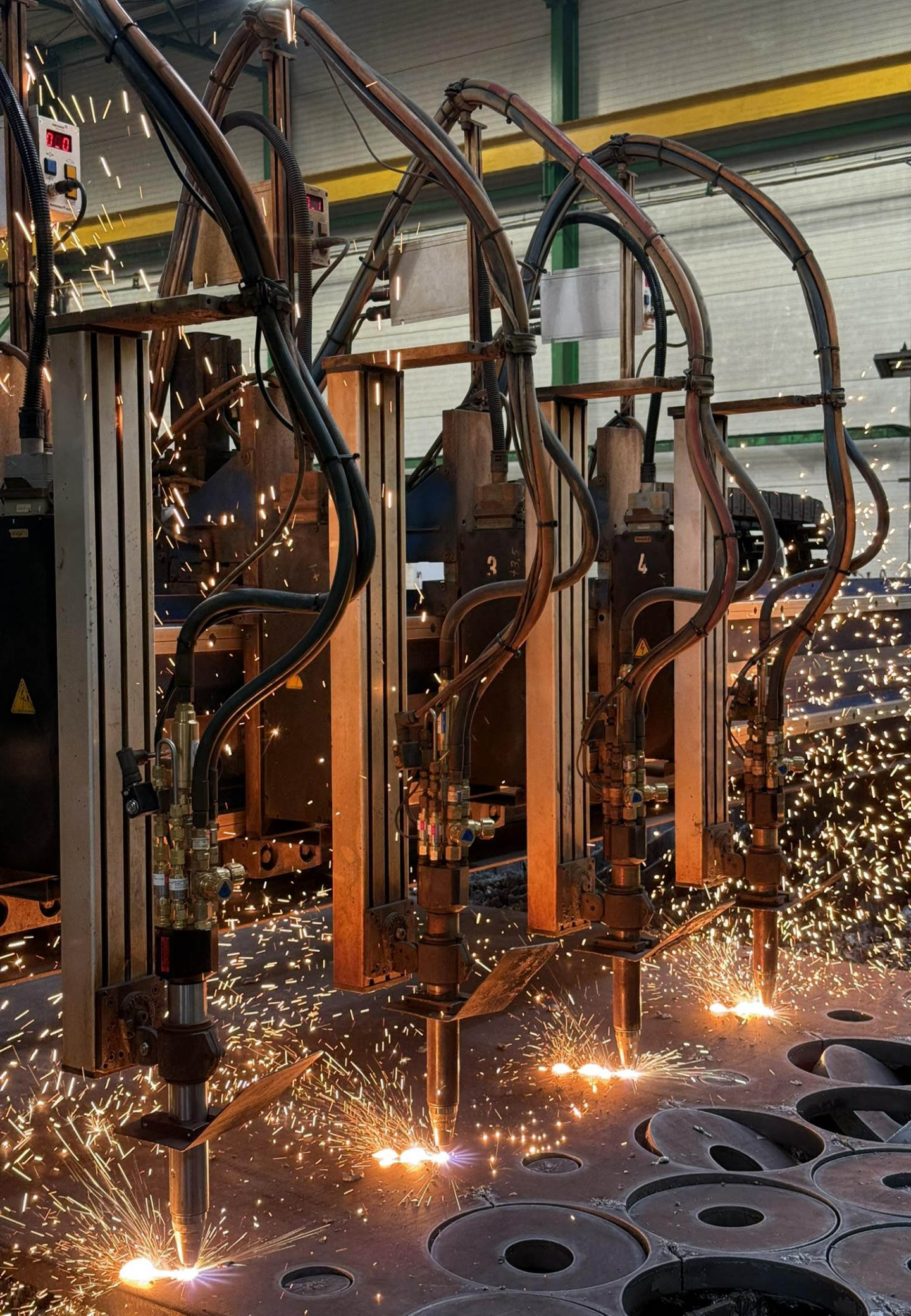


CODE OF CONDUCT



Purpose

This Code of Conduct establishes the ethical, professional, environmental, and behavioral principles that guide all employees, managers, contractors, suppliers, and business partners of BPTSteel. It reflects our commitment to conducting business responsibly, maintaining the highest standards of integrity, delivering quality services, protecting the environment, and fostering a respectful workplace. The Code serves as a foundation for our corporate culture and supports compliance with applicable laws, customer requirements, and internationally recognized management system standards.

Scope

This Code of Conduct applies to all employees of BPTSteel, regardless of their position or employment status. It also applies to members of management, temporary workers, contractors, consultants, interns, suppliers, and any third parties acting on behalf of the company. BPTSteel expects all individuals and organizations working with or representing the company to adhere to the principles set forth in this Code.

Our Values

At BPTSteel, our business is built upon integrity, responsibility, professionalism, respect, teamwork, and continuous improvement. We believe that long-term success depends on honest relationships with our customers, employees, suppliers, and local communities. Every decision we make should reflect our commitment to quality, accountability, sustainability, and ethical conduct.

Compliance with Laws and Regulations

BPTSteel conducts its business in full compliance with all applicable national and international laws, regulations, contractual obligations, and customer requirements. Employees are expected to understand and comply with the legal and regulatory requirements relevant to their work. Whenever uncertainty exists regarding legal or ethical obligations, employees should seek guidance from their supervisor or the appropriate company representative before taking action.

Ethics and Integrity

Integrity is fundamental to everything we do. BPTSteel is committed to conducting business honestly, fairly, and transparently. We do not tolerate bribery, corruption, fraud, embezzlement, falsification of records, or any other unethical business practice. Employees are expected to perform their duties with honesty, professionalism, and impartiality while protecting the reputation and credibility of the company. Business decisions must always be based on objective criteria and never influenced by improper personal interests.

Respect for Human Rights

BPTSteel is committed to protecting and respecting internationally recognized human rights. We provide a workplace where every individual is treated with dignity, fairness, and respect. Discrimination, harassment, bullying, intimidation, violence, or any form of abusive behavior will not be tolerated. Employment-related decisions, including recruitment, promotion, training, and compensation, are based solely on qualifications, competence, experience, and performance.

Occupational Health and Safety

Providing a safe and healthy workplace is a fundamental responsibility of BPTSteel and a shared responsibility of every employee. All personnel are expected to comply with applicable health and safety regulations, follow established procedures, use required personal protective equipment, and report unsafe conditions, incidents, or near misses without delay. Employees must actively contribute to maintaining a safe working environment for themselves and others. Working under the influence of alcohol, illegal drugs, or any substance that impairs judgment or performance is strictly prohibited.

Quality and Responsibility

Quality is a core value of BPTSteel and an essential element of customer satisfaction. Every employee is responsible for performing their work accurately, efficiently, and in accordance with applicable specifications, procedures, and customer requirements. We strive to prevent errors, improve operational performance, and deliver products and services that consistently meet or exceed expectations. Continuous improvement and customer focus are integral parts of our quality management approach.

Environmental Protection

BPTSteel recognizes its responsibility to protect the environment and is committed to conducting its operations in an environmentally responsible manner. We seek to minimize our environmental impact through efficient use of energy and natural resources, responsible waste management, pollution prevention, and compliance with environmental legislation. Employees are encouraged to identify opportunities for improving environmental performance and to report any environmental risks or incidents promptly.

Protection of Information and Data

Confidential information is one of the company's most valuable assets. Employees are required to protect all confidential, proprietary, technical, commercial, financial, and personal information obtained during the course of their work. Such information may only be accessed, used, or disclosed by authorized individuals and only for legitimate business purposes. All employees are expected to comply with applicable data protection laws and internal information security requirements.

Protection of Company Assets

Company assets include facilities, machinery, equipment, vehicles, tools, software, information systems, intellectual property, and financial resources. Employees are expected to use these assets responsibly, protect them from damage, misuse, theft, or unauthorized access, and report any loss or malfunction without delay. Company property should be used only for legitimate business purposes unless specific authorization has been granted.

Relationships with Customers, Suppliers and Business Partners

BPTSteel is committed to building long-term business relationships based on trust, fairness, transparency, and mutual respect. We strive to deliver high-quality services, communicate openly, and fulfill our commitments reliably and on time. We expect our suppliers and business partners to conduct their operations ethically, comply with applicable laws, respect human rights, and support responsible environmental practices consistent with the principles outlined in this Code.

Conflict of Interest

Employees must avoid situations in which personal interests could interfere with, or appear to interfere with, the interests of BPTSteel. Any actual, potential, or perceived conflict of interest should be disclosed promptly to the appropriate manager so that it can be assessed and managed appropriately. Business decisions must always be made in the best interests of the company.

Gifts and Hospitality

Business gifts and hospitality should never influence, or appear to influence, business decisions. Employees must not offer, request, or accept gifts, favors, payments, or other benefits that could compromise their independence or objectivity. Modest gifts and reasonable business hospitality may be accepted only when permitted by applicable laws, company policies, and accepted business practices.

Reporting Concerns

BPTSteel encourages employees and business partners to report any suspected violations of this Code, applicable laws, company policies, or ethical standards. Reports may be submitted through designated reporting channels and will be treated confidentially to the greatest extent possible. The company prohibits retaliation against any individual who, in good faith, reports a concern or participates in an investigation.

Accountability

Compliance with this Code of Conduct is the responsibility of everyone acting on behalf of BPTSteel. Violations of the Code may result in disciplinary action, termination of employment or contractual relationships, and, where applicable, legal consequences. Managers are expected to lead by example, promote ethical behavior, and ensure that employees understand and comply with the principles described in this document.

Continual Improvement

BPTSteel is committed to continually improving its management systems, operational processes, environmental performance, and organizational effectiveness. Through regular evaluation of risks and opportunities, performance monitoring, employee development, customer feedback, and implementation of corrective and preventive actions, we seek to strengthen our ability to deliver sustainable value to customers and stakeholders.

Final Provisions

This Code of Conduct becomes effective upon approval by the Board of Directors of BPTSteel and applies to all individuals covered by its scope. The document shall be reviewed periodically to ensure its continued relevance, effectiveness, and compliance with applicable legal requirements, customer expectations, and the company's strategic objectives. All employees are responsible for familiarizing themselves with this Code and applying its principles in their daily work and business decisions.

Alignment with International Standards

This Code of Conduct has been developed in accordance with the principles of **ISO 9001:2015** and **ISO 14001:2015**. It supports leadership commitment, customer focus, legal compliance, employee awareness, environmental responsibility, risk-based thinking, and continual improvement. As such, it forms an integral part of BPTSteel's commitment to responsible business practices and sustainable organizational performance.



ISO 9001

LL-C (Certification)



ISO 14001

LL-C (Certification)

