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Subject	LEGAL		
Subtitle	Ryerson Human Rights Policy		
Last Issue Date	09/1/2023	Revision Date	1/1/2024
Applies to Employee Type	ALL		
Applies to Business Unit	All Business Unit/Regions, Divisions, Corporate Offices, Service Centers, Vendors, and External Consultants		

As set forth in our Code of Ethics and Business Conduct (“Code”), Ryerson Holding Corporation and its subsidiaries (together “Ryerson”) are committed to conducting business in conformance with the highest standards and in an ethical, legal and socially responsible manner. This extends to our relationships with customers, suppliers, competitors, shareholders, our employees, and the communities in which we operate.

Ryerson strives to foster safe, inclusive and respectful workplaces that respect human rights, and we seek to do business with reputable business partners who are committed to the same. We are committed to non-discrimination and freedom from harassment and require that Ryerson and our suppliers refrain from knowingly entering into relationships that directly or indirectly (a) expose employees to undue health and safety risks, or (b) use child, prison, or forced labor or other exploitative practices which in any way rely on or encourage human trafficking.

Ryerson understands that there may be different legal and cultural environments applicable to its suppliers, but we expect our business units, as well as our suppliers, vendors, and external consultants (collectively “Suppliers”) to meet the following minimum requirements.

Compliance with Laws, Regulations and Published Standards

Our Code requires that all Ryerson transactions must be conducted in accordance with all applicable U.S. and foreign laws. All Ryerson business units are required to comply with all applicable laws, codes or regulations of the countries, states and localities in which we operate, including, but not limited to, laws and regulations relating to health, safety and labor practices. Further, in order to do business with Ryerson, Suppliers must similarly comply with all applicable laws, codes, and regulations and require their suppliers (including temporary labor agencies) to do the same.

Ryerson’s terms and conditions of purchase, available at <https://www.ryerson.com/ourcompany/selling-to-ryerson>, require adherence to this Human Rights Policy (this “Policy”) as a condition of doing business with Ryerson.

Labor Practices

Ryerson expects its business units and Suppliers to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. At a minimum, Ryerson requires our business units and Suppliers to comply with the following standards:

- a. Business units and Suppliers shall not use any forced labor, whether in the form of prison, indentured, bonded or otherwise.
- b. Business units and Suppliers shall not employ child labor. Business units and Suppliers must comply with local laws regarding the minimum age of employees. The minimum age for workers must be at least: (i) for countries that have ratified it, of an employment age consistent with International Labor Convention No. 138 which can be found at http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CO_DE:C138; or (ii) the minimum age established by law in the Business Unit or Supplier's country or locality, or, (iii) where neither ILO guidelines nor legal minimums are applicable, the age for completing mandatory (compulsory) education.
- c. Business units and Suppliers shall ensure that workers are paid a living wage and shall provide wages for regular and overtime work and benefits that at least meet legal requirements.
- d. Business units and Suppliers shall not require workers to work more than the maximum hours of daily or weekly labor set by local laws.
- e. Business units and Suppliers shall not retain original identification documents for any employees.
- f. Business units and Suppliers shall treat each employee with dignity and respect. In no event shall Business unit or Suppliers' workers be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.
- g. Business units and Suppliers shall ensure that all employment opportunities with Ryerson are available freely, solely based on the merit of candidates. Business units and workforce providers engaged by us shall not accept any payment or benefit either in cash or kind for the employment opportunities and will bear all the cost associated with recruitment of employees. Business units and Suppliers will reimburse the cost to the employee as soon as practicable if there is deviation from this practice.
 - Business units and Suppliers shall pay all expenses associated with recruiting employees and shall ensure that neither they nor any third party have charged potential employees any amounts in exchange for the promise of employment. Any amounts so charged shall be reimbursed to the employee as soon as practicable.
- h. Business units and Suppliers shall follow prohibitions against discrimination as set forth in the Code. Business units and Suppliers shall not discriminate in their employment practices on the basis of race, color, religion, gender, gender identity, pregnancy, age, physical or mental disability or genetic information, sexual orientation, national origin, creed, ethnicity, veteran status, marital

status, HIV-positive status, social or economic class or any other basis prohibited by law.

- i. Business units and Suppliers must commit to the protection of women's rights by recognizing that women have the right to be free from violence, harassment and discrimination and ensuring that environments are safe so that women may fulfill their potential as individuals and as contributors to work, their communities, and economies.
- j. Business units and Suppliers shall recognize and respect the rights of their workers to free association – including the right to collectively bargain and participate in union activity -- in accordance with local labor laws and established practices. Business units and Suppliers shall also respect the rights of unions in their workplaces.
 - At a minimum, business units and Suppliers shall act in accordance with ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organize), which can be found at https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087, and ILO Convention No. 98 (Right to Organize and Collective Bargaining), which can be found at https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100::NO:12100:P12100_ILO_CODE:C098:NO.
- k. Business units and Suppliers shall make every effort to ensure that their suppliers and subcontractors follow practices that are in accordance with this Policy and the Code and shall periodically conduct informal interviews of random employees to ensure compliance.

Compliance

To monitor and ensure compliance with Ryerson's policies, upon request, business units and Suppliers will be required to certify that they:

- a. Comply with all applicable laws and regulations and require their suppliers to do the same;
- b. Comply with Ryerson's standards of ethical and business conduct and Labor Practices as set forth in the Code and this Policy;
- c. Not use any form of slavery or human trafficking in their supply chains; and
- d. Use their best efforts to hold their suppliers to Ryerson's principles as set forth in the Code and this Policy.
- e. Provide any requested evidence of compliance to our data partner Assent Compliance using the requested industry standardized formats. These declarations will be provided on a timely basis, within 15 business days, from the date of request and Suppliers agree to respond to and support fulfillment of the declaration and to respond to any requests for feedback or notifications of errors.

We will evaluate our relationships with Suppliers on an ongoing basis to ensure continued compliance with this Policy. We reserve the right to request additional documentation from our business units and Suppliers regarding labor practices and adherence to this Policy and the Code. Suppliers who do not comply with these requirements will be reviewed by our supply chain organization with regard to future business.

Any Supplier or employee of Ryerson who becomes aware of violations of this Policy should notify us by calling our compliance hotline at 1.800.435.1171 or electronically via www.SpeakUpRyerson.com. Ryerson will investigate each such report and take prompt corrective action where appropriate. Ryerson employees found to have violated this Policy will be subject to discipline up to and including discharge. Suppliers found to have violated this Policy will be subject to remediation efforts that may range from a gap closure action plan or other risk mitigation approach to address all risks identified up to and including being barred from doing business with Ryerson.