

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

TABLE OF CONTENTS

Reason and Subject of Revision	Error! Bookmark not defined.
0. Introduction	3
General Profile of the Company	3
Terms	4
1. SCOPE	4
2. SUSTAINABILITY MANAGEMENT	5
2.1. Sustainability Management System:	5
2.2 Evaluation of Conformity	8
2.3. Management Representative	9
2.4. Objectives and Targets	9
3. OPERATIONAL MANAGEMENT SYSTEM OF THE SUSTAINABLE IMPROVEMENT	10
(ENVIRONMENTAL, ECONOMICAL AND SOCIAL ASPECTS)	10
3.1. Production Activities	11
3.2. Emission Resources and Release to the Air	12
3.3. Controlled Waste Water Discharge and Discharge to Sewerage System and Underground Water	13
3.4. Release to the Land	13
3.5. Waste Management Plan	14
3.6. Data Storage for Sustainable Structural Steel Workbook, Recording and Maintenance	14
3.7. Important Noise Releases, Impacts, Pollution	
3.8. Emergencies	15
3.9. Sub-contractors	16
3.10. Environmental Monitoring	16
3.11. Health and Safety Monitoring	18
3.13. Stakeholder Comparisions and Services	20
3.14. Employee Rights	20
3.15. Wage Policy and Today	21
3.16. Employment and Social Rights Policy	21
3.17. Local Economy and Ethical Supply Chain	21
3.18. Transparency	21
4. COMPETENCE, TRAINING AND AWARENESS	21
5. IMPROVEMENT	22
5.1. Monitoring and Measuring	23
5.2. Control of Nonconformity	23

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

5.3. Corrective Activities	24
5.4. Management Review	24
6. PERFORMANCE ASSESSMENT AND REPORTING	25
7 PRODUCT LABELLING AND CONFORMITY DECLARATION	26

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayım Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

0. Introduction

This Manual is valid for Kaptan Demir Çelik End. ve Tic. A.Ş. (Marmara Ereğlisi) and it shall be shortly referred to as “Kaptan” in the other sections of the Manual.

The authority to make any revision and/or correction in the Sustainability Management Systems (SMS) Manual is under the responsibility of the Integrated Systems Management Systems Management Representative who is appointed from our company’s management by the Member of the Executive Board. The SMS (Sustainability Management Systems) Manual shall come into force after it is approved by the Executive Committee Member.

The original copy of the Manual bearing wet signature is kept by the Integrated Systems Management Representative. Access to it from the intranet environment within the company is possible; if, however, a printout is taken therefrom, it shall become an Uncontrolled document. Distribution as Controlled Copy is realized against signature in accordance with the instruction of the Integrated Systems Management Representative. The EMS Procedures Follow-Up Form (EYS-FR-010) published in the Intranet is taken as reference for the latest revision in effect.

If this document is delivered to any person outside the company, the seal bearing the phrase “Uncontrolled Copy” is impressed. In case of a transition from the fourth revision to the fifth revision in this SMS Manual, the same will be reviewed by the EYS Integrated Systems Management Representative and it will be published leaving the date of revision and revision no. empty and increasing the “Edition No.” by one.

General Profile of the Company

The Company started to make iron and steel production in the first Rolling Mill built in 1964 in Karabük. Today, the company has been making productions in compliance with the international standards at its Steel Mill, Rolling Mill and Oxygen Factory located in the Thrace region.

Today, based on its experience of about 50 years, KAPTAN Group of Companies has been carrying out production for life through its companies in the iron-steel, maritime, transportation and energy sectors.

The development history of Kaptan Demir Çelik Endüstri ve Ticaret A.Ş. conducting activity as leading company of Kaptan Group of Companies in the iron and steel industry since 1964 is as follows:

1964- A rolling mill was established in Karabük with a capacity of 10,000 tons / year

1974- The rolling mill’s capacity was increased to 100,000 tons / year.

1987- A rolling mill was established in Çorlu with a capacity of 300,000 tons / year

2002- A steel mill was established with a capacity of 1.4M tons / year

2006- A rolling mill was established in M. Ereğli with a capacity of 1M tons / year

2015- The rolling mill in Çorlu was completely renovated with its capacity increased to 600.000 tons / year.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

The Steel Mill which is locomotive of the Company produces general structure, construction and low allow steel billet in cross-sections of 100x100-120x120-130x130-140x140-150x150-160x160-200x200mm with an Electric Arc Furnace having a transformer power of 120 MVA, a Ladle Furnace with a power of 18 MVA and a 6 strand continuous casting machine. Due to this capacity, it is one of the biggest steel producers of Turkey.

Our company's sustainability documents, Policy and other relevant details are available for all stakeholders at <http://kaptangrupturkiye.com/>

Terms

This document has been prepared in compliance with the terms given in the standard and the definitions specified here in below.

Environmental Aspect refers to the products or services which may interact with the activities of an organization or the environment.

Example. Emission, Waste formation, consumption of Resources.

Environmental Impact refers to all of the impacts, which are completely or partially positive or negative, on any and all environmental elements.

Example: Increase in the bio-diversity as positive environmental impact.

Sustainability Aspect refers to the products, services and all of the other activities of the organization which may interact with the environment, society and the social economy.

Sustainability Impact refers to any negative or useful change in the sustainability aspect.

Lifecycle refers to the return of a product (or a service) to its starting point with the changes undergone through from the raw material or natural resources throughout its production and economic life.

Note 1 for Introduction: The lifecycle phases consist of the raw material, design, production, transportation/delivery, use, end-of-life treatment and final disposal phases.

Environmental Product Declaration (EPD) is a document that contains and communicates verifiable, accurate, non-misleading environmental information for products and their applications in line with international standards ISO 14025 and EN 15804

Another definition: The EPDs (Environmental Product Declaration) are the declarations evaluating and declaring the environmental performance of a product or service according to the previously determined categories on the basis of the parameters defined within the framework of ISO 14040. The environmental declarations ensuring the declaration of the environmental impacts such as the International EPD system are constituted within the framework of Type III environmental declaration program.

1. SCOPE

Company Scope: Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. (Marmara Ereğlisi).

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayım Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

Aims effectively management of our Company’s activities related to the Sustainability Management and the fulfillment of the responsibilities establishing a sustainable system complying with the standards.

The sustainability manual and the relevant procedures are valid for all business processes affecting the quality of “KAPTAN” products, occupational health and safety, all Stakeholders, those working for “KAPTAN” and those in the surrounding.

Reference documents:

- ISO 9001 Quality Management System Certificate
- Quality Management System Manual (EYS-KEK-010) and procedures
- ISO 14001 Environmental Management System Certificate
- ISO 45001 Occupational Health and Safety Management Systems Certificate
- ISO 50001 Energy Management System Certificate
- Environment, Occupational Health and Safety System Manual (EYS-ÇİSGEK-010)
- Energy Management System Manual (EYS-EYEK-010)
- CARES Sustainable Structural Steel (SCS) Schema Manual
- CARES SCS – Appendix 1 - Annex 1 - Sustainable Structural Steel Workbook
- CARES Schedule of Opertations
- External source documents (ISO 9001, ISO 14001, ISO 45001, ISO 50001, BS 8902, BES 6001, Ethical Trade Initiative Base Code, International Labour Organization, Standards AA1000, Stakeholder Participation Standards, etc.).

2. SUSTAINABILITY MANAGEMENT

Sustainable development is the satisfaction of the current requirements without restricting the ability of the future generations to meet their own requirements.

The Sustainability Management System has been established together with the Quality, Environment and Occupational Health & Safety Management Systems complying with ISO 9001, ISO 14001, ISO 45001, ISO 50001 and meeting the other legal and sectoral requirements.

2.1. Sustainability Management System:

KAPTAN Sustainability Management System (SMS) contains the following:

2.1.1. A top level agreement (documented commitment) intended for joint work with the Stakeholders in order to reduce the sustainability risks and to increase the opportunities to the highest level.

2.1.2. Strategic Analysis And Expectations Of Stakeholders (EYS-SAPB-010) established in order to form an interaction with the Stakeholders and to give priority to the expectations and concerns of the Stakeholders.

Engagement with the Stakeholders may be ensured through the following:

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS-SEK-0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- A Stakeholder map defining the Stakeholders, the way of behaviour by the organization to them, the frequency and form of participation;
- Documented information regarding interaction results;
- The process of giving priority to the issues related to the expectations and concerns of the Stakeholders Materiality Matrix);
- Action plan and implementation thereof;
- Tracing of how the organization gives response to the Stakeholders;
- Review and reporting

2.1.3. Management Review Meeting (EYS-FR-120) held in order to define the environmental, social and economic aspects of the activities, products and services which may be controlled and affected by KAPTAN and the economic impacts thereof taking into consideration the lifecycle perspective and opinions of the Stakeholders.

2.1.4. Documents containing expectations of the Stakeholders, impact on the local economy, sustainable production and compliance with the applicable requirements concerning health and security, prevention of pollution have been established in order to evaluate and document the risks related to the difficulties (negative impacts) and opportunities (useful impacts) regarding sustainability.

References:

Procedure for Determination of Hazards, Aspects and Opportunities, and Risk Assessment (EYS-PR-120)

Risk Assessment Form (EYS-FR-390)

Procedure for Assessment of Quality Management System Risks and Opportunities (EYS-PR-140)

Quality Management System Risks Assessment Form (EYS-FR-210)

Opportunity Assessment Form (EYS-FR-200) containing written information regarding opportunities.

Key Supplier Sustainability, Risk Analysis And Mapping Procedure (EYS-PR-270)

Key Supplier Sustainability Risk Assessment Form (EYS-FR-720)

2.1.5. A policy taking into consideration the principles concerning business behaviours, ethic, fighting against corruption, bribery and rules of supply in the supply chain has been established in order to increase the transparency, inclusivity, stewardship, accountability and integrity of KAPTAN in the sustainability and ethical trade practices.

2.1.6. Publication of the Sustainability Policy

Sustainability Policy containing the Sustainability objectives and a commitment for the satisfaction of any and all requirements for the implementation of SMS and performance development has been established in line with the corporate targets for the Sustainability studies realized.

Sustainability Policy has been approved by the top management and announced to all employees and the related parties by hanging the same at the points determined by the

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

management and through trainings. The people other than the personnel may have access to the company Policy through the web site.

The activities related to SMS are conducted in conjunction with this policy and our SMS Policy is periodically reviewed at the Management Review Meeting and revisions are made if need be at least once a year.

Reference:

SUSTAINABILITY POLICY (EYS-SP-010)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

2.1.7. Responsibilities and Authorities

The “Job Definitions” describing the tasks, authorities, responsibilities and mutual relationships of any and all employees managing, applying and verifying the affairs affecting the Sustainability Management System (such as environment, society, health and security, welfare of the employees, performance improvement in the local economy) in our Company and submitted for information of the employees.

Top management ensured the establishment of the necessary organization chart and announced the same through e-mail and intranet within the company after having made the necessary appointments.

The task of the organization having the structure specified in the chart hereinbelow:

- is to ensure continuous improvement of the SMS system;
- Sustainability and Quality Manager will report the performance of the system and submit the same to the management.

Reference:

Job Definitions (İK-GT-010)

General Organization Chart (EYS-OŞ -010)

2.1.8. The Key Performance Indicator targets regularly reviewed have been established for continuous improvement and annual performance reporting in Kaptan. They are monitored and regularly reviewed on monthly and annual basis.

2.1.9. Top management of our organization holds a Management Review Meeting at least once a year for the purpose of controlling the appropriateness, accuracy and efficiency of the Integrated Management System.

2.1.10. In order to reduce the sustainability risks and increase the opportunities to the highest level, the same has been regularly reviewed and evaluated with a reference to the Table A.1 included in the Annex to BS 8902 and a Sustainability Development Matrix has been established)

(Ref: Maturity Matrix)

2.2 Evaluation of Conformity

The conformity obligations concerning sustainability aspects, evaluation, frequency and management of the compliance have been defined in the current Document Control Procedure (EYS-PR-010).

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS-SEK-0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

The same has been integrated into the List of Legal Regulations To Be Complied With (EYS-FR-400) established for compliance with the obligations. The Integrated Systems Management Representative will report the results of the List of Legal Regulations To Be Complied With as input for the review by the management and the results of the assessment of the compliance with the other requirements, if any, to the Top Management.

Reference:

Document Control Procedure (EYS-PR-010)

List of Legal Regulations to be Complied With (EYS-FR-400)

2.3. Management Representative

The Management Representative bearing definite responsibilities for the coordination and implementation of the sustainability management system has been determined and appointed through an announcement by the Top Management. The Management Representative has been authorized as an official who is responsible for ensuring the establishment, implementation, maintenance and continuously improvement of the sustainability of the management system.

2.4. Objectives and Targets

The sustainability objectives have been determined taking into consideration:

- Environmental Properties (EMS);
 - Risk assessments (OHSAS);
 - Sustainability aspects;
 - Legal and other requirements;
 - Opinions, requirements, concerns and expectations of the stakeholders;
 - Process and product performance;
 - Technical alternatives and financial, operational and operating requirements;
- on Specific, Measurable, Available, Realistic and Time Oriented basis for achieving these objectives.

The targets determined are evaluated in the Management Review Meeting and approved by the Executive Committee Member. The SMS Targets have been planned so that the responsible persons for the achievement of the objectives are appointed, the aim of each project is determined and the methods to be used are specified.

The SMS Targets are regularly reviewed, announced to all persons concerned and traced in the Management Review Meetings in order to ensure the coordination of the efforts made for the achievement of the targets, realization of the changes and provision of sufficient resources and trained competent personnel.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

Reference:

- SMS (Sustainability Management System) Objectives EYS-FR-250

3. OPERATIONAL MANAGEMENT SYSTEM OF THE SUSTAINABLE IMPROVEMENT (ENVIRONMENTAL, ECONOMICAL AND SOCIAL ASPECTS)

The environmental and operational aspects of the activities, products and services of Kaptan within the scope of Environmental Management System have been documented in accordance with ISO 14001.

Determination of the necessary controls for the activities, products and services of the company within the scope of hazard definition, risk assessment and OHSAS has been documented in accordance with ISO 45001

Summary of the environmental aspects and the hazards and risks of the Company has been explained in the Environment and Occupational Health and Safety Manual (EYS-ÇİSGEK-010).

For the determination of the environmental, hazard description, risk assessment and the necessary controls, the Hazard, Aspect and Opportunities Determination, Risk Assessment Procedure (EYS-PR-120) has been established.

Determination of economical and social aspects are done according to (EYS-PR-140), and recorded to Risk Assessment Form for Quality Management System (EYS-FR-210), and Opportunities Assessment Form (EYS-FR-200).

Our organization has developed a detailed supply chain impact map and conducted a risk assessment for all our suppliers. These assessments have resulted in the classification of suppliers based on risk scores. All of this information is integrated into our Key Supplier Sustainability, Risk Analysis, and Mapping Procedure (EYS-PR-270)

Key Supplier Sustainability Risk Assessment Form (EYS-FR-720), which is a vital tool for evaluating our suppliers' sustainability performance. This form helps us assess the sustainability risks associated with our key suppliers and informs our supplier management decisions. The sustainability scores obtained through this assessment are integrated into our supplier evaluation process.

Reference:

- Hazard, Aspect and Opportunities Determination, Risk Assessment Procedure (EYS-PR-120)
- Procedure for Assessment of Risks and Opportunities for Quality Management System (EYS-PR-140)
- Opportunities Assessment Form (EYS-FR-200)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- Quality Management System Risk Assessment Form (EYS-FR-210)
- Environment and Occupational Health and Safety Risk Assessment Form (EYS-FR-390)
- Key Supplier Sustainability, Risk Analysis And Mapping Procedure (EYS-PR-270)
- Key Supplier Sustainability Risk Assessment Form (EYS-FR-720)

3.1. Production Activities

In our organization, there are operational instructions and defined procedures (such as raw material procurement, transportation, storage and production) for ensuring sufficiently coordination, supervision and efficiently realization of the controls.

Realization of the activities in accordance with the determined control criteria is ensured in the instructions. Any and all documents related to the Environment, Occupational Health, Safety and Sustainability applied in our organization are transferred by the unit chiefs to the persons concerned. Controls should indicate that the purchased materials and services used in the factory have no negative impact on the environmental performance and the occupational health and safety.

Any and all sub-employer and contractor employees who are commissioned within the factory are made conscious especially regarding the procedures and the Environment, Occupational Health and Safety requirements related to the area where they are employed. The activities and services having risk and required to be conducted and rendered under control are realized as specified in the relevant documents.

- Foreign Raw Material Procurement Procedure (İTH-PR-010)
- Candidate Supplier Determination and Evaluation Procedure (İTH-PR-020)
- Surveillance Company Determination and Evaluation Procedure (İTH-PR-030)
- Electric Arc Furnace Operating Procedure (EAO-PR-010)
- Ladle Furnace Operating Procedure (PO-PR-010)
- Maintenance of Steelworks Machineries Procedure (MB-PR-010)
- Maintenance of Cranes Procedure (MB-PR-020)
- Maintenance of Hydraulic / Pneumatic and Polyp Machineries Procedure (MB-PR-030)
- Maintenance of Water Plants Procedure (MB-PR-040)
- Maintenance of Dust Collection Units Procedure (MB-PR-050)
- Preparation and Manufacturing of Spares Procedure (MB-PR-060)
- Lathe Workshop Procedure (MB-PR-070)
- Waste Management Procedure (ÇYB-PR-010)
- Identification and Assessment of Environmental Accidents Procedure (ÇYB-PR-020)
- Preventive Maintenance of Electrical Units Procedure (EOM-PR-010)
- Repair of Electrical Failures Procedure (EOM-PR-020)
- Electrical Workshop Procedure (EOM-PR-030)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayım Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- Operation of Switchgear Plants Procedure (EOM-PR-040)
- Energy Efficiency Procedure (EOM-PR-050)
- Acceptance and Charging of Billets Procedure (MHH-PR-010)
- Operation of Annealing Furnaces Procedure (MHH-PR-020)
- Rolling Procedure (MHH-PR-030)
- Cooling and Packaging of Products Procedure (MHH-PR-040)
- Workshop Operating Procedure (MHH-PR-050)
- General Maintenance of Rolling Mill Machineries Procedure (HMB-PR-010)
- Administrative Affairs Procedure (İDİ-PR-010)
- Training Procedure (İK-PR-010)
- Occupational Health and Safety Procedure (İSG-PR-010)
- Personal Protective Equipment Procedure (İSG-PR-020)
- Workers Health and Safety Unit Procedure (İSG-PR-030)
- EKED Procedure (İSG-PR-040)
- Inspection and Testing of Input Products Procedure (KL-PR-010)
- Planning of Steelworks Production Activities Procedure (KL-PR-020)
- Identification and Traceability of Products Procedure (KL-PR-030)
- Product Cooling and Packaging Procedure, Billet Storage and Transportation Procedure (SVK-PR-010)
- Product Storage and Transportation Procedure (SVK-PR-020)
- General Oxygen Plant Procedure (OKS-PR-010)
- Shutdown of Oxygen Plant Procedure (OKS-PR-020)
- Startup of Oxygen Plant Procedure (OKS-PR-030)
- Technical Enterprise Logistics Purchasing General Procedure (SA-PR-010)
- SDM Operating Procedure (SDM-PR-010)
- General Water Plants Procedure (Yİ-PR-010)
- General Dust Collection Units Procedure (Yİ-PR-020)
- Steel Construction Works Procedure (Yİ-PR-030)
- Machine Manufacturing and Assembly Works Procedure (Yİ-PR-040)
- Construction Works Procedure (Yİ-PR-050)

3.2. Emission Resources and Release to the Air

The emissions and releases arising from the operational activities are controlled at the points of their origin. A Waste Management Procedure (ÇYB-PR-010) has been established for the purpose of ensuring the recycling and removal of the solid-liquid wastes and gas emissions arising within the boundaries of Marmara Ereğlisi Factory location most properly and the compliance of the same with the legal obligations.

Reference:

- Waste Management Procedure (ÇYB-PR-010)
- Areal and Regional Emission Resources Sketch (ÇYB-PR-010 Annex 1)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

3.3. Controlled Waste Water Discharge and Discharge to Sewerage System and

Underground Water

The whole domestic waste water and sewage coming from Kaptan is collected via a separate pipeline and directed towards the current domestic and industrial sewerage system. The waste water of the maintenance workshops and the operating areas is collected in the waste water collection system and recycled after having been refined for use again.

In Kaptan, for the purpose of preventing the pollution of the underground water, the collection, refinement, recycling and reuse processes of the waste water in the waste water treatment plants and maintenance areas are explained in the Waste Water section of the Waste Management Procedure (ÇYB-PR-010).

Reference:

- Waste Management Procedure (ÇYB-PR-010)
- Areal and Regional Emission Resources Sketch (ÇYB-PR-010 Annex 1)
- Domestic Water and Treatment Plant Sketch (ÇYB-PR-010 Annex 3)
- Rain Water and Surface Water Collection Sketch (ÇYB-PR-010 Annex 4)

3.4. Release to the Land

The solid and liquid wastes arising from the operating activities are managed based on the avoidance of maximum use of the materials and the wastes. In order to manage the wastes and reduce the potential environmental impacts which may arise from these wastes, the following strategies and controls are applied:

- Collective purchasing in order to reduce the packaging materials;
- Reduction of the wastes by using high-quality materials;
- Optimization of the materials and variables;
- The recyclable wastes (by-products, slag, scale, end-head scrap, clippings, etc.) arising from the production activities are collected and sent to the recycling system for the purpose of being reused in the other industrial areas;
- The used oil, paper, metal and similar wastes are delivered to the licensed carriers and companies for recycling purpose;
- An Environmental consulting company with a Certificate of Environmental Competency has been appointed for the waste management activities and Environmental activities;
- The wastes which cannot be recycled by means of the licensed waste carriers and licensed disposal facilities are disposed of. List of Legal Regulations to be Complied With (EYS-FR-400);

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- Collection boxes, transportation equipment and appropriate storage areas have been installed for certain wastes. (Waste Temporary Storage Area Waste Delivery Form ÇYB-FR-010)
- In order to follow-up and control the waste movements, the inventory, transportation and shipment records of the hazardous/nonhazardous wastes and by-products are kept. (Waste Temporary Storage and Waste Temporary Storage Area Usage Instruction) (ÇYB-TL-010)
- Operating control procedures and operating instructions regarding the transportation and collection of the wastes have been established and they are being used.

Reference:

- Waste Management Procedure (ÇYB-PR-010)
- Waste Temporary Storage and Waste Temporary Storage Area Usage Instruction (ÇYB-TL-010)
- Waste Temporary Storage Area Waste Delivery Form (ÇYB-FR-010)

3.5. Waste Management Plan

The flow of different wastes and by-products is controlled and the opportunities to minimize the wastes and maximize reuse are defined and the recycling of waste materials and the materials containing recycled components are explained in the Waste Management Procedure (ÇYB-PR-010).

Reference:

- Waste Management Procedure (ÇYB-PR-010)
- Waste Temporary Storage and Waste Temporary Storage Area Usage Instruction (ÇYB-TL-010)
- Waste Temporary Storage Area Waste Delivery Form (ÇYB-FR-010)
- List of Legal Regulations to be Complied With (EYS-FR-400)

3.6. Data Storage for Sustainable Structural Steel Workbook, Recording and Maintenance

The information and/or data coming from the processes related to the implementation of the SMS (Sustainability Management System) are collected, recorded and maintained by the relevant process holders.

The raw material purchasing information and data are processed and recorded in the ERP (Enterprise Resource Planning) system. The other records related to the raw material procurement such as specifications, questions, purchase demands, purchase orders, invoices, delivery documents, product invoices and analysis certificates are maintained in the ERP.

The information especially related to the regularly tracing of the raw material consumption and the reporting of the same as part of the production performance indicators and the material exportation and use in the operating activities is recorded.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

3.7. impacts or nuisances, including noise nuisances (Noise Releases, Pollution)

The noise and vibration impact of the equipment and the operating activities are handled under the following controls:

- Selection of the equipment generating lower sound and vibration;
- Application of acoustic insulation, shock absorber, silencer and housings in order to meet the necessary decrease in the noise and vibration levels;
- Use of the protective equipment with sufficient hearing protection while working in the vicinity of the high noise sources;
- Tracing of the regular control situation and preventive maintenance of the noise sources or equipment;
- The regular noise measurement and tracing shall be realized according to the tracing and measuring control list. (EYS-FR-420)

Reference:

- Personal Protective Equipment Procedure (İSG-PR-020)
- Tracing and Measuring Control List (EYS-FR-420)

3.8. Emergencies

The emergencies which may arise potentially during the operational activities are determined during the Environmental Aspect Assessments and Risk Assessment studies. In order to ensure appropriately management of the emergencies, the following procedures have been established:

- In order to define the responsibilities and the general instructions to be followed in cases of emergency, DISASTER and EMERGENCY RESPONSE and EVACUATION PLAN has been established. (İSG-PL-01)
- Appropriate trainings and consciousness-raising studies are provided and conducted in order to increase the awareness of the personnel regarding the appropriate actions required to be taken in emergencies.
- In order to ensure the functionality and reliability of the systems during an emergency case, the supervision and maintenance of the fire detection, notification and extinction systems are made regularly.

Reference:

- EMERGENCY RESPONSE and EVACUATION PLAN (İSG-PL-01)
- COVID 19 PANDEMIC EMERGENCY ACTION PLAN (İSG-PL-02)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

3.9. Sub-contractors

For the materials and services used in the operational activities, the suppliers and contractors are engaged and managed in accordance with the following processes and procedures:

- In order to ensure the sufficiency of the resources and the competences required for the provision of the necessary materials and services, as well as ensuring compliance with the company policies and procedures including the sustainability requirements, the pre-qualification, evaluation and selection of the suppliers and sub-contractors are realized in accordance with the Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010).

For the goods or services to be purchased, an offer is received from the Approved Supplier List (SA-FR-120) if it is available or if it is not available, the same is received through Request for Proposal Letter (SA-FR-080) from at least 1 to 3 companies after having investigated the new companies and the offers received are entered into the ERP system and an Offer Evaluation Form (SA-FR-090) is issued. The selection of supplier with whom the order will be placed according to the issues of deadline, quality and price is made. If the supplier is not included in the approved supplier list, a New Supplier Record Form (SA-FR-050) will be sent to the relevant supplier through mail or facsimile message and after the same is filled-out by the relevant supplier, it will be included in the ERP system. The supplier is evaluated in the deadline report with regard to deadline and during the input controls (material entry control form) with regard to quality.

Evaluation with regard to financial aspects under the then effective conditions (example: the priority in respect of deadline, quality or price, etc.) is under the authority of the purchasing specialist.

- The Occupational Health and Safety requirements complying with the company policies and procedures in which the risks related to the activity to be conducted and the directions thereof are specified have been included in the major (goods or services) purchasing agreements.

Referans:

- Sub-Employer (Sub-Contractor) Working Procedure (EYS-PR-170)
- Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010)

3.10. Environmental Monitoring

The regularly recording, monitoring and measuring of the definite performance indicators of the operational activities related to the implementation of the Environment, Quality Management System and the Sustainability Management System shall be realized by the process holders for the evaluation of the efficiency of the Controls:

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- The specific environmental issues such as air emissions, waste water discharge, noise and wastes are monitored by the regulatory authority in accordance with the Environmental Monitoring Plan in order to ensure compliance with the regulatory environmental borders and requirements. (Ref. List of Legal Regulations to be Complied With, Monitoring and Measuring List, Continuous Emission Monitoring System)
- The Environmental Performance including the case statistics is regularly monitored and informed to the management and the regulatory authorities for the evaluation of the efficiency of the health and security programs. (Ref. Emission Reporting, Monitoring and Measuring List)
- The key performance indicators or the properties of the operating activities are regularly recorded and reported with daily and monthly production reports. (Ref. Production Reports, Monthly Meetings ...)

Kaptan Demir Çelik has determined and defined any and all measuring and testing devices used for the measurement of the environmental issues and hazards affecting the quality for the purpose of evidencing compliance with the requirements and the same has been added to the Calibration Equipment List. The list is kept so that the situation of the test equipment used in order to ensure compliance with the necessary standards is indicated. (Calibration Equipment List EYS-FR-150).

Furthermore, a procedure ensuring execution of the monitoring and measurements and the compliance of the same with the monitoring and measuring requirements has been established. (Calibration Procedure EYS-PR-070)

For ensuring valid results, the measuring equipment:

- is calibrated or verified with the traceable measuring standards at determined intervals or prior to the usage;
- is adjusted or readjusted, if need be;
- is defined so that the determination of the calibration situation is allowed;
- is protected against the wrong adjustments which may make the measuring results invalid and such an occurrence is avoided;
- is protected against the damages and deteriorations in the transportation, maintenance and housing.

The necessary measurements are made and the results thereof are recorded in the direction of the objectives and targets in order to monitor and measure the principal characteristics of the processes and activities having considerable impacts on the Sustainability Management System, as well as controlling the compliance of the same with the legislation.

The training will be defined when the need arises and is currently provided in order to ensure appropriateness of the competency of the personnel realizing the control, monitoring,

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

management and other activities related to the supervision, testing and measuring equipment.

Reference:

- Monitoring and Measuring Procedure (EYS-PR-150)
- Monitoring and Measuring Control Procedure (EYS-FR-420)
- Calibration Procedure (EYS-FR-070)
- Waste Management Procedure (ÇYB-PR-010)
- Waste Temporary Storage and Waste Temporary Storage Area Usage Instruction (ÇYB-TL-010)
- Dust Collecting General Procedure (Yİ-PR-020)
- Dust Collection Operating Instruction (Yİ-TL-020)
- Treatment Plant Operating Instruction (Yİ-TL-040)
- Continuous Emission Monitoring System
- Emission Report
- Training Procedure (İK- PR-010)

3.11. Health and Safety Monitoring

The regularly recording, monitoring and measuring of the definite performance indicators of the operational activities related to the implementation of the Occupational Health and Safety, Quality Management System and Sustainability Management System shall be realized by the process holders for the evaluation of the efficiency of the Controls.

- The Health and Safety Performance including the case statistics is monitored regularly and reported to the management and the regulatory authorities for the evaluation of the efficiency of the health and safety programs.
- The key performance indicators or the characteristics of the operating activities are regularly recorded and reported with daily and monthly production reports.

Reference:

- Monitoring and Measuring Procedure (EYS-PR-150)
- Monitoring and Measuring Control List (EYS-FR-420)
- Calibration Procedure (EYS-FR-070)
- Occupational Health and Safety Procedure (İSG-PR-010)
- Calibration Equipment List (EYS-FR-150)
- Workplace Health and Safety Unit Health Unit Procedure (İSG-PR-030)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

3.12. Raw Material Procurement

For the materials and services to be purchased, the requirements determined taking into consideration the conditions of contract and the stock quantity are recorded and finalized after having been examined.

The materials to be purchased are supplied in accordance with the Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010), Raw Material Importation Procedure from the companies included within the scope of the 'Approved Suppliers List (SA-TB-010).

The procurement letters describing the characteristics required for these materials are prepared and communicated to the suppliers in order to ensure that the materials have the requested properties.

The suppliers with which a joint work will be carried out within the scope of the material procurement are evaluated and selected in accordance with their performances (Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010) article 6.2), (ITH-TL-010) (Candidate Supplier Determination and Assessment Procedure (ITH-PR-020), specification and the relevant technical standards, their technical abilities, the quality, deadline and quantity criteria. The products purchased are used after having been verified.

If the candidate company is outside the EU, UK and OECD, its eligibility will be checked on the ILO website. If it is not appropriate, no purchase will be made. Our organization has developed a detailed supply chain impact map and conducted a risk assessment for all our suppliers. These assessments have resulted in the classification of suppliers based on risk scores. All of this information is integrated into our Key Supplier Sustainability, Risk Analysis, and Mapping Procedure (EYS-PR-270).

Key Supplier Sustainability Risk Assessment Form (EYS-FR-720), which is a vital tool for evaluating our suppliers' sustainability performance. This form helps us assess the sustainability risks associated with our key suppliers and informs our supplier management decisions. The sustainability scores obtained through this assessment are integrated into our supplier evaluation process.

Kaptan Demir Çelik has prepared and is currently applying such procedures as the Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010), Raw Material Importation Procedure (ITH-PR-010) describing the purchasing processes in detail.

Reference:

- Foreign Raw Material Purchasing Procedure (ITH -PR-010)
- Technical, Operating, Logistic and Purchasing General Procedure (SA-PR-010)
- Key Supplier Sustainability, Risk Analysis, and Mapping Procedure (EYS-PR-270)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- Key Supplier Sustainability Risk Assessment Form (EYS-FR-720)

3.13. Stakeholder Comparisions and Services

The scope of the communication with the stakeholders mutually covers the issues such as the requirements, requests, satisfaction, offer/labour demand/receipt and delivery of information regarding the agreement and feedback.

The method of giving priority to the establishment of communication and sustainability with the stakeholders has been established in accordance with the Strategy Analysis and Expectations of the Stakeholders (EYS-SAPB-010) in order to give priority to the expectations and concerns of the Stakeholders.

Opinions of the stakeholders are received through the questionnaire, visits, complaints and similar information. Management of their complaints is documented, investigated and informed to the beneficiaries through actions in accordance with the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110). The Stakeholder complaints concerning Sustainable Structural Steel Schema are monitored and managed by the Sustainability Management System Management Representative in accordance with the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110). Any and all stakeholder complaints are recorded together with the corrective actions when the same is appropriate irrespective of the validity thereof.

Reference:

- Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)
- Strategy Analysis and Expectations of the Stakeholders (EYS-SAPB-010)

3.14. Employee Rights

The Human Rights Policy cover the following: employee welfare; fair treatment of the Employees; equal opporutinies in the recruitment, training, promotion and work tasks, leave of employment; freedom of organization and compliance with the employment legislation (EYS-PL-010). The requirements of the standards of the Ethical Trade Initiative (ETI) Principal Code and the International Labour Organization (ILO) are taken into consideration during the exportation and the review of the policies.

Reference:

- Training Procedure (IK-PR-010)
- Human Resources Processes Procedure (IK-PR-020)
- Approved Disciplinary Board Implementation Procedure - Law (IK-PR-030)
- Recruitment Processes Instruction (IK-TL-010)
- Personnel Processes Instruction (IK-TL-020)

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

Probationer Employment Instruction (IK-TL-030)

Orientation Instruction (IK-TL-040)

Leave of Absence Transactions Instruction (IK-TL-050)

Position Title Promotion and Transfer Appointment Instruction (IK-TL-060)

Personnel Working Rules Instruction (IK-TL-080)

Leave of Employment Transactions Instruction (IK-TL-090)

3.15. Wage Policy and Today

The Human Resources Policies are in compliance with the minimum wage law and the industrial norms. Wage reductions regarding disciplinary issues are prohibited. Employees are permitted to work voluntarily in the form of overtime work and any work exceeding the limit of overtime work is prohibited.

3.16. Employment and Social Rights Policy

The Employment and Social Rights Policy ensures the avoidance of the employment of slave or prisoner, voluntarily or unvoluntarily, the protection of human rights and avoidance of bad treatment or inhuman treatment towards the employees.

3.17. Local Economy and Ethical Supply Chain

Top Management ensures the supporting of the local economy and the development of the ethical supply chain applications.

3.18. Transparency

Top Management makes efforts in order to increase the transparency of the operations related to the Sustainability Management System. Sustainability Policy, information and indicators may be accessed at the address <http://kaptangrupturkiye.com/en/> for everybody.

The ethical supply chain applications cover the provision of responsible resource and sustainable supply throughout the supply chain up to the maximum traceable limit. The suppliers are evaluated with regard to human rights, ethical trade practices and the compliance with the health, safety and environmental standards.

4. COMPETENCE, TRAINING AND AWARENESS

The management will ensure that all of the personnel working in the organization have the abilities enabling them to perform their tasks efficiently and in an effective manner complying with the necessary standards.

KAPTAN provides an Orientation training for all employees including the newly recruited persons in order to ensure that the employees are aware of the importance of the Integrated management system and the business requirements and the compliance with them.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

The job descriptions describing the tasks of the persons managing the activities having considerable impacts/risks with regard to the Sustainability Management System and the environment or directly affecting the system performance have been defined in the Job Descriptions. The Job Descriptions (IK-GT-010) are delivered to any and all employees by hand and they are caused to be read and signed.

The whole personnel including the probationers, suppliers and sub-contractors are informed about their legal and other obligations when they are employed by the company or while the conduction of their activities in their name.

Kaptan realizes the internal and external trainings in order to ensure the necessary proficiencies of the personnel affecting the sustainability personnel and working under its own control. Trainings are organized in respect of the matters required concerning the Sustainability Management Systems in the direction of the system's requirements. The records of the said trainings are maintained and the sufficiency thereof is evaluated.

The training requirements are determined and approved for ever year and thereafter, the annual training plan is finalized. Due to the fact that the training is a matter having strategic importance and requiring a serious resource, efficiency of the trainings are evaluated and the decisions regarding the training are oriented.

Reference:

Training Procedure (IK-PR-010)

Human Resources Processes Procedure (IK-PR-020)

Approved Disciplinary Board Implementation Procedure - Law (IK-PR-030)

Recruitment Processes Instruction (IK-TL-010)

Personnel Processes Instruction (IK-TL-020)

Probationer Employment Instruction (IK-TL-030)

Orientation Instruction (IK-TL-040)

Leave of Absence Transactions Instruction (IK-TL-050)

Position Title Promotion and Transfer Appointment Instruction (IK-TL-060)

Personnel Working Rules Instruction (IK-TL-080)

5. IMPROVEMENT

KAPTAN continuously develops the efficiency of the sustainable management system using the Sustainability policy, Sustainability targets, results of the supervision, analysis of the data, the corrective actions and the management review.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

The issues of development and improvement are chosen at the management review meeting held every year for the spread of the continuous development and improvement philosophy. The results are viewed in the following management review meeting.

5.1. Monitoring and Measuring

The Management Representative is responsible for the monitoring and measuring of the efficiency of the SMS, OHSAS and the environmental management systems. These targets have been determined taking into consideration the legal and other requirements, the possible environmental impacts thereof and the Workplace Health and Safety risks. In order to complete the targets, the responsibility and time frame has been clearly defined and the technological alternatives, the financial, operational and operating requirements of the company and the opinions of the stakeholders have been taken into consideration.

The necessary measurements are made and the results thereof are recorded in the direction of the objective and the targets in order to monitor and measure the major characteristics of the transactions and activities having considerable impacts over the Management System in our organization and the results thereof are recorded.

The SMS (Sustainability Management System) is continuously developed using the data of the key process indicators and the case and accident investigation and measuring the company's performance against these targets. The improvement opportunities are defined and implemented through the intermediary of the verified corrective actions and the management evaluations.

The results obtained as a result of these activities are reviewed at the management review meeting.

Reference:

SMS (Sustainability Management System) Objectives (EYS-FR-250)

Management Programs (OHSAS and Environment) (EYS-FR-410)

Monitoring and Measuring Procedure (EYS-PR-150)

Monitoring and Measuring Control List (EYS-FR-420)

Calibration Procedure (EYS-FR-070)

5.2. Control of Nonconformity

The products, services or activities not complying with the determined requirements are determined and the actions required to be taken for the elimination of the nonconformity and prevention of the repetition are taken. Controlling of the nonconformity has been specified in the Corrective Activities Procedure (EYS-PR-050).

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

Events are investigated, recorded and analyzed. Investigation of the shortcomings with regard to the Sustainability, Environment and Workplace Health and Safety has been explained in the Accident Investigation Procedure (EYS-PR-130).

Reference:

Accident Investigation Procedure (EYS-PR-130)

Corrective Activities Procedure (EYS-PR-050)

5.3. Corrective Actions

The situations occurring in the conditions other than the acceptance criteria and the conditions defined in the systems are qualified as nonconformity and the solutions firstly referred to and the temporary and the momentary solutions for the elimination of such occurrences are called to be as ‘correction’. Following the ‘correction’, the situation is examined, the root cause is investigated and a permanent solution is created. An action is taken in order to determine the reason of the real and potential disconformities and to take effective corrective actions. The nonconformities contain the stakeholder complaints, the events of Environment and Workplace Health and Safety events and the disconformities arising during the inspections.

The Corrective Action Procedure (EYS-PR-050) in which the Corrective Activities are described in detail and which contains the quality records has been prepared and is being applied.

Any and all findings obtained are submitted by the Management Representative to the management for review purpose. The corrective activities found to be useful are extended to the other products, processes and operations.

Reference:

Corrective Action Procedure (EYS-PR-050)

5.4. Management Review

Top management of our organization holds a Management Review Meeting at least once a year in order to control the appropriateness, accuracy and efficiency of the Sustainability Management System. The other employees may be invited to participate in the management reviews, if need be.

The coordination of the preparations and agenda of the evaluations shall be conducted by the Management Representative. The Management Representative shall keep any and all records concerning the management review meetings.

This meeting should contain the following:

- Sustainability Policies;

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

- b) Expectations and concerns of the stakeholders;
- c) Important impacts, risks and opportunities;
- d) Resources;
- e) Sustainable development targets and the key performance indicators (KPI);
- f) Maturity Matrix;
- g) Internal and external performance reports;
- h) Nonconformities and Corrective Activities Procedure, monitoring and measuring results, inspection results, feedbacks regarding sustainability performance;
- i) Opportunities regarding continuous improvement are evaluated after they are reviewed;
- j) Evaluation of the compliance of with the requirements of the relevant Standards and our Company and the compliance with the legal requirements.

Reference:

Management Review Meeting (EYS-FR-120)

6. PERFORMANCE ASSESSMENT AND REPORTING

According to the sustainable construction steel criteria, the performance is submitted in such format as envisaged on annual basis to CARES and contains the following:

- Greenhouse gas emissions and energy usage including the Environmental Product Declaration (EPD) or CARES carbon footprint questionnaire;
- Impacts of transportation;
- Sustainable Consumption and Production;
- Materials - Quality and Performance;
- Water utilization;
- Waste Management;
- Bio-diversity and ecotoxicity;
- Local community and stakeholder participation;
- Social and economical matters.

In order to reach the level of “Transition”, KAPTAN ensures the satisfaction of any and all compulsory conditions and tries to find a performance showing opportunity within the comprehensive sustainability range by increasing the voluntary performance criteria in the CASER SCS Annex – Sustainable Structural Steel Workbook. It has established procedures and systems for the purpose of ensuring a way of supervision and verification of the data and evidences collected.

There is an Environment-Friendly Product Declaration (EPD) approved in accordance with the requirements of ISO 14025 and EN 15804 and the same is open to the public.

	SUSTAINABLE CONSTRUCTIONAL STEEL MANAGEMENT SYSTEM	Doküman No	EYS–SEK–0010
		Yayın Tarihi	1/1/2026
		Revizyon Tarihi	
		Revizyon No	0

The source and place of the data used for the reporting of the key performance indicators are recorded in a record book. Data collection frequency for EPD is once in a year like SCS KPi and BES 6001 data. With this application, increasing data collection awareness and system improvement was aimed. The process holder is responsible for the collection of any and all data related to the relevant area and this information is systematically reviewed and analyzed by the Sustainability and Quality Department.

The same will be periodically reviewed by the top management during the management review meeting.

7 PRODUCT LABELLING AND CONFORMITY DECLARATION

The product declarations complying with the CARES sustainable reinforcing steel including the product labelling are made only for the whole products purchased from the CARES sustainable reinforced steel approved producers and treated in compliance with the requirements thereof.

The declarations of conformity are made as follows: **“This construction steel has been produced in accordance with BS 8092:2009 according to the CARES Sustainable Structural Steel Schema.”**