



Workplace and Human Rights Policy

Purpose

CMC firmly believes that all people should be treated fairly and with respect, and that human rights are inherent to all, regardless of race, ethnicity, color, religion, sex, age, physical or mental disability, national origin, citizenship, military or veteran status, sexual orientation, gender identity and/or expression, genetic information or any other status.

This Policy is guided by the core principles of both the UN Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises, and reinforces our commitment to honoring all internationally recognized human rights consistent with the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We recognize that certain individuals or groups may be at greater risk of negative human rights impacts due to their vulnerability or marginalization. We also recognize that women and men may face different risks and are committed to respecting the rights of both women and men. We are committed to including stakeholders in the development and the implementation of this policy.

Every employee at CMC is expected to uphold this policy and to hold one another accountable. Implementation of this policy is supported and reinforced at all levels of management. CMC's Board of Directors through the Nominating & Corporate Governance Committee has responsibility for overseeing compliance with this policy. We empower our employees to make the right decisions and have established the CMC Code of Conduct and Business Ethics to help our employees understand CMC's policies and guide their actions.

Compliance with all applicable laws is mandatory, but laws alone do not define our ethical business practices. CMC values open and honest communications, and we encourage all employees to provide their feedback in a constructive manner.

Scope

CMC is a global manufacturer with locations in the United States (U.S.), the United Kingdom, Europe and Asia. Our Workplace and Human Rights Policy applies to all CMC facilities globally and focuses on the areas of human rights that have been identified as priorities for our company and the steel industry.

Our Stakeholders

Our commitment to upholding this policy extends to all stakeholders, including our employees, our business partners and the communities where we live and work. Our employment policies and practices aim to ensure fair and equitable treatment for all our employees and are built on a foundation of respect.

We are committed to working with business partners, suppliers and contractors whose views on human rights align with our own and who apply the rules of this policy as well as the rules of our Supplier Code of Conduct. You can learn more about this commitment in our Supplier Code of Conduct, which is available on cmc.com. We are proud to be active members of our local communities. We engage in community outreach and civic organizations that allow us to have an open dialogue with our neighbors on the potential impact of human rights issues in the communities where we operate.

Children and Young Workers

As a fundamental principle, we do not employ children or support the use of child labor. We do encourage educational and training programs tied to formal education for young people by offering all dependents of U.S. employees a \$500 scholarship annually, for up to four years to further their education. We also provide apprenticeship programs and technical training programs for certain employees, as well as programs geared toward employing recent college graduates. We promote a dual educational system in Poland at local technical high schools, enabling students to benefit from this scholarship program.

Forced Labor and Modern Slavery

We believe that people should work because they want or need to, not because they are forced to do so. We prohibit the use of prison labor, forcibly indentured labor, bonded labor, slavery or servitude.

Freedom of Association and Collective Bargaining

We respect our employees' right to join or not to join a labor union without fear of reprisal, intimidation or harassment. CMC respects these rights to freedom of association and collective bargaining.

Health and Safety

We conduct our business in a manner that aims to prevent harm to people and respects the environment. We are committed to continuous improvement towards zero incidents and to compliance with all applicable safety, health, and environmental laws and regulations.

This commitment is supported by our comprehensive safety and environmental procedures and training which we provide to our teams, our safety and environmental policies for contractors, and by our company-wide incident management and reporting network.

Equality of Opportunity

We recognize, respect and embrace the cultural differences found in the worldwide marketplace. Our goal is to attract, develop, promote and retain the best people from all cultures and segments of the population, based on ability.

Compensation and Benefits

We are committed to ensuring our employees are paid a living wage based on local labor market assessments. We provide competitive pay and benefits that are commensurate with industry standards and ensure that compensation meets or exceeds the legal minimum requirements. Our compensation philosophy is clearly communicated to employees and is in full compliance with all applicable laws.

Working Conditions and Working Hours

CMC complies with all applicable labor and employment laws and regulations, including those regarding work time, work conditions, and appropriate compensation.

Relationships with Local Communities and Indigenous People

Within the framework of our Guiding Principles, we respect the cultures, customs and values of all people, including indigenous people, in communities where we operate and take into account their needs, concerns and aspirations, including the right to free, prior and informed consent. We also take seriously the responsibility that comes with being a good corporate citizen and are dedicated to making a positive impact in our local communities where we live and work.

No Discrimination, Harsh or Inhumane Treatment

We are committed to maintaining a professional, safe, and discrimination-free work environment and to ensuring that each employee is treated with fairness and dignity. We have zero tolerance for discrimination or harassment of any kind. No employee shall be subject to any physical, sexual, psychological or verbal harassment, or abuse or intimidation in any form. CMC prohibits retaliation against anyone who has made a harassment complaint in good faith.

Training and Communication

CMC will communicate this policy and relevant guidance to employees through our established internal communication channels. CMC employees shall have access to CMC's applicable corporate policies and employees will receive relevant training on how to implement this policy in the scope of their employment.

Ethical Conduct & Stakeholder Grievance Mechanisms

An employee who believes that a violation of applicable workplace laws and/or CMC policies has occurred may report this information to local management, Human Resources, the Legal Department, or the 24-hour Ethics Hotline without fear of retaliation. This hotline is available to all CMC employees as well as external stakeholders (e.g., suppliers, contractors, local communities, non-governmental organizations (NGOs), and members of the public). Each report to the Ethics Hotline is investigated and, if warranted, remedial actions are taken to address the issues raised.