

## Code of Conduct of TSN 2024

### - Annex to Tata Code of Conduct 2015 -

The Tata Steel Nederland (TSN) Code of Conduct 2024 is based on the 2015 Tata Code of Conduct plus legally required variations. Thus, the Tata Steel Nederland (TSN) Code of Conduct 2024 includes those variations that align any discrepancies between the 2015 Tata Code of Conduct and the laws, regulations or working conditions in force in the country where we operate, in which case the latter shall prevail, as stated in article C13 of the 2015 Tata Code of Conduct.

This Code of Conduct uses the pronouns "he", "him", "him/her", "his/her" and the nouns "employer" and "employee" without distinction of gender, to facilitate the readability of the text.

If it is determined that an employee's behaviour may be a reason for disciplinary action, such disciplinary action shall be taken in accordance with the provisions in force in each case.

In addition, a description of what is expected of TSN employees is included for several articles of the 2015 Tata Code of Conduct.

- Articles D1 to D3 (Equal Opportunity Employer) and D4 and D5 (Dignity and Respect) should be interpreted in line with any local anti-harassment policy of TSN.
- Articles D12 (Freedom of association), D13 (Outside employment) and D24 to D28 (Conflicts of interest) are interpreted in such a way that employees have the option to:
  - have their own company, work elsewhere;
  - or accept responsibilities in other entities and/or
  - or participate in civil or public activities.

If these options could result in a conflict of interest, as defined by TSN regulations, the employee must inform his or her manager and, within the limits of the applicable local law and/or the individual employment contract, seek his or her prior approval.

- Articles I1 to I3 (Non-political alignment) of the Tata Code of Conduct are interpreted as referring only to the behaviour of employees in the context of their work for TSN and therefore not to their behaviour in the private sphere.

The way in which whistleblowing can take place at TSN differs from what is set out in the 2015 Tata Code of Conduct. In the case of TSN, the way in which wrongdoing can be reported is set out in the TSN Confidential Whistleblowing Policy which can be found at the following link:

<https://tatasteelurope.integrityline.com>