



Sustainability Manual

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00	All	Creation of the manual	06.11.2022
01	All	Review all chapter	09.09.2023
02		Update policy ,stakeholders map and communication frequency	06.03.2024

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1. Company Information and Certifications

1.1 Introduction to Company

Tosyali Algeria is a jewel of the steel industry a few kilometers from Oran. The mega complex, which started to be commissioned in 2013, has an important place in the Algerian industry. The fully integrated Tosyali Algerian steel complex is a jewel of the Algerian industry thanks to its state-of-the-art units, managerial efficiency and quality of its products.

Integrated Production Units at the state-of-the-art of Technologies are:

Palletization unit

DRI unit

Meltshop 1, Meltshop 2 units

Lime kiln unit

Rolling mills units RM1, RM2, RM3 and Wire rod

Auxiliary units: Oxygen unit, Substation(400kv), Water treatment unit, Fumes Treatment Plant

With about 4000 employees, Tosyali Algeria contributes to the industrial development of Algeria by employees in efficient work and management techniques. The transfer of skills is an integral part of this mega project.

“Our production covers a large part of the needs of the Algerian market, essential to its development. This self-sufficiency allows us to achieve significant savings by eliminating imports and exporting our products abroad.”x

The Tosyali Algeria Iron and Steel complex is located in Bethioua, 40 km east of Oran, the second largest city in Algeria. The complex covers 4 million-meter square. It's one of the largest steel complex in the country.

The high level of integration of our complex allow us to cover the manufacturing process of iron ore to the finished product ready for delivery.

Our products are destined for the Algerian market of the construction, the transformation of wire rod and for the international export since 2018.

High Productivity and Advanced Technologies

Thanks to state-of-the-art management and facilities developed by the major players in the field, the Tosyali Algeria complex is unrivaled in the Algerian market, guaranteeing a continuous supply.

1.2 Information:

Corporate name: Spa TOSYALI Algeria, Iron and Steel

Legal form: Company by shares

Address: Pole Economique Plateau Gourirate Bethioua Algeria

Post code : 31210

Phone : 213 41 79 31 32 Fax : 213 41 79 31 31

E-mail : <http://www.tosyali-algerie.com>

Creation date: 2008

Staff: 3882 to 31.12.2023

Industry: Ministries of Industry and Mining

Activity: Manufacture of billet which is a semi-finished product used in the production of reinforcing steel rebar's and wire rod.

Contacts:

General Director	Mr. İZZET ULU
Quality Manager	Mr. Ali BILICI

1.3 Scope:

This manual describes the sustainability management system of Tosyali Algeria which covers the policies, organization, responsibilities and associated procedures applicable for the production of reinforcing steel rebar's in accordance with the CARES SCS Applicable Appendix & BRE Environmental & Sustainability Standard BES 6001: ISSUE 3.1 & ISSUE 4.0

1.4 Documents and reference standard

The reference documents and standards are listed in document (*FOR-QMS-014*) The external documents List.

2. Sustainability Management System

Tosyali Algeria's sustainability and responsible sourcing management system is implemented jointly with the quality, environment and occupational health and safety management systems in accordance with the requirements of ISO 9001 standards, ISO 14001 and ISO 45001 and legal and other applicable product requirements.

2.1 Documented Information

The management system documentation covers all activities. The general conditions of document management within the company Tosyali – Algeria are managed by the Documentary Control Procedure (*PRO-QMS-001*).

Responsible persons, identification, storage and accessibility, retention and protection and disposal of records are managed by the Records Control Procedure (*PRO-QMS-002*).

The backup of recordings on computer media is ensured daily by the IT department, according to the “backup procedure” (*PRO-IT-001*).

To make documents available and accessible and reduce the use of paper, an electronic document management interface “Quality Document Management System “QDMS”” has been set up and paper printing quotas are limited.

2.2 Sustainability Policy

The sustainability and responsible sourcing policy (*SUSTP-SUST-001*) is established, approved and implemented by the Management of Tosyali - Algeria on the basis of the relevant environmental, social and economic factors to preserve environmental sustainability at all levels of its operations. This policy is reviewed annually and when necessary.

The management of Tosyali - Algeria is committed to:

- Comply with environmental, labor relations, anti-corruption, and commercial relations regulations at the national and international levels;
- Monitor and minimize the intensity of our greenhouse gas emissions;
- Monitor and minimize the environmental impacts of transport, practice sustainable management of waste and by-products with reuse, recycling and recovery, reduce the consumption of water, energy and natural resources;
- Maximizing materials efficiency ;
- Continuously improve the environmental life cycle performance.
- Prevent Ecotoxicity and protect Biodiversity;
- Prevent against Human Right Abuses.
- Prevent against child Labor.
- Respect workers & labor rights continuously for its employees & contractors employees;
- Promote diversity, equity, equal opportunities, and inclusion within our company;
- Ensure a safe and healthy working environment for all employees.
- Ensure fair compensation and treatment for all employees and provide opportunities for professional and personal development.
- Consult and involve employees and their representatives in decision-making.
- Consider the well-being and mental health of our employees , as well as promoting a environmental work.
- Promote ethical business practices by combating corruption, bribery, unfair practices, conflicts of interest, and gifts that compromise integrity or impartiality.
- Communicate and raise awareness among our stakeholders about our environmental, social, economic and responsible sourcing sustainability policy and commitments;
- Collaborate with stakeholders to understand their concerns, risks and opportunities;
- Contribute a diverse economy
- Ensure transparent communication and regular consultation with all our stakeholders by providing clear and precise information;
- Address the concerns and expectations of our stakeholders;
- Actively contribute to the economic and social development of local communities;
- Promote responsible sourcing in our supply chain;
- Promote the principles of inclusivity, integrity, stewardship and transparency;
- Guarantee fair treatment of suppliers;
- Implement supplier selection based on sustainability criteria and encourage the traceability of materials throughout the supply chain;

Through our sustainable development and responsible sourcing policy, we are committed to respect and promote above commitments, regularly evaluating our performance and continuously improving our sustainability management system.

The management of Tosyali - Algeria ensures that its sustainability policy:

- is communicated, understood by all employees, suppliers, subcontractors, customers, neighbors, local authorities and other relevant interested parties, through awareness raising, posting, QDMS and emails and Company website.
- is implemented throughout the organization.

The sustainability policy is reviewed during management meetings and whenever necessary for its permanent suitability.

Ref : The sustainability and responsible sourcing policy (*SUSTP-SUST-001*)

2.3 Stakeholders identification

Through its materiality matrix, Tosyali Algeria identifies its stakeholders who are classified according to their high, medium or low level of influence in the following map(*FOR-SUST-001*).

Stakeholder Category	Description	Stakeholder Expectations	Communication Tools/way	Frequency	Level of interest	Level of influence
Internal Stakeholders						
Top Management	Executive team responsible for strategic decisions	- Long-term economic profitability	Phone, email, meeting WhatsApp	Regularly, usually in the form of periodic meetings	High influence	High influence
Employees and their Representatives	All people employed by Tosyali	- Working conditions and safety - Respect for human rights - Training and skills development - Contribution to local development - Respect for ethical and social standards	Phone, email, meeting WhatsApp, QDMS, SMS, Internal display	Regularly, usually in the form of periodic meetings	High interest	High influence
Shareholders	Individuals or entities owning shares in Tosyali	- Long-term economic profitability - Contribution to local development - Respect for ethical and social standards	Phone, email, meeting	Periodic meetings	High interest	High influence
External Stakeholders						
State and Local Authorities	Government bodies	- Reducing your carbon footprint, effective waste management, responsible use of natural ways and resources and reducing energy and water consumption. - Respect for human rights - Community engagement - Training and skills development - Contribution to local development - Good business practices - Innovation research and development - Respect for ethical and social standards - Promotion of local purchasing - Transparency and traceability of products	Phone, email, meeting Website, Social networks Press ,Visit	Occasional or planned depending on the circumstances.	High interest	High influence
Local Communities	Residents and businesses adjacent to Tosyali's facilities	- Reduction of carbon footprint - Respect for human rights - Community engagement - Contribution to local development - Good business practices - Innovation research and development - Respect for ethical and social standards - Promotion of local purchasing	Phone, email, meeting Website,Social networks Press, Visit	Occasional or planned depending on the circumstances.	High interest	High influence
Neighbourhood	Residents living near Tosyali's facilities	- Reduction of carbon footprint - Respect for human rights - Community engagement - Contribution to local development - Respect for ethical and social standards - Promotion of local purchasing	Phone, email, meeting Website, Social networks Press ,Visit	In case of need or specific projects	High interest	High influence

Customers and Consumers	Individuals or businesses purchasing Tosyali's products	<ul style="list-style-type: none"> - Long-term economic profitability - Contribution to local development - Good business practices - Respect for ethical and social standards - Transparency and traceability of products 	Phone, email, meeting Website, Social networks Press ,Visit	Daily via customer service	High interest	High influence
Suppliers/Providers	Companies providing goods or services to Tosyali	<ul style="list-style-type: none"> - Respect for human rights - Community engagement - Contribution to local development - Good business practices - Respect for ethical and social standards - Promotion of local purchasing - Transparency and traceability of products 	Phone, email, meeting Website, Social networks Press ,Visit	Regular and structured, integrated into the supply/service processes	Medium interest	Medium interest
Investors	Individuals or entities investing in Tosyali's projects	<ul style="list-style-type: none"> - Long-term economic profitability - Good business practices - Respect for ethical and social standards - Transparency and traceability of products 	Phone, email, meeting Website, Social networks Press ,Visit	During financial reporting and following the progress of projects	Medium interest	Medium interest
Insurance Companies	Companies providing insurance coverage to Tosyali	<ul style="list-style-type: none"> - Long-term economic profitability - Respect for ethical and social standards 	Phone, email, meeting Website, Social networks Press ,Visit	Annual upon contract renewal	Medium interest	Medium interest
Associations	Charity associations and volunteering Non-profit associations	<ul style="list-style-type: none"> - Respect for human rights - Community engagement - Good business practices - Respect for ethical and social standards 	Phone, email, meeting Website, Social networks Press ,Visit	Depending on events or collaborations	Medium interest	Medium interest
Banks	Financial institutions Tosyali engages with	<ul style="list-style-type: none"> - Long-term economic profitability - Good business practices - Respect for ethical and social standards 	Phone, email, meeting Website, Social networks Press ,Visit	During follow-up meetings	Medium interest	Medium interest
Universities	Institutions of higher education, study and research	<ul style="list-style-type: none"> - Collaboration and partnerships - Professional development - Access to research and innovation - Reputation and social responsibility 	Phone, email, meeting Website, Social networks Press ,Visit	Depending on specific collaborations or projects	Medium interest	Medium interest
Calibration organisms	Calibration companies	<ul style="list-style-type: none"> - Respect for human rights - Collaboration and partnerships 	Phone, email, meeting Website, Social networks Press ,Visit	Depending on specific collaborations or projects, certification audits	High interest	High influence
Standards organization	Standard associations	<ul style="list-style-type: none"> - Respect for human rights - Collaboration and partnerships 	Phone, email, meeting Website, Social networks Press ,Visit	Depending on specific collaborations or projects, certification audits	High interest	High influence
Interns	a student doing internships in a company	<ul style="list-style-type: none"> - Practical experience - Supervision and learning opportunities: - Regular feedback on their performance 	Phone, email, meeting Website, Social networks Press ,Visit	Monthly during follow-up meetings	Medium interest	Medium interest
Certification Organisms	Certification bodies	<ul style="list-style-type: none"> - Product standards requirements - Management systems requirements - Reporting of performance of product - Long term quality performance reports 	Phone, email, meeting Website, Social networks Press ,Visit	Depending on specific collaborations or projects, certification audits	High interest	High influence

2.4 Communication:

The direction communicates internally on various essential subjects, including company strategy and policies (sustainability, quality, environment and OHS), commitment to sustainable development, stakeholder satisfaction, preservation of environment, health and safety at work and compliance with legal and regulatory requirements. The frequency of this communication is regular, usually in the form of periodic meetings.

Management also communicates internally on emergency plans, responsibilities and authorities, the definition and achievement of objectives and indicators, the operation of processes, the training plan, information related to health and safety at work, audit results, management reviews, continuous management improvement systems, needs and suggestions of workers, social activities for employees, as well as investments aimed at reducing the consumption of natural resources and energy. This communication is also regular and adapted to needs.

External management communication encompasses several essential aspects. She continuously communicates with customers by providing product information, processing requests, contracts and orders, measuring customer satisfaction and planning for emergency management. The frequency of this communication is often dictated by customer needs and can vary from daily to periodic, depending on market requirements and specific interactions.

In addition, management communicates with suppliers and external service providers by sharing information on products, expected services, activities, staff skills, customer/service provider relationship rules, monitoring and performance tools, methods, inspection, environmental requirements, emergency plans, non-conformities and corrective actions. This communication is regular and structured, often integrated into the company's procurement and quality management processes.

Management also establishes communication with other relevant parties, such as visitors, emergency services, public authorities, local communities and associated agencies, to discuss environmental requirements, emergency plans, compliances and corrective actions. This communication may be to meet a need or planned based on specific circumstances and events.

Finally, management engages all parties concerned in the context of sustainable development by communicating on the sustainable development policy, the company's commitments in terms of sustainable development, the needs and expectations of stakeholders, significant environmental impacts, sustainable development goals and the annual sustainable development report. This communication is often periodic, with regular updates on progress made and ongoing initiatives.

The company uses the following communication tools: The telephone, The SAP integrated information system, the QDMS "Quality Documents Management System" software, 'Outlook' messaging, meetings, memos, information notes, etc.

Notice boards, Awareness, information and/or training meetings, SMS, WhatsApp, display screens, Quality Management Systems records, Suggestion boxes, The website

Social networks (LinkedIn, X, Facebook and Instagram).

Ref: Communication procedure (PRO-QMS-009)

2.5 Responsibility and authorities

Executive management

- Develop sustainability policy and commitment.
- Integrate a sustainability strategy into the company's overall objectives.
- Allocate the necessary resources to support sustainable initiatives.
- Define and implement sustainability objectives for the company.
- Take final responsibility for sustainability outcomes.
- Ensure compliance with applicable laws and regulations.
- Ensure sustainable and ethical practices in operations.
- Promote equitable relationships with suppliers, based on sustainability criteria.
- Promote diversity, equity and equal opportunities.
- Raise awareness and dialogue with stakeholders to promote the sustainable development policy and meet their expectations.
- Actively contribute to the economic and social development of local communities.
- Transparently communicate sustainability policies and performance.
- Encourage stakeholder participation and feedback for continuous improvements.

Management Representative

- Ensure effective implementation and maintenance of the Sustainability Management System in accordance with CARES Sustainability requirements.
- Ensure that regulatory requirements are identified, understood and communicated,
- Ensure that sustainability objectives are established, measured and the actions to achieve them are defined.
- Provide training and awareness on the requirements of the sustainability management system.
- Report regularly to management on progress and obstacles encountered in implementing the sustainability strategy.
- Ensure stakeholders are informed and involved in sustainability commitments.
- Ensure transparent communication with all stakeholders.
- Organize and lead management reviews of the sustainability management system.
- Establish the annual sustainability report.

Sustainability Management System Responsible

- Implement and maintain the sustainability management system.
- Ensure compliance with sustainability-related standards and regulations.
- Coordinate periodic audits and evaluations of the system.
- Establish objectives for the sustainability management system and develop actions to achieve them.

Human Resources Manager

- Comply with laws and regulations relating to labor relations, ensure a safe and healthy working environment, recognize human rights and ethical practices.
- Integrate sustainable practices into HR policies.
- Raise awareness and train staff on sustainable practices at work.
- Implement sustainable development and employee well-being programs.
- Define sustainability objectives for HR and implement measures to accomplish them.
- Ensure compliance with anti-corruption laws in HR processes and employment relations.
- Promote diversity, equity, and equal opportunities, without discrimination.
- Guarantee fair remuneration and gender equality.
- Provide professional and personal development opportunities to employees.
- Encourage dialogue and employee participation in decision-making processes.
- Actively contribute to the economic and social development of local communities.

Communication Responsible

- Develop awareness campaigns on sustainability.
- Communicate the company's sustainable initiatives internally and externally.
- Ensure transparency and consistency of sustainability messaging.
- Set sustainable communication objectives.
- Ensure transparent communication of sustainability and responsible sourcing performance.

Training Responsible

- Establish training programs on sustainability.
- Train staff on sustainable practices and sustainability objectives.
- Monitor and evaluate the effectiveness of sustainability training programs.
- Establish sustainable training objectives and implement actions to achieve them

Manager of the Accounting and Finance Department

- Integrate sustainability objectives into the financial strategy.
- Monitor and evaluate the financial impact of sustainable initiatives.
- Report on financial performance linked to sustainability.
- Set sustainable financial objectives.
- Comply with local, national and international laws and regulations, and integrate sustainability criteria into the company's financial decisions.

Production Unit Managers

- Identify and implement sustainable production practices.
- Ensure compliance with environmental and sustainability standards
- Oversee the reduction of waste and energy consumption.
- Establish objectives for sustainable production and develop actions to achieve them.

Responsible for Local and International Purchasing

- Evaluate suppliers on sustainability criteria.
- Select local and international suppliers aligned with sustainability objectives.
- Integrate sustainability criteria into purchasing and supplier selection processes.
- Define sustainable purchasing objectives and deploy actions to achieve them.
- Comply with environmental laws and regulations.
- Minimize the environmental impact of purchases, promote recycling and reuse.
- Encourage sustainable practices among suppliers.
- Ensure fair, transparent and sustainable commercial relationships with suppliers.
- Promote the traceability of materials throughout the supply chain.
- Comply with local, national and international laws and regulations

Sales Manager

- Integrate sustainability criteria into sales activities.
- Promote sustainable products or services.
- Collaborate with customers for solutions aligned with sustainability.
- Set sustainable sales objectives and take steps to achieve those objectives.

Health, Safety and Environment Manager (HSE)

- Monitor and improve systems Hygiene, Safety and Environment put in place.
- Implement practices to ensure a safe and healthy work environment.
- Ensure compliance with environmental and occupational health and safety regulations.
- Establish health, safety and environment objectives, and implement actions to achieve them.
- Guarantee safe and sustainable management of operations, minimizing risks for employees and the environment.

Environment Responsible

- Monitor CO2 emissions and other pollutants.
- Ensure compliance with national and international environmental regulations.
- Establish environmental objectives and implement actions to achieve them.
- Ensure sustainable waste management;
- Monitor energy and natural resources consumption;
- Monitor and control GHG and other pollutants emission;
- Ensure preservation of biodiversity from all sort of pollution and eco-toxicity Prevent all sort of pollution and
- Monitor the environmental impacts of transportation.
- and ensure continuous improvement

Employees (All departments)

- Follow company sustainability policies.
- Report opportunities for sustainability improvement.
- Participate in training on sustainability and the application of good practices.
- Contribute to the establishment of specific objectives for their respective departments and engage in actions to achieve them

Ref: Sustainability Responsibility and Authorities matrix (TB-SUST-001)

2.6 Risk and Opportunities

Through its materiality matrix, Tosyali Algeria identifies the environmental, social, economic and responsible sourcing issues considered consistent with its strategy. These issues are evaluated in terms of their importance to the company and its stakeholders, taking into account the relevant requirements of the latter.

Once these issues are identified, Tosyali Algeria conducts an analysis of the risks and opportunities associated with them. These risks and opportunities are assessed based on their severity and probability, and then classified and prioritized accordingly. Then appropriate actions are determined to address these risks and capitalize on these opportunities.

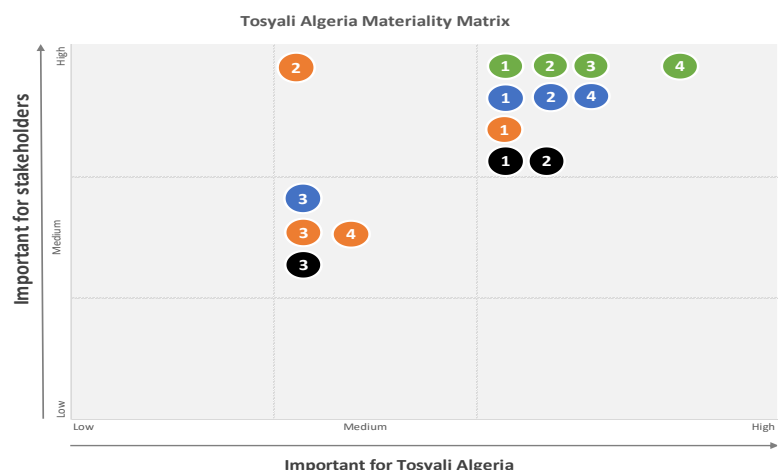
Ref: Tosyali materiality matrix (TB-SUST-003)

Environnemental risks & Opportunities (FOR-SUST-005)

Social risks & Opportunities (FOR-SUST-005)

Economic risks & Opportunities (FOR-SUST-005)

Responsible Sourcing risks & Opportunities (FOR-SUST-005)



2.7 Legal and other requirements

Tosyali Algeria identifies and monitors the legal and regulatory requirements applicable to its sector of activity, through government agencies, consultation of the Algerian Official Journal (JORA DP), regulatory monitoring, and consultation of legal experts.

Compliance with legal and regulatory requirements is assessed at each Department or in collaboration with specialized third-party organizations (*Legal doctrine*) and the necessary measures are taken to ensure compliance with these requirements.

Applicable occupational health and safety and environmental legal and regulatory requirements are identified and assessed in the Regulatory Requirements Identification and Assessment Table (*TB-HSE-001*).

*Ref: Identification, conformity assessment and regulatory monitoring procedure (PRO-HSE-004).
Contract with Legal Doctrine Organisation.*

2.8 Objectives

For Tosyali Algeria's sustainability management system, measurable objectives are established, implemented and measured at all relevant levels based on: Compliance with legal requirements.

- Pollution prevention and waste treatment.
- Emission reduction and climate protection.
- Efficient use of water.
- Efficient energy management.
- Employment and Skills Development.
- Health and security at work.
- Communication with stakeholders.
- Relationship with suppliers.
- Communication with customers.
- Contribution to the Local Economy.

Action plans to achieve the objectives and targets set are established, implemented and reviewed regularly.

These objectives are communicated to all internal and external stakeholders through the annual sustainability report.

*Ref: Environmental Objectives (FOR-SUST-006)
Social Aspects Objectives (FOR-SUST-006)
Economic Objectives (FOR-SUST-006)
Responsible Sourcing Objectives (FOR-SUST-006)
Action plans to achieve the objectives (FOR-SUST-008).*

2.9 Resources

Tosyali - Algeria, has made available all the material, human and financial resources necessary to achieve its objectives, values and commitments to sustainable development. Other resource needs may be identified during the management review.

The Human Resources Department's mission is to meet human resource skills needs. It also has the mission of managing and developing these skills through training and social security coverage.

2.10 Sustainability Management System Representative

The Quality Manager is appointed to represent the company for the sustainable development management system.

Ref: Sustainability management system Representative decision

2.11 Management review

Each year, the management system is periodically reviewed to ensure its relevance, adequacy and effectiveness in responding to the sustainable policy through a management review which is subsequently communicated.

The review takes into consideration

- The Sustainability Policy
- Stakeholder Expectations and Needs
- Significant impacts, risks and opportunities and adequate resources to manage them.
- Objectives and performance indicators (KPIs) in relation to sustainable development
- Internal and external performance reports.

Tosyali ALgerai has priortrase sustainable system including in inclusivity, integrity, stewardship and transparency in its all activities including economical and social activities. All necessary actions are taken accordingly

Other information is communicated to stakeholders according to their needs and expectations, such as reports on environmental, social and economic impacts, the action plans put in place and the achievement of objectives.

The complaints processing process begins with the reception of complaints, which can be expressed through various means such as phone, email, fax. Complaints are assessed based on their merit, impact, urgency, and priority. Valid complaints undergo a thorough investigation, with corrective measures taken accordingly. Complainants are informed of the actions taken to resolve their complaint, and all details are recorded for follow-up.

Ref: Customer complaints procedure PRO-QMS-006

Purchasing procedure PRO-PURS-001

Complaints from neighbors and associations are handled by the general management with an assessment of concerns, communication with complainants, monitoring of corrective measures, and closure of the complaint once resolved.

Recruitment and Skills Evaluation procedure PRO-RH-001

2.14.1 Product life cycle

The identification of the life cycle of the Tosyali-Algeria product is illustrated in the following diagram where the environmental aspects are identified and evaluated through the environmental aspects procedure (PRO-ENV-001).

Assessment of environmental aspects (FOR-ENV-002)

Icon	Acronyme
	electrical
	Natural resources
	Waste generation
	Natural Gas
	CO2 emissions
	water
	Fuel
	Marine transport
	Terrestrial transportation
	Pole Transportation
	Electrical Conveyor
	Output
	Input
	Auxiliary

2.14.2 Product tracability

Receipt of Iron ores and pellets, Pellets and Scrap:

Essential raw materials, including iron ores and pellets are supplied by international suppliers and scrap metal supplied by local suppliers, are transported to the Tosyali factory.

Iron ores and pellets from international suppliers are transported by ship. On arrival at the port, these Iron ores and pellets are transported from the port to the factory via a specially designed conveyor system, and are stored in appropriate locations for each ship, accompanied by their quality certificates.

Upon receipt, each batch of these Iron ores and pellets are checked upon receipt to ensure its quality and compliance with the required specifications.

Unloading the boat can take several days depending on the tonnage of the boat and is done in several batches. Samples are taken and analyzed from each batch to verify the chemical composition and physical characteristics of the ores and pellets. The analysis results, batch number, date of receipt, vessel name and supplier name are recorded in the chemical analysis report (FOR-QC-069).

Scrap metal collected locally is supplied by local suppliers and is transported to the factory via trucks specially adapted for this type of transport. Once arrived, the different types of scrap metal are stored in appropriate locations. Each scrap metal truck is subject to a quality and radioactivity inspection.

Product identification and traceability are established and maintained throughout processes, ensuring product traceability at every stage of steel manufacturing, from continuous casting to rolling, storage to delivery, and onwards. 'to the customer's warehouse.

The heat g number is the primary unit of traceability, providing full access to all information relating to each heat or final product.

Product identification and traceability is the responsibility of the Quality Department

Product identification begins during steel manufacturing, assigning a unique eight-digit progressive number to each heat. The first two digits represent the year, in the following format (e.g., 18012345).

Product identification is reinforced by attaching a label to each bundle, compliant with the Algerian standard for products used in Algeria. For CARES certified products (BS 4449: B500B), three labels are affixed to each bundle, while for other international standards, two labels are used.

Information on the label includes the producer's logo and name, customer's name (optional), material type (Reinforcement Bars), order number, standard, heat number, quality, diameter, length, number of bars, bundle weight, production date, recipient (optional), origin (Made in Algeria), producer's address, product certificate logo, and QR codes for CARES products.

Traceability of product information is provided by the SAP ERP system, ensuring compliance with monitoring and measurement requirements throughout the manufacturing process

Ref: Labeling instruction (INS-QC-019)

2.15 Ethical Business Practices

Tosyali Algeria's ethical business practices are:

Avoid conflicts of interest

- Avoid situations creating conflicts of interest in current positions and responsibilities due to political activities.

Do not work for your own benefit or that of your loved ones

- Do not grant unfair advantages to yourself, your loved ones or third parties.
- Avoiding conflicts of interest in personal investments.
- Ensure that personal investments do not interfere with professional responsibilities.

Representation and participation in event invitations

- Obtain approval for participation in influential events other than activities open to general participation.

Those who left the company

- Act in the best interests of the company before and after leaving the company.
- Avoid conflicts of interest before or after departure.
- Inform superiors if relatives have interests in a company engaged in a commercial relationship.

Sharing and trading of internal information (insider trading)

- Do not engage in insider trading.
- Protect confidentiality even after leaving the company.

Fight against corruption and Bribery

- Tosyali Algeria and its group companies are committed to fighting corruption and bribery.
- Comply with anti-corruption laws.
- Ensure that all payments to suppliers are linked to services/products and not bribes.

Ref: Tosyali ethical rules (ER-SUST-001).

2.16 Ethical Supply Chain Practices (Responsible Sourcing)

The following Tosyali Algeria ethical supply chain practices aim to meet commitments related to responsible sourcing

- Treat all suppliers fairly and transparently in procurement processes.
- Avoid any form of discrimination or bias in the selection of suppliers.
- Ensure that the origin and route of materials used in production are traceable and well documented.
- Implement measures to monitor the environmental and social impact of sourced materials.
- Strive to reduce the social and environmental impacts associated with product transportation.
- Explore and adopt sustainable transportation practices, such as reducing emissions and optimizing logistics.
- Prioritize sourcing raw materials from suppliers located as close as possible to manufacturing facilities.
- Aim to minimize the distance between the source of raw materials and the factory to reduce the carbon footprint.
- Implement strategies to minimize the environmental impact of transporting materials, goods and employees.
- Promote environmentally friendly transportation options and optimize travel routes.

Tosyali Algeria is committed to the Responsible Sourcing in the sustainability policy through

- Comply with anti-corruption, and commercial relations regulations at the national and international levels;
- Communicate and raise awareness among our stakeholders about our environmental, social, economic and responsible sourcing sustainability policy and commitments;
- Ensure transparent communication and regular consultation with all our stakeholders by providing clear and precise information;
- Address the concerns and expectations of our stakeholders;
- Actively contribute to the economic and social development of local communities;
- Implement supplier selection based on sustainability criteria and encourage the traceability of materials throughout the supply chain;

Tosyali Algeria determines the traceability of raw materials and the suppliers that are most important in terms of impact on sustainability aspects through the mapping of its supply chain.

Ref : Tosyali ethical rules (ER-SUST-001)

Tosyali Sustainability Annual Report (FOR-SUST-002)

Supply chain map (FOR-PURS-002)

Tosyali Supply chain map (FOR-PURS-002)

Category	Material	Supplier	Location	Distance KM	Impact on our Sustainability system (High-Medium-Low)	Related Risks
Raw Material	SINTER FEED	SNIM	MAURITANIA	2,260	Low	Risque minime que : - l'impact sur l'environnement soit négatif - les pratiques soient non conformes aux normes éthiques -l'impact sur l'economie soit négatif
	SINTER FEED	DIMIN	TURKEY	2,887	Low	Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	SINTER FEED	LKAB	SWEDEN	4,862	Low	Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	SINTER FEED	VEDANTA	LIBERIA	3,928	Low	Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	PELLET FEED	TOSÇELİK	TURKEY	2,887	Low	"Minimal risk that:- the impact on the environment is negative- practices do not comply with ethical standards -the impact on the economy is negative
	PELLET FEED	METINVEST	UKRAIN	3,920	Low	"Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	PELLET FEED	ANGLOAMERICAN	BRAZIL	4,273	Low	"Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	PELLET	VALE	BRASIL	6,727	Low	"Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	STEEL SCRAP (Outsourced/Purchased)	ERC	ALGERIA	400	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
		ERE	ALGERIA	530	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
		ERO	ALGERIA	35	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
		SAF HADID	ALGERIA		High	"High risk that:- the impact on the environment is negative- practices do not comply with ethical standards -the impact on the economy is negative

DRI and HBI, freely purchased	TOSCELIK Profil Ve Sac ENDÜSTRİSİ A	TURKEY	3,517	Low	"Minimal risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	METINVEST INTERNATIONAL SA (IRON ORE)	FRANCE	1,048	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
ANTRASİT COAL	DEEPBLUE MARINE BROKERAGE & TOWAGE	RUSSIA	4,194	High	Risque minime que : - l'impact sur l'environnement soit négatif - les pratiques soient non conformes aux normes éthiques -l'impact sur l'economie soit négatif
	MOST ORGANIC	RUSSIA	4,270	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
	AFER ALLIANCE (OTHERS)	TURKEY	3,517	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
LIME	KOCABEY	ALGERIA	40	High	"High risk that:- the impact on the environment is negative- practices do not comply with ethical standards -the impact on the economy is negative
CALCIUM FLOURIDE (Fluorspar)	MINE MOUNT SA	TURKEY	3,075	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
CALCIUM SILICIDE	MINE MOUNT SA	TURKEY	3,236	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
FERRO MANGANESE	SINOSTEEL EQUIPMENT & ENGINEERING	INDONESIA	13,530	Medium	"Medium risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
FERRO SILICON	AFER ALLIANCE (OTHERS)	HOLLAND	7,172	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
FERRO SILCON MANGANESE	AFER ALLIANCE (OTHERS)	TURKEY	3,075	High	"High risk that: - the impact on the environment is negative - practices do not comply with ethical standards -the impact on the economy is negative
FERRO MANGANESE	MORTEX	INDIA	3,075	High	"High risk that:- the impact on the environment is negative- practices do not comply with ethical standards -the impact on the economy is negative

3. Environmental Aspects

Tosyali Algeria identifies the Environmental Aspects and their impacts related to activities, products and services, including abnormal conditions and emergency situations which the company has the capacity to control or influence, taking into account as much as possible the life cycle.

An assessment method is put in place to determine the Significant Environmental Aspects.

Necessary control measures are put in place to prevent or minimize the significant environmental impacts related to the Significant Environmental Aspects.

Ref: Procedure for environmental aspects (PRO-ENV-001).

3.1 Harvesting or extraction impacts

For its water needs Tosyali Algeria is supplied by a single state supplier SEOR, and does not practice water abstraction.

3.2. Primary Material Use, Materials Efficiency, Recyclability and Recycled Content

Metal recycling has become essential because this practice makes it possible to prevent environmental damage (soil pollution, atmospheric pollution and deforestation). This recycling approach also makes it possible to save resources (some are scarce) as well as the energy necessary for the extraction and processing of the ore.

Tosyali - Algeria has invested in the recycling of ferrous waste for its steel manufacturing process.

The method consists in collecting all the ferrous waste (scrap metal) throughout the Algerian territory, storing and treating them at the scrap zone and transforming them into billets which enter as raw material in the manufacture of the concrete round. This process integrates many units and auxiliary units.

Valorizing the metal by recycling it makes it possible to produce new products faster which will quickly find themselves on the market.

Tosyali Algeria carries out the enrichment of iron ore, it is a multi-step process related to the enrichment of the metallic iron content by concentration and the improvement of the physical characteristics of the DRI charged in the EAF furnace. Enrichment of iron content from 62% to 68.5% results in a higher quality product, optimization of iron ore utilization, fewer amounts of resources to refine steel, which reduces the generation of waste and air emissions and therefore reduces the environmental impact

3.3. Energy and Water Use

Reducing of electricity and natural gas energy consumption is one of Tosyali Algeria's objectives. This makes it possible both to optimize energy expenditure, thus saving money, but also to preserve the environment by fighting against global warming.

For this, Tosyali Algeria has set up indicators for the reduction of energy at the level of all its operating units.

The management and treatment of water supplied by SEOR (Société de Distribution des Eaux) in Tosyali Algeria is the responsibility of the water treatment unit through its installations which are constantly maintained and developed in order to eliminate water losses. For this, many measures have been implemented at this unit to ensure responsible water use and effective treatment of liquid discharges for sustainability purpose.

3.4. Biodiversity and Eco-toxicity

Tosyali Algeria is aware of the importance of its role in the preservation of biodiversity through compliance with legal requirements and the assessment of the impacts of the eco-toxicity of chemicals purchased and used for the manufacture of steel (e.g. lubricants, cleaners, solvents, chemical additives ...ect.) on biodiversity.

Ref: Procedure for environmental aspects (PRO-ENV-001).

3.5. Global Warming Potential (GWP) and Greenhouse Gas Emissions (GHG)

In accordance with Executive Decree 06-138 and other CARES requirements regulating the emission into the atmosphere of gases, fumes, vapors and particles, the sources of atmospheric emissions of Tosyali Algeria's operational activity units are measured and analyzed by an approved external service provider who issues an atmospheric emission analysis report after each operation.

Indicators concerning atmospheric emissions are established according to the elements and regulatory thresholds required as well as CARES requirements.

Ref: Monitoring and measurement procedure (PRO-ENV-004)

All emission sources in our facilities are equipped with abatement systems that adhere to the Best Available Techniques (BAT) for both the Iron and Steel industry, as well as the lime production industry.

Moreover, the majority of our stacks are outfitted with dust monitoring equipment.

3.6. Transport Impacts

Tosyali Algeria aims to reduce the impacts of the transport by choosing the possible nearest suppliers and prioritizing purchasing from local market sources. Furthermore, the transport of iron ore is ensured by a closed conveyor from the port to the facility, which contribute on the reduction of our carbon footprint.

The monitoring is done through the mapping of the supply chain and the recording of transport distances document.

3.7. Waste, Recycling, By-Product Management, Emissions and Releases

In order to limit the negative impacts on the environment and to save natural resources, Tosyali Algeria treats each solid and liquid waste generated by the exploitation activities according to its nature (Reduce, Reuse, Recycle, Recover, incineration, co-processing, landfill)

Waste volume, categories and trends are identified monitored and reported annually (Waste Inventory Table TB-ENV-001)

Waste management begins with sorting at the generating unit, then the transfer and weighing of this waste to the waste area by trucks (Internal waste removal form FOR-ENV-005)

In this area, the separation and storage is ensured according to the specificities of each waste, regulations and standards and also according to waste valorization, then approved external collectors are contacted for removal. The waste management register (FOR-ENV-006) is updated accordingly.

Ref: Waste management procedure (PRO-ENV-002).

In accordance with Executive Decree 06-138 regulating the emission into the atmosphere of gases, fumes, vapors, particles.

The sources of atmospheric emissions of Tosyali Algeria's operational activity units are measured by an approved external service provider who issues an atmospheric emission analysis report.

Ref: Monitoring and measurement procedure (PRO-ENV-004)

The Water Treatment Plant of Tosyali Algeria manages the water in accordance with Executive Decree 06-141 defining the limit values for industrial liquid effluent discharges

The polluted and contaminated released water by the production is treated the following process:

- The used water is treated to avoid deterioration of the facilities and equipment and ground contamination.
- The waste water generated from production facilities is conveyed by separated pipelines to the scale pit then to sedimentation tank filter then filtered by sand filters before cooled and conveyed back to the open circuit tank.
- Sewerage Water generated from activities such as cleaning and flushing activities is conveyed by separated pipelines to a tank to undergo a biological treatment in biomass process before it is released to the public sewage water network.

The waste water generated by Tosyali Algeria's operational activities units are measured and analyzed quarterly by an approved external service provider who issues a waste water analysis report.

Executive Decree No. 06-141 defining the values of discharges of industrial liquid effluents.

3.8. Spills, Leaks and Land Remediation

Liquid spills and leaks generated by production units are directed towards the water treatment plant for an adequate treatment system (scrapping system). This scrapped oil is treated according to the waste management procedure *PRO-ENV-002*.

In the main maintenance workshop, an oil/water separator is put in place to separate oil from water and ensure proper and compliant liquid discharge.

The preventive maintenance activity of each unit is responsible for the management of the liquids generated and the prevention of spills and leaks.

4. Social Aspects

4.1. Human Rights and Ethical Labor Practices

Recruitment at Tosyali Algeria is carried out in accordance with the recruitment procedure (PRO-RH-001) while respecting Algerian legislation, in particular the Algerian Labor Code and Law No. 90-11 relating to labor relations. These laws establish a solid legal framework for labor relations in Algeria, ensuring the protection of workers' rights and promoting fair working conditions.

The Algerian Labor Code defines the rights and obligations of employers and workers in Algeria, covering various aspects such as employment contracts, working conditions, leave, remuneration, occupational safety and health, as well as collective labor relations. Its aim is to protect workers' rights and ensure fair working conditions.

Law No. 90-11 relating to labor relations supplements the Labor Code by specifically addressing relations between employers and workers, covering subjects such as collective bargaining, worker representation, labor disputes, dismissals and dispute resolution procedures. It aims to regulate labor relations and ensure the rights and protection of workers.

Salary, leave and career management is the responsibility of the human resources department, in accordance with internal regulations and regulations. To facilitate these tasks, software such as SAP and KELIO are used.

A complete mechanism is put in place for the management of social works, under the responsibility of worker representatives.

Concerning the management of complaints, the process begins with the receipt of the complaint form, suggestion boxes or meetings with staff representatives. Then, the complaint is assessed by the relevant manager, together with human resources, who investigate the complaint and propose corrective measures to resolve the issues. Monitoring of the implementation of corrective measures is carried out by the relevant manager, thus ensuring the satisfactory resolution of the complaint for the employee or representatives. Once the complaint is resolved, the complaint sheet is closed and the details of the resolution are recorded.

Ref: Recruitment and skills assessment Procedure (PRO-RH-001) & Training Procedure (PRO-QMS-007)

4.2. Safe and Healthy Working Conditions

To provide healthy and safe working conditions, Tosyali Algeria has set up a system to anticipate, identify, assess and control the hazards related to the health and safety of workers:

Tosyali-Algeria provides initial training for new employees, subcontractors and visitors on HSE requirements, the potential hazards at the workplace dangers to which they may be exposed, mandatory internal rules, emergency response, safe practices behaviors. It also provides training and internal awareness planned on the golden rules of Tosyali Algeria.

Every accident and , even a near miss, is the subject of an immediate investigation in order to identify the main and root causes linked to this harmful effect. (***Accident Investigation Form FOR-HSE-005***).

Tosyali-Algeria ensures the availability of personal protective equipment (PPE) for each worker as well as the availability of collective protective equipment (EPC).

Tosyali-Algeria ensures that all equipment passes successfully the regulatory control (lifting equipment, earthmoving machinery, pressurized gas appliances, electrical equipment, etc.)

For operating machinery and mechanical handling equipment, all operators (Tosyali/subcontractor) must be qualified, having undergone training and possessing certification confirming their competence (diploma, certificate, or machinery driving aptitude certificate). Additionally, they must hold a driving license issued by the employer and confirmation of their medical fitness for the position

In order to prevent the hazards related to the handling of chemical products, their precautions for use must be included in the work area data sheet (MSDS) of the work area, their storage must comply with the compatibility table and the workers who must handle these products must wear the Specific PPE according to the PPE Procedure (***PRO-HSE-006***).

Electrical installations are subject to periodic regulatory inspections.

Electrical work as well as energy insulation are subject to a work permit and insulation certificate.

For any electrical activity, the worker must be qualified following specific training and must provide medical confirmation of their fitness for the job at hand

Emergency Situations

Tosyali Algeria identifies emergencies and to assess the hazards results due to the occurrence of these situations that may have an impact on the health, safety of workers and the environment. Necessary means and resources were deployed to respond to the emergencies related to the operational activities efficiently.

Managers, unit's chiefs, department's chiefs, engineers and environment delegates are responsible of the respond to emergencies through the internal operational plan.

Operational Command Post responsible directs and coordinates the intervention teams present on the site (Rescue & Fire, Heavy Equipment Intervention and Operational Intervention) by:

- Identifying the tasks to be accomplished
- Anticipating the evolution of the disaster and ensure the fight of first intervention
- Determining and request the necessary means
- Providing rescue, first aid and evacuation of injured
- Coordinating actions in the field between operation and intervention
- Protecting nearby facilities

Unit managers in collaboration with the HSE team ensure that:

- The emergency exits are constantly operational and usable at all times.
- The alarm system is operational at all times
- The extinguishers are constantly operational
- The firefighting network and equipment's such as armed fire hoses and fire hydrants are operational.

In accordance with current regulations, all workers are subject to periodic medical examination. Tosyali Algeria operates its own specialized medical center for occupational medicine, providing round-the-clock medical services equipped with all necessary personnel and resources.

This center is dedicated to fulfilling two primary objectives: preventing occupational diseases and providing immediate care in case of work-related accidents or medical incidents.

Health & safety department periodically performs training, awareness campaigns, exercises and simulations to test efficiency of the emergency internal operational plan. A report is issued after the performance of the simulations. Detected Occupational illnesses that occur during or after the performance of their duties are covered by the National Social Insurance Fund in collaboration with the human resources department and occupational medicine in accordance with the Law No. 83-13 of July 2, 1983, the Decree No. 84-28 of February 11, the 1984, Interministerial Order of May 5, 1996 and Interministerial Order of May 5, 2010..

*Ref : Accident Investigation Form FOR-HSE-005
Procedure (PRO-HSE-006).*

4.3 Skills and Training

Each employee at Tosyali - Algeria is annually evaluated through the Evaluation and Versatility Matrix (FOR-RH-022). This evaluation allows measuring each employee's skills, identifying skill gaps and training needs, and enables the company to better manage its human potential in terms of skills and versatility.

An annual training plan (FOR-QMS-021) for internal and external training is established based on these skill gaps, while other training needs are identified through each department's form (FOR-QMS-023). Supplementary training is also implemented when new techniques, certifications, processes, and equipment are introduced.

Every training action, whether internal or external, is evaluated by the participant's hierarchical manager. This evaluation focuses on the implementation of the training after a defined period ranging from one (1) to three (3) months, via the form (FOR-QMS-027).

Ref: Recruitment and skills assessment Procedure (PRO-RH-001) & Training Procedure (PRO-QMS-007)

4.4. Community Relations and Community Initiatives

Tosyali Algeria through its policy is committed to identifying its stakeholders and being attentive to their needs, to meeting with representatives of the local community in order to discuss all our possible impacts on the community.

4.5. Social Management System

Tosyali Algeria integrates into its sustainability management system working conditions and issues relating to human rights according to Tosyali Work Ethics Rules.

5. Economic Aspects

5.1. Contribution to Diversity and Stability of the Local Economy

In addition to strategic purchases and in accordance with government policy, Tosyali Algeria contributes to the national economy by promoting local purchases which has allowed the development and stability of the local market as well as the growth of commercial activities of local suppliers taking into account the importance of his needs. .

Supplier payment terms are governed by law and payment terms are defined in purchasing contracts.

The purchasing department has implemented indicators to measure the performance of its local purchases.

Given that the majority of workers come from the local community, Tosyali Algérie has chosen to confirm all its employees on permanent contracts (CDI) in order to meet the needs and expectations of its stakeholders, in particular local authorities, employees and the neighborhood, as part of its contribution to the diversity and stability of the local economy through sustainable employment practices. The human resources department has implemented indicators to measure its performance in terms of sustainable employment practices.

5.2 Pursuing Innovation in processes, products and management methods

Les complexes de Tosyali Algérie intègrent les technologies les plus avancées du secteur sidérurgique, en partenariat avec les acteurs les plus innovants et efficaces de l'industrie. Des projets d'innovation se concentrent actuellement sur les sources d'énergie, l'efficacité énergétique, les technologies environnementales et le développement de nouveaux produits.

5.3. Fair Treatment of Suppliers

For transparency and fairness, Tosyali Algeria selects its suppliers according to the following procedure:

After receiving various offers from suppliers, a selection is made based on several criteria, including quality, relevance of the offer, deadlines, payment terms, compliance with health and safety requirements at work, as well as compliance with environmental requirements.

Then, a comparative table of financial offers (CTO) is used to transparently validate the selected supplier or provider. Supplier complaints are monitored by the purchasing department.

Ref: Purchasing procedure (PRO-PURS-001)