MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

1. Purpose and Commitment

AS METAL COM adopts a zero-tolerance approach to modern slavery, forced labour, child labour and human trafficking.

The company is committed to conducting its activities responsibly and ethically, respecting fundamental human rights and ensuring that such practices are not present within its operations or supply chain.

2. Definitions

For the purpose of this policy:

- **Modern slavery** includes slavery, servitude, forced or compulsory labour and human trafficking.
- **Forced labour** means work performed under the threat of penalty and without free consent.
- **Human trafficking** refers to the recruitment, transportation, transfer or harbouring of persons for the purpose of exploitation.

3. Scope

This policy applies to:

- All AS METAL COM employees;
- Management and directors;
- Contractors, suppliers, subcontractors and business partners;
- Any third parties acting on behalf of or in the interest of the company.

4. Principles

AS METAL COM:

- Strictly prohibits modern slavery and human trafficking;
- Complies with applicable human rights and labour legislation;
- Promotes transparency and responsibility across its supply chain;
- Expects its business partners to uphold equivalent ethical standards.

5. Governance and Responsibilities

AS METAL COM management is responsible for the implementation, enforcement and monitoring of this policy.

Managers at all levels are responsible for preventing, identifying and addressing risks related to modern slavery and human trafficking.

Employees are required to comply with this policy and report concerns in good faith.

6. Prevention and Awareness

AS METAL COM raises awareness of modern slavery and human trafficking risks through internal communication and by informing employees of applicable policies and reporting mechanisms.

7. Risk Identification

Indicators of modern slavery or human trafficking may include, but are not limited to:

- Lack of control over identity documents;
- Restricted freedom of movement;
- Social isolation;
- Fear or signs of coercion.

8. Reporting Concerns

Suspected cases of modern slavery or human trafficking must be reported through line management or the company's whistleblowing mechanism.

Confidentiality and protection against retaliation are guaranteed for individuals reporting concerns in good faith.

9. Monitoring and Results

The application of this policy is monitored through internal controls and management oversight.

During the period 2023–2025, no confirmed cases of modern slavery or human trafficking were identified within the company or its supply chain.

10. Policy Approval

This Modern Slavery and Human Trafficking Policy is approved by AS METAL COM management and effective as of the date of approval.

GENERAL MANAGER,

Constantin APOSTOL

