



Code of Conduct

Radius Recycling

Adopted September 29, 2006 | Updated November 10, 2023

A Message from Our Chairman and CEO



“Our ethical performance depends on each of us choosing to act with uncompromising integrity.”

Dear Colleagues,

Radius has been dedicated to operating ethically and responsibly since its founding in 1906. We approach every day with a strong sense of purpose, knowing that each decision we make has an impact on our relationships and our legacy. Our priorities and our decisions accordingly reflect our Core Values of Safety, Sustainability, and Integrity.

Our ethical performance depends on each of us choosing to act with uncompromising integrity. This is how we garner the trust and respect of our fellow employees, business partners, customers, suppliers, investors, and communities.

Radius' Code of Conduct outlines our broad principles of legal and ethical business conduct, and is a guide to help us make ethical decisions and maintain our foundation of respect and responsibility. It is a set of rules and expectations determined by our values and principles, and it applies to all of us. Nothing—not competitive pressures or even a direct order from a supervisor—should compromise our integrity.

This Code details the resources available to you as well as the steps you can take to find answers to your questions and avenues to voice your concerns should you encounter an ethical dilemma. You will also find instructions for reporting anonymously using our misconduct reporting system.

We are all proud of our Company, our services and products, and our reputation for doing business with honesty and integrity. The courage and integrity you demonstrate by speaking up, asking questions or raising concerns, and always choosing to do the right thing, are appreciated. I thank you for your commitment to upholding our values and helping to protect and sustain Radius' legacy every day.

Please join me and our Board of Directors in reviewing the Code and renewing our efforts to understand these principles and abide by our obligations to our Company and to each other. Let us continue to inspire one another to stay safe, operate sustainably, and always act with integrity.

A handwritten signature in black ink that reads "Tamara L. Lundgren". The signature is fluid and cursive.

Tamara L. Lundgren

Chairman, President, and Chief Executive Officer

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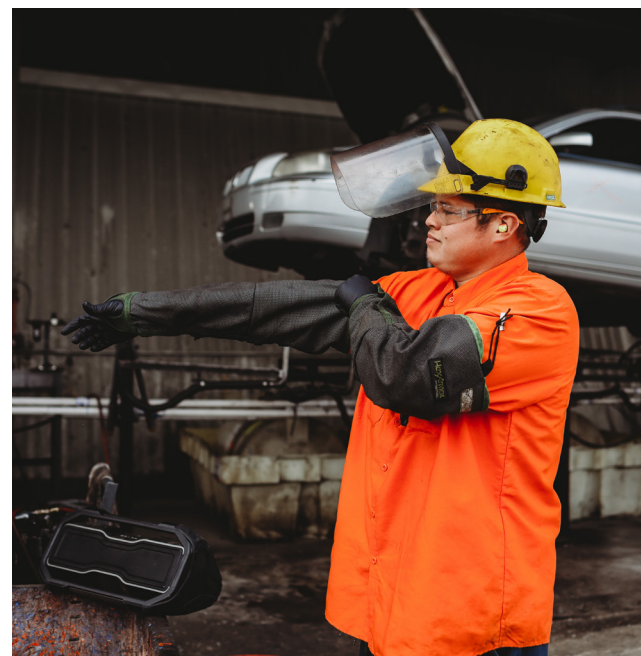
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Our Code



Introduction

Since our Company's founding in 1906, we have been committed to building a sustainable future. For more than a century, we have developed robust networks to collect, process, and deliver recycled metals to customers in North America and around the world. These recycled metals represent critical feedstock in the global circular economy, supporting production of bridges, buildings, cars, and appliances, as well as technologies that advance a low carbon future such as solar panels, wind turbines, hydropower dams, advanced battery storage systems, and electric vehicles.

Together, we continue to leverage our collective strengths to deliver high-value products and services, while forging trusted partnerships with our customers, suppliers, and communities. As we navigate through our second century of excellence, our Company's commitment to our Core Values of Safety, Sustainability, and Integrity remains unwavering.

Our Core Values

Our Core Values of Safety, Sustainability, and Integrity set clear expectations for all employees and offer a lens through which we make decisions. Our Core Values define our workplace culture and illustrate what matters most to our stakeholders.



Safety

Safety is Our Responsibility and Our Priority. Through a dedication to creating a safe work environment and a sustainable safety culture, we continue to make meaningful progress in addressing potential risks. Through consistent employee engagement, we work to ensure everyone remains safe on the job and returns home free of injuries.



Sustainability

Sustainability is Our Business. Our business activities promote a future with less waste, more natural resource conservation, and cleaner air. We equip our workforce with the tools and resources they need to succeed and foster partnerships with resilient communities so we can prosper together.



Integrity

Integrity is About Respect. We hold ourselves to the highest standards of ethical behavior. We treat everyone with respect and expect the same in return. We go beyond just following the law to being a truly ethical and responsible company. We challenge ourselves to make sure that integrity underlies every aspect of how we do our jobs. We operate honestly and treat one another fairly.

We NEVER compromise our Core Values

“As we have for over 100 years at our Company, we must work to maximize our positive impact by choosing to uphold our Core Values in every action we take and in every decision we make. Our Core Values of Safety, Sustainability, and Integrity are the foundations upon which our culture is based and serve as the guideposts directing our way forward.”

– Tamara Lundgren, Chairman and CEO

Code Purpose and Scope

How do you make sure that you are always acting in accordance with Our Core Values? **Start here.** Our Code of Conduct outlines our expectations for how we do business everywhere we operate.

The Code applies to us all.

- It applies to our Board of Directors.
- It applies to employees of Radius, and to employees of each of its wholly- and majority-owned subsidiaries, such as Pick-n-Pull and Cascade Steel Rolling Mills, Inc.
- It applies to employees at all levels.
- It applies regardless of union status.

Our Responsibilities

We are all responsible for living according to our Core Values.

This means:

- Reading, understanding, and following the Code.
- Following all Company policies and applicable laws.
- Completing all required education and certifying compliance with the Code.
- Cooperating fully with Company investigations.
- Seeking guidance when uncertain about a course of action.
- Reporting suspected violations of the Code, Company policies, or the law.

Our Leaders' Responsibilities

Great leaders exhibit their values and ethics in their actions. Leaders set the example. Good leaders model the behavior that is expected of everyone they lead. Remember, you are here to serve others, particularly those who look to you for guidance. Leadership is about trust.

This means:

- Continually communicating the importance of our Core Values and acting accordingly.
- Holding yourself and your team accountable for following this Code, especially when evaluating, promoting, and rewarding employees.
- Encouraging, and being available to, your team to ask questions, seek guidance, and report issues.
- Taking all reports of misconduct seriously and escalating them as necessary.
- Making sure that nobody fears retaliation of any sort.

Never give anybody any reason to believe that our Company is anything other than ethical and beyond reproach.



Ask Questions. Get Answers.


The Code cannot provide answers to every situation. We must use common sense and good judgment when making decisions that reflect our values. These decisions must be ones we can be proud of and stand behind. As employees, we represent Radius. Understanding the connection between our individual actions and our Company's reputation can be more important than we realize, especially when we are faced with an ethical dilemma. We should always look to our Core Values as our guide and never be afraid to seek help and guidance.

When faced with a tricky situation, consider these questions:

- Is it legal?
- Is it consistent with our Core Values and the Code?
- Am I setting a good example?
- Do I have all the information I need to make this decision?
- Am I being fair and honest?
- Is this the right thing to do?
- Am I willing to be held accountable for this decision?
- Would I be comfortable explaining this decision to my family?

If the answer to any of these questions is “no,” don't do it. If you are still not sure, seek further guidance from your supervisor or from someone in the Human Resources, Security, Ethics, or Legal Department.

The Our Resources section beginning on page 38 lists contact information to help you find these and other Company resources referenced in this Code.

It is always a good idea to review any relevant Company policies applicable to your issue. Several are discussed throughout this Code, which you can click on to access directly, as indicated by this icon: 

Whatever you do, unless you are 100% sure you are making the right decision, seek guidance before you take any action.

Speak Up, Listen Up, Follow Up

We all have a responsibility to stop behaviors that are contrary to our Core Values, Our Code, or even the law. Speaking up should be as easy as possible, yet we know that you might be uncomfortable or hesitant. This is why we have a variety of ways for you to tell us when you have a concern. Even if you do not have all the details or are less than certain something is wrong, go ahead and report your concern and let us determine the facts of the situation.

We appreciate your decision to Speak Up. Be assured that we will take your concern seriously and proceed promptly and carefully.

How do I Speak Up?



Start local. In most circumstances your team leader—your manager or supervisor—is the person in the best position to resolve your question or concern. If you are not comfortable going to that person, or if you have done that but feel that they have not adequately addressed your concern, reach out to someone in the Human Resources, Security, Ethics, or Legal Department.

Alternatively, you may file a report through the Radius misconduct reporting system. This confidential, multilingual system is accessible 24 hours a day, 7 days a week. Reporters may remain anonymous.

Misconduct Reporting System:



Call: 1-866-400-5738



Visit: radiusrecycling.ethicspoint.com



Mobile option: Activate the QR code through your mobile phone's camera app

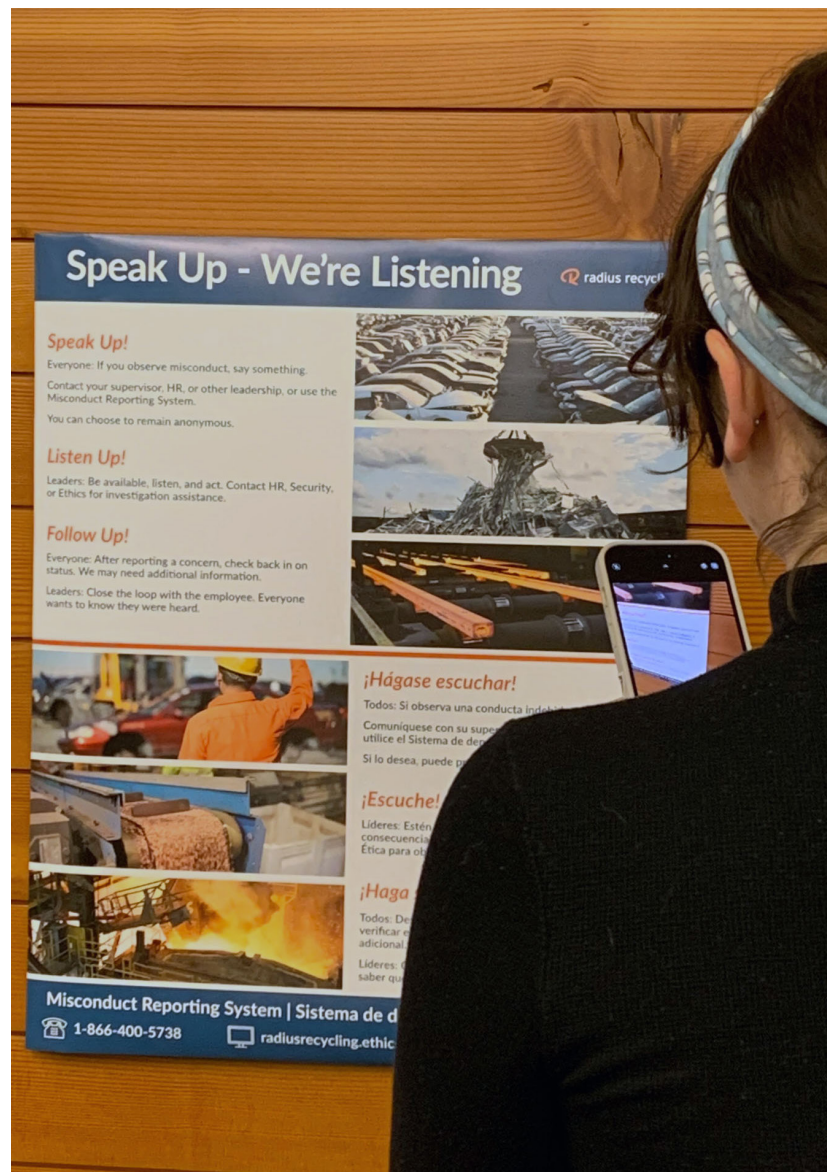
You may also submit a report by mail:



Chief Ethics Officer
Radius Recycling, Inc.
P.O. Box 10047
Portland, OR 97296-0047
Mark the envelope: CONFIDENTIAL

The method you use to Speak Up is entirely your choice. Choose the method that is most comfortable for you.

Our Code and our policies do not limit the right of any employee represented by a collective bargaining agreement to file a grievance, without notice to Radius.



What happens next?

Know that however you choose to report, we will investigate your report in a way that preserves your dignity and ensures fairness and consistency.

We investigate. We begin by assigning individuals with the right knowledge, skills, and objectivity to investigate the issue. The investigators, and possibly others in position to assist them, will act in the Company's best interest, as opposed to acting as your personal representatives. The investigation team will analyze the evidence and may conduct interviews.

All of us must cooperate in an investigation if asked.

This means:

- Responding promptly to requests to schedule an interview or to provide information and evidence.
- Providing accurate information honestly and to the fullest extent of your knowledge.
- Not interfering with the evidence or witnesses or any other aspect of the investigation.
- Keeping the existence of the investigation and anything you learn of it confidential.

We reach a conclusion. Once the investigation is complete and we have reviewed all the information gathered, we will determine whether the concern is substantiated and decide what or if any action is warranted to resolve it. If possible and appropriate, we will let you and the person who was the subject of the concern know of our findings in general terms.

We keep investigations confidential. Be assured that we will only share information on a "need-to-know" basis, and only for the purpose of completing the investigation or as required by law.

We do not retaliate. We know it takes courage to speak up when something seems wrong or concerning. Any retaliation against anyone who raises a concern in good faith—making an honest attempt to provide accurate information—undermines our goal of addressing and eliminating misconduct. That is why we have a zero-tolerance policy for retaliation against those who raise concerns. This is true even if we determine that the allegation was entirely unsubstantiated.





Leaders must Listen Up and Follow Up.

When employees have the courage to Speak Up, leaders have the responsibility to Listen Up.

This means leaders must:

- **Listen carefully.** Make time to Listen Up when an employee raises a concern. Thank the person for speaking up and acknowledge the fact that their choice to do so may have been difficult for them.
- **Respond respectfully.** Take every concern seriously, even if the person receiving the report does not share the concern or agree that the issue reported is valid. Commit to addressing the issue and close the loop after doing so.
- **Protect confidentiality.** Do not discuss the conversation or the issue with anyone other than those who need to know to help address it.
- **Escalate the concern if necessary.** Leaders are not expected to be experts in every issue. The most important thing is that the issue is properly investigated and handled. Leaders should contact the Human Resources, Ethics, Security, or Legal Department for assistance.
- **Close the loop.** Follow Up by circling back to the person who raised the concern so they know that they were heard.

SPEAK UP, LISTEN UP, FOLLOW UP

Policy 1.1.4, Anti-Retaliation

Example Scenario:

Q: *I was contacted by HR and asked to be interviewed as part of their investigation into a recent incident at my workplace. I really don't want to get anybody in trouble, despite the fact that at the time I was pretty upset about what I witnessed. My coworker and friend, who is Black, was called the "N-word" by our white coworker. He was supposedly "only kidding around," and claimed he didn't mean to offend her, but I know that is never appropriate, plus I have known this person to make racist comments in the past. I'm not sure if my perspective on what happened is going to matter much, and I am reluctant to get involved if there is a chance this person or anyone else who knows about it, including my boss or other teammates, might target me if they find out I said anything to anyone, especially to HR; however, I really do want to stand up for my friend and hopefully prevent anything like this from happening in the future. Is getting involved in this going to cause problems for me or am I doing the right thing to agree to go talk with them?*

A: *Yes, it is right to agree to the interview and to answer their questions. You are simply providing factual information about what you saw and heard. It is up to the investigator to determine if what you have to offer is relevant. Your job is to cooperate and be truthful. You also should not discuss the interview or the situation in general with others at your workplace or anywhere else, including with your friend. Going forward, if you see something like this, please don't hesitate to report it, and remember that no one is allowed to punish you in any way for speaking up, especially in a situation when you or someone else is harassed or bullied or is in any other kind of unsafe scenario. Promptly reporting witnessed or suspected misconduct, and cooperating fully in investigations, are some of the ways we uphold our Core Value of Integrity.*



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Our People



We are Strong Because We Are Diverse

We recognize that the best opportunities for innovation, especially across globally diversified markets, stem directly from the inspiration generated by shared information and ideas. We know that the more diverse our employee community is, the broader our perspectives and stronger our connections can be.

Throughout our Company's history we have benefited from being the kind of organization that attracts a wide variety of workers with widely varied backgrounds, skills, and talents, located across the U.S., Canada, and Puerto Rico. This is one of the reasons we are so well positioned to effectively deliver on our commitments to customers, suppliers, investors, communities, and each other. We proudly acknowledge that our competitive advantage comes in part from our diverse employee community.

We recognize each other's diverse abilities and experiences and value the different perspectives of all.

Feeling valued, safe, and free to be ourselves at work is important, as is remaining committed to bringing our best selves to work every day. We do our best work in an environment in which every employee knows their perspective is invited and their full participation is welcomed. We know that fully engaged employees are safe and successful ones.

It is up to each one of us to foster an inclusive environment.

This means:

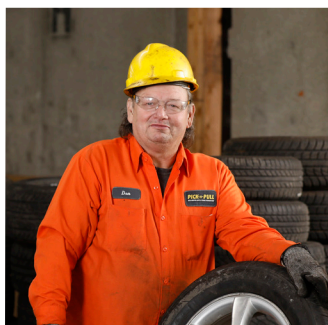
- Being open to understanding others' viewpoints despite their differences from our own.
- Listening intently to what others are saying.
- Being respectful, even when we disagree.
- Recognizing unconscious bias and developing strategies to avoid its potentially negative impacts on our actions and decisions.

We must do our part to ensure that no employee feels "less than" and that we are affording all employees opportunities to thrive.

This means:

- We hire and promote based on an individual's qualifications and performance.
- We actively look for qualified candidates beyond the typical recruitment sources and from traditionally underrepresented populations.
- We encourage employee engagement through dedicated programs like our Employee Resource Groups that build a sense of belonging, deepen the connection to our shared purpose, and help employees better understand one another.
- We do not discriminate, nor do we tolerate discrimination against anyone based on characteristics protected by law.

Characteristics protected by law include: Race • Religion • Color • Gender • Marital status • Disability status • National origin or ancestry • Veteran status • Age • Prior industrial injury • Sexual orientation • Gender identity or expression • Genetic Information • Any other protected status under local, state, provincial, or federal law.



We Respect Each Other

“We understand that excellence is achieved in an environment where diversity is celebrated, and where every employee’s engagement is optimized because they feel valued and appreciated. Without a culture based on respect and equity, our success is not possible.”

– Stef Murray, Chief Diversity and Inclusion Officer

We treat everybody with dignity and respect.

This means:

- We never bully, intimidate, retaliate against, or threaten another person.
- We recognize harassment when we see it, react promptly, and speak up.
- We remain careful not to engage in behavior that someone else might find offensive or inappropriate.
- We don’t ignore or dismiss harassment or other inappropriate conduct we experience or see, no matter who we perceive to be the target.

What do you do if you see or experience behavior that is contrary to our Core Values? If it is safe to do so, we tell the person to stop. If that seems less than safe or feels uncomfortable in any way, talk to your manager or use one of the many reporting avenues we have available as described in the Speak Up section on page 5.

Special Responsibilities of Leaders. *Our leaders set the tone. As leaders you must take extra care to make sure you are acting in a way that models inclusive and respectful behavior. Never criticize or reprimand a member of your team in front of others. Seek out solutions and accept contributions from all your team members, not just those with the loudest voices.*

Harassment comes in many forms, but here are some of the most common:

- Derogatory comments, slurs, or name-calling
- Unwelcome sexual advances
- Offensive or derogatory displays (including clothing) or gestures
- Assault, bullying, intimidation, or unwanted touching

Example Scenario:

Q: *My production team is all male. Several of my teammates like to tell dirty jokes in the breakroom, or even on the floor while we are working. They often say it is OK to tell these jokes if there are no women around. I really don’t like these types of jokes, as they make me uncomfortable, if not angry and annoyed. Is there anything I can do?*

A: *It is irrelevant that the team is all male. These types of jokes are never appropriate in the workplace, even on breaks. You could start by telling the others that you would rather they not make the jokes. If you are uncomfortable doing so, or if you tell them and they don’t stop, report the situation to your supervisor or by using any of our other reporting channels.*

 [Policy 3.1.12, Equal Employment Opportunity; Harassment and Discrimination](#)

 [Policy 8.1.10, Prohibition of Violence in the Workplace](#)

 [Policy 9.1.4, Corporate Security](#)



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Our Operations

“Continuous improvement in our safety culture is an essential component of our success. This means not only reinforcing safe behaviors, but also creating an expectation and a habit of learning, mutual accountability, and ensuring that people look out for one another.”
– Suresh Rajapakse, VP Health and Safety

We Keep Each Other Healthy and Safe

Safety is a Core Value.

Your health and safety are of paramount importance to us, which is why we work hard to provide a safe and healthy environment for our employees, contractors, and visitors.

We all play a part in ensuring health and safety.

This means:

- We learn and follow all health and safety requirements.
- We are alert and aware.
- We model safe work practices.
- We do not take shortcuts or ignore required safety practices.
- We look out for each other.

An injury-free workplace IS possible.



Be Alert and Aware. Pay attention not just to what you are doing, but to what those around you are doing as well. Understand your situation at all times. You are empowered to exercise your Stop Work Authority, meaning you can stop work when you perceive an unsafe condition or behavior, to prevent incidents or harm. In this way, we ensure safety takes precedence.

Model Safe Work Practices. Always assess the risks before starting a task, even if you have done it 100 times before. Keep work areas clear and uncluttered. Follow all safety procedures and always wear your personal protective equipment (PPE). Do not take shortcuts or perform a task that you are not trained and approved for.

Look Out for Each Other. Look out for each other every day, during every task. Point out any potential hazards or any concerns a teammate may not notice or be aware of.

Bring Your Best Self to Work. Before we can look out for each other, we must look after ourselves. That means we need to make sure we come to work fit and healthy. We should not be fatigued or under the influence of drugs or alcohol, or even a prescribed medication, which could impair our ability to carry out our work safely.

 [Policy 3.1.16, Drug and Alcohol](#)

 [Policy 8.1.1, Health and Safety](#)





We always report injuries and accidents.

Part of working safely is reporting any situations that would compromise a healthy and safe workplace. We support a reporting culture that includes transparency and accountability. Promptly reporting unsafe conditions, accidents, and injuries empowers us to take appropriate and effective preventative or corrective action.

This means:

- We immediately report all unsafe conditions, accidents, injuries, and near misses to a supervisor.
- We document and investigate all reports.
- We never cover up an injury or accident.
- We implement changes that strengthen our safeguards and prevent recurrence.

Here are just a few examples of the types of things you should report:

- Any injury to an employee, contractor, or visitor while at our facilities.
- All property or equipment damage.
- An illness that possibly arises from a workplace condition.
- Motor vehicle accidents involving employees during job-related driving.
- Near misses— narrowly avoided safety incidents — and hazards, such as clothing caught in machinery, damaged electrical cords in water, or an object that poses a hidden hazard.

Just as we do not tolerate retaliation for reporting wrongdoing or other types of infractions in our workplaces, we do not tolerate retaliation for reporting illness or injury.

We are Dedicated to Cultivating a Culture of Continuous Improvement and Transforming Incidents into Opportunities. Each incident or injury presents a unique opportunity for growth and refinement. We use these moments to learn and to make improvements to our procedures and practices. Thorough review and remediation of incidents and injuries move us forward in our ongoing journey toward an even safer workplace.

 [**Policy 8.1.4, Prohibition Against Retaliation for Reporting Workplace Injury & Illness**](#)

 [**Policy 8.1.5, Health and Safety Reporting, Recording, and Incident Investigation**](#)

“Compliance is not optional. It is doing the right thing in addition to doing things right. Your commitment to compliance is essential to the long-term success of Radius. Every day, each one of us plays a critical role in creating a workplace culture where compliance becomes integrated into every business aspect and activity throughout the company.”

– Matt Vaughn, SVP General Counsel & Chief Compliance Officer

We Comply with Laws and Regulations

Compliance is vital to Radius’ success and yours. We are committed to conducting business in full compliance with all legal requirements and obligations.

This means:

- We understand and follow the legal requirements applicable to our work responsibilities and functions.
- We expect ourselves and others to comply with the law in all business activities.
- We complete all required compliance-based training and comply with all Company policies and internal controls.
- We promptly report any potential violations or non-compliance.
- We do not interpret legal requirements, but rather seek assistance from the Legal Department.

Ensuring Compliance with Regulations Through Continuous Improvement.

At Radius we advocate for a “Culture of Compliance” that encourages ethical conduct and a commitment to compliance with all applicable laws, regulations, and Company policies in every aspect of Company business.

Radius has a formal and comprehensive Compliance Assurance Program that provides a well-designed and independent governance structure, documented internal controls, adequate staffing and financial resources, and appropriate oversight and empowerment. We promote:

- A safe forum for employees to raise concerns regarding compliance-related issues.
- Annual continuous improvement plans to sustain effective detection, mitigation, and prevention of an ever-broadening range of compliance risks.
- Training to fully embed compliance in all business aspects and activities.
- A strict prohibition on retaliation for reporting in good faith misconduct or other compliance-related issues.



We Protect the Environment

We protect the environment by leading in sustainability and complying with environmental laws through our individual and collective actions. Like safety, environmental protection requires constant vigilance and the attention of every one of us, every day.

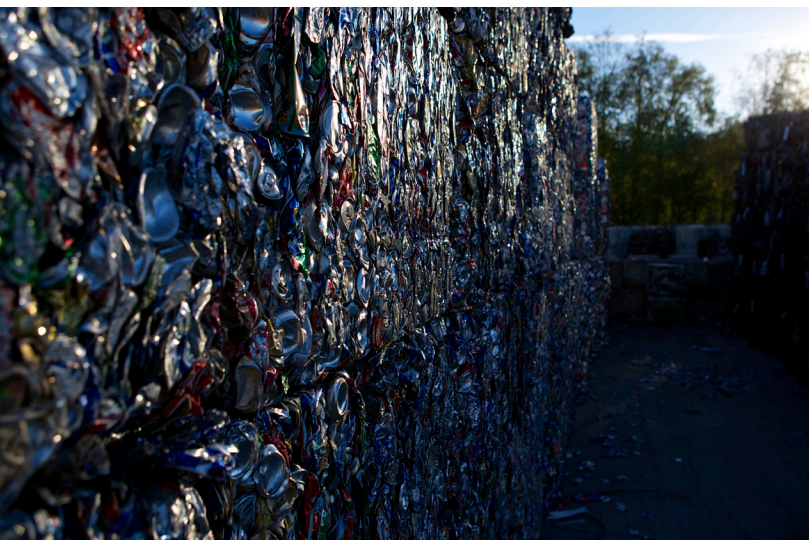
This means:

- We are knowledgeable about the environmental aspects of our jobs and follow all applicable laws, regulations, rules, and Company policies.
- We remain alert and aware, taking all required precautions when handling or transporting hazardous materials, hazardous waste, and other materials that can impact the environment.
- We use and dispose of chemicals and other materials properly.
- We manage stormwater runoff from our facilities to protect water quality in nearby lakes, streams, and oceans.
- We implement controls to minimize air emissions from our facilities and obtain air permits whenever required.
- We follow environmentally-responsible work practices.
- We speak up and promptly report any actual or potential environmental hazards, spills, discharges, excessive emissions, or other environmental concerns.
- We communicate and follow our scrap acceptance requirements.

Protecting the Environment While Improving Operations

Every Radius employee, customer, supplier, and visitor plays a part in identifying and managing environmental risks, hazards, and compliance requirements to protect the environment. Radius supports our Core Value of Sustainability through our ISO 14001 Environmental Management System that, among other things, requires us to:

- Comply with applicable environmental laws, regulations, and industry standards
- Reduce impacts to the environment and conserve natural resources
- Continually improve operational environmental performance using environmental targets, key performance indicators, and periodic audits
- Continually improve environmental awareness, understanding, and engagement with employees, customers, suppliers, and the communities in which we work and live
- Minimize energy consumption, air emissions, and waste generation to support pollution prevention and resource conservation across the Company
- Evaluate and implement technologies and operational changes that improve environmental performance
- Communicate these goals and requirements to all Employees





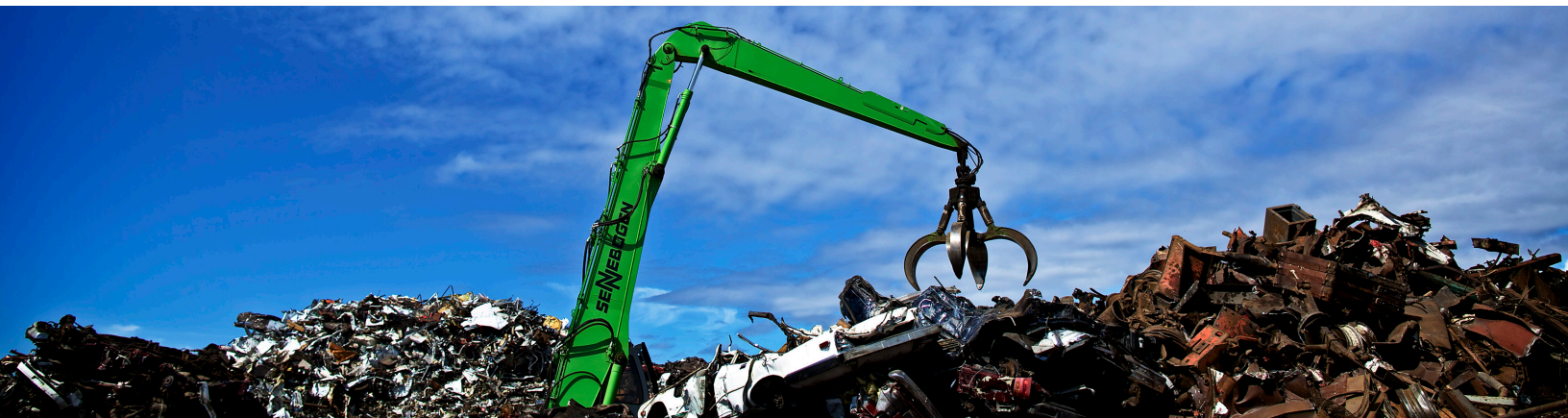
Example Scenario:

Q: *I saw one of my coworkers kicking clean gravel over what appeared to be an oil stain at the Pick-n-Pull yard. I asked what was going on, and my coworker explained that a customer who'd been in the process of pulling a transmission spilled a large amount of motor oil that flowed all the way onto the gravel. He said he was trying to cover it up with gravel so it was no longer visible. He went on to say that his team is behind on their production goals and he really didn't have time to do a thorough cleanup, and besides, "it was only a little bit of oil." I explained to him that this was not the correct approach, and that what he needed to do was to dig up the stained gravel and put it in the appropriate storage bin, and then get enough clean gravel to put in the hole left by the stained gravel. I reminded him that while I could understand the need to save time, taking a shortcut like this was not only against the rules, but could have led to contaminated stormwater and even groundwater. He thought about it for a second, nodded, and the two of us proceeded to get a couple of shovels and dig up the gravel and put fresh gravel in its place. Was this the right thing to do?*

A: *Yes. Your coworker was not acting in accordance with our environmental practices or our Core Values. Production deadlines are never an excuse for not doing the right thing. You were right to speak up and not allow him to continue. In fact, you showed your integrity by speaking up when you noticed something that wasn't right, and by helping show him what to do—not to mention stepping up to help him get the job done right. If you had found your coworker less receptive to your pointing out the issue, or if they refused to agree with what you said and work with you to fix it, your next step would have been to notify your supervisor and explain the situation.*

[!\[\]\(e474458956c9a37fbf9586ddb60a7fa1_img.jpg\) **Policy 10.1.1, Environmental Stewardship and Compliance**](#)

[!\[\]\(3e2231b1ad3ca8da8658228c00dd08e0_img.jpg\) **Policy 10.1.4, Environmental Management System**](#)



We Avoid Conflicts of Interest

We make business decisions based on the best interests of our Company.

We all have interests and relationships outside of our jobs; however, we have a responsibility to remain objective and unbiased when performing work on behalf of the Company, especially when there is a potential for conflict or undue compromise.

A conflict of interest can arise when we have overlapping interests between our job responsibilities and our personal relationships or circumstances. If we fail to recognize and manage any conflict, or the potential for conflict, we risk damaging our long-established reputation for integrity and trustworthiness, jeopardizing our brand and good standing in our industry and in the global marketplace.

[!\[\]\(e78f798d4ea5c530c9db49e7d26e6b95_img.jpg\) Policy 3.1.18, Conflicts of Interest](#)

[!\[\]\(23d9fc146e83b5c3013cfa32c784f8d5_img.jpg\) Policy 11.1.1, Purchasing \(Non-trade\)](#)

If you are not sure if there is a conflict, get a second, objective opinion. If the answer is yes, there is a potential conflict, or the appearance of one, you must seek guidance on how to proceed from your supervisor or another person in leadership, or from the Ethics Department. Do not act until you have received authorization to do so. And, if you are told not to proceed, don't.

Learn to recognize a potential conflict when you see one. Here are some of the more common examples:

- **Other employment.** As long as you are able to perform your duties for the Company, you are free to seek additional employment unless a collective bargaining agreement or union contract under which you are employed prohibits such dual employment or “moonlighting.” However, you must obtain approval first if you intend to work for one of our competitors, suppliers, or customers.
- **Family members and close personal relationships.** Conflicts can arise in a number of ways related to friends and family. Our Company does not allow an employee to be in a reporting relationship with a relative or close friend, meaning an employee cannot be in a position to evaluate, promote, or make hiring decisions about relatives or close friends. We may not use personal influence to get our Company to do business with a company in which our family members or friends may have an interest. If you are aware that the Company is considering doing business with an entity that your relative or friend works for, you must disclose this to avoid even the appearance of a conflict.
- **Investments.** If you make a financial investment with one of our suppliers, this too can create the appearance of a conflict. Disclose it.
- **Board service.** You may not agree to serve on a for-profit company's board of directors without approval, and you should ensure that service on a nonprofit board does not create, or appear to create, a conflict.
- **Meals, Gifts, and Entertainment.** While often appropriate and even customary, courtesies that build goodwill between our Company and our business partners carry the potential to cross the line to create an impermissible conflict of interest. Giving or accepting things from our suppliers or other business partners can pose a conflict of interest and potentially interfere with our ability to be objective. We have clear rules for what business courtesies are and are not acceptable.



You may not give or receive a business courtesy if it is:

- Solicited; we don't ask for gifts, nor do we provide gifts when asked to do so by others.
- Not reasonable or customary, or extravagant in value.
- Intended to improperly influence a decision.
- Given with the expectation of receiving anything of value in return (quid pro quo).
- Cash or a cash equivalent (gift card or gift certificate). Policy 6.1.4 (below) details specific exceptions to this prohibition.

We are allowed to accept unsolicited gifts if their approximate value does not exceed \$50, and if they do not otherwise violate any of these guidelines.

 **Policy 6.1.4, Purchase and Award of Customer Gift Cards**

Example Scenario:

Q: *At Radius we often need documents, including this one, translated into Spanish. I have been asked to locate and hire a translator for some forthcoming publications. My girlfriend works for a translation services company and makes commissions for every new client acquisition. I would love to give her the business and know from my research that her company is qualified and their pricing is competitive. I am worried, however, that others may not understand the situation and think that I did something improper if I go ahead and give the job to them. What should I do?*

A: *You are correct to be worried about this apparent conflict of interest, even if your girlfriend's company might be the best for the job. You must seek out your supervisor, explain the situation, and then let someone else handle the selection of the translator. They may select your girlfriend's company, or they may not, but it is inappropriate for you to be involved in the decision. Also, if your girlfriend's company is selected, you must not be involved going forward with any negotiations regarding contract renewals, etc. If either you or your supervisor has additional questions, contact the Ethics Department.*



We Operate Fairly

“Integrity must guide our actions at work and in life. Business success and personal achievement are natural outcomes when we are committed to integrity.”
– Eric Sork, Chief Ethics Officer

We base our business relationships on trust, transparency, and objectivity.

We know that we are judged not just by what we do, but by the company we keep. We do business with others who share our commitment to sustainable, safe, and ethical business practices. This means that we value our customers, suppliers, and other third parties and always deal with them honestly and fairly.

This means:

- We choose wisely. We look for companies that share our values. We conduct appropriate due diligence before entering into business relationships.
- We follow our procurement policies. We competitively bid business opportunities and select our suppliers based on objective criteria. We obtain all necessary approvals in advance of committing Company funds to a purchase.
- We act responsibly. We do not manipulate, conceal, or misrepresent facts. We also do not take unfair advantage of anyone. We do not make disparaging or untrue comments about competitors. We do not engage in corruption of any type.
- We fulfill all of our obligations. We treat our business partners honestly and fairly, honoring all contract terms.
- We require our suppliers to affirm their commitment to our Core Values by agreeing to abide by our **Supplier Code of Conduct**.
- We monitor closely. Our commitment to accountability does not end when the contract is signed; we make sure that those with whom we do business continue to perform legally and ethically while delivering commercial value to our Company.
- We maintain thorough and complete records. We document our business transactions, complying with our Company’s procedures and all internal financial controls.
- We protect confidential information as required by our contracts and as stipulated by executed Nondisclosure Agreements.
- We do not bribe or accept kickbacks.
- We follow applicable metal theft laws.

 **Policy 11.1.1, Purchasing (Non-trade)**

We take particular care when engaging agents, subcontractors, or other third parties that work with us beyond the scope of a typical customer or supplier relationship. We conduct enhanced due diligence, include contractual provisions that make our expectations regarding compliance and ethical obligations clear, and take extra care to ensure that any payment accurately reflects the work performed.



We Do Not Engage in Anticompetitive Behavior

We compete fairly.

We know that free and fair competition is essential to a thriving marketplace. We outperform our competition legitimately and honestly, maintaining a competitive advantage because of the value and quality of our products and services.

We strictly abide by all competition and antitrust laws wherever we do business.

This means:

- We never collude with competitors to:
 - fix or set prices;
 - divide markets, territories, or customers;
 - coordinate bidding for a project;
 - restrict production, supply, or sales; or
 - refuse to do business with a particular customer or supplier.
- We do not try to monopolize a market or eliminate competition.
- We do not try to improperly influence the outcome of a competitive bid.

We act with uncompromising integrity.



Policy 5.1.10, Antitrust Compliance

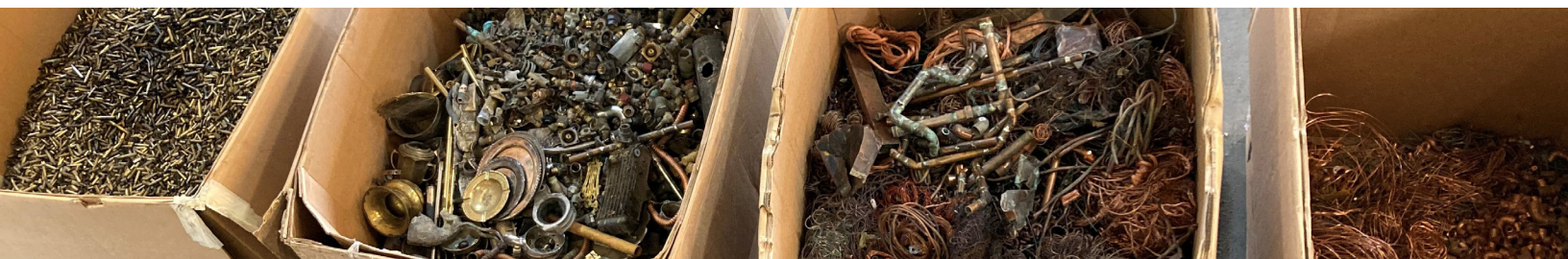
Even if you do not believe there was an agreement with a competitor, the law may say otherwise. Agreements can be oral or written, expressed or implied, created directly with a competitor, or arranged through a third party. Also, even if there was never an actual agreement, the mere appearance of an agreement can be enough to constitute illegal behavior.

Engaging with industry associations and trade groups often involves attendance at gatherings of competitors, and therefore requires enhanced vigilance to avoid violating the law. If you take part in these gatherings or are involved in these types of activities, make sure your discussions never include pricing, bidding, allocations, or other topics where confidential business information may be shared or learned. If you are present and such a discussion does arise, you must speak up, tell the group that the discussion is not appropriate, and then immediately excuse yourself. Then, contact the Legal Department right away to report the situation. This protects you and our Company.

Example Scenario:

Q: *A new scrap yard has opened a few miles away from the Radius yard where I work. I've noticed that our scrap flows seem to be lower than before. One of our scrap peddlers told me the new yard was offering \$2 more per ton, but because he valued our service, he wanted to continue coming to us. If I raise our prices by \$2 am I doing anything wrong?*

A: *No. If the new scrap yard's prices were otherwise publicly available, the information was volunteered freely by the scrap peddler, and you have had no communications with your new competitor, this pricing decision would not violate antitrust laws. However, if you had contacted the new competitor and suggested agreeing to a common price, or to split the market or services provided at each yard, that would have been illegal and could subject you and the Company to antitrust penalties.*





We market and sell responsibly.

We stand by the products and services we sell, whether it is scrap metal shipped around the globe, used auto parts our customers buy to keep their vehicles running, or finished rebar that supports bridges and buildings.

We provide excellent customer service and are honest, transparent, and accurate regarding quality, price, and availability.

Our marketing and advertising statements are honest, supported by facts, and in compliance with applicable marketing laws and regulations.

We gather market intelligence the right way.

It is smart business to remain aware of what our competition is doing, but we do so legally and ethically.

This means:

- We use good judgment when seeking information. If it feels wrong, it probably is, and you should seek guidance before proceeding.
- We rely on public information sources and customer and supplier feedback.
- We do not misrepresent ourselves or our intentions to gain access to nonpublic information.
- We do not ask past or present employees of our competitors to share other companies' confidential information.

We always know what we are importing and exporting.

We are proud to ship our products around the world, and that we have valued suppliers in many countries. We take very seriously our responsibilities associated with importing and exporting products.

This means:

- We comply with laws and regulations governing the movement of goods across national borders.
- We always know what is in every shipment we import or export.
- We always provide accurate information to any customs official or broker that assists us with shipments.

The rules governing import and export can be very complex, but we have a team to guide you. If you are involved in a transaction where goods will cross borders, including the U.S.-Canadian border, make sure you check the [International Trade page on SharePoint](#) or contact the Legal Department for guidance and assistance.

 [Policy 5.1.11, Import Compliance](#)

We Avoid Corruption

We do not accept bribes. We do not offer bribes.

Bribery is when someone offers or accepts something of value in exchange for business advantage or personal gain. It is inherently corrupt, unfair, and illegal.

- Bribery is a betrayal of trust.
- Bribery generates a host of economic and social harms that impair governments, commercial entities, global markets, and the general public.
- Bribery distorts fair competition within and across markets, interfering with global trade and hampering economic development.
- Bribery is a crime and both the person offering the bribe and the person receiving it can be criminally charged.

We prohibit bribery in all business dealings, in every country around the world, with governments and the private sector. Our Anticorruption Policy uses the term *Prohibited Payment* for a bribe to a foreign government official (including employees of state-owned entities), and *Improper Payment* for a bribe to a private party (that is not a foreign government official). While the particular laws governing bribery may differ in different countries and depending on whether the transaction involves private sector or government entities, we remain resolute in our commitment to ensuring we are never involved in any form of bribery.

The definition of “government official” is broad and includes, but is not limited to, government employees, candidates for office, and any employee of a government-owned company. See the Government Officials section on page 23.

Bribes are not limited to cash-stuffed envelopes. They can be anything of value offered or promised to obtain an improper business advantage, such as cash equivalents (like gift cards), gifts, travel expenses, meals, entertainment, goods, or services. They could also take the form of seemingly harmless favors, like employing a relative or friend of the “recipient,” or granting a loan.

We prohibit facilitation payments.

We prohibit all bribes, including so-called “facilitation payments.” These are usually small payments offered to a government official in exchange for expediting the issuance of a license or permit, or to secure an exemption from a regulation, tax, or customs rule. Making a payment to a foreign customs agent to get a shipment processed more quickly is an example of this type of payment. A bribe is a bribe, no matter how small, and strictly prohibited.

We do not ask a third party to do something that we ourselves are prohibited from doing.

This means that we never allow anyone operating on our behalf, including distributors or agents, to engage in corrupt behavior of any kind.

When faced with an extortion situation, your safety is most important.

If you are confronted by a corrupt government official or any other person that threatens you with harm if you do not make a payment, such as during a bogus traffic stop, and you reasonably believe that not making the payment would create an imminent risk to your or your traveling companions’ personal health or safety, make the payment. There is nothing more important to our Company than your safety. Please note that these types of extortion payments are not illegal bribes, as there is no intent to obtain an improper business advantage. When, and only when, you are safe, notify the Company’s Chief Compliance Officer and Chief Financial Officer so that we can take any additional steps necessary to resolve the situation and properly document the transaction.



We are vigilant about detecting money laundering.

Money laundering is one way criminals hide funds obtained through engaging in criminal and terrorist activities. Our Company is committed to complying fully with all anti-money laundering and anti-terrorism laws throughout the world. We perform due diligence on our suppliers and customers to make sure we have enough information about their business and business activities to confirm that they are legitimate before we enter into contracts with them. We flag and review any transactions that look suspicious and do not accept any payments until we are certain they are appropriate. We also rely on you to be vigilant about understanding the details of all sales and purchases and report anything suspicious, including large cash transactions, payments from or to third countries (especially recognized tax havens), or anything else that raises suspicion of money laundering. Engaging in money laundering is considered a *Prohibited Transaction* under the Anticorruption Policy.

We don't do business with sanctioned entities. We don't comply with boycotts.

There are certain people, companies, and even countries with whom doing business is prohibited because of sanctions imposed by U.S., Canadian, or international law. By screening our customers, suppliers, and other business partners against lists published by the U.S. and Canadian governments, as well as the United Nations and other international agencies, we ensure that we are complying with all sanctions and not engaging in business with a prohibited entity.

Also, we must not comply with a boycott imposed by a foreign country against a country friendly to the United States or Canada.

If you have any questions about whether a particular transaction may be sanctioned, or if you are asked to comply with a foreign boycott, contact the Legal Department.

Policy 5.1.9, Anticorruption

We follow the highest ethical standards when interacting with government officials.

We interact with government officials for many different reasons. We may need to submit forms to acquire permits for building and operating our metal recycling facilities. We file paperwork with the Coast Guard to comply with rules related to operating at our deep-water ports. We may be invited or even required to meet with an elected official for any number of reasons, including to discuss metal theft laws or other industry-specific topics. We may need to interact with a purchasing manager of a foreign-government-owned company when selling them our products. Regardless of the situation, we always make sure that everything we do is legally permissible and in alignment with our Core Values.

This means:

- We never take shortcuts; we strictly comply with rules and regulations and refrain from potentially illegal or otherwise prohibited activities.
- We consult with our Legal Department before pursuing any government contracts or public-private partnerships.
- We do not engage in lobbying activities or provide donations to government entities on behalf of the Company unless we are authorized to do so after consulting with our Governmental Affairs Department. See page 26 for more on Political Activities.
- We cooperate fully in all government audits and investigations.
- We follow Company procedures if presented with a search warrant or subpoena or a request from law enforcement.
- We do not offer or give anything of value to a government official that is inconsistent with our anticorruption policy.

Policy 6.1.2, Political Contributions

Policy 5.1.15, Acceptance of Service

We Protect Privacy

We keep private information private.

We need to collect personal information about people as part of our operations, including from employees, customers, and suppliers. We have an ethical and legal obligation to limit the amount of personal information we collect to the minimum amount needed for our business purposes. We respect and protect this type of personal information.

This means:

- We follow all applicable local, state, and federal data protection and privacy laws.
- We properly secure personal data.
- We follow our policy on data privacy.
- We require any third parties that have access to our data to have security and privacy standards as strict as our own.
- We maintain and securely destroy personal data according to our policy on records retention.

Policy 5.1.14, Data Privacy

What is personal information?

Anything that could identify someone, directly or indirectly. It is very broad and goes beyond the things you might normally think of.

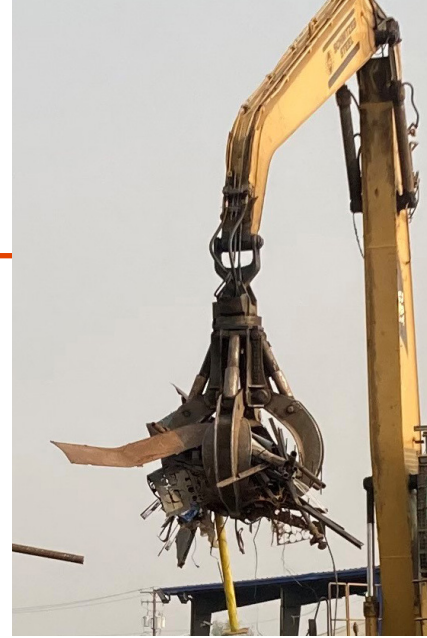
Here are just some examples:

- Name
- Address
- Email address
- Phone number
- Social security number
- Driver's license or other government photo ID information
- Bank or credit card details
- Health information
- Insurance policy numbers
- Benefits, pay, or performance information
- IP address or other online identifiers (usernames, etc.)

Example Scenario:

Q: *The scrap purchasing laws in my state require me to make a copy of the photo ID of each scrap supplier and keep it on file for 60 days. I scan but do not print the information, so I don't make any paper copies. Is this what I should be doing?*

A: *Yes. By not creating paper copies, you are helping to protect yourself, our customer, and our Company from the risk of a privacy violation. By scanning the information, it becomes protected by our secure electronic systems. Also, the information can then more easily be retained, retrieved, and deleted according to policy.*





Our Shareholders



We Communicate Responsibly

We speak clearly, and with one voice.

Both the content and the manner in which we communicate externally can impact our reputation. We strive to provide consistent, clear, and accurate information about who we are and what we do. If you speak publicly to express your personal views or beliefs, avoid giving the impression that you are representing the Company. Make clear that these are your views and that you are not speaking for the Company.

It is important that only those authorized to do so speak to the press. If you receive a call from a journalist or other media representative, please direct them to our Public Affairs Department and refrain from further comment. The Our Resources section starting on page 38 includes the contact information for the Public Affairs team.



If you are invited to participate in external events or speaking engagements, or if you plan to engage in any activity that can be perceived as representing the Company, seek approval from Public Affairs before proceeding.

We have special rules for serving.

If you are considering running for government office or serving on a board of directors for a nonprofit organization, please seek guidance from the Legal Department to ensure it will not constitute a conflict of interest. See page 17 for more on conflicts of interest and board service.

[Policy 3.1.18, Conflicts of Interest](#)

We use social media responsibly.

Most of us engage in social and online communities; it is a way to stay in touch and connect with those who share our interests. It is important that we use good judgment and common sense in our activities and do not engage in conduct that could be harmful to others or reflect poorly on the Company.

This means:

- We do not post confidential information about our Company or our customers or suppliers.
- We do not post harassing or discriminatory comments; if you wouldn't say it in the workplace, don't say it online.
- We do make clear that what we share and say reflects our own rather than Radius' views.
- We follow our Social Media Policy.

[Policy 6.1.5, Social Media](#)

We participate in the political process, but we are respectful when engaging in political discussions at work.

Each of us has political views and opinions and may want to express them to varying degrees. While we welcome opportunities to engage in civil discourse when appropriate or necessary, we keep our personal political interests and activities separate from the Company's. We do not use, or appear to use, Company assets in connection with promoting or advocating a political candidate or cause.

When engaging in political discussions at work, we remain respectful of our colleagues' diverse perspectives and sometimes conflicting opinions. By overindulging in political conversations in the work environment we risk crossing the line to annoying or even offending one another, thereby damaging working relationships with our colleagues. While we support and respect each other's rights to actively participate in the political process, we engage only in constructive and respectful conversations.

This means:

- We are sensitive to the views and tolerance levels of others when choosing whether to engage in political discussions at work.
- We do not use Company resources for personal political activities outside of what is stipulated in our policy on political contributions.
- We encourage each other to exercise our right to vote.

[Policy 6.1.2, Political Contributions](#)

We Ensure Financial Integrity

“By applying financial integrity to our business activities we make sure our financial records and disclosures are correct, complete, accurate, and meet the highest standards of quality.”

– Stefano Gaggini, Chief Financial Officer

We maintain accurate business records.

We create business records every time we make a sale, buy equipment, produce rebar, buy scrap, charter a vessel, create an inventory report, process payroll, or carry out any of our business activities. Our books and records must continually reflect an accurate picture of our business. This is how we ensure financial integrity and provide timely and accurate disclosures of our financial information to the public.

This means:

- We honestly and accurately report financial information, following all applicable laws and Generally Accepted Accounting Principles.
- We follow all internal controls.
- We manage budgets, expenses, and other funds responsibly and accurately.
- We obtain the necessary approvals for expenditures.
- We help prevent fraud by being vigilant for suspicious activities and promptly reporting anything we see.
- We do not cover up mistakes; we correct them.
- We do not enter false information about any transaction.
- We do not sign contracts without the appropriate authority and approvals, including from Legal and Finance.
- We cooperate fully with all audits, both internal and external.
- We recognize that oversight of our financial recordkeeping and reporting rests with our Chief Financial Officer and Chief Accounting Officer, both of whom have a fiduciary responsibility to financial integrity.
- We make sure that we promptly inform our Finance team of any actions or events that may affect the Company's finances or accounting.

We take particular care when preparing and filing expense reports. We only seek reimbursement for authorized business expenses and make sure expense reports are accurate, complete, and appropriately documented.

Policy 4.1.2, Travel and Expense Management

Example Scenario:

Q: *I was asked to gather some information for an audit that is being conducted by the Company's Internal Audit Department. I noticed that some documents that should have been there are missing and a few others are incomplete. After telling my supervisor, she explained that this was simply an oversight, and then told me to create the missing documents and fill in the incomplete documents so the Department won't "look bad" in the audit. What should I do?*

A: *You must not follow your supervisor's instructions as doing so would violate our prohibition against false records. The correct approach would be to proactively communicate to Internal Audit the issue with the records and work together to determine a way to make sure this does not happen in the future. If your supervisor insists, or if you suspect that she, or someone else, is creating the false records, you must report it. We understand this may put you in a difficult position, but it is essential that you speak up. Remember, we do not tolerate retaliation for reporting a potential problem or voicing issues or concerns.*



We retain records for as long as necessary and required.

Maintaining accurate records includes keeping them for a certain duration and destroying them when they are no longer necessary or required. Make sure you follow the guidelines set forth in our Record Retention Policy that specifies the length of time we should maintain business records and when destroying them is permitted or required.

At any time, a situation may arise when documents are needed in connection with a lawsuit or investigation. If you receive a “hold notice” issued by the Legal Department, you must not destroy the documents covered by the notice until the hold is lifted and you are explicitly authorized to do so. Seek guidance from the Legal Department if necessary.

 **Policy 5.1.1, Record Retention**

We assign special responsibility for reporting and disclosure to qualified and judicious individuals.

There are certain individuals in our Company who have a special responsibility for financial reporting and promoting financial integrity. They must ensure that what we disclose in public communications and file with government regulators is complete, accurate, timely, and legally compliant.

These individuals include:

- Each member of the Board of Directors
- The Chief Executive Officer
- The Chief Financial Officer
- The Chief Accounting Officer
- Each member of the Company’s Finance Department



We Protect Our Assets

Think about the things you use every day to do your job: tools, mobile equipment, computers, handheld radios, and office supplies, to name just a few. These are assets we all must protect and use wisely.

We only use Company assets for legitimate Company business.

This means:

- We keep personal use to a minimum.
- We never access a customer, supplier, or employee's personal information or records except for strictly necessary business purposes.
- We never use our information systems to view or send sexually explicit or offensive materials, or to communicate using discriminating, harassing, or threatening language.

We properly maintain Company assets.

This means:

- We report any malfunctioning equipment promptly.
- We follow a regular maintenance schedule for all equipment.
- We refrain from downloading or installing unauthorized software onto any Company device.

We safeguard private and confidential information.

Just as we make sure to lock cash in a safe, secure the keys to mobile equipment, and protect our scrap from theft, we must also protect our confidential business information and the personal information of our customers, suppliers, and employees. This includes our own information and information we receive from others.

Confidential information comes in many forms, including customer and supplier lists, pricing data and proprietary details about our products and services, news of pending or potential acquisitions, or other information that has not yet been announced or made public. It may even be something found in a car or left behind by a customer.

Personal information also comes in many forms, including any information that identifies or may be used to identify an individual, such as name, address, phone number, date of birth, email address, driver's license number, etc. We all have an ethical and legal obligation to protect the privacy and confidentiality of personal information, and to use it only in ways consistent with the business purposes for which we collected it.

We must protect our Company's confidential information—and the confidential information others entrust us to safeguard—as if it were our own.



How do we protect our information?

We Do:

- Limit access to information to those who need to know.
- Mark and secure hard copies of documents and shred them when we are done.
- Follow our rules and policies regarding document retention, data privacy, and confidentiality.
- Only use Company-approved hardware, software, applications, and storage devices.
- Use a complex password and promptly install all required IT security updates.
- Follow all IT Security Standards.
- Install all required updates to your computer and any other devices used for Company work.
- Be vigilant for phishing and other attempts to gain unauthorized access to our IT systems.
- Seek internal clarification on any external communication or request that seems unclear or strange.
- Immediately report any unauthorized access or suspicious activity to the SSI Help Desk.

We Don't:

- Discuss confidential Company matters in public places.
- Leave confidential documents where they can be seen or intercepted, including on a desk, copier, or any open space accessible by employees or others.
- Share passwords or account information.

 [Policy 5.1.12, Confidential Business Information](#) |

 [Policy 5.1.14, Data Privacy](#)

 [Policy 13.1.21, Acceptable Use of Digital Assets](#) |

 [Policy 5.1.1, Record Retention](#)

Contact the [Help Desk](#) at (866) 724-6005 or RdusHelpDesk@rdus.com regarding any issues you have in using our information systems or to report anything suspicious.



We Safeguard Information

We keep our information systems secure.

We actively monitor our information systems for threats and unauthorized access. You should have no expectation of privacy in anything you create, store, or communicate while using the Company's information systems, regardless of the device by which you access them. The Company reserves the right to monitor, intercept, and review without further notice all activity on the Company's information systems. Personally owned electronic devices containing or accessing Company information are also subject to applicable provisions of the Company's information security policies and procedures to protect the integrity and security of Company data. As detailed under We Protect Privacy on page 24, we take precautions to keep all private information private.

Example Scenario:

Q: *I take my Radius laptop home every night. Sometimes I forget my laptop in my car, but I always lock the doors. That's okay, right?*

A: *No. You should never leave your laptop or other Company asset in your vehicle. You are responsible for keeping your devices with you at all times, taking appropriate steps to log off of your laptop, password-protecting all devices, and storing all devices in secure locations when they are not in use.*

Remember, your obligation to protect our Company's confidential information continues even after you leave the Company. By the same token, we would not ask for or expect employees to share their former employers' confidential information with us.

We are all responsible for protecting our information systems.

Protecting the security of our information systems and Company data is the responsibility of every employee. The vast majority of successful cyberattacks involve human error by the target, usually in the form of successful deception. We therefore must be constantly vigilant against phishing attempts and other potential sources of malicious software. You should carefully evaluate and identify the authenticity of electronic communications, always stop to think and investigate before clicking on links and buttons, and be sure to speak up if you encounter something suspicious by reporting potential problems to your supervisor or the Help Desk. By working together, we protect the systems we use on daily basis from hostile cyber threats.

All of the security precautions we take to protect our business information also apply to people's private personal information, but there are additional laws and regulations we must follow when we collect and store this type of information. Refer to the We Protect Privacy section on page 24 for more on how we protect people's personal information.

[!\[\]\(c50c8b7b2cc2cf9ff925edec0ee94c0d_img.jpg\) Policy 13.1.15, Information Security](#)

[!\[\]\(6a9b39b98eb945faa14c645ec99e4eaa_img.jpg\) Policy 13.1.21, Acceptable Use of Digital Assets](#)



We respect intellectual property.

What is intellectual property? Intellectual property is an intangible asset produced by creativity. It includes things like our trademarked logos, copyrights (for written publications), patents (for inventions), and trade secrets. Respecting intellectual property means protecting our own and not using others' without permission.

We carefully protect our Company's intellectual property by:

- Following **Radius' Brand Guidelines** for using our logos and other graphic elements.
- Not entering into any agreement related to our intellectual property without approval from the Legal Department.
- Following our policy on intellectual property.

We avoid unauthorized use of others' intellectual property by:

- Using software legally; obtaining licenses for any third-party applications.
- Not plagiarizing.
- Understanding that just because you find something on the internet does not mean you are allowed to copy or recirculate it.

 **Policy 5.1.13, Intellectual Property**



We Trade Securities Legally and Avoid Insider Dealing

We don't buy or sell stock if we have material nonpublic information.

We are a public company. Our stock is traded on the NASDAQ stock exchange under the symbol RDUS.

Through our work we may come across information about our Company, or another publicly traded company, that has not been disclosed to the public and that is considered "material." By material we mean the kind of information an investor would consider important in making a decision to buy or sell stock.

We are not allowed to trade in stock using this type of "inside" information. We are also not allowed to "tip" family, friends, or others about the information so that they may trade. To be clear, insider trading and tipping insider information are serious violations of our Code of Conduct and the law, and may constitute a criminal offense.

Examples of material nonpublic information include:

- Financial results or forecasts that have not been publicly announced.
- Advance notice of changes in senior management.
- Unannounced acquisitions or divestitures.
- Pending or threatened litigation.
- Development of a significant new product or service or investment in new technology.

When in doubt, you should presume that information you obtain is both material and nonpublic. Do not trade in Company securities when you are aware of material information affecting our business that has not been publicly released.

Our Stock Trading Policy sets forth the rules regarding stock trading for our directors and employees and their households and immediate family members. Further, if you have been advised that you are a Restricted Person, you are subject to special rules regarding trading in the Company's stock.

Policy 5.1.4, Stock Trading

Before trading, ask yourself:

- Have I reviewed the policy on stock trading?
- Do I understand what is appropriate and what is not?
- Do I possess material inside information?
- Am I currently subject to a Blackout Period?

Example Scenario:

Q: I had been planning on buying some shares of Company stock but heard today that our Company just received a new demolition contract that could be very profitable. I don't think this information is public yet. Can I go ahead and purchase the stock as I had been planning to before I learned this news?

A: Your previous plans to purchase the stock are irrelevant. What is important now is whether this information is public. Seek guidance before trading.

These rules regarding insider trading also apply to the stock of other companies (suppliers, customers, etc.) about which you receive information in the course of your employment.

Contact the Legal Department for any questions you may have about this topic.



 radius recycling



Our Communities



Sustainability is Our Business

“From the way we source, process, and transport recycled materials to the energy we use to produce sustainable steel, Radius is well positioned to meet the demands of the low-carbon economy of the future. Together, we are making steady progress toward achieving our ambitious sustainability goals.”
– Judodine Nichols, Chief Sustainability Officer

Sustainability isn't just one of our Core Values; it's what we do.

Sustainability is at the core of what we do and how we operate, as it has been since our founding in 1906. We work every day to ensure a future with less waste, more natural resources, and cleaner air and water. We turn the old into new, enable the obsolete to become reusable, and in the process build better communities.

Our sustainability framework of People, Planet, and Profit is fundamental to our business success. Our sustainable operations, low-carbon products, and secure recycling services contribute to the resiliency of local, regional, and global economies and communities.



We demonstrate our commitment to sustainability through well-defined and actionable principles, sensible, effective policies, and ambitious sustainability goals.

Our commitment to sustainability is reflected in our investments in the health, safety, and well-being of our workforce, in advancing industry-leading processing technologies that increase the volume and quality of the metals we recycle and reduce the materials directed to landfills, and in emissions control and natural resource conservation systems that enable us to responsibly manage the environmental impacts of our business activities.

All of the sustainability impacts we focus on and create goals and strategies around underscore our commitment to supporting a more equitable, clean-energy future, incorporate the highest standards for workers' health and safety, prioritize diversity, equity, and inclusion, and actively address the needs of the communities in which we operate.

For more information on our sustainability program, see our annual Sustainability Report.
sustainability.radiusrecycling.com



We Strive to Make a Positive Impact

We are active members of the communities in which we operate. Through charitable giving, direct donations, and employee volunteerism, we provide meaningful support to individuals, families, and community organizations.

Our community investment programs center around a core set of priorities that provide resources to individuals and community groups. Our investment focus areas are aligned with long-term strategic goals such as advancing local workforce development, promoting the Company's role in sustainability and environmental stewardship, and cultivating enduring partnerships with our communities.

We engage with and proactively support our communities in many ways:

Direct giving. We financially support efforts to relieve hunger, further educational opportunities (including for trade school programs), combat homelessness, restore critical habitat, and enrich lives through arts and culture.

Employee volunteerism. Our employee volunteer efforts reinforce specific and personal connections within our communities. Through our Volunteer Time Off (VTO) Program, we offer every employee eight paid hours a year to volunteer.

Earth Day. Beyond our daily efforts to promote environmental conservation through our recycling services, Radius celebrates Earth Day each year with a day of service. We partner with community groups and nonprofit organizations to extend our impact and protect the environment in the communities in which we operate.

Speaking out on issues of fairness and equity. We recognize that fairness and equity lead to better lives and opportunities for all. We engage in candid conversations about how to eliminate inequities due to characteristics such as race, gender, religion, disability, age, sexual orientation, or any other discriminatory behavior.

Supporting our fellow employees who have suffered hardships. Our *Recycling for a Better Tomorrow* charitable foundation helps employees and their families recover from disasters that disrupt their lives. Our paid time off bank allows employees to donate time they will not use to others who may need a little extra due to illness or another disruptive event.

Promoting safety in our communities. Our business model allows us to assist first responders with training, including providing vehicles to assist police and firefighters in mastering specialized tools and techniques for extracting passengers from vehicles in the event of an auto accident as well as hosting K-9 Certification Training for dogs learning to identify various materials.



We Respect Human Rights

We are committed to respecting and advancing the human rights of all people everywhere. We likewise partner with third parties who aspire to the same high standards.

This means:

- We honor the right to a safe, clean, healthy, and sustainable environment and promote the long-term health, safety, and wellness of all employees.
- We advocate for a workplace that is free from violence, harassment, and intimidation.
- We comply with all applicable laws concerning pay, benefits, and working conditions; we do not work “off the clock.”
- We prohibit all forms of slavery, including involuntary, forced or prison labor, child labor, and human trafficking.
- We respect the rights of employees to organize and collectively bargain.
- We work to protect the rights of all people, including women, members of minority groups, and indigenous peoples.
- We educate our leaders and employees to identify potential human rights abuses that may occur in the course of our business activities and empower them to raise potential incidents through the myriad channels we offer as detailed in the Speak Up section on page 5.
- We oppose corruption in all forms.

 [Policy 1.1.1, Human Rights](#)

We Do Not Deal in Conflict Minerals

We know that trade in Conflict Minerals has been associated with human rights abuses. We are committed to responsible sourcing of the metals and other raw materials we use in our operations and therefore do not purchase Conflict Minerals. We require our suppliers of products that could potentially contain Conflict Minerals to certify that they do not. We do not require this certification from suppliers of scrap metal, as these materials are considered conflict free under current U.S. law. We comply with all legal requirements related to due diligence and disclosure regarding Conflict Minerals.

Conflict Minerals are cassiterite, columbite-tantalite, gold, wolframite, and their derivatives in tin, tantalum, and tungsten that originated from the Democratic Republic of Congo or other countries specified under U.S. law.

 [Radius Disclosure on Conflict Minerals](#)





 radius recycling



Our Resources



Company Resources and Information

To report concerns or misconduct, contact:

Misconduct Reporting System

(866) 400-5738

radiusrecycling.ethicspoint.com

Chief Ethics Officer

Radius Recycling
PO Box 10047
Portland, OR 97296-0047

Mark the envelope: CONFIDENTIAL

Visit the Radius SharePoint intranet page at SCHNWEB.sharepoint.com for employee resources and information, including contact information for whomever you may wish to consult regarding any topic covered in this Code.

Radius Recycling Corporate Office

(503) 224-9900

Security Control Center

(404) 332-0024 or (404) 681-4061
RadiusSecurity@rdus.com

Compliance

compliance@rdus.com

Data Privacy

dataprivacy@rdus.com

Environmental

rdusenvironmental@rdus.com

Ethics

Ethics@rdus.com

Health and Safety

KOIN-Safety@rdus.com

Internal Audit

internalaudit@rdus.com

Human Resources

(855) 804-4749
HR@rdus.com

Information Technology

(866) 724-6005
rdushelpdesk@rdus.com

Investor Relations

investorrelations@rdus.com

Legal

generalcounsel@rdus.com

Public Affairs

pa@rdus.com

Sustainability

Sustainability@rdus.com

Policies

Please find all of our Company policies and procedures by going to our SCHNWEB portal on SharePoint and clicking on the **Policies and Procedures Library**. Listed below are the policies referred to in this Code:

- [!\[\]\(746d018fdf6ab02bf5fb7681133e8b29_img.jpg\) **Policy 1.1.1, Human Rights**](#)
- [!\[\]\(5daa6eee1904cb6b9d765700250de764_img.jpg\) **Policy 1.1.4, Anti-Retaliation**](#)
- [!\[\]\(d72e437c7cc5947bc0b147aba6602563_img.jpg\) **Policy 3.1.12, Equal Employment Opportunity; Harassment and Discrimination**](#)
- [!\[\]\(0d2a89e6d0cbcd8e0459b972b9332401_img.jpg\) **Policy 3.1.16, Drug and Alcohol**](#)
- [!\[\]\(cdcd8a42e5993b465235781ccc1c8555_img.jpg\) **Policy 3.1.18, Conflicts of Interest**](#)
- [!\[\]\(c0c9434f3698c901303014555ccb5687_img.jpg\) **Policy 4.1.2, Travel and Expense Management**](#)
- [!\[\]\(4f9bd4c242eb94a69f6647adc92289eb_img.jpg\) **Policy 5.1.1, Record Retention**](#)
- [!\[\]\(2043c91b19713cb6115a4799f072cbca_img.jpg\) **Policy 5.1.4, Stock Trading**](#)
- [!\[\]\(db8bdec0696fd5238eefca5b38e3467b_img.jpg\) **Policy 5.1.9, Anticorruption**](#)
- [!\[\]\(b360ad16bdc7d6189e2925016b1b3ed0_img.jpg\) **Policy 5.1.10, Antitrust Compliance**](#)
- [!\[\]\(330328ae07b5745be406cfc9969e3643_img.jpg\) **Policy 5.1.11, Import Compliance**](#)
- [!\[\]\(60cb7d1235d4d987b531e31489f1225b_img.jpg\) **Policy 5.1.12, Confidential Business Information**](#)
- [!\[\]\(7cb93e551cef6cae62b325637457f4d9_img.jpg\) **Policy 5.1.13, Intellectual Property**](#)
- [!\[\]\(e918707da0392c42efd38cf1c1534341_img.jpg\) **Policy 5.1.14, Data Privacy**](#)
- [!\[\]\(9449be45787e7c1c007d0c56f7d83a4a_img.jpg\) **Policy 5.1.15, Acceptance of Service**](#)
- [!\[\]\(52d562819d96ee02fbd79106c2065608_img.jpg\) **Policy 6.1.2, Political Contributions**](#)
- [!\[\]\(cfae5971f193f6e6fa93edcee016c40a_img.jpg\) **Policy 6.1.4, Purchase and Award of Customer Gift Cards**](#)
- [!\[\]\(8833d691aa8ec9e36bc02fc68508bd2a_img.jpg\) **Policy 6.1.5, Social Media**](#)
- [!\[\]\(8eddc727a5f3e0ebee12f839f9c02258_img.jpg\) **Policy 8.1.1, Health & Safety**](#)
- [!\[\]\(dbad90e930d83b37c3833dc98a14ebfa_img.jpg\) **Policy 8.1.4, Prohibition Against Retaliation for Reporting Workplace Injury & Illness**](#)
- [!\[\]\(3a10704a830aafe1c4093cad79f3d9a7_img.jpg\) **Policy 8.1.5, Health and Safety Reporting, Recording, and Incident Investigation**](#)
- [!\[\]\(992611a906d038a46fc8362438c76ef8_img.jpg\) **Policy 8.1.10, Prohibition of Violence in the Workplace**](#)
- [!\[\]\(cb502cf2483bea4ac74f8cd9cb7d4530_img.jpg\) **Policy 9.1.4, Corporate Security**](#)
- [!\[\]\(af1073df5cd9b573c0e39de84fec03c3_img.jpg\) **Policy 10.1.1, Environmental Stewardship and Compliance**](#)
- [!\[\]\(0dd106c73228a091821b5cb7bdfe18fc_img.jpg\) **Policy 10.1.4, Environmental Management System**](#)
- [!\[\]\(575a58e9551de7cf10b1942a1cb72901_img.jpg\) **Policy 11.1.1, Purchasing \(Non-trade\)**](#)
- [!\[\]\(da2af5625b49a71cc9d5394c9d20ddca_img.jpg\) **Policy 13.1.15, Information Security**](#)
- [!\[\]\(12df36886907bb1a9d3f576601cd770d_img.jpg\) **Policy 13.1.21, Acceptable Use of Digital Assets**](#)