

ENTERPRIZE STEEL LTD

Code of Conduct: Ethics and Operating Principles

Introduction

This Code of Conduct formalizes the ethics and operating principles of Enterprize Steel Ltd, providing a clear framework for all Person and related parties. By adhering to these standards, ESL upholds our commitment to integrity, respect, and responsibility in all our activities. **These principles also serve as a foundation for our Quality Management System (QMS), ensuring a process-based approach, and a commitment to continual improvement across all operations.**

1. Inclusion and Diversity

ESL is dedicated to fostering a workplace and operating environment that is inclusive and celebrates diversity. We believe that a wide range of backgrounds, experiences, and perspectives is vital to our success.

- **Equal Opportunity:** We are committed to providing equal opportunity in all aspects of employment and engagement, free from discrimination based on race, color, religion, gender, sexual orientation, national origin, age, disability, or any other characteristic protected by law.
- **Respectful Environment:** All individuals must be treated with dignity and respect. Harassment, discrimination, and bullying of any kind are strictly prohibited.
- **Non-Retaliation:** Retaliation against anyone who reports discrimination or harassment is prohibited.

2. Conflicts of Interest

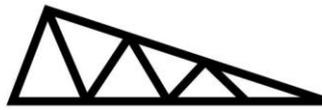
A conflict of interest occurs when an individual's personal interests interfere, or appear to interfere, with the interests of Enterprize Steel Ltd. All Person must manage and disclose any potential or actual conflicts.

- **Disclosure:** Any real or perceived conflict of interest must be promptly disclosed in writing to Keith Munro.
- **Gifts and Hospitality:** Gifts, meals, or entertainment should only be accepted or offered if they are reasonable, infrequent, and consistent with customary business practice, and do not improperly influence a business decision.
- **Outside Employment:** Any outside employment or business relationship must not compete with or compromise the performance of duties to Enterprize Steel Ltd and must be disclosed.

3. Anti-Bribery and Corruption

ESL has zero tolerance for bribery and corruption. We comply with all applicable anti-bribery and corruption laws in every jurisdiction in which we operate.

- **Prohibition:** We strictly prohibit the offering, paying, soliciting, or accepting of bribes, kickbacks, or any other improper payments to secure an advantage.
- **Accurate Records:** All transactions must be accurately and truthfully reflected in our records. **This commitment to maintaining documented information is vital to the integrity and effectiveness of our QMS.** False or misleading entries are strictly forbidden.
- **Facilitation Payments:** We prohibit the use of facilitation payments (small, unofficial payments made to secure or accelerate a routine governmental action).



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4. Whistleblower Mechanism

We encourage the reporting of illegal or unethical behavior without fear of reprisal.

- **Reporting Channels:** Concerns can be reported confidentially and anonymously to the Health and Safety Manager or through the process detailed in the File document.
- **Investigation:** All reports will be handled seriously, confidentially, and investigated promptly and fairly by the board of Directors. **Investigations will be evidence-based to ensure impartial decision-making and corrective action, promoting continual improvement of our organizational processes.**
- **Protection Against Retaliation:** Enterprise Steel Ltd strictly prohibits retaliation against anyone who makes a good faith report or assists in an investigation.

5. Confidentiality

The protection of confidential and proprietary information is critical to our business and reputation.

- **Duty to Protect:** All Person must safeguard the organization's confidential information, including trade secrets, business plans, financial data, and customer information.
- **Use of Information:** Confidential information must only be used for legitimate business purposes and must not be disclosed to unauthorized third parties.
- **Post-Employment Obligation:** The duty of confidentiality continues even after employment or engagement with the organization ends.

6. Engaging with Communities

We are committed to being a responsible corporate citizen and engaging with the communities where we operate in a positive and constructive manner.

- **Respect:** We commit to respecting the cultures, customs, and laws of the communities in which we operate.
- **Community Impact:** We strive to minimize any negative impact our operations may have on the environment and local communities.
- **Stakeholder Dialogue:** We will maintain an open and honest dialogue with community stakeholders on matters of mutual concern.

7. Privacy Policy

ESL is committed to protecting the privacy of personal information entrusted to us by customers, employees, and other stakeholders.

- **Compliance:** We adhere strictly to all applicable data protection and privacy laws and regulations.
- **Data Handling:** Personal information must be collected, used, stored, and shared responsibly and lawfully, only for legitimate business purposes as outlined in our full Privacy Policy, located at File.
- **Data Security:** We are committed to implementing appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction.

Reviewed and authorised by
Director: Keith Munro

Director: Sarath Fernando