



Supplier Code of Conduct

Radius Recycling

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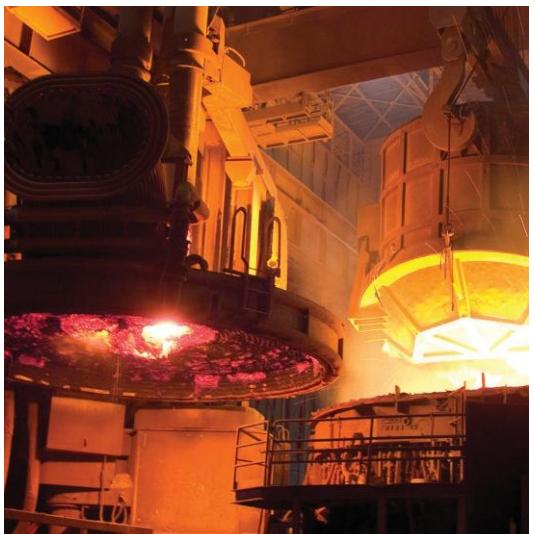
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Introduction

Radius Recycling, Inc., including its wholly and majority-owned subsidiaries (“Radius” or “we” or “our”), has created this Supplier Code of Conduct (“Supplier Code”) to provide guidance regarding our supplier conduct expectations, and we require our suppliers to read, agree to, and comply with the Supplier Code while doing business with Radius.

We may, among other things, eliminate the supplier from Radius’ Preferred Supplier List or suspend or terminate the business relationship with any supplier (a) that fails to comply with this Supplier Code, or (b) whose performance or actions might reasonably cause financial or reputational damage to Radius.

Examples of performance or actions that might reasonably cause reputational damage to Radius include, but are not limited to, suppliers whose personnel or business practices are (a) the subject of (i) a criminal investigation or indictment, or (ii) allegations of fraud, or (b) otherwise contrary to generally accepted industry or societal norms.

Supplier Expectations

Safety, Sustainability, and Integrity are Radius’ core values. These values inform our approach to business, guide our interactions with our employees and the communities in which we operate, and are foundational to successful business relationships with our suppliers.

Our Core Values



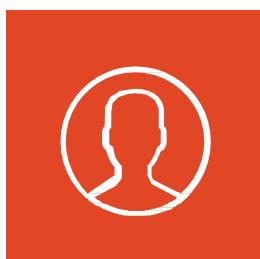
Safety

The safety of our employees and those who visit our facilities is always our primary concern, and we expect the same from our suppliers. Suppliers are expected to complete all required training, maintain any required certifications for on-site work, and adhere to all Radius safety procedures when visiting a Radius facility.



Sustainability

Sustainability is at the core of what we do and how we operate. Our ability to deliver sustainable value is tied to our ability to deliver sustainable profitability to our shareholders through, among other things, valued relationships with suppliers who commit to sustainable practices in their own business models. When performing work for or on behalf of Radius, we expect our suppliers to comply with all environmental laws and regulations related to their business practices, and to conduct their business activities in a manner that helps protect the communities where we work and live.



Integrity

Integrity is at the core of every Radius Recycling relationship. We treat employees, customers, business partners, investors, and suppliers with respect and fairness and expect the same in return from our suppliers. We are committed to conducting business according to our core values and ethical principles, with the highest regard for the quality of our relationships and in full compliance with the legal regulations and requirements that govern our business practices. We expect our suppliers to share our commitment to integrity and ethical conduct.

Complying With Laws, Rules, and Regulations

We expect Radius suppliers to adhere to all laws, regulations, and other legal requirements that apply to their business or any work performed on Radius' behalf. Suppliers are expected to comply with the terms of their agreements with Radius and refrain from any illegal or inappropriate behavior. While these expectations apply generally to all applicable laws, rules, and regulations, we wish to specifically emphasize the following:

Antitrust and Fair Competition. Radius is committed to the development and operation of competitive and open markets and supports fair and equitable trade and investment in all countries and markets in which we operate. We expect our suppliers to behave in a manner consistent with our behavior. We strictly prohibit any anti-competitive or abusive market dominance or collusion against competitors, and we expect and demand that all suppliers comply with applicable antitrust laws and regulations. Accordingly, suppliers should not enter into agreements with competitors that could potentially breach antitrust laws or regulations.

Conflict Minerals. Radius is committed to the responsible sourcing of materials attained for all business operations. We are aware that trade in certain minerals, particularly cassiterite, columbite-tantalite, gold, wolframite, and their derivatives in tin, tantalum, and tungsten that originated from the Democratic Republic of Congo (DRC) and its adjoining "Covered Countries" has been associated with human rights abuses. Radius complies with all due diligence, disclosure, and reporting requirements and regulations under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act regarding Conflict Minerals. We expect that any of Radius' suppliers who provide products containing Conflict Minerals, except for scrap, which is considered DRC Conflict Free under current U.S. law, certify that they do not contain Conflict Minerals originating from the Covered Countries.

Conflicts of Interest. We expect Radius suppliers to avoid situations that may involve or appear to involve a conflict between personal interests and their responsibilities to Radius and to avoid taking part in or seeking to influence any decision under circumstances that could give rise to an actual or perceived conflict of interest. We expect that if a supplier becomes aware of a potential conflict of interest, the supplier will notify Radius immediately.

Corruption, Bribery, and Improper Payments. Radius suppliers are expected to support Radius' zero tolerance for corruption, and its commitment to abiding by all anticorruption laws, conventions, and regulations in any country in which the supplier does business. Suppliers are expected to prohibit any offer, promise, or the giving of any undue advantage, directly or through an intermediary, to a public official or any similar governmental third-party agent, in order to obtain or retain business or other improper business advantage. Radius prohibits any act of commercial bribery, including the offering, giving, or receiving of bribes, or any sort of improper payments or kickbacks, and expects suppliers to prohibit the same.

Customs, Import-Export, and Trade Controls. Radius expects its suppliers to adhere to all relevant trade sanctions and export controls and comply with all regulations relating to the transfer of products, services, and information across national borders.

Data Privacy. We expect Radius suppliers to comply with all applicable data privacy laws.

Meals, Gifts, and Entertainment. Suppliers are expected to comply with Radius' meals, gifts, and entertainment policies when providing items of value to Radius employees. Our policy prohibits Radius employees from soliciting gifts or giving or receiving gifts of cash or cash equivalents. Radius employees may accept reasonable and infrequent business courtesies including gifts of a nominal value, which we define as trinkets and items with a value of less than \$50. Entertainment of any amount must not be offered to or received from a Radius employee or representative in connection with contract bidding, evaluation, or award, or in order to otherwise secure an improper business advantage.

Insider Trading. We expect all Radius suppliers to comply with U.S. or other applicable securities laws that prohibit the buying or selling of securities when they have knowledge of non-public material information, including information related to Radius.

Money Laundering. Radius suppliers are expected to comply with all applicable laws and regulations governing the prevention of money laundering and agree not to participate in any money laundering activities.

Radius Policies and Procedures

Procurement Policies and Procedures. We expect Radius suppliers to comply with Radius' procurement policies and procedures in good faith. This includes providing appropriate bid documentation in response to any Requests for Proposals, complying with Radius' requirements that purchase orders be issued for all goods and services purchased, assuring that all invoicing and other administrative activity is performed effectively, and strictly complying with all aspects of this Supplier Code.

Safeguarding Information

Accurate Records. Radius suppliers are expected to keep complete and accurate records related to the goods and services provided to, and the business relationship with Radius. These records are expected to be maintained, retained, and disposed of pursuant to industry-accepted document retention guidelines or applicable contractual obligations.

Protecting Radius Confidential Information. We expect and require that Radius suppliers who have received or have access to Radius' confidential information will safeguard it with the utmost care and prudence and take all necessary precautions to avoid inadvertent disclosure. In the event of a disclosure, Radius suppliers shall immediately inform Radius.



Employment Practices and Conduct in the Workplace

Diversity, Equity, and Inclusion. We support efforts to continually build an increasingly diverse, equitable, and inclusive workforce. Accordingly, we value the importance of fostering relationships with suppliers whose forward-looking initiatives are in alignment with ours. We encourage our suppliers to actively support diversity, equity, and inclusion initiatives within their own workforces.

Equal Opportunity and Nondiscrimination. We treat everyone in our work environment with dignity and respect, and do not tolerate any form of discrimination or harassment by anyone, including our suppliers. Accordingly, we expect suppliers to never subject workers to unfair treatment or discrimination with regard to hiring, promotion, or termination, and to always comply with all applicable laws and regulations.

Labor Laws and Human Rights. We are deeply committed to ensuring that human rights are protected during the performance of our business activities, in conformance with the principles set forth in the United Nations' Universal Declaration of Human Rights ("Universal Declaration") and the International Labor Organization's Declaration

on Fundamental Principles and Rights at Work ("Fundamental Principles"). We expect our suppliers to perform their business activities for Radius in conformance with the Universal Declaration and Fundamental Principles, including, but not limited to, avoiding participation in or in any way supporting the use of child labor or human trafficking of any kind.

Violence in the Workplace. We have a zero tolerance policy for violence in the workplace. We expect our suppliers to fully comply with this policy. Carrying weapons on Radius premises is also strictly prohibited.



Prohibition of Retaliation

Radius does not retaliate or tolerate any form of retaliation against individuals who, in good faith, report possible violations of our Codes of Conduct or potentially illegal acts or activities. We expect our suppliers to commit to maintaining the same protections and preventing retaliation against their own employees and subcontractors if they in good faith report any allegations of wrongdoing or misconduct relating to their work for Radius.

Reporting Violations or Concerns

Radius expects its suppliers to report any witnessed or suspected wrongdoing or misconduct relating to their work for Radius, using any of the following methods:

- Contact their Radius Procurement Department representative or Operations management.
- File a report through the Radius misconduct reporting system. This multilingual system, operated by a third party, is accessible 24 hours a day, 7 days a week. Reporters may remain anonymous.



Misconduct Reporting System
call: (866) 400-5738
or visit:
radiusrecycling.ethicspoint.com



- Submit a written report by mail and send it to:



Chief Ethics Officer
Radius Recycling
P.O. Box 10047
Portland, OR 97296-0047

Mark the envelope: **CONFIDENTIAL**



Conclusion

If Radius has a good-faith belief that a supplier has violated or is reasonably likely to violate this Supplier Code, or that a supplier's performance or actions might reasonably cause financial or reputational damage to Radius, or for such other justification in Radius' reasonable judgement, then Radius may, at any time and in its sole discretion, take actions that include, but are not limited to, the following: (a) suspension, cessation, or cancellation of purchase orders; (b) termination or suspension of contracts or the business relationship; (c) suspension or revocation of preferred supplier, single-source supplier, or sole-source supplier status; and/or (d) prohibiting further or future purchases.

For further guidance on interpretation of this Supplier Code, please contact your Radius liaison or Radius' Ethics Department at ethics@rdus.com.

