



CORPORATE POLICY

Vendor Code of Conduct

Title: Vendor Code of Conduct	Doc Number: PRO.POL.001
Issue Date: January 1, 2022	Revision Date: May 7, 2025
Originating Department: Procurement	
Approved by: Rajat Marwah	Signature: 
Approved by: Nick Macan	Signature: 

A. Introduction

Algoma Steel Inc. (“Algoma Steel”) values honesty, fairness and excellence in all of its business dealings and is committed to ensuring that its vendors and Algoma’s employees are aligned with these values and conduct themselves in a way that upholds the integrity and reputation of Algoma Steel.

To further this objective, Algoma Steel has created a Vendor Code of Conduct (hereafter “Vendor Code” or “Code”) to make abundantly clear its expectations of those with whom it collaborates.

All vendors and their employees must adhere to the Vendor Code while conducting any business with Algoma Steel. Vendors shall promptly inform Algoma Steel in the event that a situation or circumstance develops that causes, or could cause, the vendor or a vendor’s employee to be in violation of or perceived to be in violation of this Code.

Not every situation has been nor can be outlined in this Code and Algoma Steel expects its vendors to use this document to guide their conduct in a manner that is consistent with both community standards as well as all legal obligations.

This Code informs Vendors of the following:

- They may not engage in corrupt or dishonourable practices;
- They must disclose information on any situation that may appear to present a conflict of interest;
- Algoma Steel has a zero-tolerance policy with regards to the acceptance of gifts or hospitality from vendors;
- There are restrictions on the employment by vendors of former ASI employees.

This Vendor Code is not to be read in lieu of, but in addition to, vendors’ obligations as set out in any purchase order or contract between Algoma Steel and the vendor.

Vendors must ensure that all their suppliers and permitted subcontractors are in compliance with the requirements of this Vendor Code or at least have similar requirements in place for their upstream supply chains.

The vendor shall be responsible for any breach of the obligations described in this vendor Code by the vendor or vicariously through the vendor’s employees, agents, subcontractors, or other representatives.

Vendors may not engage in any transaction that alone, or as part of a series of transactions, would result directly or indirectly in avoiding or circumventing this Code.

Algoma Steel reserves the right to, in its discretion, apply the consequences of a breach of this Code both retroactively and prospectively.

B. Compliance with Applicable Laws & Regulations

Algoma Steel expects its vendors and their employees to act with integrity and to be ethical in their business dealings. This begins with complying with all applicable laws and regulations. In addition, vendors must adhere to any standards, rules or codes of conduct set out by any regulatory body that governs the vendor.

C. Human Rights

The requirements in this Vendor Code are based on internationally accepted good labour practices, including the International Labour Organization Standards, the United Nations Guiding Principles for Business and Human Rights and the Universal Declaration of Human Rights.

Algoma Steel expects its vendors to commit to the following:

- Support and respect the protection of human rights within their areas of influence
- Prohibit all forms of modern slavery including forced labour, bonded labour, compulsory labour and child labour
- Respect freedom of association and the effective recognition of the right to collective bargaining by employees
- Support the principles of equality, fairness, inclusion and respect when dealing with the recruitment and selection of employees
- Ensure that individual workers and job seekers are not charged for their jobs and that the cost of recruitment is borne by the employer
- Comply with all applicable laws and regulations regarding wages, overtime pay, benefits, leave and maximum working hours.

D. Environmental

Algoma Steel expects its vendors to have an effective environmental policy and to comply with existing legislation and regulations regarding the protection of the environment. Vendors should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the use of environmentally sustainable technologies.







E. Health and Safety

Without compromise, Algoma Steel is committed to the health and safety of all workers. Algoma Steel expects its vendors to ensure, in accordance with Algoma Steel policies and applicable laws, that:

- Only adequately trained workers are assigned to complete work
- Unsafe work is to be recognized and immediately stopped

- Workplace sites, machinery, equipment and processes under a vendor's control are safe and without risk to health
- All chemical, physical and biological substances and agents under a vendor's control are without risk to health when the appropriate measures of protection are taken
- Where necessary, adequate protective clothing and protective equipment are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

In addition, Algoma Steel has identified Six Life Saving Rules that are key focus areas that will help protect workers safety. Violating any of the Six Life Saving Rules, policies or procedures will result in removal from Algoma Steel property for a period to be determined and, potentially, other consequences for a breach.

-  **FIT FOR DUTY – Ensure you are trained, qualified, authorized and physically and mentally fit to work.** Every worker has the responsibility to work in a manner that will not harm themselves or others.
-  **CONFINED SPACE ENTRY – Never enter a confined space unless authorized and have all required training.** Workers will be trained to identify a confined space and understand the requirements of that space prior to entry. The necessary permits and authorizations will be in place and reviewed prior to entering the confined space. The rescue plan must be reviewed with all workers involved in the setting up and accessing the confined space.
-  **FALL PROTECTION – Always use an appropriate method of fall protection when working from heights.** Protect yourself against falls while working at heights. While the heights may be below 3 meters, you must be protected from falling into operating machinery, water, or another liquid, into or onto a hazardous substance or object, or through an opening on a work surface.
-  **ENERGIZED EQUIPMENT – Always verify that hazardous energy has been released and the equipment is locked out before starting work.** Isolation of energized systems ensures that all stored energy is released or made safe. The use of locks prevents accidental starting of equipment.
-  **MACHINE GUARDING – Never alter, disable, or remove safety guarding or devices on operating machinery.** Any machine that has an exposed moving part, pinch points or material being processed that may cause injury must be safeguarded where the operation of a machine or accidental contact with it can injure the operator or others. All guards and/or safety devices must be re-installed after maintenance operations are completed.
-  **SAFE DRIVING – Adhere to traffic rules and be alert to your surroundings.** ASI traffic rules and safe driving practices enable a safe driving experience for employees, contractors, and visitors.

F. Ethical Conduct

Corruption

Algoma Steel expects its vendors to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

Conflict of Interest

Algoma Steel vendors are expected to disclose any situation that may appear as a conflict of interest, including if any Algoma Steel employee, agent, or representative may have an interest of any kind in a vendor's business, or any kind of economic ties with a vendor.

- Algoma Steel expects its vendors to avoid situations that might create or even appear to create a conflict of interest. A conflict of interest can occur when personal, financial or family interests interfere with Algoma Steel's best interests. Examples of unacceptable conflicts of interest include: paying a referral fee, commission, or any direct or indirect economic benefit to any Algoma Steel employee (or any beneficiary thereof) as consideration for referring or securing business for the Vendor
- paying an Algoma Steel employee personally for services, or procuring subcontracting work for Algoma Steel based on familial or personal relationships.

All conflicts of interest must be disclosed by the vendor by contacting Algoma Steel at VendorCompliance@Algoma.com even where there is simply uncertainty surrounding a particular situation.

Post-employment restrictions

Former Algoma Steel employees may be ineligible to provide services on behalf of vendors except as otherwise agreed by Algoma Steel.

G. No Gifts or Hospitality

Gifts can be a way to demonstrate that a business relationship is valued; however, gifts, including gifts of hospitality, can lead to concerning situations and can ultimately harm reputations – even when the harm that is done is merely creating an appearance of compromised integrity. At times, it can even be difficult for parties to discern when a gift is innocent and when it crosses into an effort to secure an advantage over competitors.

Accordingly, Algoma Steel has eliminated the need for its employees and vendors to try to determine whether or not certain gift giving is acceptable by imposing a blanket prohibition.

Algoma employees are not permitted to receive any gifts except those that are negligible in value, such as promotional items (ex. a t-shirt or pen) or small food items. (ex. coffee, popcorn). Examples of gifts include:

- Wine, beer or liquor
- Gift baskets
- Tools
- Sporting equipment
- Automotive repairs
- Home renovations
- Artwork

- Cash or gift cards or any free goods or goods that have been reduced in price or services or favours for their personal benefit or the personal benefit of their families or any designated beneficiaries

Algoma Steel employees are not permitted to accept hospitality unless there is a legitimate business purpose or the hospitality is reasonable, customary and not extravagant AND both the vendor and the Algoma Steel employee attend the hospitality event. Free travel or accommodations cannot be accepted by employees without prior authorization. Examples of hospitality include:

- Meals
- Event tickets
- A round of golf
- Travel and accommodations

Vendors are advised to contact VendorCompliance@Algoma.com with questions, seek authorization or to express concerns involving gifts or hospitality.

H. Business Ethics Standards

Whether or not the vendor is using gifts or hospitality, vendors may not exert pressure on Algoma Steel employees, through a competitive or non-competitive sourcing process, in order to gain an advantage over a competitor.

- Vendors shall not attempt to induce Algoma Steel employees to breach their own standards of conduct and professionalism.
- Vendors shall refrain from engaging in:
 - Intimidation tactics towards a competitor
 - Questionable or unethical financial practices
 - Deceptive marketing practices
 - Unethical business practices
- Vendors (both current or prospective) are entitled to conduct business with Algoma Steel free from undue pressure, coercing or otherwise unprofessional behavior from Algoma Steel employees, and are encouraged to report such tactics by contacting Algoma Steel at VendorCompliance@Algoma.com.

I. Fraud

Vendors must be ethical in the preparation of all invoices submitted to Algoma Steel. Vendors shall refrain from knowingly providing invoices containing inaccurate or misleading information or that conceal or withhold information to the benefit of the vendor or third party. Examples of prohibited conduct include but are not limited to:

- Engaging in conduct that unnecessarily adds time to a particular activity thereby increasing the value of a contract to the vendor
- Falsification of time card or employee presence data
- Overstating work, material or staffing requirements for a contracted project or variations to a project.

Concerns shall be reported to Algoma Steel at VendorCompliance@Algoma.com.

J. Confidentiality

Vendors shall maintain the confidentiality of any information received regarding Algoma Steel and/or Algoma Steel customers.

Furthermore, such confidential, proprietary and/or personal information of others, as applicable, shall be protected from unauthorized use or access or accidental disclosure through the use of appropriate physical and electronic security. Both during and after its business relationship with Algoma Steel, vendors may not disclose, copy, sell or distribute the confidential and proprietary information of any Algoma Steel customer to any third party. Vendors must immediately return or destroy all Algoma Steel related information, equipment and property in their possession upon the termination of the relationship or on Algoma Steel's request.

Vendors must comply with provincial and federal privacy laws, wherever applicable.

K. Compliance with Competition Laws

Vendors shall comply with the *Competition Act*, RSC 1985, c. C-34 and amendments. In particular, vendors will not engage in any form of conspiracy or bid rigging. Vendors will not enter into any anti-competitive agreements with competitors, suppliers, customers or other third parties and will not abuse a dominant market position.

L. Consequences for Breach

Algoma Steel anticipates that its vendors will duly comply with the principles set forth in this document; however, penalties for non-compliance may include, but are not limited to (i) immediate removal as a vendor; (ii) sanctions including termination; and, (iii) civil, regulatory or criminal liability. At any time, Algoma Steel may require a vendor to participate in mandatory training on the issues set forth in this Vendor Code of Conduct.

In the event that Algoma Steel determines a violation of this Code to be a material breach of a written agreement between Algoma Steel and the vendor, Algoma Steel reserves the right to treat such written agreement with the vendor as terminated.

M. Vendor Enforcement of ASI Code of Conduct

Algoma Steel encourages its vendors to create and enforce their own code of conduct aligned with these requirements. However, all vendors shall provide training on Algoma Steel's Vendor Code to their employees and permitted subcontractors.

Furthermore, it is a requirement under this Code that all vendors create and maintain a mechanism by which employees can anonymously report issues within the vendor's organization that may constitute a breach of this Code. Vendors must protect whistleblowers and may not engage in any form of reprisal against these individuals. Algoma Steel expects that any vendor who becomes aware of conduct that constitutes a breach of this Vendor Code shall promptly take remedial action.

Vendors are to promptly contact Algoma Steel at VendorCompliance@Algoma.com to report the details of the occurrence to the extent permissible under law, including applicable federal or provincial privacy legislation.