Issuing Department: Law	METALLUS	Effective Date: October 1, 2022
HUMAN RIGHTS POLICY		

Ethical. Responsible.

At Metallus, being ethical and responsible are among our core values. We recognize our responsibility for the company culture and the impact our practices have on society as a whole. Being ethical and responsible at our core means that we believe in treating all people with dignity and respect, from our workplaces to our supply chain partners.

Fundamental human rights go beyond any single policy – they are inherent to all human beings, regardless of race, sex, nationality, ethnicity, religion, or other status, and are embedded throughout the organization. While all Metallus employees share these core values and are committed to the protection and advancement of human rights, those in leadership, human resources, supply chain and compliance are particularly focused on matters related to human rights. In addition to this policy, human rights and fair employment practices are described further in our Codes of Conduct, handbooks, company policies and procedures and related training.

Our Most Valuable Assets: People and the Environment

Metallus values people as our most important asset. Our core value of Safety First means our first responsibility is to one another; to providing a safe environment where all employees can thrive. We do not tolerate harassment or disrespect of an individual for any reason. We expect our suppliers to maintain safe and healthy working conditions and comply with our policies and all laws and regulations applicable to workplace safety and health.

In addition, we strive to foster a culture that thrives on diversity, equity, and inclusion, and operate our business as a good corporate citizen that supports our communities. We provide employees with challenging work assignments and opportunity to grow with the company, personally and professionally. Our compensation and benefits practices are competitive and equitable, and we have programs which support our employees' overall physical and mental health.

As responsible stewards of the environment, our focus is on maintaining clean air, water, and land and seeking opportunities to reduce the amount of waste we generate, increase recycling, and reduce energy consumption and emissions. Ongoing efforts around energy conservation, scrap metal sourcing and handling, and water management and reuse have positioned Metallus as a sustainability leader. We

comply with all environmental rules and regulations and expect the same from suppliers.

Child, Forced Labor/Slavery, Human Trafficking

Metallus strictly forbids any form of child labor, forced labor or slavery, or human trafficking at any of our facilities or within our supply chain. We fully comply with all applicable laws and collective bargaining agreements pertaining to wages, hours, and benefits.

Equal Employment Opportunities

Metallus is an equal opportunity employer and does not tolerate any form of unlawful harassment or discrimination on the basis of race, ethnicity, sex, gender or gender identity, sexual orientation, or any other legally protected status. We provide periodic training to all employees and management on the prevention of harassment and discrimination. These protections are in place at our facilities as well as anywhere an employee is carrying out their work duties, such as with customers, vendors, or other third parties.

Reporting Concerns

Metallus encourages reporting of potential violations of this, or any, company policy. We provide employees with many avenues for reporting concerns, including filing a report with the Metallus HelpLine (reports can be made anonymously):

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

Additionally, call the National Human Trafficking Hotline at 1-888-373-7888 or visit the United States Department of State Domestic Trafficking Hotlines website to get help and learn more:

- https://www.state.gov/domestic-trafficking-hotlines/

Policy Written By:	**L. Hoffman**	**DATE**	October 1, 2022
Approval:	**D. Higgins**	**DATE:**	October 1, 2022
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