

## Responsible Sourcing Policy

Coen Steel is committed to operating our business in a responsible manner and making it easier for our customers, supply chain partners, and employees to make a difference for the environment and the communities in which they live and work. We recognise our important role and opportunity in promoting and providing sustainable products. This responsible sourcing policy reflects our values and commitment to the sustainability of the products we source, manufacture and use.

Coen Steel sources materials and services on a national and worldwide basis. We therefore recognise that our supply chain activities have a broad impact, with our responsibilities extending beyond our own operations and into those of our suppliers. Coen Steel's Responsible Sourcing Policy (RSP) was developed to reinforce our commitment of working together with our suppliers towards a long-term, sustainable and successful future for all our parties. Coen Steel together with its suppliers must adhere to the United Nation's 10 Principles of the Global Compact covering Human Rights, Labour, Environment and Anti-Corruption.

### Scope and Coverage

This policy applies to all Coen Steel employees engaged in purchasing and sourcing activities. It applies also to consultants and contractors in relation to their work for, or on behalf of Coen Steel. The purpose of this policy is to set out the key elements and principles of material sourcing.

### Environmental Standards

We must encourage our key suppliers, including manufacturing contractors, to measure, manage and report their carbon emissions. We must work with these suppliers to ensure that they continuously improve their product packaging in terms of weight, recyclable content and use of plastic. All hazardous waste and hazardous substances used within the manufacturing process must be declared to Coen Steel.

### Health & Safety

For key suppliers and contractors, Coen Steel must be satisfied that the supplier has implemented adequate procedures to maintain a safe and secure environment, and that there is a clear, publicly available health & safety policy statement in place. The supplier must evidence the existence of an appropriate health & safety risk management system and first aid.

### Human Rights and Labour Standards

Key suppliers and contractors must be reviewed to validate their compliance with UN guidance on human rights. Suppliers are expected to treat their workers equally and with respect and dignity. Appropriate HR policies must be in place.

### IT Security and Data Protection

Coen Steel must consider the IT security of any new supplier relationship. Coen Steel may need to obtain assurances from the suppliers regarding their IT security controls and their activities to raise awareness of IT security risks. If personal data will be sent to the supplier in the course of running the business, then a data processing agreement must be put in place.

### Taxation

All employees involved in managing supplies should be vigilant to the risk of tax evasion. We may not be complicit with any activities which help to facilitate the avoidance of tax evasion, for example a supplier requiring to be paid through an offshore location.

### Anti-bribery and Corruption

See Coen Steel Anti-Bribery and Corruption Policy.

### Selection of new suppliers

Ethical and environmental considerations must form part of the selection criteria for any new key supplier and Contractor. Standard questionnaires have been developed by procurement.

### Periodic Inspections

The nature and extent of review activities is commensurate to each supplier's risk. All suppliers and contractors will be audited annually.



Michael Curtin, COO

Reviewed Sept 2023