

CORPORATE SOCIAL RESPONSIBILITY & RESPONSIBLE PROCUREMENT POLICY

At NTS our business philosophy is particularly important to us. We acknowledge the responsibility that we, as a business have, both as part of the global steel supply chain and as part of our local communities and we expect the same from our suppliers. As such our procurement philosophy is one of long-term partnerships with a professional and reliable supplier base that shows integrity in all aspects of their business and requires the same from their supply chains.

NTS recognises that the values, quality and performance of our suppliers are not only the cornerstone of our business but are fundamental in us being able to provide a reliable & sustainable service to our customers.

The business ethics of our suppliers and their approach to sustainability are a key consideration, alongside quality and price, when we consider where to place our business. Particular consideration is paid to the following principles.

1. Ethical and Fair Business Practices

NTS conducts business with all our business partners in an honest, transparent, fair & professional manner with respect for both laws and regulations, and we recognise the importance of a business having high ethical standards. We expect all our suppliers, and their supply chain, to actively work to these values. The following are particularly important to us and we evaluate our suppliers on this basis.

- Ethical conduct – to conduct business in a fair and transparent manner, displaying integrity and honesty in all actions and transactions, neither supporting unfair trade practices nor entering into any form of bribery.
- Confidentiality – to treat information & data in the strictest of confidence and with respect; only divulging this to others with appropriate permission or valid reason.
- Conflict of Interest – to ensure business networks have a positive and healthy influence on business and connections are not used for purposes that encourage unfairness or at worst linked with corruption.

2. Human Rights

NTS takes human rights very seriously and complies with The UK Modern Slavery Act 2015. We expect our suppliers to ensure that the rights of their employees & contractors are protected. We work to the following principles and we expect our suppliers to have implemented policies to cover at least the following:

- No child (under 15 years of age) or forced labour (including human trafficking) shall be used in the supply of products or services provided.
- No discrimination based on race, origin, religion, disability, gender or other valid reason.
- Wages paid for a standard working week must meet the legal and industry standards and be sufficient to meet the basic needs of workers and their families.

3. Health & Safety

All shareholders, managers and employees of NTS are fully committed to ensuring the safety of all our employees, visitors and contractors on all our sites, as well as elsewhere where we may influence the health & safety practices in use. NTS operates a stringent Health & Safety management system being certified to OHSAS 18001 and we look to our suppliers to operate to similar standards and to always be working to maintain or improve their health and safety performance. In particular we look to our suppliers to show evidence of certification to OHSAS 18001, ISO 45001, or similar as evidence of compliance. In the absence of this the following are considered:

- A systematic approach to Health & Safety ensuring appropriate training and awareness for all employees is linked to an objective monitoring, analysis and preventative control system.
- A culture that encourages engagement in health and safety at all levels of the company with a focus on learning from each other, as well as from other organisations, rather than on blame and enforcement.
- An ongoing focus on improvement and a good / improving accident record.

4. Environmental

NTS is committed to business adopting sustainable practices and a life-cycle approach; reducing resource use and minimising waste and pollution during all operations. In particular we believe that it is the responsibility of business today to consider the long-term impact of our actions on the environment for future generations.

NTS is proud to be certified to ISO 14001 however we recognise that when discussing environmental impact no one company can make the difference and it is only when full supply chains accept their environmental responsibilities and work together that a more sustainable future can be realised.

To this end we require our suppliers to apply an environmental perspective to their work and their own supply chains. To establish this, we review whether a Company has certification to ISO 14001, and if so, it is deemed to be compliant. In the absence of holding an environmental certification we look for our suppliers to demonstrate the following:

- Compliance with all relevant legislation.
- Efficient use of all natural resources, minimising waste and pollution and energy use, paying particular attention to greenhouse gas emissions to reduce climate change.

5. Sustainability in Construction

We also fully support the construction industry in their efforts to develop sustainable practices throughout the supply chain with the introduction of LEAD, BREAM & BES 6001 accreditations. The importance of these standards is growing and the requests for material that support these is growing. As such we look for these from our suppliers of structural products.

6. Local Community

Business engagement with the local community is rarely neutral. NTS actively aims to make a positive contribution to the local community and we expect our suppliers to do the same. Suppliers should be able to demonstrate that they:

- Contribute to community development.
- Enhance social and economic development.

7. Counterfeit, Fraudulent and Suspect Items (CFSI)

Counterfeit, Fraudulent and Suspect Items pose a very real danger to our industry and for our society. NTS strive daily to ensure that products supplied are genuine and fully traceable right through to the raw material supply. It is critical that our suppliers have this same approach, pro-actively monitor this and advise us of any changes in production controls or their supply chain. NTS are committed to working towards eradicating counterfeit goods from our shared marketplace and we rely on the same commitment from our suppliers to achieve this endeavour.

8. Cyber Security

Cyber Security threats are part of our everyday life. We take all reasonable precautions to protect ourselves and others from cyber threats and we expect our suppliers to do the same.