



POLICY OF QUALITY IN THE AUTOMOTIVE INDUSTRY, ENVIRONMENT, HEALTH AND SAFETY AT WORK AND ENERGY MANAGEMENT

Our integrated health and safety at work system, environment, quality in the automotive industry and energy management system has been established according to the requirements of standards SR EN ISO 45001:2018, SR EN ISO 14001:2015, SR EN ISO 9001:2015, IATF 16949:2016 and SR EN ISO 50001:2019.

The policy approved by S.C. ERDEMIR ROMANIA S.R.L. is in line with the purpose and organizational context and supports its strategic direction of development.

Our policy on Integrated Occupational Health, Safety, Environment, Quality in the automotive industry and Energy is based on a process-based approach, providing the right resources to meet our goals, continuously improving systems and performance, increasing awareness of all our employees, and giving them the opportunity to show their leadership abilities within their responsibilities.

The principles and strategic elements by which the Integrated Policy of S.C. ERDEMIR ROMANIA S.R.L. an organization specialized in the production of cold rolled electrical steel sheets and strips, aim at:

Occupational Health and Safety

- We consider it one of our fundamental responsibilities to ensure that our employees work in a healthy and safe environment. The company's priority is to produce steel in safe and healthy working conditions for the prevention of work-related injuries and illnesses, which are adequate to the purpose of the technological process and the context of the organization, as well as the specific nature of its OSH risks and opportunities.
- Elimination or minimization of risks for all staff, including contractors and visitors, by ensuring a modern work environment, by using technical and administrative controls, including training and by using appropriate personal protective equipment, with a low level of risk from a Occupational Health and Safety activities point of view;
- Decision-making based on facts and in accordance with the requirements of the legislation and regulations in force, as well as other requirements that the company has adopted regarding Occupational Health and Safety;
- Support and continuous improvement of the occupational health and safety management system through awareness, training and motivation of all staff at all levels to encourage active involvement in professional development and knowledge of individual occupational health and safety requirements;

Environment

- We see responsible production as an unalterable basic requirement. We focus on reducing our environmental impacts, especially those caused by climate change, playing a role in the transition to a green circular economy, and implementing pioneering practices to ensure the best performance in occupational health and safety.
- Considering all environmental risks caused by climate change, we continue our activities with a sense of responsibility that considers not only the present but also the future. We are working to give a better direction to our future and to provide added value to our country. We believe that a circular economy, where resources are used more efficiently and all materials are recycled into the production process, is the key to a better future for all of us.
- Protecting the environment, through refurbishment (modernization), where possible, through pollution prevention and control, resource, material, and waste management, in the spirit of sustainable development;
- Reduce the amount of waste resulting from our own activities and the efficient and ecologic recovery of waste;
- Ensure compliance with the legal requirements in force, with other existing regulations, with the standards and other requirements applicable to our field of activity and the generated environmental aspects;
- Encouraging all staff to contribute to environmental protection.
- We consider the environmental responsibility as one of the basic premises of a correct collaboration with all customers, partners and third parties, regarding the purpose of the organization.

Quality

- The satisfaction of our customers dictates our actions;
- Maintaining and improving the integrated quality management system;
- Increasing customer satisfaction by understanding their needs and expectations;
- Developing new products by increasing innovation culture and increasing revenue;
- Minimizing losses through appropriate use of resources;
- Creating mutually beneficial relationships with our suppliers, soliciting them and encouraging them to increase the quality, environmental and product risk;
- Periodic evaluation of policy, objectives and management programs, for the purpose of continuous improvement and improvement, making the necessary corrections whenever needed;
- Continuous growth of competitiveness through continuous and efficient improvement and development of cost-effective projects and improvements in all our processes;
- Quality is a factor of constant competitiveness, so we have focused our efforts on preventing defects, rather than detecting them.

Energy

- While contributing to the protection of natural resources and the environment through efforts for the efficient use of energy, we also gain competitive advantage. Recognizing the importance of renewable energy, we also prioritize efforts to generate energy from renewable energy sources.
- Establish energy targets and targets that are communicated, analysed, and reviewed at the foreseen deadlines and identify opportunities for reducing energy consumption, efficient use of energy sources and energy efficiency of processes.
- Supporting and continuously improving the efficiency of the energy management system and thereby continuously improving energy performance by encouraging dialogue with all stakeholders in energy management issues.
- Permanent compliance with the applicable legal requirements and other requirements the organization has subscribed to regarding energy use, energy consumption and energy efficiency;
- Supporting the purchase of efficient and adequately designed energy products and services to achieve improved energy performance.
- Minimizing energy losses through systematic measurement and monitoring.

As part of the group **OYAK Mining and Metallurgy**, we act responsibly in our professional activities. In addition to legal obligations, we act with care towards our clients, employees, shareholders, suppliers, partners, competitors, society and humanity to fulfil our responsibilities listed below:

- we do not use or favour the work of minors under 18 years of age;
- we guarantee a healthful and safe job, taking measures to prevent incidents and accidents;
- we do not hire or support the use of forced or compulsory labour;
- we do not engage or support trafficking in human beings.
- we respect privacy and take seriously data protection, security and compliance with privacy and privacy laws.

The integrated management of occupational health and safety, environment, quality in the automotive industry and energy policy is documented and communicated at all levels of the organization and is regularly reviewed and updated if necessary.

All managers are directly responsible for communicating to employees the importance of meeting the objectives of the integrated management system for compliance with this Policy, implementing this Policy and other relevant documents in their areas of responsibility.

It is the responsibility of each employee of S.C. ERDEMIR ROMANIA S.R.L. to adhere to this Policy, to know and to apply the related procedures.

As members of the ERDEMIR and OYAK family, we are all committed to adopting and maintaining the above principles in the conduct of our work.

MANAGEMENT



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 |
|--|---|

Phone (7/24): 0212 924 7865
E-mail: erdemir@etikhat.com
Web Site: <https://www.speak-hub.com>
User Name: Erdemir
Password: Erdemir22



ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBE POLICY

The policy applies to all ERDEMIR ROMANIA employees and to third parties (interested parties) who represent or act on behalf of ERDEMIR ROMANIA, regardless of their identity: subcontractors, agents, intermediaries as well as business partners.

ERDEMIR ROMANIA employees carry out their activity in a normal and fair competitive environment, including by promoting correct and non-deceptive forms of advertising, in accordance with the legal competition provisions in force.

Any act of corruption, blackmail and embezzlement is prohibited.

In fact, any person who works on behalf of or for ERDEMIR ROMANIA will not give or accept bribes, will not engage in illegal activities that may stimulate business partners or public authorities.

Anti-fraud, anti-corruption and anti-bribery policy:

ERDEMIR ROMANIA does not request, does not accept and does not agree to receive, promise or offer bribes.

It is also forbidden:

- the concealment of bribes for commercial or charitable purposes;
- the intentional modification of data, financial accounting documents, making unjustified, unfounded payments;
- the theft of persons who come into direct contact with the assets of the organization;
- the forgery of contracts concluded by ERDEMIR ROMANIA with other companies;
- the forgery of decision-making documents;
- the money laundering;
- the conflict of interest;
- the secret agreements between staff and customer or suppliers of goods;
- the abuse of power;
- the unauthorized introduction, deletion or modification of computer data;
- the unjustified receipt of money, gifts and hospitality.

And / or other corruption or work infringement as described in the current Penal Code.

Ex: Types of acts defined as corruption offenses:

- Taking bribes (art. 289 of the Criminal Code) is the act of the employee who, directly or indirectly, claims or receives money or other benefits that are not due to him or accepts the promise of such benefits or does not reject it, in order to fulfill, not to perform or delay the performance of an act concerning his duties or to perform an act contrary to those duties.

- Bribery (art. 290 Penal Code) is the promise, offering or giving of money or other benefits to an employee, in the ways and purposes shown above, for the unlawful satisfaction of an interest.

ERDEMIR ROMANIA complies with all legal regulations in force, including those relating to the sustainable development of the socio-economic environment and social responsibility.

Violation of this measure by an employee of ERDEMIR ROMANIA constitutes a serious disciplinary violation and will be sanctioned according to the legislation in force.

Responsibility

ERDEMIR ROMANIA's management is responsible for the application of an internal managerial control system based on the Code of Ethics and Professional Conduct at GROUP level, which identifies, evaluates and prevents fraud risks as part of operational risk.

Staff at all levels have a duty to ensure the protection of assets, the rational and efficient use of resources, the promotion and protection of the company's reputation.

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.

In addition, we encourage all collaborators to report any request for undue benefits from an employee or a person with a management position within ERDEMIR ROMANIA with the aim of vitiating or altering a purchase / sale process.

Monitoring of such notifications is done on the email address: office@erdemir.ro

Phone (7/24): 0212 924 7865

E-mail: erdemir@etikhat.com

Web Site: <https://www.speak-hub.com>

User Name: Erdemir*

Password: Erdemir22

MANAGEMENT

Approved: HR&Administrative Director – M. Balauta
Prepared: Quality Responsible – A. Dinescu

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