
KME Steelworks Limited

Corporate Code of Conduct

Document Control

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 - **Approved by:** Board of Directors
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Approval and Authorization

This Corporate Code of Conduct has been reviewed and approved by the Board of Directors of KME Steelworks limited. It reflects our collective commitment to the highest standards of ethical business conduct, legal compliance, environmental stewardship, human rights protection, and corporate responsibility.

Approved by the Board of Directors on: 03 September 2025

Signatures:

Name	Title	Signature	Date
Jason Quinn	Director		03 September 2025
Seamus Murchan	Director		03 September 2025

Corporate Code of Conduct

1. Purpose and Scope

This Code of Conduct defines the ethical principles, standards, and behaviours expected of all employees, officers, directors, contractors, suppliers, and business partners of KME Steelworks limited (“the Company”). It applies globally and serves as a foundation for compliance with all applicable laws, regulations, international conventions and best practice.

2. Corporate Governance and Integrity

- Conduct business transparently, honestly, and responsibly.
 - Avoid conflicts of interest and disclose any personal or financial interest that may influence decisions.
 - Maintain accurate, timely, and complete financial records.
 - Prevent bribery, corruption, fraud, money laundering, and financial misconduct in any form.
 - Comply with all anti-bribery and anti-corruption laws (e.g., UK Bribery Act, FCPA).
 - Ensure fair competition, avoiding collusion, price-fixing, or other anti-competitive practices.
 - Respect intellectual property rights and prevent unauthorized use, copying, or distribution of proprietary information.
 - Comply with export controls, trade sanctions, tariffs, and other international trade laws.
 - Prohibit counterfeit components or materials in products and supply chains.
 - Protect confidential, proprietary, and personal data in accordance with GDPR, privacy, and data protection laws.
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3. Environmental Responsibility

- **Air and water quality monitoring:** Regularly monitor and minimize emissions and discharges.
- **Noise monitoring:** Assess and mitigate noise pollution from operations.
- **Waste reduction and recycling:** Minimize waste generation, maximize reuse and recycling, and avoid landfill disposal where possible.
- **Circular economy practices:** Incorporate product life-cycle thinking, designing out waste and keeping materials and packaging in use.
- **Responsible sourcing of wood and raw materials:** Use certified or sustainably sourced inputs to prevent deforestation and resource depletion. Only use recycled pallets.

- **Use of renewable energy:** Transition operations to renewable energy sources where feasible.
 - **Fleet electrification:** Replace diesel and petrol vehicles with electric or zero-emission vehicles.
 - **Supplier collaboration to reduce carbon footprint:** Partner with suppliers to decarbonize operations and supply chains.
 - **Business travel reduction:** Favour virtual meetings and lower-carbon travel options; phase out diesel use wherever possible.
 - **Comply with all legislation UK and European:** Obtain, maintain and comply with all environmental permits, licences and registrations necessary for the operation.
 - **Scope 1 and 2 carbon neutrality:** strive to be fully carbon neutral by 2030 in line with international standards.
 - **Animal welfare:** we will actively promote animal welfare and rights and respect the five animal freedoms formalised by the world organisation for animal health (OIE).
 - **Green Steel:** promote the use of green steels with our customers and throughout our supply chain.
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4. Human Rights and Social Responsibility

- **Respect land rights:** Avoid forced eviction or improper land acquisition.
- **No offensive or provocative materials on site:** Prohibit inappropriate flags, emblems, or materials that may incite hostility.
- **Freedom of expression and peaceful assembly:** Employees may voice concerns lawfully and respectfully.
- **Non-use of public or private security forces** where such forces could contribute to human rights violations.
- **Abolition of child labour and forced labour:** Comply fully with modern slavery legislation. And actively promote abolition of child labour.
- **Ethical recruitment:** Ensure fair hiring practices without charging fees to workers or engaging in deceptive practices.
- **Living wage compliance:** Pay at least legal minimum wages and work toward living wage standards.
- **Working hours and overtime:** Comply with local laws on hours worked, ensure overtime is voluntary and compensated fairly.
- **Parental, maternity, and family leave:** Provide lawful leave rights to employees.
- **Equal opportunity employment:** Eliminate discrimination of any kind (race, religion, gender, disability, sexual orientation, age, nationality).

- **Fair employment practices and collective bargaining:** Respect the right to organise, unionise, and negotiate collectively.
 - **Harassment, bullying, and intimidation:** Prohibit any form of mental, physical, or verbal abuse, bullying or harassment. Monitor and prevent any form of discrimination whatsoever.
 - **Non Retaliation:** we will not take actions against employees, suppliers or other stakeholders who report misconduct, participate in investigations or exercise their legal rights.
 - **Modern slavery prevention:** Maintain due diligence to ensure no forced labour or trafficking occurs in operations or supply chains.
 - **Obey all UK laws:** in terms of proper pay and taxing regime, enforcement of auto enrolment pension schemes for all. Proper on-boarding of foreign workers.
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5. Health, Safety, and Employee Well-being

- **Safe working environment:** Ensure facilities comply with legal and industry safety standards.
 - **Personal protective equipment (PPE):** Provide and enforce use of appropriate safety gear.
 - **Emergency planning and hazard assessment:** Conduct regular risk assessments, drills, and maintain emergency response plans.
 - **Health and safety training:** Provide induction and refresher training at least every six months.
 - **Incident reporting:** Require prompt reporting and investigation of workplace hazards, incidents and accidents. We will strive to determine root causes and implement appropriate actions.
 - **Promote physical and mental well-being:** Offer programs to support stress management, health checks, and wellness.
 - **Promote inclusiveness:** Foster a sense of belonging, promote inclusivity in committee team and its various activities, support and listen to diverse perspectives in the workplace, community and professional life. Provide diversity and inclusion training.
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6. Ethical Business Conduct

- **Suppliers and partners:** Engage fairly and transparently, avoiding coercion or exploitation.
- **Responsible sourcing:** Perform due diligence to ensure suppliers meet ethical, environmental, and labour standards.
- **Transparency:** Disclose relevant information to stakeholders, regulators, and partners honestly and promptly.

- **Anti-money laundering (AML):** Implement controls to prevent use of Company assets or accounts for illegal financial activities.
 - **Financial integrity:** All transactions must be legitimate, properly documented, and auditable.
 - **Privacy:** ensure we fully comply with our duty of confidentiality to our customers, providers of IP, suppliers, employees and all other affected stakeholders.
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7. Whistleblowing, Non-Retaliation, and Right to Appeal

- **Whistleblowing policy:** Employees and stakeholders can report unethical or illegal activities confidentially and without fear.
 - **Non-retaliation:** Strictly prohibit retaliation, intimidation, or harassment of anyone raising concerns in good faith.
 - **Right to appeal:** Employees disciplined under this Code have the right to appeal decisions through defined Company procedures.
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8. Training, Communication, and Compliance

- **Mandatory training:** All employees must complete training on this Code and related policies at induction and periodically.
 - **Refresher training every six months on health and safety:** Required to maintain knowledge and readiness.
 - **Disclosure of information:** Employees must promptly disclose any situation that may conflict with this Code.
 - **Monitoring and enforcement:** The Company will audit compliance, investigate violations, and take corrective action as needed.
 - **Continuous improvement:** The Code will be reviewed regularly and updated to align with evolving best practices and legal requirements.
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