

CODE OF CONDUCT

BUILT ON UNDERSTANDING. DRIVEN BY QUALITY.

At ERA Recycling, we believe that strong and long-term business relationships are built on trust, understanding, and quality. As a family-owned company, we have worked with steel recycling since 1996 and built long-standing relationships with customers, suppliers, and other business partners.

We are committed to conducting our business in a responsible, fair, and trustworthy manner. Our Code of Conduct sets out the fundamental principles for how we do business, make decisions, and work with others. It translates our values into clear guidelines for our daily work and conduct.

We expect all ERA Recycling employees to follow these principles, and we expect our customers, suppliers, and other business partners to respect the same fundamental principles of responsible business conduct.

HOW WE DO BUSINESS

Our values should be reflected in the way we work.

- **We build on understanding**
We make an effort to understand our customers, suppliers, and their needs. Good communication and mutual understanding are the foundation for effective solutions and long-term relationships.
- **We deliver quality**
To us, quality is about more than the material itself. It is also about communication, documentation, logistics, service, and delivering what we have agreed.
- **We stand by our agreements**
We communicate openly and honestly and stand by our agreements. If circumstances change, we communicate as early as possible and we find solutions.
- **We act responsibly**
We take responsibility for our decisions and actions and for the impact they may have on people, the environment, and our business partners.
- **We continuously improve**
We learn from experience, feedback, and mistakes and use these insights to continuously improve our processes, our collaboration, and the value we create.

WE DO BUSINESS WITH INTEGRITY

Trust is essential to our business. We aim to be a business partner that customers, suppliers, and other stakeholders can rely on.

- **Laws and regulations**

We comply with applicable laws, regulations, and regulatory requirements in the countries where we operate. This includes, among other things, rules relating to trade, waste and cross-border shipments, environmental protection, occupational health and safety, taxation, data protection, and competition law.

- **Sanctions and Trade Restrictions**

We comply with applicable sanctions, trade restrictions, and export control regulations. We do not enter into business relationships or carry out transactions that are in breach of such requirements.

As part of our responsible business practices, we also refrain from doing business in markets or with business partners where sanctions, trade restrictions, or other significant compliance risks would be inconsistent with our principles for responsible business conduct.

We likewise expect our customers, suppliers, and other business partners to comply with applicable sanctions and trade restrictions.

- **Anti-corruption and bribery**

ERA Recycling does not tolerate corruption or bribery. We do not accept payments, gifts, or other benefits that could influence, or be perceived as an attempt to influence, a business decision. Ordinary business gifts and hospitality must be reasonable, proportionate, and have a legitimate business purpose.

We also expect our customers, suppliers, and other business partners to comply with applicable anti-money laundering laws and regulations, including customer due diligence and know-your-customer (KYC) requirements. Given the elevated money laundering risk associated with the scrap metal trade, we expect suppliers and business partners to be able to demonstrate the legitimate source of funds and goods, and to support the documentation our customers and banks may require in this respect. Cash payments must not be used to circumvent identification, verification, or reporting obligations.

- **Hazardous content in delivered materials**

Materials supplied to ERA Recycling must not contain radioactive sources, ammunition, explosives, pressurized gas containers, or sealed/closed containers of any kind. The suppliers or business partners must inform ERA Recycling without undue delay of any known contamination or hazardous content in materials supplied, so that appropriate handling and safety measures can be taken.

- **Legal origin of materials**

We expect suppliers and business partners to have lawful title to all materials supplied to us, to source such materials only through legitimate channels, and to be able to document the origin and chain of custody of materials upon request.

- **Conflicts of interest**

Personal interests or potential conflicts of interest must not influence decisions made on behalf of ERA Recycling.

- **Fair competition**

We believe in free and fair competition and comply with applicable competition laws. We do not enter into agreements with competitors regarding prices, market allocation, customers, or other matters that restrict competition. Commercially sensitive information, such as prices, margins, delivery terms, and customer agreements, is not shared with competitors.

WE TREAT PEOPLE WITH RESPECT

At ERA Recycling, we are committed to conducting business with respect, fairness, and equal opportunities. We do not tolerate discrimination, harassment, bullying, threats, or any other form of abusive or inappropriate behavior.

We respect the United Nations Universal Declaration of Human Rights and do not tolerate child labor, forced labor, or human trafficking. We expect our business partners to demonstrate the same respect for fundamental human rights.

SAFETY AND RESPONSIBLE WORKING CONDITIONS

At ERA Recycling, safety and responsible working conditions are a natural part of how we do business. Transport, storage, and handling of materials are primarily carried out by external business partners, and we therefore require these activities to be performed safely and responsibly.

We place great importance on working with responsible and professional companies that comply with applicable occupational health and safety requirements and actively work to prevent accidents and reduce risks.

Likewise, we expect our business partners to prioritise safety and ensure safe and responsible conditions for everyone working at or visiting their premises. We also expect our business partners to apply equivalent requirements to any subcontractors they engage in connection with work carried out for ERA Recycling.

WE TAKE RESPONSIBILITY FOR THE ENVIRONMENT

Recycling is at the core of ERA Recycling's business. By ensuring that steel is recycled and returned to the circular economy as raw material, our business contributes to a more circular economy and more efficient use of resources.

However, working with recycling does not in itself mean that our environmental responsibility is complete. We work to:

- Promote recycling and the circular use of materials.
- Ensure the responsible handling and transport of materials and waste in accordance with EU legislation on waste shipments.
- Comply with relevant environmental and waste legislation.
- Prevent pollution and environmental damage.
- Use resources efficiently.
- Reduce unnecessary waste.
- Consider environmental impacts in relevant business decisions.
- Reduce our environmental impact.

We work with logistics providers, storage facilities, and other business partners, and we place great importance on ensuring that materials are handled responsibly throughout the value chain.

WE BUILD RESPONSIBLE BUSINESS RELATIONSHIPS

Long-term relationships are an important part of the way ERA Recycling does business. We aim to be a fair and reliable business partner to both customers and suppliers. This means, among other things, that we:

- Communicate openly, respectfully, and honestly.
- Strive to honour our commitments.
- Inform our business partners as soon as possible if we are unable to deliver as agreed.
- Treat customers and suppliers fairly and professionally.

- Work to ensure consistent and documented quality.
- Seek solutions that create value for all parties.
- Prefer long-term and sustainable business relationships over short-term gains.

At the same time, we expect our suppliers and other business partners to conduct their business legally and responsibly.

WE PROTECT INFORMATION AND THE COMPANY'S INTEREST

In our daily work, we have access to confidential information about ERA Recycling, our customers, suppliers, and other business partners. We handle confidential information responsibly and do not share it with unauthorized parties. This includes, among other things, commercial information, agreements, personal data, and other confidential business information.

We process personal data in accordance with applicable data protection legislation and use the company's IT systems and digital solutions responsibly.

We also expect responsible conduct on social media when ERA Recycling or our business partners are mentioned or can otherwise be associated with the communication.

WHISTLEBLOWER REPORTING

At ERA Recycling, we aim to maintain an open and responsible culture where questions and concerns are taken seriously. If there is any doubt as to whether an action or situation is consistent with our Code of Conduct, applicable legislation, or our values, we encourage it to be raised.

Employees and business partners are encouraged to report:

- Breaches of this Code of Conduct.
- Illegal conduct.
- Safety issues or unsafe working conditions.
- Serious environmental concerns or risks of environmental damage.
- Unethical or otherwise unacceptable business conduct.

Concerns can be reported to the management of ERA Recycling. All reports will be handled confidentially, and we will protect the identity of anyone who raises a concern, to the extent permitted by law. Reports may also be made anonymously.

RESPONSIBILITY AND FOLLOW-UP

The management of ERA Recycling has overall responsibility for this Code of Conduct.

The Management is responsible for ensuring that the principles:

- Are communicated with relevant employees.
- Are integrated into the way we conduct our daily business.
- Are updated when the company's activities or applicable requirements change.
- Are supported by relevant policies and procedures.

The Code of Conduct is reviewed at least once a year as part of our ongoing work with quality, environmental responsibility, and responsible business practices.



Document Owner:
Approved on:



Management, ERA Recycling
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Agern Allé 24, DK-2970 Hørsholm
+ 45 31 41 00 88, info@erarecycling.com
CVR nr./VAT 30515781