



# **Our Ways of Working**

## **ResponsibleSteel Code of Conduct**

September 2023



**Our Ways  
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## Scope of application of this document

This document and its contents apply to all representatives of ResponsibleSteel – employees, consultants, auditors, certification bodies, board members, Technical Advisory Panel members and Assurance Panel members.

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## Our Purpose and Mission

ResponsibleSteel™'s Purpose is

***To maximise steel's contribution  
to a sustainable future.***

And our strategic mission is

***To be driving force in the socially and  
environmentally responsible production  
of net-zero steel by 2050, globally.***

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## Our Ways of Working

# Our Common Values

*Committed to our mission and underpinned by our code of conduct, we are guided by our common values:*

## **Respect**

Working together to deliver impact with passion and mutual trust, valuing our time and allowing ourselves the space to reflect, rest and recharge.

## **Integrity**

Saying what we do and do what we say, taking responsibility for our own actions even when no one is looking, learning and growing as we go.

## **Transparency**

Communicating clearly, honestly and openly in a timely manner in all we do

## **Collaboration**

Engaging with those affected, listening to understand, co-creating bold strategies to deliver greater impact.

*NB this will replace the 'principles on our new website, which will also outline explain our theory of change*



## Our Policies

⚖️ Equality and Diversity

⚖️ Anti-Bribery and Corruption

⚖️ Antitrust Compliance

⚖️ Issues Resolution System

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## Equality and Diversity

At ResponsibleSteel™, we are dedicated to encouraging a supportive, diverse and inclusive culture amongst our whole workforce. It is within our best interest to promote diversity and eliminate discrimination in the workplace. Through our [Equality and Diversity Policy](#), we are committed:

- To create an environment in which individual differences and the contributions of all team members are recognised and valued.
- To create a working environment that promotes dignity and respect for every employee.
- To not tolerate any form of intimidation, bullying, or harassment, and to discipline those that breach this policy.
- To make training, development, and progression opportunities available to all staff.
- To promote equality in the workplace, which we believe is good management practice and makes sound business sense.
- To encourage anyone who feels they have been subject to discrimination to raise their concerns so we can apply corrective measures.
- To encourage employees to treat everyone with dignity and respect.
- To regularly review all our employment practices and procedures so that fairness is maintained at all times.

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## **Anti-trust**

At ResponsibleSteel™, we are committed to complying with all relevant antitrust and competition laws and regulations. Failure to abide by these laws and regulations can potentially have extremely serious consequences for ResponsibleSteel™ and its members, including heavy fines and, in some jurisdictions, imprisonment for individuals. ResponsibleSteel™ has therefore adopted an [Anti-trust Policy](#), compliance with which is a condition of ResponsibleSteel™ membership and participation.

Some of the key principles are:

- ResponsibleSteel™ members and participants should always make their own unilateral educated decisions, whatever the source of information may be.
- ResponsibleSteel™ will not become involved in the competitive business decisions of its members and participants, nor will it take any action that would attempt to restrain competition in the steel value chain.
- Discussion of any commercially sensitive matters at an ResponsibleSteel™ meeting or event is strictly prohibited.

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## **Anti-Bribery and Corruption**

At ResponsibleSteel™, we are committed to conducting our business in an honest and ethical manner. We have adopted an [Anti-bribery and Corruption Policy](#) to provide a framework for the avoidance and risk management of bribery and corruption, which may otherwise occur in the operations of ResponsibleSteel™.

As such, we consider it unacceptable for a ResponsibleSteel™ Representative (or someone on the Representative's behalf) to:

- give, promise to give, offer, or accept a payment, unduly lavish or extravagant gift or hospitality from anyone with the expectation or hope that an advantage will be received, or to reward an advantage already given under any circumstances.
- threaten or retaliate against another individual who has refused to commit an act of bribery or corruption or who has raised concerns under this Policy; or
- engage in any other activity that does or may lead to a breach of this Policy.

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## Issues Resolution

Any party may bring forward any concerns they might have in relation to the ResponsibleSteel™ programme. This includes issues concerning a certified site, a certification body, a certification decision, an interpretation of the ResponsibleSteel standard, ResponsibleSteel policies or procedures, and ResponsibleSteel personnel.

Our [Issues Resolution System](#) is designed to understand the issues brought to ResponsibleSteel's attention and to resolve them efficiently and fairly with the stakeholder raising the issue and with other relevant parties.

It is a condition of ResponsibleSteel membership that Members and Associate Members agree to participate in good faith in the ResponsibleSteel Issues Resolution System in order to resolve issues raised by them or relating to their own conformity with ResponsibleSteel standards, policies, procedures, bylaws or other rules.

Our Issues Resolution System follows a 3-step approach:

Step 1: Initial discussion of the issue with ResponsibleSteel Secretariat.

Step 2: Resolution using the appropriate pathway.

Step 3: Escalation to an Ad-Hoc Resolution Committee.

The Issues Resolution System is available on our website [here](#)

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## Contact for stakeholders wishing to use to Issues Resolution System

Stakeholders may contact ResponsibleSteel about an issue via email:

[issues@responsiblesteel.org](mailto:issues@responsiblesteel.org)

If email is not possible, stakeholders may send a letter using the following contact details:

**PKF Newcastle Pty Limited**

*(ResponsibleSteel company secretary)*

**PO Box 2368**

**Dangar, NSW, Australia**

**2309**

The ResponsibleSteel Secretariat may also implement the issues resolution pathways when stakeholders bring issues to its attention through other channels.



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