Conflict of Interest Management Policy

Approved by the Board of Directors of 7 Steel on December 10, 2025

1. Definitions

- **7 Steel / the Organization**: 7 Steel and entities within its compliance perimeter.
- **Compliance Perimeter**: Entities operating under 7 Steel's Criminal Risk Prevention Model.
- **Board of Directors**: Governing body with ultimate authority; oversees the Executive Committee.
- **Executive Committee**: Senior leadership with management responsibility.
- **Audit and Control Committee**: Non-executive Board body monitoring compliance.
- **Members of the Organization**: Board, Executive Committee, employees, contractors, consultants, and temporary staff.
- **Business Partners**: External parties (suppliers, agents, advisors, joint ventures, clients, etc.).
- **Third Party**: Any entity outside 7 Steel.
- **Criminal Risk Prevention Model**: Internal system for preventing, detecting, and managing criminal risks.
- **Ethics Committee**: Independent body overseeing compliance and managing the Internal Reporting System.
- **Family Members**: Relatives up to the fourth degree, including partners, children, parents, siblings, in-laws, and grandparents.

2. Purpose

This Policy sets rules for identifying, disclosing, and managing conflicts of interest, ensuring integrity and preventing corruption. Conflicts arise when personal or family interests may diverge from 7 Steel's interests. If unmanaged, they may lead to corruption or reputational harm. The Policy aligns with the Code of Ethical Conduct, the Compliance Policy, and the Anti-Corruption Policy.

3. Scope

- **Entities/Individuals**: Applies globally to all 7 Steel entities, Members of the Organization, and Business Partners. Stricter local laws prevail.
- **Activities**: Covers all business functions and operations.
- **Declarations**: Members must sign compliance declarations (Annex I and II).

4. General Principles

1. Prevent conflicts through internal controls and updates.
2. Provide training and awareness.
3. Establish governance mechanisms for reporting and resolving conflicts.
4. Ensure clear responsibilities and transparency.
5. Separate duties to avoid concentration of influence.
6. Monitor Business Partner relationships.

5. Types of Conflicts of Interest

- **Actual**: Private interest directly affecting objectivity in decision-making.
- **Potential**: Influence that could create future risk.
- **Perceived**: Situation seen by others as a conflict.

Common Scenarios:

- Hiring/contracting relatives or close contacts (allowed only if disclosed, approved, and compliant with policies).
- Personal interests in Business Partners (must be declared).
- Gifts and hospitality (only permitted if lawful, compliant with anti-corruption rules, and not influencing decisions).
- External professional activities (must be declared).
- Any other situation reasonably perceived as a conflict (must be reported).

6. Managing Conflicts

Members must avoid, disclose, and mitigate conflicts. Possible actions include:

- Declaring the situation via the Conflict of Interest Declaration.
- Recusing from related decisions.
- Rejecting or removing the source of conflict (e.g., refusing a gift).
- Transparency with relevant parties.

Process:

1. **Identification & Reporting**: Members must report to the Ethics Committee; partners/third parties may use the Ethics Channel.
2. **Recordkeeping**: All cases recorded in the Compliance Cockpit.

3. **Evaluation**: Direct managers assess and forward to the Ethics Committee.
4. **Resolution**: Ethics Committee decides and sets proportionate actions (e.g., exclusion from decisions, restricted access, or eliminating the root cause).

7. Obligations of Members

- Act in line with laws, rules, and ethics.
- Always prioritize 7 Steel's interests.
- Disclose conflicts via the Declaration.
- Abstain from decisions where a conflict exists.
- Not exploit business opportunities belonging to 7 Steel.
- Uphold ethical culture and report violations.
- **Board/Executives**: Must disclose conflicts during hiring/appointment and submit annual compliance declarations.

8. Acknowledgement

This Policy is provided to all hires and available via the Employee Portal and corporate website. Business Partners may also access it.

9. Reporting

All Members must report conflicts immediately via the Ethics Committee or Ethical Channel (also open to partners and third parties).

10. Consequences of Non-Compliance

Breaches may result in disciplinary or legal actions. Business Partners are also expected to align with these principles.