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# **Metallus Supplier Code of Conduct**

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# METALLUS SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“Code”) addresses issues of particular importance in our global supply chain, including human rights, ethical business practices, responsible sourcing, and environmental sustainability. It outlines workplace standards and business practices consistent with our core values. We expect our Suppliers around the world to adhere to this Code as we work together for mutual success.

## CORE VALUES

Metallus' core values reflect our vision to harness the enduring power of steel to make the world a better place:

- **Safety First**
- **Customer Driven**
- **Best-in-Class Quality**
- **Innovation & Collaboration**
- **Ethical & Responsible**

We evaluate and select Suppliers on more than just economic criteria. We seek Suppliers who share our Core Values, are committed to promoting ethical behavior, and operate in full compliance with all applicable laws, rules, and regulations. We expect Suppliers to know and follow this Code or maintain a code or set of policies consistent with our Code.

## WHO IS COVERED BY THIS CODE?

The Metallus Supplier Code of Conduct applies to individuals and companies ("Suppliers") providing goods or services to Metallus.

### **Subcontractors**

This Code also applies to any Sub-contractor(s) providing goods or services to the Supplier. Each Supplier is responsible for compliance by any Sub-contractor(s) as if it was the Supplier itself.

# PROTECT AND RESPECT HUMAN RIGHTS

The United Nations Guiding Principles on Business and Human Rights and its foundational principles for business enterprises, including those expressed in the International Bill of Human Rights, serve as the framework for our approach to human rights. Suppliers are expected to comply with these internationally recognized standards and treat their workforce fairly, humanely, and respectfully.

## ▀ Human Rights

Being ethical and responsible means that we believe in treating all people with dignity and respect, from our workplaces, to our communities, to our supply chain partners. We expect our Suppliers to do the same in compliance with our [Human Rights Policy](#).

## ▀ Child Labor

Metallus strictly prohibits the use of child labor at any of our facilities and throughout our supply chain. Suppliers must comply with Metallus' [Child and Forced Labor Policy](#) and all applicable minimum working age laws according to local regulations and shall only employ workers who meet the applicable minimum legal age requirement.

## ▀ Forced Labor and Human Trafficking

Metallus condemns and strictly prohibits all forms of forced labor and human trafficking anywhere in our supply chain in accordance with our [Combating Human Trafficking Policy](#). Suppliers must not participate in, or purchase materials or services from companies using forced, involuntary, or slave labor.

### ▀ Workplace Health and Safety

Suppliers must comply with all applicable environmental laws and regulations and all Metallus policies including, but not limited to our [Environmental, Health and Safety Policy](#). Suppliers shall provide and maintain safe and healthy plant and office working conditions that meet or exceed all laws and regulations applicable to safety, occupational health, and fire safety. Suppliers are expected to perform regular risk assessments and put in place corrective and preventative measures to minimize workplace hazards including, but not limited to, mechanical, electrical, chemical, fire, and physical hazards.

### ▀ Ethical Recruiting

Suppliers must not mislead or defraud potential workers about the nature of work, ask workers to pay recruitment fees, or confiscate, destroy, conceal, or deny access to worker passports and other important documents. Workers should receive a written contract or offer of employment at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner the details of the position and their rights and responsibilities.

### ▀ Wages and Benefits

Supplier must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and any other legally-mandated benefits.

### ▀ Freedom of Association and Collective Bargaining

Suppliers should respect workers' rights to join, form, or not join labor unions without fear of reprisal, intimidation, or harassment. Where workers are represented by a legally recognized union, Suppliers must be committed to bargaining in good faith with their union representatives.

## ▀ Non-Discrimination and Inclusion

Metallus encourages Suppliers to develop and promote inclusive cultures where diversity is valued and celebrated and everyone can contribute fully to reach their full potential. Suppliers must treat all employees and applicants equally according to their individual qualifications, abilities, experiences and other employment standards. There shall be no harassment or discrimination due to sex, gender or gender identity, sexual orientation, race, color, religion, national origin, ethnicity, age, disability, veteran/military status or any other basis protected by applicable law. There shall be no retaliation against individuals for reporting concerns in good faith of discrimination or harassment.

## ▀ Community and Stakeholders

Suppliers are expected to conduct themselves in a socially responsible manner by respecting the cultures and traditions of the communities and indigenous people in each country where they operate. Suppliers should respect rights to decent living conditions, education, employment, social activities, and natural resources in the communities in which they operate.

# RESPONSIBLE AND ETHICAL BUSINESS PRACTICES

Metallus is committed to honest and ethical business practices and expects the same from our Suppliers.

## ■ **Anti-Bribery and Corruption**

No Supplier may request, offer, promise, give or authorize the payment of anything of value, either directly or indirectly, to anyone for the purpose of influencing or obtaining an improper business advantage. Suppliers are expected to comply with all applicable international anti-bribery laws.

## ■ **Conflicts of Interest**

Suppliers should never allow personal interests and actions to interfere with conducting business in an effective and objective manner.

## ■ **Gifts and Entertainment**

The offering, payment or acceptance of kickbacks, bribes or other illegal payments is prohibited and will not be tolerated. Also, Metallus prohibits the offer or acceptance of any gifts or gratuities that the recipient would reasonably consider to be greater than nominal value. A gift is generally considered to be of "nominal value" if its value (or aggregate value of multiple gifts from the same Supplier during any 12-month period) is less than \$100. Any Supplier that violates this policy risks immediate loss of all existing and future Metallus business.

### ▀ Business Records

Suppliers shall accurately record and disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable laws, regulations, and industry standards.

### ▀ Fair Competition

Suppliers are to comply with all applicable antitrust laws and preserve fair, honest, and vigorous competition. Suppliers may not participate in price fixing, market or customer allocation, market sharing or bid rigging.

### ▀ Export Controls and Economic Sanctions

Suppliers are expected to comply with all applicable export control laws, as well as laws that prohibit or restrict business relationships with sanctioned countries, entities, persons, or industry sectors. Suppliers should conduct appropriate due diligence to comply with these requirements and maintain accurate and complete records related to customs activities.

# RESPONSIBLE SOURCING

At Metallus, we strive to operate responsibly and sustainably and expect our suppliers to share these same goals. Suppliers should responsibly source raw materials and minerals used in their products by developing a management system to promote disclosure, traceability, and transparency throughout the supply chain.

## ▀ Conflict Minerals

To support our commitment to responsible sourcing, Suppliers must comply with our [Conflict Minerals Policy](#) to ensure that any tin, tantalum, tungsten or gold that is contained in the products it supplies to Metallus is not sourced from the conflict region of the Democratic Republic of the Congo or any of its nine adjoining countries.

# ENVIRONMENTAL SUSTAINABILITY

We believe that access to a healthy and clean environment is a basic human right and we are committed to reducing our environmental impact to ensure a more sustainable future for present and future employees, and our communities. We expect our Suppliers to do the same.

## ▀ Environmental Compliance

Suppliers must follow all local, state, national, and international environmental laws and regulations. Suppliers must also obtain and keep current all requirement environmental permits, approvals, and registrations, and follow their operational and reporting requirements, and will provide supporting documentation to Metallus upon request. Metallus encourages all suppliers to integrate additional environmentally sustainable practices and management systems throughout their companies.

## ▀ Water, Waste and Recycling

Suppliers should seek to eliminate waste, divert waste from landfill to products, recycle and reuse, and reduce freshwater usage where feasible. Suppliers are encouraged to adopt policies that emphasize organized resource management and promote the circular economy.

## ▀ GHG Emissions and Energy

Suppliers are encouraged to seek ways to minimize the use of energy and, where available, to utilize renewable sources of energy. We expect suppliers to embrace transparency and accountability by setting reduction targets and publicly disclosing efforts to reduce their environmental impact and meet their targets.

### ■ Chemical Management

Suppliers should identify, minimize, or eliminate the use of substances of concern in manufacturing processes and finished products to ensure regulatory compliance. Any use of such substances of concern in the manufacturing process or finished products must be communicated to Metallus consistent with applicable laws, regulations, and Metallus requirements.

## INFORMATION SECURITY

Metallus is committed to safeguarding our data, networks, and other information technology. Suppliers must implement and maintain an Information Security Management System in accordance with the requirements of internationally recognized standards such as ISO27001 or NIST CSF.

### ■ Cybersecurity Risk Management

Suppliers must implement a process to identify and manage emerging and evolving cybersecurity risks and develop strategies to detect, prevent, and response to them. Suppliers must focus on minimizing the risks of incidents that impact Metallus' networks and data and the products and services provided to us.

### ■ Security Controls and Procedures

Suppliers must implement adequate security controls, procedures, and related monitoring systems to prevent, detect, and respond quickly to security incidents. At minimum, Suppliers must adopt controls to protect customer data and networks from unauthorized access, use, damage, and disclosure.

Suppliers must regularly review the effectiveness of the applied security controls, procedures, and monitoring systems. Suppliers are expected to internally communicate and train their staff to ensure the effective implementation of information security controls and procedures.

### ▀ Cyber Security Incidents

Metallus takes seriously any threats – real or suspected – to the security and integrity of Metallus’ data, networks, and other information technology infrastructure. Suppliers must immediately report any suspected cyber threats, attacks, security problem, or other misuse of Metallus data, networks, or other information technology.

## COMPLIANCE MONITORING

### ▀ Management Systems

Suppliers must adopt and implement a management system to comply with the principles set forth in this Code. Management systems will vary from supplier to supplier based on the size and scope of the business and risk but should be designed to ensure (1) compliance with applicable laws, regulations, and customer requirements; (2) conformance with this Code; (3) mitigation of risks; and (4) a process to track, measure, and drive improvements. These objectives should be achieved through implementation of risk assessments, training programs, company standards, internal and external assessments, investigations, and audits, corrective action processes, and documentation.

### ▀ Supplier Audits

Suppliers must allow Metallus and/or its representatives or agents access to its facilities and all relevant records associated with the products and services provided to Metallus. Suppliers and Metallus will establish a mutually agreeable date and time for access.

If risks to Metallus' business require immediate access to the products, services, and associated records, Suppliers must accommodate Metallus' access as required. Suppliers must also provide Metallus with additional information and certifications evidencing compliance, upon request by Metallus.

### ▀ Subcontractors

Suppliers must adopt a process to communicate Code requirements to their subcontractors and suppliers and monitor compliance to this Code. Metallus reserves the right to audit the Supplier's Sub-contractors for compliance to this Code and Supplier must accommodate Metallus' audit as required.

## NON-COMPLIANCE

Suspected wrongdoing, questions, and concerns should be directed to the Metallus Ethics Helpline. The Helpline is available 24/7 to report concerns or request guidance related to compliance or ethics matters.

Reports can be filed online or via phone:

- Online: [Metallus.ethicspoint.com](https://Metallus.ethicspoint.com)
- Mobile-friendly: <https://Metallus.navexone.com/>
- By phone: 1-855-754-2921 (USA) 001-844-806-5460 (ITFS MEXICO)

If the Supplier does not comply with this Code, Metallus requires that the Supplier implement a corrective action plan to cure the non-compliance within a specified time period (furnished in writing to the appropriate Metallus contact). If the Supplier fails to meet the corrective action plan commitment, Metallus may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. Metallus reserves the right to hold Supplier responsible for reasonable costs of investigating non-compliance.

Metallus will not tolerate any retaliation against its Suppliers for bona fide reports of unethical or unlawful conduct by our employees or representatives.

## QUESTIONS

For questions or to request more information about the Supplier Code, please contact your Metallus Purchasing Department representative or our [Ethics Helpline](#).

## APPROVAL & REVIEW

<b>Revision Number:</b>	<b>Rev:</b>	2
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<b>Approval:</b> Danielle Higgins, Assistant General Counsel	<b>Date:</b>	Month D, YYYY
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