



CLEVELAND-CLIFFS INC.

Cliffs Steel Inc.

200 Public Square, Suite 3300, Cleveland, OH 44114

P 216.694.5700 clevelandcliffs.com

October 27, 2023

Subject: Restrictions imposed by the European Union on the import of certain iron and steel products

To Whom It May Concern:

Cliffs Steel Inc. ("Cliffs") commits to conduct its operations ethically and in compliance with the laws and regulations applicable to it. Compliance with the applicable sanctions regimes is a central component of Cliffs' internal compliance program.

In particular, in light of Article 3g(1)(d) of EU Regulation 833/2014, Cliffs certifies that, to the best of its knowledge and after conducting due diligence and analyzing its production process and supply chain, it does not sell iron or steel products listed in Annex XVII that contain inputs listed in Annex XVII originating in Russia. This statement only applies as of 1 April 2024 for products of Annex XVII containing products of CN code 7207 11, and as of 1 October 2024 for products of Annex XVII containing products of CN codes 7207 12 10 or 7224 90.

If you require evidence of the iron and steel inputs used in the processing of material produced against your purchase order, that must be noted on your purchase order to us. In such cases, Cliffs will issue a mill test certificate and/or supplemental letter containing the HS code or other additional information concerning the inputs used in the processing of the material produced against your purchase order.

Should you have any questions or require further information, please contact the undersigned at evelyn.hoffman@clevelandcliffs.com.

Sincerely,

A handwritten signature in black ink that reads "Evelyn Hoffman". The signature is written in a cursive, flowing style.

Evelyn Hoffman
Director, Central Quality

The information in this letter is provided by Cliffs Steel Inc. for itself and, if applicable, for its subsidiaries, Cleveland-Cliffs Steel Corporation and Cleveland-Cliffs Steel LLC, for the general information of customers and does not imply any warranty. The interpretation or use of this information is the sole responsibility of the user. This information is provided to you on the following conditions: (1) Cliffs makes no representations or warranties as to any tests used in preparing this letter or correctness of its contents; (2) Cliffs shall not be liable to you or any other person for the performance, merchantability, suitability or fitness for any purpose of any material or item tested or investigated in the preparation of this letter, whether such liability is asserted on the basis of express or implied representations, warranties or conditions, in contract or tort, by statute or common law, or on any other basis; and, (3) you agree to hold Cliffs harmless against any liability that may be imposed on it in connection with this letter, the manufacture of any item in reliance on it, the use of any item so manufactured or the breach of any of these conditions.