



Dear Valued Supplier:

The David J. Joseph Company (“DJJ”) is a world leader in scrap metal processing and trading and has a long-standing history of conducting its business in a socially responsible manner. DJJ’s emphasis on safety, the environment and social responsibility has been an integral part of DJJ’s success, as well as the success of DJJ’s valued suppliers.

In keeping with this tradition, DJJ has developed a Supplier Code of Conduct (“Code”) to emphasize those values which DJJ believes will play a significant role in the continued success both of DJJ and its suppliers. The Code reflects principles which DJJ expects of itself and of those companies with whom it does business.

A copy of the Code is attached for review. DJJ anticipates that each of its suppliers will agree that the Code reflects principles to which all companies should adhere, and expects that those companies wishing to continue doing business with DJJ will match DJJ’s commitment to these principles.

Thank you for your attention to this matter.

Sincerely,

THE DAVID J. JOSEPH COMPANY

THE DAVID J. JOSEPH COMPANY SUPPLIER CODE OF CONDUCT

The David J. Joseph Company (with its subsidiaries, “DJJ”) has a long history of conducting its businesses in a manner consistent with high standards of social responsibility. In order to continue promoting this goal in the future, DJJ is requiring that each contractor and supplier (individually a “Supplier” and collectively “Suppliers”) comply with the following code of conduct (“Code”), and each Supplier will be asked to acknowledge its compliance with the Code. The principles and values expressed by the Code reflect DJJ’s ongoing commitment to social responsibility and human dignity.

Labor

- (a) Suppliers must not utilize involuntary labor of any type. This shall include, but not be limited to, forced, indentured, bonded or prison labor.
- (b) Suppliers must not utilize child labor. For purposes of the Code, a “child” will be considered any person younger than (i) fourteen (14) years old; (ii) the minimum age for completing compulsory education in the country of manufacture; or (iii) the minimum age for employment in such country, whichever is the highest.
- (c) Suppliers must treat each of their employees with respect and dignity. As such, Suppliers shall not subject any employee to physical, sexual, verbal or other forms of harassment, coercion or abuse.
- (d) Suppliers shall not subject any employees or applicants for employment to unlawful discrimination.
- (e) Suppliers must pay each of their employees at least the minimum wage, and supply the minimum benefits, required by applicable local laws. In the absence of applicable local laws, Suppliers shall provide minimum wages and benefits consistent with industry practice in such location.
- (f) Suppliers shall comply with all applicable health, safety and welfare laws, rules and regulations, and shall provide a safe working place for their employees. Suppliers must have and implement effective programs to promote the foregoing.

Environment

Suppliers should strive to minimize impact on the environment from their operations and, at a minimum, must operate in compliance with applicable environmental laws, rules, regulations and ordinances.

Business Ethics

DJJ expects each of its Suppliers to conduct its business subject to high ethical standards. At a minimum, each Supplier must conduct business in accordance with all applicable laws, rules and regulations regarding business ethics, including those dealing with bribery or other prohibited business transactions.

Compliance

Suppliers must maintain documentation reasonably necessary to evidence compliance with this Code. Such documentation must be made available to DJJ upon reasonable advance written request. Failure to comply with this Code may subject a Supplier to possible termination of its business relationship with DJJ.