

ASSOCIATED STEEL INDUSTRIES LTD.





Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Modification Summary				
Version n°	Date	Approved by	Signature	
1	2022-02-22 Elaboration	Guillaume Wilbois Plant Manager	CV >	
2	2023-02-22 Update	Guillaume Willows Plant Manager		



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Table of Contents

Modification Summary	ĺ
INTRODUCTION1	
Our Mission	
Our Vision1	
Our Values	
GUIDING PRINCIPLES2	!
General Goal of the Policy2	
Field of Application	
GOALS3	3
Reduction of Resource Usage3	3
Responsible Sourcing4	
Sustainable Transport and Greenhouse Gas (GHG) Reduction	1
Reducing the Quantity of Residual Materials Used5	5
Responsible Employer	5
Social Implication in the Collectivity	õ
Ecosystem Preservation 6	ō
IMPLEMENTATION AND FOLLOW-UP	7
Appendix – Sustainable Development Program	3

RD

Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Introduction

Our Mission

Strong with more than fifty years of experience, the Associated Steel Industries Ltd. (ASI) currently plays a major role in the metal recycling industry of Quebec. This Quebec company is a part of the RIVA Group, a multinational metal recycler located in Italy which has multiple divisions across Europe (Italy, France, Belgium, Spain, and Germany).

The ASI site, located in the industrial park of Sainte-Catherine (Québec), produces annually more than 80 000 tons of shredded scrap coming mainly from the fragmentation of end-of-life vehicles and other steel scrap. Due to its high level of expertise in the field of ferrous and nonferrous recycling, ASI offers quality products and services to its customers and providers, as well as great respect for environmental and health and safety norms.

Our Vision

ASI's vision is simple: continuing to go further in the recycling of metal scrap in order to give waste a second life and decrease the carbon footprint, all of this while being a responsible actor and employer. This vision is fully reflected in the current environmental conjuncture aiming to reduce the amount of waste and revalue and recycle a maximum of materials in a responsible matter.

Our Values

The values promoted by ASI focus around the following three major axes.

- ✓ Family Spirit The human capital is key to the success of the industry. All hired for a common goal, accomplish work and acquire knowledge through a collective effort.
- Recycling Recycling being our core business, we continually invest to search and innovate in terms of quality, health & safety and environment in order to optimise our recycling activities while increasing our positive impact on the environment and the community.
- ✓ Professionalism and rigour Our customer's satisfaction is a daily and permanent challenge. ASI invests the necessary efforts in perfecting its expertise in order to differentiate from competitors. All members are dedicated to respect the best practices and norms in terms of quality, environment, and health & safety at work.



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Guiding Principles

General Goal of the Policy

Sustainable development is generally recognized as « Development that meets the needs of the present without compromising the ability of future generations to meet their own needs » (definition from the publication *Our Common Future* written in 1987 by the *World Commission on Environment and Development* of the United Nation's organization). ASI's recycling mission is fully reflected in this setting and the general objective of the present policy aims to establish the frame in which ASI wishes to project its different objectives in terms of sustainable development.

Field of Application

The present sustainable development policy applies to all people working at ASI. It constitutes a frame which reflects the vision that the direction wishes to promote towards its employees. Il also allows to divulge the vision of the industry to the different stakeholders, providers as much as customers, and constitutes thereafter the pledge of a proactive engagement towards the sustainable development and the different engagements fixed by the company.



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Goals

In accordance to the values by which they adhere and wish to communicate, ASI has fixed the following objectives in order to translate its engagement towards sustainable development. For each objective listed below, different secondary objectives are proposed as well as actions to which ASI complies to execute. For certain actions listed below, indicators, targets and timelines are also specified.

Reduction of Resource Usage

Objective

Evaluate the possibility to reduce electric energy consumption

Anticipated actions

- ✓ Improve the energy efficiency of the different buildings;
- ✓ Conduct a compilation of the different electric energy consumption posts;
- Create awareness among the employees regarding electric consumption and daily actions that can be taken to reduce consumption;
- ✓ When appliances must to be replaced, prioritise new appliances that consume less energy;
- ✓ Carry out an energy audit to determine the specific areas where the building's thermal sealing/insulation should be reinforced in order to reduce energy needs;
- ✓ Maintain an energy efficient lighting system (LED lighting);
- ✓ Turn down heating and cooling during non-working hours;
- ✓ Within the office space, encourage natural lighting and close curtains when the sun is shining;
- ✓ Participate in energy reduction grant programs, such as Hydro-Québec's Efficient Solutions Program.

Objective

Evaluate the possibility to reduce fossil fuel consumption

Anticipated actions

- ✓ Evaluate the different options where savings on fossil fuels could be achieved;
- ✓ Increase awareness among employees concerning turning off heavy machinery and vehicles when they are not in use;
- ✓ Create awareness among the employees to adopt a driving method leading to lower fuel consumptions;
- ✓ When vehicles must be replaced, prioritise new vehicles which consume less fuel or which operate under a hybrid or electric mode.

Objective

Evaluate the possibility to reduce water consumption

Anticipated actions

- ✓ Conduct a compilation of the water consumption posts;
- Reduce the water consumption in the offices by installing toilets with a lower flow of water:
- Reduce the water consumption at the process level (humid dust collector) by adopting an optimised work method;
- ✓ Evaluate the possibility of managing rainwater by implementing recovery systems, including the installation of gutters/drains on the roof connected to a storage tank with a filtration system (debris, leaves, insects, etc.) in order to be able to reuse the water on the site (toilets, watering, cleaning, etc.).



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Objective

Evaluate the possibility to reduce paper and ink consumption

Anticipated actions

- ✓ Create awareness among the employees to print only what is absolutely necessary;
- ✓ Encourage low resolution printing modes when possible;
- ✓ Configure printers for double-sided printing;
- ✓ Encourage the archiving of documents in numerical format;
- ✓ Promote digital formats as much as possible for the various forms of the company (contracts, invoices, pay slips, etc.);
- ✓ Give preference to scanning documents and sending them by e-mail rather than by fax:
- ✓ Develop a guide on good environmental management practices at work that includes a section on paper use.

Responsible Sourcing

Objective

Aim for the usage of eco-responsible cleaning supplies

Anticipated actions

- ✓ Verify among the providers the possibility to obtain a supply of eco-responsible cleaning products;
- Create awareness among the purchasing manager to supply the company with ecoresponsible cleaning products;
- ✓ Create awareness among the maintenance personnel to use eco-responsible cleaning products.

Objective

Aim for the usage of biological hydraulic oils and fats

Anticipated actions

- ✓ Substitute the usage of traditional fats and oils with biological products (CAT certification);
- Create awareness among the purchasing manager to supply the company with biologic fats and oils;
- Create awareness among the workers on the use of biological fats and hydraulic oils.

Sustainable Transport and Greenhouse Gas (GHG) Reduction

Objective

Evaluate the possibility to reduce greenhouse gases on the site

Anticipated

- ✓ Conduct a compilation of the different GHG emission posts;
- actions
- ✓ Create awareness among the employees to adopt a driving method aiming to consume less fuel;
- ✓ Minimise the operation of fuel powered vehicles on site.

Objective

Encourage sustainable transport for the employees

Anticipated actions

- ✓ Offer public transport incentives for the employees coming to the factory;
- ✓ Improve active transport infrastructures to the factory (installation of bike racks, etc.);
- ✓ Create awareness among the employees regarding carpooling;
- ✓ Evaluate the GHG compensation options linked to transport, such as business trips.



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Reducing the Quantity of Residual Materials Used

Objective

Evaluate the possibility to reduce the quantities of residual materials

Anticipated actions

- ✓ Proceed to a residual material characterisation and evaluate the options to diminish and/or value the different flows;
- ✓ Document the reduction of paper usage throughout the years;
- ✓ Create awareness among the employees regarding the potential to reuse matter and materials;
- ✓ Implement a compost system usable all year round;
- ✓ Assure adequate sorting of paper, metal, plastic, and other different residual material;
- ✓ Install ashtrays to collect cigarette butts and send them to a specialized company for recycling.

Objective

Evaluate the different options to re-use electric and electronic equipment

Anticipated actions

- ✓ Favor the recuperation of old equipment to transfer them to a recovery site;
- ✓ Encourage the purchase of second hand equipment;
- ✓ Assure optimal equipment maintenance in order to increase their lifetime;
- ✓ When possible, give back electric and electronic equipment to charities;
- ✓ Create awareness among the employees regarding adequate disposal (in the correct faculty) of different electric and electronic equipment.

Responsible Employer

Objective

Assure a healthy and safe workplace

Anticipated actions

- ✓ Favor a pleasant workplace;
- ✓ Promote and support diversity, inclusion and equity;
- Encourage the consideration and appreciation of cultural and intergenerational diversity;
- ✓ Offer all the necessary equipment for the safe realisation of tasks;
- ✓ Offer welcoming workspaces for the employees (cafeteria, changing room, etc.);
- ✓ Include measures that promote the social environment (quality of the work environment, work-life balance, work climate, feeling of security, etc.);
- ✓ Put in place a work council for the realisation of social events among the company.

Objective

Assure quality jobs

Anticipated actions

- ✓ Maintain equitable work conditions towards the employees and competitive work conditions towards the industry;
- ✓ Propose interesting social advantages;
- ✓ Propose training sessions to employees in accordance with their different tasks and maintain a training program.





Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Social Implication in the Collectivity

Objective Anticipated actions

Collaborate with the educational system, research centers and organizations working in the field of sustainable development

- Collaborate with various educational organizations by offering internships (collaborations that could lead to gateways to new sustainable development technologies);
- ✓ Join organizations that organize networking activities to generate business opportunities and partnerships (such as Réseau Environnement, Comité 21 and Écotech Québec).

Objective

Being an admirable corporative citizen

Anticipated actions

- ✓ Contribute financially to the socio-economical development of the municipality of Sainte-Catherine;
- ✓ Being active in the community and the municipal life;
- ✓ Remaining attentive to the complaints coming from neighbors and attempting to resolve conflicts through meditation and hearing.;
- ✓ Join community environmental organizations and engage employees at community events.

Objective

Act in a compliant way, with transparency and morals

Anticipated actions

- ✓ Make sure to always ask for the required administrative documents for the development of the company (license, ministerial authorisations, etc.);
- Respect and even surpass the legal and regulatory requirements in terms of health and security, environment, etc.;
- ✓ Make public the analysis results for the environmental follow ups (atmospheric emissions, wastewater, ground water, etc.).

Ecosystem Preservation

Objective

Assure the ecosystem preservation.

- ✓ Collaborate with specialized companies in sustainable development, such as Alvole for the management of the beehive located in the site;
- ✓ Responsibly manage contaminated soils identified on the site.



Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Implementation and Follow-Up

Following the implementation of the present Sustainable Development Policy, ASI implemented a Sustainable Development Plan for each of the secondary objectives and elements listed in the previous section (see Appendix). A Follow-Up Grill of Actions Related to Sustainable Development has also been developed and will be completed as the company undertakes actions.

This grill will establish, for every action put in place:

- 1. a target or performance criteria;
- 2. a timeline to achieve this target or performance criteria;
- 3. the person responsible for this action;
- 4. a measure of the reachability of the target or performance criteria.

The Sustainable Development Plan include the present policy and Follow-Up Grill of Actions Related to Sustainable Development. A program revision will be conducted on an annual basis by the Sustainable Development Committee. During this process, the Sustainable Development Policy and the Follow-Up Grill of Actions Related to Sustainable Development will be updated and adapted and/or adjusted accordingly.

The Sustainable Development Committee is composed of the following individuals:

- ✓ M. Guillaume Wilbois,
- ✓ Mme Suzie Boulerice,
- ✓ M. Alexandre Dubé.

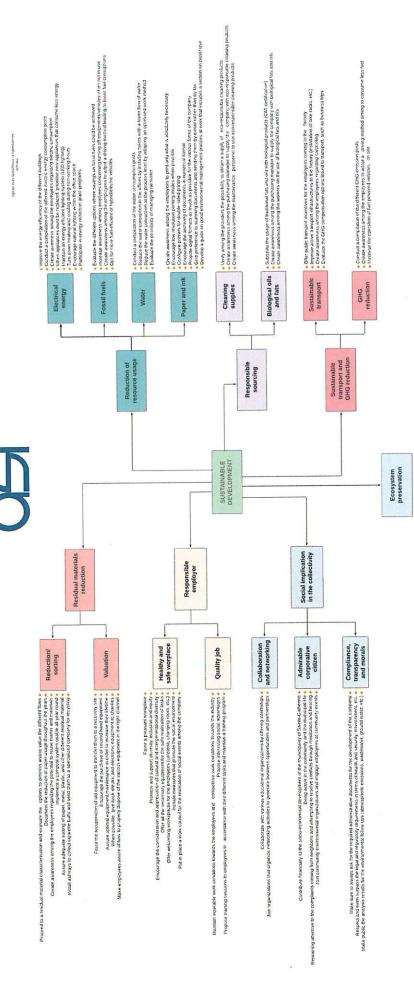


Associated Steel Industries Ltd. Version n°2 – February 22nd, 2023

Appendix — Sustainable Development Plan



PLAN DE DÉVELOPPEMENT DURABLE



Cotalzente with specialized comparies in sustainable development, such as Asiate for the management of the twelvire located in the site

 Respectably inhabigor contaminated solis administrated on the site