



Scandinavian Steel AB  
Code of Conduct

Scandinavian Steel is a leading distributor of metals and ferro alloys with worldwide distribution. As we are established in the international market, we recognise our responsibility to contribute to sound business practices and sustainable development in the mining and metal industry within our sphere of influence as a trading company.

Our Code of Conduct defines the standards and behaviours expected of employees at Scandinavian Steel. The principles of our Code of Conduct are lasting over time and fundamental to how we do business and forms the foundation to the relationships with suppliers, customers and wider society. We strive to build transparent and fruitful relations with our business partners for long term growth and responsible business conduct. We encourage our business partners and suppliers to adopt the same or equivalent standards of business conduct as set out in our Code for Responsible Sourcing.

Employees of Scandinavian Steel all have a responsibility to understand our Code of Conduct, to follow its guidance and to contribute to an open culture where questions or concerns may be raised. The principles and standards in this Code of Conduct represent what our customers and partners expect of us and in turn what we expect from our business partners. As a company we support the ten principles of the UN Global Compact, which incorporates the Universal Declaration of Human Rights and the eight fundamental ILO<sup>1</sup> Conventions. Our commitment is to comply with all applicable laws and regulations.

## Human Rights

Scandinavian Steel supports and promotes human rights in our value chain. We respect our employee's right to form or join trade unions and to bargain collectively. We also strive to create a workplace with equal treatment independent of transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. We do not accept abusive discrimination in our workplace. Employees are expected to treat all people encountered in the professional role with courtesy, dignity and respect.

We place the same expectations on our suppliers and in the supply chain as expressed in our Code for Responsible Sourcing. Scandinavian Steel has committed itself not to trade with conflict minerals<sup>2</sup> from politically unstable areas or conflict affected areas. Trade in these minerals can be used to finance armed groups, fuel forced labour and other severe human rights abuses, and support corruption and money laundering.

## Health and Safety

Our competency and employees are our most important asset. We promote a safe and healthy workplace by creating an attractive working environment and by empowering employees. Important aspects of how we support a long-term healthy working life of employees at Scandinavian Steel is enabling life-work balance and a workplace with proper ergonomics. Scandinavian Steel addresses risks systematically to prevent work-related injuries and illness. Employees have a responsibility to know and comply with applicable safety rules for fire protection and emergency preparedness in our offices. Incident and accidents must be reported.

---

<sup>1</sup> International Labour Organisation

<sup>2</sup> Gold, tantal, tungsten and tin

## Business Ethics

Corruption in the form of bribes or other crime as extortion is illegal and also leads to unhealthy competition, inefficiency and arbitrariness. Within Scandinavian Steel, there is zero tolerance for corruption. It is an internal decision that we do not give gifts.

Employees shall avoid conflicts of interest situations, seeking personal advantages in that may not be in line with the best interests of our company. Be aware of the risks for actual, potential or perceived conflicts of interest and take care to avoid them and raise concerns to your closest manager.

Scandinavian Steel will take all reasonable measures to safeguard and secure our employees privacy and personal information and we are transparent in how and why we collect, use and store data. We all have a responsibility to ensure that we safeguard any personal information we have in our possession or that we have access to, from loss or misuse.

## Environmental Responsibility

Scandinavian Steel's ambition is to take responsibility for the environmental impact throughout the value chain. We are working systematically to reduce our negative impact by our Environmental Management Systems certified according to ISO 14001. As a distributor, however, we do not have our own production or transport. We use our influence by placing demands on suppliers to reduce energy consumption, greenhouse gas emissions and to promote natural resources management and waste reduction in the supply chain. Our priorities are where we have direct influence, which includes reduced climate impact, phasing out substances that are hazardous to the environment and health and to support innovation and research. Employees are expected to integrate environmental considerations in the day-to day work and to contribute to Scandinavian Steels environmental goals. By making informed choices regarding travelling, energy use and use of products employees can significantly help to reduce the company's environmental footprint.

## Implementation and compliance

Each manager is responsible for establishing awareness of this Code of Conduct and for promoting and monitoring compliance as well as reporting any breach of the Code of Conduct to the Management or the Board. It is the responsibility of every employee to ensure that operations are conducted in line with what is defined in the Code of Conduct. Employees are encouraged to seek advice or raise your concerns about business conduct related issues.

## References

UN Universal Declaration of Human Rights: [www.un.org/en/about-us/universal-declaration-of-human-rights](http://www.un.org/en/about-us/universal-declaration-of-human-rights)

UN Global Compact: [www.unglobalcompact.org/](http://www.unglobalcompact.org/)

International Labour Organisation: [www.ilo.org](http://www.ilo.org)



President & CEO, Kent Löwenberg