

Supply Chain Sustainability Code of Conduct

In order to contribute to the creation of a sustainable society, the Nippon Steel Trading Group is carrying out its own initiatives for sustainability, and is also engaged in reducing human rights risks, environmental risks, and other risks in its supply chain, aiming for continual development within the entire supply chain.

The Nippon Steel Trading Group has formulated the *Supply Chain Sustainability Code of Conduct*, and requests the understanding and implementation of the Code of Conduct by everyone at all suppliers and other business partners. We are carrying out initiatives for constructing a sustainable supply chain in cooperation with our business partners.

1. Observance of laws and regulations, and respect for international norms

Observe related laws and regulations in the countries and regions where we conduct our business activities, conduct fair business with consideration for international rules and practices, and thoroughly prevent extortion, bribery, and other corruption.

2. Respect for human rights

- (1) Respect the human rights of employees, prevent discrimination in hiring based on gender, race, religion, or other characteristics, and do not engage in abuse or other inhumane treatment.
- (2) Prevent child labor and forced labor.
- (3) Appropriately manage employee working hours, holidays, and leave, and prohibit excessive overtime work.
- (4) Observe the legally mandated minimum wage, and give consideration to paying wages that are at or above a living wage. Do not engage in unjust wage cuts.
- (5) Aiming for smooth discussions between labor and management, respect employees' right to organize and right to collective bargaining.

3. Ensuring working environment safety and health

Endeavor to prepare working environments that are safe, sanitary, and healthy for employees.

4. Quality control

Ensure the quality and safety of products and services.

5. Consideration for the global environment

- (1) Strive to reduce emissions of greenhouse gases to combat climate change.
- (2) Actively work for the 4 R's of waste (Reduce, Reuse, Recycle, Renewable), and strive to reduce the amount of waste produced.
- (3) Give full consideration to impacts on natural ecosystems, and strive to maintain and preserve biodiversity.
- (4) Promote the efficient use of energy, water, and other resources, and strive to reduce the amounts used.
- (5) Work to prevent or reduce environmental pollution.

6. Information security

Appropriately carry out management related to information security.

7. Corrective action

- (1) In the event it was found that a business partner has violated this Code of Conduct

and caused a negative effect on human rights, the environment, or a similar area,
request corrective action by the business partner.

- (2) If it is concluded that correction is difficult, consider reviewing the business conducted with that business partner.

8. Information disclosure

Conduct appropriate disclosure of information related to the above items at suitable times.

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