REPORTING MECHANISMS	15

PREAMBLE

Oryx Stainless Group, referred to as “Group”, is an international leading player for trading and processing scrap metal as a raw material for stainless steel production.

These Social Standards were created to outline our commitment to upholding human rights for our employees, clients, suppliers, shareholders, and the communities in which we operate and were developed in conjunction with our sustainable business model. The Standards apply to all operations globally and shall be amended in accordance with relevant local laws to ensure their legal validity. However, this document shall not be misinterpreted as providing an independent basis for asserting contractual rights against the Group.

Our directors, managers, employees, and shareholders support and commit themselves to the United Nations’ Universal Declaration of Human Rights and the ILO Core Labor Standards. Furthermore, the Oryx Stainless Group is a member of numerous industry associations whose statutes and standards also include social standards and criteria. Developing and implementing the Social Standards are a valuable addition to our company values, e.g., codified in the Employee Code of Conduct, Supplier Code of Conduct and Supplier Admission Procedure.

As such, the Group acknowledges and commits itself to comply with international labor standards or national regulations, if more stringent. In the Group, these standards are used to derive decisions and to exert influence in the respective area of action, while adhering to local guidelines and the area of responsibility of the respective government to uphold human rights.

IMPLEMENTATION APPROACH

- These standards must be adjusted with regard to local legal specifications to legally ensure their relevance to the Groups' business operations around the world.
- Generally, the registered directors of the subsidiary or local organization are responsible for implementing and complying with these policies.
- Adhering to and supporting these standards is the responsibility of the leadership role. Therefore, managers must take appropriate measures to implement these principles and exercise their responsibility accordingly.
- All managers, supervisors, and the HR department should create awareness and attention to these standards among their employees. In addition, the standards and policies should be made available to employees.
- Employees should be able to report their concerns and complaints to their supervisor or through a confidential whistleblower system at any time without fear of negative repercussions or reprisals.

1. WORKING HOURS, SALARIES, AND VACATION ENTITLEMENTS

Objective/ Target

To respect the applicable labor laws and employee entitlements and provide decent working conditions.

Prerequisites

- The ILO Core Labor Standards serve as our guide, and we comply with applicable national working time laws. Also, we are developing suitable working hours policies for the Group's global businesses. These cover overtime pay in the form of paid time off or other appropriate compensation.
- The total compensation of each employee is evaluated once per year.
- Compensation and benefits should be independent of gender, origin, religion, and other factors, thus non-discriminatory. Instead, remuneration is based on job performance, job descriptions, regional standards, and cost of living. Regular compensation evaluations are required.
- Payment of remuneration must be made promptly and according to the terms of the agreement. Any potential deductions from the compensation shall be clearly stated.
- Given local legal requirements, adequate vacation entitlement and maternity leave must be offered.
- More details are explained in the respective country organization.

2. CAREER MANAGEMENT & TRAINING

Objective/ Target

We want to allow our employees to develop personally and professionally – through internal and external measures as well as learning on the job.

Prerequisites

- Training is granted to each employee to the extent permitted by law and depends on the individual development and career plan. Educational leave is also permitted to any employee if deemed useful and required by the company.
- The process shall be defined on a local level.
- New employees shall receive a proper onboarding, including information about the company and their job and tasks.
- It is crucial to determine what training is needed and to provide it.

3. DIVERSITY, DISCRIMINATION, AND HARASSMENT

Objective/ Target

Zero tolerance for discrimination and unequal treatment.

Prerequisites

The Group's business philosophy is based on the core idea that all its employees must be treated equally.

- Discrimination against individuals based on their race, skin color, gender, sexual orientation, religion, political affiliation, union membership, disability, nationality, social origin, age, or any other characteristic protected by regional laws (i.e., pregnancy) is prohibited.
- Any discrimination based on the above criteria in the hiring process, salary, advanced training, promotion, termination, or retirement will not be tolerated and must be reported to supervisors, managers, or the human resource department.
- Any form of harassment is not condoned.
- To prevent Discrimination and Harassment, we provide supplementary training, for instance, regarding diversity or forced labor the company aims to provide from time to time.

4. CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING

Objective/ Target

Zero tolerance for child and forced labor, as well as human trafficking. Therefore, the quantitative object is a zero report.

Prerequisites

Globally, the Group has a zero-tolerance policy towards child and forced labor.

- Children under the age of 15 years (defined as “child”) are not permitted to be employed.
- The following policies apply to the Group. However, if local laws provide otherwise, the specific regulations for the respective location apply first.
 - A young worker is defined as someone who is over the age of a child, as stated above, but under the age of 18 years. Only in cases where the relevant law specifies stricter rules are there exceptions to this definition. If young workers are under the School Law, they may only work during non-instructional times.
 - Young workers should not work more than 10 hours per day in total. This includes teaching time, actual working hours, and commuting to work. In addition, they should not work at night.
 - Young workers must not perform hazardous tasks that, by their own nature or in any other way, endanger their health, safety, or moral development.
- Any form of forced or compulsory work, including contemporary slavery and human trafficking, is not tolerated. We vehemently reject using forced or illegally required labor in our commercial operations, starting at the very beginning of the supply chain (see [Supplier Code of Conduct](#)), in compliance with ILO Core Labor Standards.

5. CONFLICTS OF INTEREST AND CORRUPTION

Objective/ Target

Zero tolerance for corruption, bribery, and fraud.

Prerequisites

- Whether it involves governmental officials or the private sector, we do not tolerate any kind of bribery or corruption in our group operations. Giving, accepting, offering, or promising money or anything else of value to or from third parties does not influence our actions or attempts to obtain inappropriate business advantages.
- Any indications of fraud are followed up and investigated.
- For the corruption of suppliers, see our [Supplier Code of Conduct](#)
- For anti-corruption and conflict of interest policies as well as fraud incidents, see [Employee Code of Conduct](#). Furthermore, all employee contracts shall include a specific clause regarding corruption.
- The Group also conducts regular corruption risk assessments and offers training to its employees on corruption.

6. HEALTH AND SAFETY

Objective/ Target

We bear responsibility for the safety and health of our employees, including occupational health care. The Group aims to have a zero-accident frequency and accident severity rate.

Prerequisites

- To protect the health and safety of our employees is our top priority. Therefore, we are constantly working to ensure this goal and better protect our employees with additional certifications. One example is the use of ISO certification guidelines such as ISO 45001 to improve occupational health and safety.
- For detailed information on specific job descriptions, reference is made to operations' work procedures and instructions governed as part of our quality management systems.
- In addition, we make it a priority to protect the health and safety of supply chain workers and ensure that no one suffers harm as a result of their employment.
- Occupational health professionals must be accessible to every employee.
- Prompt first-aid care must be guaranteed with the proper equipment and qualified staff on hand throughout all shifts.
- In accordance with the applicable regulations and laws as well as specific hazards, an occupational health examination must be performed before taking up the job and at regular intervals.

**SOCIAL
STANDARDS** ■

- In general, based on regional and national conditions, health promotion should be made available and special programs in this area should be offered to all employees.
- The results of medical exams must be recorded. Medical records must be handled as confidential information and preserved securely.
- Our employees are regularly trained on the topics of safety, health, and environmental protection at the workplace.

7. CUSTOMERS, SUPPLIERS, AND SERVICE PROVIDERS

Objective/ Target

We want to ensure that our standards are communicated to our customers, suppliers as well as service providers and that these companies adhere to our ethical principles.

Prerequisites

- Customers, suppliers, and service providers for the Oryx Stainless Group are screened for compliance with the Group's ethical and social standards, including zero tolerance of child labor and recognition of international labor standards. Furthermore, we follow a strict risk assessment procedure for all possible and existing suppliers. More details on the exact assessment can be found in our Supplier Admission Procedure.
- For more details, see our [Supplier Code of Conduct](#)

8. DATA PROTECTION AND INFORMATION SECURITY

Objective/ Target

It is vital for us to protect the individual rights of our employees, customers, suppliers, and other business partners concerning data and information.

Prerequisites

We adhere to the applicable local data privacy laws and regulations. Furthermore, where required by law, we have appointed a Data Protection Officer and hired a service provider to ensure the security of the network infrastructure.

- Regarding privacy and confidentiality of data from and information about customers, suppliers, and other business partners, we only use those which are necessary for the Groups' operations.
 - Information is retained as long as necessary or as required by law.
 - The consent of the person concerned must be obtained before disclosing any personal information externally unless legal processes or contractual obligation provides otherwise.
- To ensure cyber security, each employee shall keep herself and himself informed of and comply with any state-of-the-art measures regarding cyber security. This includes, for instance, that no confidential or business-related data shall be stored on private devices or data carriers.
- For more details, see our [Employee Code of Conduct](#)

9. SUSTAINABLE PROCUREMENT POLICY

Objective/ Target

We want to incorporate our Corporate Social Responsibility (CSR) concepts into the Group's procurement procedures and decisions while ensuring that they continue to satisfy the needs of our stakeholders.

Prerequisites

- Due to our business model and our daily operations, we trade and process scrap metal as a raw material for stainless steel production. Therefore, our business model is already very sustainable. Regarding the social component, we only cooperate with suppliers where the legal owner is known to us. Furthermore, we source our scrap exclusively from countries not sanctioned by the UN.
- For more details, see our [Supplier Code of Conduct](#)

10. COMPLAINTS AND REPORTING MECHANISMS

Objective/ Target

Incorporate and provide appropriate complaints management to effectively avoid and address negative human behavior violating human rights, environmental protection measures, or corruption, fraud, and bribery policies.

Prerequisites

- Employees are encouraged to promptly contact a supervisor, manager, or the human resource department, if he or she believes to have observed a violation of any of the Group's Code of Conducts, the Social Standards, or any other illegal or unethical behavior by any officer, employee, or by anyone purporting to be acting on the Group's behalf.
- Reports may be made anonymously.
- Confidentiality will be protected and subject to applicable law, regulation, or legal proceedings.
- If a supervisor, manager, or other person receives a report of violations or questionable behavior pursuant to the Group's Code of Conduct, this document, or applicable laws, that person shall be responsible for such reports to the attention of his or her supervisor in accordance with the Group's reporting standards.
- The Group will not permit retaliation of any kind against anyone who makes a report or complaint in good faith that a violation of the Group's Code of Conduct, this document or other illegal or unethical conduct has occurred.
- To ensure the safety of all our employees, customers, suppliers and other parties when reporting violations to our Codes of Conduct and other offences, we have implemented an anonymous internet-based whistleblower system. This system can be accessed [here](#).