

Code of Conduct Policy

Purpose

This Code of Conduct outlines JHL Global Steel Supply Limited's commitment to ethical behavior, integrity, and compliance with applicable laws, including the **UK Bribery Act 2010**. All employees, officers, contractors, and third-party associates are required to act in accordance with this policy to ensure the company's operations remain free from bribery and corruption.

Scope

This policy applies to:

- All employees (full-time, part-time, temporary)
- Directors and officers
- Contractors and consultants
- Agents, intermediaries, and any third parties acting on behalf of JHL-GSS.
- All operations and activities conducted globally, regardless of location.

Key Principles

3.1 Zero Tolerance for Bribery

Bribery is strictly prohibited. No employee or representative shall:

- Offer, promise, give, request, or accept a bribe (directly or indirectly)
- Make facilitation payments (small payments to expedite routine governmental actions)
- Use company funds, gifts, hospitality, or any advantage to improperly influence a business decision or gain undue advantage.

3.2 Gifts and Hospitality

- Must be reasonable, proportionate, and for legitimate business purposes.
- Must not be given or received if intended (or perceived) to induce improper performance.
- All gifts and hospitality above a set threshold (£50) must be recorded and approved via the company's Gifts and Hospitality Register

3.3 Charitable Donations and Sponsorships

Charitable contributions must be transparent and not used as a substitute for bribery. All donations require prior approval and must comply with this policy.

3.4 Political Contributions

JHL does not make political donations. Employees must not use company resources or name in connection with personal political activities.

4. Responsibilities

4.1 Employees and Representatives

- Read, understand, and comply with this policy.
- Avoid situations where personal interests conflict with the interests of the company.
- Report concerns about any suspected bribery or unethical conduct.

4.2 Management

- Promote a culture of integrity and transparency.
- Provide training and guidance on anti-bribery policies.
- Maintain internal controls and systems to detect and prevent corruption.

5. Reporting and Whistleblowing

Employees are encouraged to report any suspected bribery or unethical behaviour without fear of retaliation. Reports can be made to the Group Administration Manager.

6. Disciplinary Action

Any violation of this policy will result in disciplinary action, up to and including termination of employment or contract. Where appropriate, the matter may be reported to relevant authorities for criminal investigation.

7. Training and Communication

All staff will receive anti-bribery training appropriate to their role. This policy will be communicated to all business partners, suppliers, and contractors at the start of any business relationship.

8. Monitoring and Review

This policy is reviewed annually to ensure its effectiveness and alignment with legal requirements.



Approved by: *Julian J Hepburn, Managing Director, January 2026*