Issuing Department: Law	METALLUS	**Effective Date:** October 1, 2022

COMBATTING HUMAN TRAFFICKING POLICY

Scope

This policy applies to all Metallus employees, suppliers, vendors, contractors and agents of Metallus Corporation and its wholly owned or controlled subsidiaries.

Purpose

The purpose of this policy is to clearly articulate Metallus' condemnation for all forms of human trafficking and to outline the company's anti-trafficking procedures in compliance with applicable laws and regulations, including those related to Metallus' performance of U.S. Government contracts or subcontracts.

Human Trafficking

The United States Department of State's Office to Monitor and Combat Human Trafficking defines human trafficking as a crime involving the exploitation of someone for the purposes of compelled labor or a commercial sex act through the use of force, fraud, or coercion. Where a person younger than 18 is induced to perform a commercial sex act, it is a crime regardless of whether there is any force, fraud, or coercion. Victims can be from around the world or right next door: any gender, age or citizenship.

"Trafficking in persons," "human trafficking," and "modern slavery" are general terms – often used interchangeably – to describe crimes in which adults or children are exploited by compelling them to perform labor or engage in commercial sex. The U.S. recognizes two primary forms of human trafficking: forced labor and sex trafficking.

Forced Labor

Forced labor, sometimes referred to as labor trafficking, encompasses the range of activities involved when a person uses force, fraud, or coercion to exploit the labor or services of another person.

Sex Trafficking

Sex trafficking encompasses the range of activities involved when a trafficker uses force, fraud, or coercion to compel another person to engage in a commercial sex act or causes a child to engage in a commercial sex act.

Policy

Metallus has zero tolerance for all forms of human trafficking anywhere in our operations or in our supply chain, including but not limited to threats of force, withholding of pay, confiscation of identity documents, false or manipulative recruiting practices, psychological coercion, or any other form of coercion or force.

Metallus employees, suppliers, vendors, contractors and agents are prohibited from:

- Engaging in any form of human trafficking or sexual exploitation, including sex trafficking;
- Using forced labor;
- Confiscating or otherwise denying access to identification or immigration documents, e.g., passport, driver's license, etc.

Recruiting & Hiring

Metallus complies with all applicable labor laws and will only use recruiters who comply with the local labor laws of the country where the recruiting occurs. Charging employees with recruiting fees is strictly prohibited.

Additionally, Metallus employees, suppliers, vendors, and contractors are required to ensure that any employment offers, contract, recruitment agreement, or other applicable work documents:

- Are presented to the employee in a language/format accessible to the employee;
- Contain essential job information such as wages, benefits, hours, work location, and if applicable, living conditions, housing, and associated costs (if provided or arranged by the employer or agent);
- (If required by law or contract) are provided to the employee in writing prior to the start of employment; and
- (In the unlikely relocation to a foreign country to perform the contracted work) are provided to the employee at least five (5) business days prior to relocation.

Reporting Concerns

Metallus encourages employees to report all ethics and compliance concerns to one of our many ethics reporting resources, without fear of reprisal. Reporting is a critical tool for Metallus to be able to monitor and detect trafficking violations.

Any suspected human trafficking activity must be immediately reported to the Metallus Law Department, anonymously if preferred.

Employees may report concerns of human trafficking to their manager (who will communicate the report to the Law Department), or through the HelpLine, anonymously if preferred:

- Online at Metallus.ethicspoint.com
- 1-855-754-2921 (USA)
- 800-880-1406 (Mexico)

Metallus may be required to notify U.S. Government officials of any credible information regarding suspected trafficking activity. Such notification will be coordinated by the Metallus Law Department.

Additionally, employees may call the National Human Trafficking Hotline at 1-888-373-7888 or visit the Domestic Trafficking Hotlines website to get help and learn more: https://www.state.gov/domestic-trafficking-hotlines/

General Procedures

- Metallus' Law Department will investigate any credible information from any source related to suspected trafficking violations, taking appropriate action as necessary. If the allegations are connected with the performance of government contract or subcontract, Metallus' Law Department will immediately notify the appropriate Contracting Officer and agency Inspector General of the information and action taken.
- Metallus will cooperate fully with any Federal anti-trafficking investigation, including, but not limited to, providing timely responses to investigators, and reasonable access to personnel and facilities.
- Metallus managers and employees are provided with periodic training and communication on this policy, including sharing resources for detecting and preventing human trafficking. Managers should ensure that their direct reports are aware of the anti-trafficking policy and how to report concerns.

Procedures for U.S. Government Contracts or Subcontracts

- Flow-down language pursuant to Federal Acquisition Regulation (“FAR”) Clause 52.222-50, Combatting Trafficking in Persons, is included in Metallus' “GOVERNMENT CONTRACTS SUPPLEMENT TO TERMS AND CONDITIONS

OF PURCHASE";

- The company periodically evaluates the risk of human trafficking within our direct suppliers and may conduct audits at supplier locations to evaluate their compliance with company anti-trafficking policy, as appropriate;
- In all requests for proposals and solicitations relating to any U.S. Government contracts or subcontracts, include FAR 52.222-56, Certification Regarding Trafficking in Persons Compliance Plan, and require suppliers to submit all representations and certifications as required by the FAR;
- Metallus maintains the right to terminate, by default, any supplier who commits any material violation of law relating to basic working conditions and human rights in their performance of a government subcontract for Metallus;
- Prior to the award of a U.S. Government contract or subcontract Metallus will submit, as required, a certification which states that Metallus (a) will not engage in any trafficking in persons or related activities, including but not limited to the use of Forced Labor, in the performance of this contract; (b) has hiring and subcontracting policies to protect the rights of its employees and the rights of subcontractor employees and will comply with those policies in the performance of this contract; and (c) has notified its employees and subcontractors of—(i) the responsibility to report trafficking in persons violations by the contractor, contractor employees, or subcontractor employees, at any tier; and (ii) Employee protection under 10 U.S.C. 2409, as implemented in DFARS subpart 203.9, providing whistleblower protections for reporting violations of trafficking in persons.
- For any U.S. Government contract or subcontract where Metallus has implemented an Anti-trafficking Compliance Plan pursuant to the requirements of FAR 52.222-50(h), the company shall annually submit a certification to the appropriate contracting officer: restating the existence of the plan and that after completing due diligence either that: (i) to the best of Metallus' knowledge and belief, neither it nor any of its agents, subcontractors, or their agents is engaged in any trafficking in persons activity; or (ii) if an abuse relating to trafficking in persons has been identified, that Metallus or its subcontractor has taken appropriate remedial and referral actions.

Penalties

Failure to adhere to this policy, or any applicable Anti-Trafficking Compliance Plan, may result in disciplinary action (removal from contract, suspension or debarment of the employee from further U.S. Government contracting) up to and including suspension and termination of employment. The penalties imposed on individuals for violations of anti-trafficking laws can be severe. The consequences of prosecution may include prison sentences, legal fees and other financial penalties. Violations of this policy may also have severe consequences for Metallus, up to and including

suspension or debarment from U.S. Government contracting and subcontracting.

Policy Written By:	**L. Hoffman**	**DATE**	October 1, 2022
Approval:	**D. Higgins**	**DATE:**	October 1, 2022
Last Revision:	**Version 1 (rebranded)**	**DATE:**	February 27, 2024