

Human Rights Policy

1. Introduction

1.1 Purpose

ERSIGROUP (UK) is committed to respecting and upholding human rights in all aspects of our operations. This Human Rights Policy outlines the principles that guide our conduct and reflects our commitment to continuous improvement in our understanding and promotion of human rights.

1.2 Scope

This policy applies to all ERSIGROUP (UK) employees. We expect subcontractors working on our sites to comply with this policy and we promote these principles to our subcontractors and suppliers. We are committed to complying with all applicable laws and international standards, including the UN Guiding Principles on Business and Human Rights and the core conventions of the International Labour Organization.

1.3 Risk Context and Proportionality

ERSIGROUP (UK) recognizes that the nature and severity of potential human rights risks can vary depending on the operating context and supply chain characteristics. As a UK-based company primarily utilizing UK suppliers, many of whom are certified to BES 6001, we acknowledge that the risk profile for severe human rights abuses such as forced labour and child labour is generally lower compared to organizations with international supply chains in higher-risk regions.

However, ERSIGROUP (UK) remains committed to upholding all internationally recognized human rights and conducting due diligence that is proportionate to the identified risks. Our due diligence approach aligns with the OECD Due Diligence Guidance for Responsible Business Conduct, emphasizing a risk-based approach to identifying, preventing, mitigating, and accounting for potential human rights impacts. As part of our commitment to responsible business conduct, ERSIGROUP (UK) has undertaken an assessment of its operations, practices, methods, procedures, and responsibilities. Based on this assessment, considering factors such as our UK-based operations, reliance on BES 6001 certified suppliers, and robust internal controls, we consider our overall risk exposure to human rights infringements to be low. Our due diligence efforts will focus on addressing the salient human rights risks relevant to our operations, including but not limited to ensuring fair labour practices, safe working conditions, equality and diversity, and addressing potential modern slavery risks. In addressing identified risks, particularly those deemed to be higher priority, we will develop mitigation plans that include clear objectives, responsibilities, and timelines for completion. We will leverage existing mechanisms such as BES 6001 certification and internal audits to support our due diligence processes.

2. Core Principles and Commitments

ERSIGROUP (UK) is committed to respecting all internationally recognized human rights, including but not limited to:

2.1 Equal Opportunity and Non-Discrimination

ERSIGROUP (UK) shall not discriminate against any employee or applicant for employment based on race, colour, religion, ethnic or national origin, gender, sexual orientation, age, disability, social status, or any other protected characteristic.

This commitment applies to all stages of employment, including recruitment, hiring, training, promotion, disciplinary practices, termination, and other terms and conditions of employment.

ERSIGROUP (UK) is committed to creating an inclusive and respectful work environment.

Discrimination is a serious violation of equal employment opportunity law and ERSIGROUP (UK) company policies.

Supervisory employees are responsible for ensuring that discrimination does not occur and all employees are responsible for reporting any violations of this policy or applicable law.

Reference is made to the Equality and Diversity Policy 2024 for further guidance.

2.2 Labour Rights

ERSIGROUP (UK) shall not use forced or compulsory labour, as further outlined in our Modern Slavery Statement.

Workers are recruited freely, receive competitive wages and benefits packages, and are provided with clear terms and conditions of employment.

ERSIGROUP (UK) does not use child labour and respects the rights of children to be protected from economic exploitation.

ERSIGROUP (UK) recognizes and respects employees' right to freedom of association, including the right to choose whether to join or not join third-party organizations, to associate freely, and to bargain collectively. Where applicable, ERSIGROUP (UK) supports the rights of its employees to make these choices through fairly conducted secret ballot elections.

2.3 Health, Safety, and Wellbeing

ERSIGROUP (UK) is committed to ensuring the health, safety, and wellbeing of our employees, the people living and working in the communities near our facilities, and the environment.

ERSIGROUP (UK) will provide the necessary human, physical, and financial resources to meet this commitment.

These resources will be used to enable employees and contractors to work safely and comply with company policies and the law, to prevent pollution, and to protect the environment.

Employees are expected to comply fully with company policies, and training will be provided to employees on these company policies and legal requirements, promoting our philosophy of Safe Sustainable Steel.

2.4 Harassment and Violence-Free Workplace

ERSIGROUP (UK) is committed to providing employees with a non-discriminatory work environment free from any type of harassment, in accordance with company policy and the law.

Supervisory employees must investigate all complaints of harassment, and employees are responsible for reporting violations.

The company will take appropriate disciplinary action for any violation of policy or law, as detailed in the company's disciplinary policy.

All verbal and physical threats of violent behaviour are unacceptable and should be reported as outlined in the company's employee handbook.

Every report of violence or threats of violence will be investigated, and employees who engage in such behaviour will be subject to disciplinary action, up to and including termination of employment and criminal prosecution.

3. Due Diligence and Risk Management

3.1 Human Rights Risk Assessment

ERSIGROUP (UK) will conduct ongoing human rights risk assessments to identify, prevent, mitigate, and address potential adverse human rights impacts associated with our operations and supply chains.

This process will include assessing risks related to labour conditions, modern slavery, discrimination, health and safety, community impacts, and other relevant areas.

3.2 Integration into Decision-Making

The findings of human rights risk assessments will be integrated into relevant company policies, procedures, and decision-making processes.

3.3 Supply Chain Responsibility

ERSIGROUP (UK) is committed to promoting human rights throughout our supply chain.

We will work with suppliers to ensure they adhere to ethical labour practices, respect human rights, and comply with applicable laws and regulations.

This includes due diligence measures in supplier selection and monitoring.

4. Implementation and Accountability

4.1 Communication and Training

This Human Rights Policy will be communicated to all employees and relevant stakeholders.

ERSIGROUP (UK) will provide training programs for staff on human rights issues generally and the requirements of this policy specifically.

Training will be provided in appropriate formats and languages.

4.2 Reporting Concerns

ERSIGROUP (UK) will establish and maintain accessible grievance mechanisms to enable employees and other stakeholders to report human rights concerns.

Concerns can be raised through [specify channels, e.g., HR, etc.].

ERSIGROUP (UK) will ensure that reports are taken seriously, investigated promptly and impartially, and that appropriate action is taken.

ERSIGROUP (UK)'s grievance policy document provides further information on this.

4.3 Monitoring and Review

ERSIGROUP (UK) will regularly monitor and review this policy and its implementation to ensure its suitability, effectiveness, and alignment with evolving best practices and legal requirements.

This review will be conducted at least annually by [specify responsible function or committee] and will involve consultation with relevant stakeholders where appropriate.

The outcomes of these reviews will inform updates and improvements to our human rights due diligence processes.

4.4 Remediation

ERSIGROUP (UK) is committed to providing access to effective remedy for any actual adverse human rights impacts we have caused or contributed to.

Remediation measures will be appropriate to the nature and extent of the impact and developed in consultation with affected stakeholders.

ERSIGROUP (UK) – Project Director

Date: 16/07/2025

Victor Eugui

