

Sustainable Constructional Steel Scheme

Operational Assessment Schedule
Traders

CARES Cloud App

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Annex 1	Self-Assessment and Audit Workbook	Separate document

Amendment Control Sheet

Section	Amendment	Date of Issue
V10 draft	New version 10 – Traders New scope under SCS therefore this is the first draft of the suite of documents, including this Schedule.	June 2026

Terminology

Within this Guidance, the following terminology is adopted:

The term **"shall"** is used to indicate a mandatory requirement.
The term **"should"** is used to indicate a recommendation, rather than a requirement.
The term **"may"** is used to indicate an option that is permissible.
The term **"can"** is used to indicate a possibility or a capability.

Other terminology and definitions are contained in a separate glossary.
Where a term is specified in this document, the glossary definition becomes normative.

1. Company information and certifications

Scope:
The Scheme is applicable to trading of the following steel product categories:

- Carbon steel billets, carbon steel bars/coils and wire rod for further processing into carbon steel bar, coil or rod for the reinforcement of concrete to national and international steel standards acceptable to CARES.
- Stainless-steel billets and stainless steel bars/coils for the reinforcement of concrete to national and international stainless steel standards acceptable to CARES.
- Cold worked bar, wire, fabric (mesh), prestressing wire and prestressing strand to national and international stainless steel standards acceptable to CARES.
- Steel billets/blooms/beam-blank and structural steels to national and international steel standards acceptable to CARES.
- Steel slabs and hot rolled flat steel products to national and international steel standards acceptable to CARES.
- Steel billets/blooms/beam-blank, track rail and other rail steel products to national and international steel standards acceptable to CARES.
- And/or Steel products made to national and international steel standards acceptable to CARES

It relates to:
- The purchase and supply of steel products
- The transportation of steel products
- The stockholding, packaging and the reconsignment of steel products
- The trading of steel products.

SDG Alignment – 1. Company Information and Certifications



This Schedule shall only apply to organisations possessing valid certificates from CARES or from an accredited certification body acceptable to CARES covering:
- ISO 9001 QMS
- ISO 14001 EMS
- ISO 45001 OH&SMS

If the trading organisation does not hold valid ISO 14001 and ISO 45001 certificates then their steel suppliers shall hold valid ISO 14001 EMS and ISO 45001 OH&SMS certificates.

Traders shall pass on valid certificates to their customers.

Approved traders under the scheme shall have been deemed to have satisfied the sustainable constructional steel criteria in this Schedule as documented in the *Self-Assessment and Audit Workbook* (Annex 1).

Trader certification enables an unbroken chain of custody based on the identity preserved traceability model used by the CARES digital traceability system (CARES Cloud - https://cares.cloud/) and its Digital Record.

Mandatory Requirements:

- Annex 1 - Annually Completed the *Self-Assessment and Audit Workbook*

2. Sustainability governance and management

The organisation shall have a defined approach to governing and managing its impacts on sustainable development - a Sustainability Management System (SMS).

Senior management shall demonstrate leadership and publicly commit to work to enable sustainability performance to be improved through the value chain through operating an effective management system. There shall be objective evidence that top management is actively involved in the development, implementation and continual improvement of the SMS.

Where the organisation subcontracts work that is the subject of this schedule there shall be a documented procedure(s) to ensure those acting on the organisation's behalf (contractors or agents) comply with the organisation's sustainability policy requirements that relate to them.

There shall be a documented procedure(s) for purchasing steel. Any steel to be supplied shall be from a CARES Sustainable Constructional Steel scheme certified producer, or from an organisation possessing a valid sustainability certificate acceptable to CARES, and shall be controlled through the purchasing procedure. Purchasing procedure(s) shall include all aspects of the steel specification which are important in ensuring satisfactory steel quality, delivery conditions, transport arrangements, stockholding, identification, traceability and sustainability performance.

The management system requirements shall be documented in a SMS Manual or another Manual in any format, implemented and maintained. Its scope shall be appropriate to the nature and scale of trading activities.

SDG Alignment – 2. Sustainability governance and management



Mandatory Requirements:

- Documented information as evidence of SMS Manual or another Manual acceptable to CARES
- Documented Procedure(s) to control subcontract works, contractors and agents
- Documented Procedure(s) for purchasing and transporting steel
- Documented Procedure(s) for stockholding steel if relevant

Ref.	Requirement	Classification

2.1. Sustainability Policy, Principles and Leadership

2.1.1.	**Policy** The organisation shall approve and publish a Sustainability Policy(ies) which shall cover at a minimum the organisation's commitments to: - Engage with stakeholders to understand their concerns, risks and opportunities - Operate with integrity, adopt and follow ethical business practices and good corporate governance to avoid bribery and corruption - Recognise the material sustainability impacts associated with input materials for steel manufacture, steel production, fabrication and transport at all value chain stages. Material impacts include: Environmental, health and safety, employee wellbeing and mental health, human rights, labour rights, ethical business practices, good corporate governance to avoid bribery and corruption, community, social and economic impacts - Comply with applicable legislation, regulations and voluntary compliance commitments and obligations - Maintain awareness of and pass on links to or summary information related to the measurement, monitoring and public disclosure of material impacts, summary plans and targets to manage them and associated performance as published by steel producers - Support and promote continual improvement on a pathway towards fully sustainable and responsible practices covering the material impacts of the steel value chain. This shall include a commitment to support investigation and remedy in the event of environmental harm, unethical business practices, human or labour rights violations. Support and promote the decarbonisation of steel operations and products over time aligned to nationally determined contributions and sector decarbonisation pathways aligned to the Paris Agreement or a science-based decarbonisation pathway acceptable to CARES - Support and promote the decarbonisation of shipping and transportation sectors - Enable responsible sourcing and ethical supply chain practices including the fair treatment of suppliers and customers; and to minimising negative impacts and maximising positive impacts across the whole value chain - Fair employment and to contribute to a diverse and stable local economy - Implement an effective and fair grievance mechanism	**Mandatory**

- Use, support and promote the CARES Digital Record to enable effective controls on traded products
- Document and act on any breaches to this policy and/or code and providing evidence that the organisation has addressed any concerns and complaints
- Protect commercially sensitive information and data as part of confidentiality
- Promote financial transparency
- Promote the assessment and transparent sharing of sustainable and responsible business management practices and performance

2.1.2 **Commitment to Principles** **Mandatory**

The organisation's leadership shall commit to sustainability principles (inclusivity, integrity, stewardship and transparency) and the organisation shall communicate this commitment, ensuring it is publicly and freely available.

2.1.3 **Leadership and Accountability** **Mandatory**

A single defined Director or equivalent role shall be designated as accountable for the implementation and maintenance of the SMS. Responsibility for ensuring sustainability principles, values and policies is implemented and sustainability performance is monitored shall be assigned to the site Directors or the most senior oversight body.

2.2. Stakeholder Engagement

2.2.1 **Engagement** **Mandatory**

The organisation shall publish a list of its key stakeholders, including those which can control or influence sustainability impacts and those impacted across supply routes. It shall highlight the degree of control and influence on sustainability impacts and the nature of this influence and make this information publicly available.

2.3. Assessing Risk and Opportunities

2.3.1 **Risk and Opportunity Review** **Mandatory**

The organisation shall complete an initial risk and opportunity review by assessing and documenting its adverse impacts (risks) and beneficial impacts (opportunities). It shall consider these using a life cycle perspective, a right's holder perspective, the degree of influence or control it has over the impacts and periodically update them should it identify a change.

2.3.2 **Compliance Register** **Mandatory**

The organisation shall identify and access its compliance obligations related to its full range of sustainability impacts and

determine how these compliance obligations apply to the organisation.

2.3.3 **Non-Compliance Risk Assessment** **Mandatory**

The organisation shall assess the risks of non-compliance.

2.4. Sustainability information and chain of custody

2.4.1 **Transfer of Information** **Mandatory**

The organisation shall enable the transfer of the following, relevant sustainability information from the source of the purchased or procured steel products - steel manufacturers, or other traders - to its customer.

1. Sustainability management and responsible sourcing practices
2. Ethical trading practices and compliance
3. Environmental performance including use of the CARES Digital Passport including an Environmental Product Declaration (EDPs).
4. Social including human rights, labour conditions and health, safety and wellbeing performance
5. Economic performance

2.4.2 **Monitor Operational Impacts, Setting Objectives and Targets** **Mandatory**

The organisation shall monitor its own sustainability performance, identify and adopt sustainable development objectives and targets.

2.4.3 **Action Planning** **Mandatory**

The organisation shall establish, document, implement and maintain programme(s) and plan(s) for achieving its objectives.

2.4.4 **Transparency** **Mandatory**

The objectives and summary of plans to meet them, with the exclusion of confidential information; shall be made publicly available and effectively communicated with interested stakeholders and its effectiveness monitored.

2.5. Resource allocation and competence building

2.5.1 **Allocating Sufficient Resources** **Mandatory**

The organisation leadership shall allocate responsibility for meeting its sustainability policy and implementing its SMS. It shall ensure that appropriate resources are allocated to achieve its sustainable development objectives, company values and commitments.

2.5.2	**Learning and Development Needs** The organisation shall identify the learning and development needs of employees particularly those with responsibility for meeting stated objectives and improving sustainability performance.	**Mandatory**

2.6. Achieving progress and review

2.6.1	**Management Review** The organisation shall conduct a management review that shall include, at a minimum: - Sustainability Policy(ies) - Stakeholder's expectations and concerns - Material impacts, risks and opportunities - Sufficiency of resources to manage impacts - Progress of its key performance indicators (KPIs) and against its sustainable development objectives - Performance reporting	**Mandatory**

2.7. Building confidence through transparency

2.7.1	**Transparency and Accountability** The organisation shall determine methods to increase transparency, accountability and integrity of its operations, and shall publicly report strategies, management practices and performance of its material sustainability impacts.	**Mandatory**

2.8. Product Stewardship and Traceability

2.8.1	**Traceability** The organisation shall ensure traceability throughout the full life cycle and make the extent of traceability publicly available.	**Mandatory**

2.9. Ethical Business Practices

2.9.1	**Business ethics policy** The organisation shall implement a Policy(ies) detailing its approach to ethical business practices including fair treatment of suppliers and customers.	**Mandatory**
2.9.2	**Business ethics system** The organisation shall implement a system to maintain ethical business practices and avoid bribery and corruption.	**Mandatory**
2.9.3	**Customer Service** The organisation's customer service provision shall include, at a minimum: 1. Customer enquiry procedures 2. Customer complaints procedures 3. Product and service literature	**Mandatory**

	4. Product Health, Safety and Environmental (HSE) disclosures 5. Risk and opportunity control measures	
2.9.4	**<u>Grievance Mechanism</u>** The organisation shall have a system(s) for dealing with incidents, external stakeholder complaints and prosecutions.	**Mandatory**
2.9.5	**<u>Complaints and prosecutions</u>** The organisation shall complete the KPI within the *Self-Assessment and Audit Workbook* (Annex 1) for "Stakeholder Complaints and Prosecutions."	**Mandatory**

3. Environment

The organisation shall have a defined approach to managing its impacts on the environment at a local, regional, national and global level.

SDG Alignment – 3. Environment



Mandatory Requirements:

- Documented information as evidence of the management of environmental impacts
- Documented Procedure(s) to control subcontract works and contractors

Ref.	Requirement	Classification

3.1 Environmental Management System

3.1.1. **Environmental Management System**

The organisation shall implement and maintain a documented environmental management system (EMS) which is aligned to the requirements of ISO 14001 (or equivalent). The scope and formality of the system shall be appropriate to the size of the organisation and the nature of its risks.

3.2. Energy Use

3.2.1 **Energy use and objectives** **Mandatory**

The organisation shall assess the environmental impacts of its Energy Use and set related objective(s). This shall include its use of direct and indirect renewable energy and its objectives and timeline for increasing renewables usage. It shall also include energy efficiency measures to reduce energy demand over time.

3.2.2	**Renewable and low carbon energy** The organisation shall complete the KPI within the *Self-Assessment and Audit workbook* (Annex 1) for 'Renewable and Low Carbon Energy' and shall publicly report the value.	**Mandatory**

3.3. Greenhouse Gas (GHG) Emissions and Global Warming Potential (GWP)

3.3.1	**GHG Emissions Measurement and Monitoring** The organisation shall have a system for measuring, monitoring and reducing its GHG Emissions.	**Mandatory**
3.3.2	**GHG Emissions Verification** The organisation should obtain third-party verification for its GHG emissions.	**Voluntary**
3.3.3	**Product GHG Emissions Measurement and Monitoring** The organisation shall have a system for measuring and monitoring the GHG Emissions associated with trade in products.	**Mandatory**
3.3.4	**GHG Emissions Reduction Targets and Plans** The organisation should set and publish short (1-5 years) and medium term (5-15 years) GHG emissions reduction targets for emissions under its control. It shall document plans to achieve the targets and publicly report the targets and summary plans.	**Voluntary**

3.4. Transport and Shipping Impacts

3.4.1	**Transport Impacts – Employee Travel** The organisation should record and assess employee transport patterns and set objective(s) to reduce these impacts.	**Voluntary**
3.4.2	**Transport Impacts – Business Travel** The organisation should record and assess business travel patterns and set objective(s) to reduce these impacts.	**Voluntary**
3.4.3	**Transport Impacts – Product shipment** The organisation should record and assess product shipping impacts and set objective(s) to reduce these impacts.	**Voluntary**

4. Social

The organisation shall have a defined approach to managing its impacts on society at a local, regional, national and global level.

SDG Alignment – 4. Social



Mandatory Requirements:

- Documented information as evidence of the management of social impacts
- Documented information as evidence of meeting the requirements listed below designated by 'the organisation shall'
- Documented Procedure(s) to control subcontract works and contractors

Ref.	Requirement	Classification

4.1. Human Rights, Non-discrimination and Ethical Labour Practices

4.1.1 **Human Rights, Non-discrimination and Ethical Labour Policy** — **Mandatory**

The organisation shall approve and publish a Policy(ies) and/or Codes of Conduct which commits the organisation, its employees and contractors to:

1. Comply with human rights legislation and avoid complicity with human rights abuses
2. Avoid use of or be complicit in forced labour or child labour
3. Comply with applicable laws and industry standards on fair labour conditions
4. Promote equal opportunity, non-discrimination, diversity and inclusion practices in employment and contracting and actively prevent all forms of discrimination
5. Promote respect for workers dignity and labour rights including in disciplinary practices
6. Advance equal opportunities and non-discrimination practices

7. Provide a mechanism for employees to raise a compliant or grievance and have it fairly assessed and responded to in a timely manner

4.1.2	**Employee Terms of Employment** The organisation shall ensure that workers have a written contract and understand their current employment terms with regards to wages, working hours, overtime, holidays, paid leave and other employment conditions.	**Mandatory**
4.1.3	**Employee Grievance Mechanism** The organisation shall have a formal system for considering and acting on employee complaints and grievances.	**Mandatory**
4.1.4	**Employee Grievance Assessment** The organisation shall complete KPI sheet within the *Self-Assessment and Audit Workbook* (Annex 1) for 'Grievance System'.	**Mandatory**
4.1.5	**Employee Grievance Resolution** The organisation should resolve employee complaints and grievances.	**Voluntary**

4.2. Health, Safety and Wellbeing

4.2.1	**Occupational Health and Safety (OHS) Management System** The organisation shall implement and maintain a documented occupational health and safety management system (OH&SMS) which is aligned to the requirements of ISO 45001 (or equivalent). The scope and formality of the system shall be appropriate to the size of the organisation and the nature of its risks.	**Mandatory**
4.2.2	**Employee Wellbeing** The organisation should take steps to support employee mental health and wellbeing, recognise the right to a private life and support work-life balance.	**Voluntary**

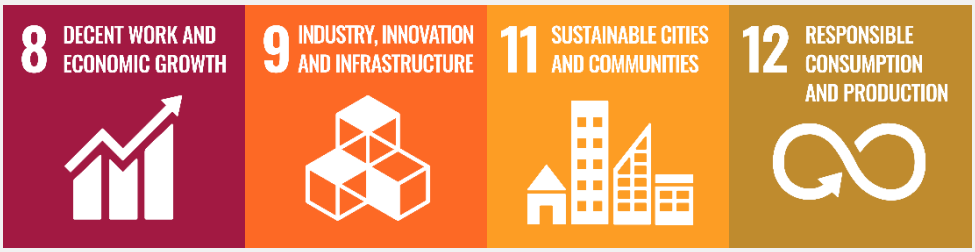
4.3 Employee skills and training

4.3.1	**Skills and Training** The organisation shall provide appropriate training and incentives to employees so that they understand how their work may impact on sustainable development, to meet business needs and enable them to progress their career.	**Mandatory**

5. Economic

The organisation shall have a defined approach to managing its impacts on the economy at a local, regional and national level.

SDG Alignment – 5. Economic



Mandatory Requirements:

- Documented information as evidence of the management of economic impacts
- Documented information as evidence of meeting the requirements listed below designated by 'the organisation shall'
- Documented Procedure(s) to control subcontract works and contractors

Ref.	Requirement	Classification

5.1. Fair Payment Practices

5.1.1	**Fair Payment Practices** The organisation should implement a payment policy to pay SME's within 30 days and other organisations within 60 days from receipt of invoice.	**Voluntary**

5.2. Financial Transparency

5.2.1	**Financial Reporting** The organisation shall produce externally audited accounts and financial reports for the latest financial reporting period.	**Mandatory**

6. Performance Improvement

The organisation shall commit to improving performance, reducing its negative and enhancing its positive sustainability impacts. This includes improving the effectiveness of systems used to manage; business ethics, environmental, social, community, health and safety, labour and human rights, and economic impacts across direct operations, supply, distribution and sales chains.

Performance improvement is enabled by many factors including: effective collaboration, clear policy commitments, objective setting, ensuring appropriate competencies and adequate resources, implementing internal and independent third-party audit regimes and corrective action planning, analysis of data, incident investigation, evaluation of suppliers, customer satisfaction monitoring and analysis, annual performance monitoring, management and maturity review and public reporting.

There shall be a documented procedure(s) for identifying the cause of non-conformance and implementing the necessary corrective action including implementing or modifying controls necessary to avoid repetition of the non-conformance. The procedure(s) shall define the responsibility and authority for handling and investigating non-conformances and for initiating and completing corrective action. Any corrective action taken to eliminate the causes of actual and potential non-conformances shall be appropriate to the magnitude of problems and commensurate with the impact encountered.

The corrective action procedure(s) shall provide for dealing with stakeholder complaints. Documented information of all stakeholder complaints received, and action taken shall be retained for a minimum of three years. Action shall include modification to the sustainability operational procedures where appropriate.

Performance indicators shall be developed and implemented to monitor the sustainable constructional steel criteria for internal management use, performance, reporting, and for assessment against conformance with this scheme including for mandatory requirements of voluntary credit requirements that feed into the Rosette Rating System (RRS) evaluation.

Performance improvement targets should take account of climate and ecological science, society and community expectations and the organisations operational context. The targets should seek to align or better expectations expressed in international standards, agreements and norms. For example, targets for GHG emission reductions should align to a Paris Agreement aligned transition pathway.

The organisation shall meet all mandatory requirements to achieve a ‘Pass’ level. The RRS is designed to give an opportunity to the organisation to demonstrate additional performance across the full range of material sustainability impacts. The voluntary performance credits are available by completing the credit rating criteria in the *Self-Assessment and Audit Workbook* (Annex 1) and the provision of suitable evidence. Procedures and systems shall be in place to provide an audit trail and allow data and evidence collected to be verifiable.

The *Self-Assessment and Audit workbook* (Annex 1), self-assessment shall be completed and submitted to CARES once per year ***at least two weeks*** before the CARES audit takes place in the prescribed format. If the applicant or approved organisation does not submit the

Self-Assessment and Audit workbook (Annex 1), at least two weeks before the scheduled CARES audit; CARES will reserve the right to cancel or reschedule any scheduled assessment or surveillance audit activity. In these cases, CARES will charge 50% fee (based on number of days and daily rate). The *Self-Assessment and Audit Workbook* (Annex 1) will be analysed at CARES and will form part of the subsequent CARES audit assessment and rating.

7. Declarations and Product Labelling

Steel traded shall be labelled and supplied with the necessary electronic documentation to enable the products to be traced. Product conformity schemes such as CARES Steel for the Reinforcement of Concrete (SRC) shall ensure that steel supplied to the end user consistently satisfies the requirements of the product standard and is digitally traceable (See CARES Cloud - https://cares.cloud/) from initial production to final use using the CARES Digital Record.

Declarations of product conformity with the Scheme, including product labelling, shall be made only for products which fully conform, and which have been handled in compliance with the requirements of this Scheme.

When a Rosette Rating has been achieved, the associated number of CARES Rosettes (logo) can be included on the organisation's website, product labelling and associated literature for as long as the approvals and Rosette Rating are maintained. Any change in approval or Rosette Rating requires the immediate removal or adjustment of such marks in line with the current approval.

The Rosettes shall be reproduced as they are on certificate of approval issued to approved firms as per Figure 2. Therefore, they should be in CARES Red (Pantone 193; GB: 211/46/63 CMYK 0/91/65/11 HEX: C95163), accompanied by the word 'Rating' sized no bigger than 1.5 x the size of the text size used for the word 'Rating' and neither shall be bigger than 7.5mm when presented on A4 and proportionate to these dimensions when presented larger or smaller. The text 'Rating' can be above or before the Rosettes.

Figure 2. Rosette Rating reproduction requirements.



8. Additional References

The following documents, guidance, standards have been reviewed and contributed to the development of the SCS scheme requirements:

AA1000 Stakeholder Engagement Standard (AA 1000SES) 2015

The Aluminium Stewardship Initiative – Performance Standard v3.0 May 2022

BES 6002: Ethical-Labour-Sourcing-Standard Issue 2 July 2018

BREEAM: Criteria for the evaluation of responsible sourcing certification schemes within BREEAM v4.0.'

ISO 9001:2015+A1:2024 Quality management systems. Requirements

ISO 14001:2026, ISO 14001:2015+A1:2024 Environmental management systems - Requirements with guidance for use During the transition period, certification to ISO 14001:2015 or ISO 14001:2026 shall be acceptable

ISO 45001:2018+A1:2024 Occupational health and safety management systems - Requirements with guidance for use

ISO 50001:2018+A1:2024 Energy management systems - Requirements with guidance for use

ISO 26000:2010 Guidance on Social Responsibility

ISO 22095:2020 Chain of custody - General terminology and models

ISO 20400:2017 Sustainable procurement – Guidance

EN 15804:2012+A1:2013+A2:2019 Sustainability of construction works. Environmental product declarations. Core rules for the product category of construction products

BS 8902:2009 Responsible sourcing sector certification schemes for construction products - Specification

ISO 14025:2006 Environmental labels and declarations. Type III environmental declarations. Principles and procedures

ISO 14025:2026 Environmental statements and programmes for products - Environmental product declarations (EPDs)

ISO 14040:2006+A1:2020 Environmental management. Life cycle assessment. Principles and framework

ISO 14044:2006+A1:2017+A2:2020 Environmental management. Life cycle assessment. Requirements and guidelines

ISO 14046:2014 Environmental management Water footprint — Principles, requirements and guidelines

ISO 14050:2020 Environmental management - Vocabulary

Ethical Trading Initiative (ETI) Base Code

Global Reporting Initiative (GRI) Sustainability Reporting Standards

UN Guiding Principles on Business and Human Rights

International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work

International Labour Organisation (ILO) conventions

PAS 2050:2011 Specification for the assessment of the life cycle greenhouse gas emissions of goods and services

PAS 2080:2023 Carbon management in infrastructure

ResponsibleSteel International Production Standard v2.1

SA 8000:2014 Social Accountability International Standard

Steel Standards Principles (SSP)

Universal Declaration of Human Rights

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

The Global Reporting Initiative (GRI) Standards

The International Financial Reporting Standards (IFRS) S1 Standard - General Requirements for Disclosure of Sustainability-related Financial Information

The EU Corporate Sustainability Reporting Directive

UN Sustainable Development Goals

The International Financial Reporting Standards (IFRS)



Better for customers

Product Quality certification

Full traceability from steel mill to construction site

Sustainable Constructional Steel certification

Attract credits in Building and Infrastructure Rating Systems

CARES Cloud and digital ecosystem

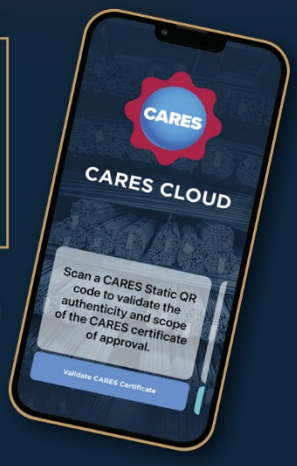
CARES Cloud App

Assured Steel Certification

Independent | Impartial | Trusted

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