

CLEVELAND-CLIFFS INC. AND ASSOCIATED COMPANIES HUMAN RIGHTS POLICY

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APPROVED



Follow-up Review Date: As Needed

Lourenco Goncalves
Chairman, President & Chief Executive Officer

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Link

[United Nations' Universal Declaration of Human Rights](#)
[United Nations' Guiding Principles on Business and Human Rights](#)
[United Nations' Declaration on the Rights of Indigenous Peoples](#)
[OECD Guidelines for Multinational Enterprises and Responsible Business Conduct](#)
[ILO Declaration on Fundamental Principles and Rights at Work](#)

DISTRIBUTION

Company's Intranet: <http://www.onecliffs.com>

Company's External Website: <https://www.clevelandcliffs.com>

MAINTENANCE RESPONSIBILITY

Executive Vice President, Chief Legal and Administrative Officer & Secretary

1. **UNITS AFFECTED**

- 1.1. Cleveland-Cliffs Inc. and its consolidated subsidiaries and associated companies, including controlled partnerships and/or joint ventures (collectively, the “Company”).

2. **SCOPE**

- 2.1. The Company believes that it has the duty to foster positive social and employment relationships in every area of operation. The Company is committed to respecting all internationally recognized human rights, including upholding the values associated with the *United Nations’ Universal Declaration of Human Rights*, the *United Nations’ Guiding Principles on Business and Human Rights*, the *United Nations’ Declaration on the Rights of Indigenous Peoples*, the *International Labor Organization’s (“ILO”) Declaration on Fundamental Principles and Rights at Work*, and the *Organization for Economic Cooperation and Development’s (“OECD”) Guidelines for Multinational Enterprises on Responsible Business Conduct*, while striving to promote and protect safety and human rights wherever it operates, particularly for historically vulnerable groups such as: women, racial, national or ethnic minorities, persons with disabilities, children, religious or linguistic minorities, and indigenous peoples. Also, the Company will obey the laws and regulations of the countries in which it operates.
- 2.2. This Human Rights Policy (this “Policy”) operates in conjunction with and in support of the Company’s Core Values, Code of Business Conduct and Ethics (the “Company Code”), and Code of Conduct for Cleveland-Cliffs’ Suppliers (the “Supplier Code”).

3. **PURPOSE**

- 3.1. The purpose of this Policy is to clearly establish the Company’s policy on Human Rights and its relationship with employees and the communities in which it operates.
- 3.2. The Company requires that all of its suppliers, consultants, vendors and contractors adhere to the principles contained in this Policy and promote such standards among their own supply chains.

4. **INTERACTION WITH LOCAL COMMUNITIES**

- 4.1. The Company is committed to being a respectful member of the communities in which it operates. The Company endeavors to have open, transparent relationships

with all of its stakeholders.

- 4.2. The Company endeavors to work with the local communities to focus on understanding and responding to community concerns as quickly as possible.
- 4.3. Local stakeholders are invited to engage with the Company by communicating directly regarding issues that are relevant to the communities that host our operations, including by submitting questions via the Company's website link for community inquiries at www.clevelandcliffs.com or by calling the toll-free number 866-477-3335.

5. **EMPLOYEE RELATIONS**

- 5.1. The Company is committed to providing all employees with a safe working environment that is free of discrimination. It is also committed to the elimination of forced labor and the abolishment of child labor, including all forms of slavery and human trafficking.
- 5.2. To support the fundamental principles above, the Company:
 - 5.2.1. obeys the local laws and regulations in all of the countries in which it operates;
 - 5.2.2. adheres to applicable international and local standards for health and safety;
 - 5.2.3. safeguards all Company employees and assets using the necessary security arrangements applicable to its operating environments while respecting human rights;
 - 5.2.4. prohibits the employment of forced or child labor within the Company and among third parties with which it does business;
 - 5.2.5. provides equal employment opportunity and treatment to all persons consistent with employment requirements and qualifications;
 - 5.2.6. commits to pay a living wage and to comply with all applicable wages and benefits laws and regulations;
 - 5.2.7. complies with applicable working hours laws and regulations;
 - 5.2.8. recognizes and respects the right of employees to freely associate and collectively bargain, including the right to voluntarily organize and choose whether to join a labor or trade union, and to not be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively, consistent with the *ILO Declaration*

on Fundamental Principles and Rights at Work;

- 5.2.9. honors the terms of collective bargaining agreements negotiated with labor or trade unions; and
- 5.2.10. prohibits discrimination or harassment in the workplace based on race, color, religion, national origin, age, military status, disability, sex, sexual orientation, gender identity, genetic information or any other characteristic protected by law.

6. **HUMAN RIGHTS**

- 6.1. The Company is committed to upholding the values associated with the *United Nations' Universal Declaration of Human Rights*, the *United Nations' Guiding Principles on Business and Human Rights*, the *United Nations' Declaration on the Rights of Indigenous Peoples*, the *ILO Declaration on Fundamental Principles and Rights at Work*, and the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*, while striving to promote and protect safety and human rights wherever it operates, including access to safe water and sanitation, as well as sound management of freshwater ecosystems that are essential to human health and economic prosperity.
- 6.2. The Company will educate employees about human rights and require them to conduct internal and external business fairly and ethically.
- 6.3. The Company Code mandates that Company employees are responsible for interacting fairly and respectfully with the Company's customers and suppliers, as well as host communities, and Company employees are likewise responsible for treating each other with the same fairness and respect, at all levels of the organization.
- 6.4. The Company will take appropriate action against any employee who violates the human rights of others. It will also report any credible accusation of human rights violations to the appropriate government authorities and agencies.
- 6.5. The Supplier Code mandates that, among other things, all suppliers of goods and services to the Company provide a safe working environment, respect the basic human rights of their employees and comply with principles of non-discrimination.

7. **REPORTING AND ACCOUNTABILITY**

- 7.1. The Company promotes the principles embodied in this Policy throughout its operations and empowers its employees to fulfill the commitments contained in this Policy.
- 7.2. Employees are encouraged to raise any issues or concerns that may arise under this Policy in a manner consistent with the Code, including by contacting their supervisor, local human resources personnel or a member of the Company's Legal Department or through use of the ethics helpline at 800-886-2416 or online ethics reporting website at <https://secure.ethicspoint.com>. The ethics helpline and reporting website are hosted by an independent provider and offer confidential and anonymous means to raise issues or concerns.