



ETHICAL ESCALATION POLICY

The policy of ethical escalation, together with our fundamental values, offers guidelines regarding an acceptable behavior within the company ERDEMIR ROMANIA.

Fundamental values

We protect the information of our customers, our suppliers and all interested parties. We deliver what our customers want, when they want. We communicate in an open and honest, constructive and respectful way. We are always honest and never compromise our core values. We are personally responsible for our actions, commitments and results. We work as a team to accomplish more than we can as individuals.

As employees of ERDEMIR ROMANIA we demonstrate:

- Security by providing a safe and healthy work environment for ourselves and our colleagues, by protecting the physical security of our facilities and their contents;
- Satisfaction by open and honest communication with our customers, by keeping our promises, providing accurate and timely information to our customers.
- Integrity by trying to do the right thing, even when the options are unclear.
- Honesty towards our customers and colleagues, always honest competition in the market.
- Responsibility by always acting ethically and helping others to act ethically.
- Making decisions that are in the interest of the company and not just in our personal interest.
- Work with our suppliers to ensure that they are responsible for the same high standards as us.
- Teamwork through collaboration to achieve goals and objectives at the organizational level.

Final provisions:

ERDEMIR ROMANIA will post this policy both on the company's website and on the premises, which is available to all interested parties and brought to the attention of all employees.

ERDEMIR ROMANIA encourages its employees to express their opinion on any behavior that does not meet the standards set forth in the Code of Ethics and Professional Conduct.

The first step in resolving most issues is to talk directly with the direct chief or the Human Resources Director, and if employees do not receive a satisfactory response or feel at ease, they are encouraged to use the communication channels listed below or to contact the members of the Ethics Committee.

Monitoring of such notifications is done on the email address: office@erdemir.ro or by using the contact information below:

What is the Ethics Hotline?

The ethics hotline is a 24/7 support line managed by Remed, a company completely independent of OYAK Mining Metallurgy, where you can express your concerns and report violations to code of ethics and business conduct.

What can I report?

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| <ul style="list-style-type: none">• Non-compliance with the company's business ethics• Forgery of documents• Conflicts of interest• Discrimination• Unethical/illegal behavior• Trading of company data | <ul style="list-style-type: none">• Harassment/ psychological pressure that you experience or observe• Situations that could damage the company reputation• Violations of personal data |
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