

**CLEVELAND-CLIFFS INC. AND ASSOCIATED COMPANIES
AFFIRMATIVE ACTION AND PAY TRANSPARENCY POLICY**

Effective Date: August 1, 2022

Supersedes: Any similar policy prior to effective date

APPROVED

Policy No: # HR1-02

Follow-up Review Date: # As Needed



APPROVER SIGNATURE

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MAINTENANCE RESPONSIBILITY

Executive Vice President, Human Resources & Labor Relations

1. **UNITS AFFECTED**

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

2. **PURPOSE**

- 2.1. It is the policy of Cleveland-Cliffs Inc. and each of its subsidiaries ("the Company") to comply with all applicable federal, state and local laws governing nondiscrimination in employment and to ensure equal opportunity in all terms and conditions of employment or potential employment.

3. **AFFIRMATIVE ACTION POLICY**

- 3.1. The Company prohibits discrimination and harassment against any employee or applicant for employment because of any legally protected group status, as referenced in the Company's Equal Employment Opportunity and Respectful Workplace Policy (the "EEO Policy").
- 3.2. The Company has established Affirmative Action Programs under EO 11246, Section 503 of the Rehabilitation Act, and the Vietnam Era Veteran's Readjustment Assistance Act of 1974 ("VEVRAA"). The Company engages in affirmative action measures to ensure that qualified applicants are employed, and that employees are treated during employment without regard to their race, color, religion, sex, sexual orientation, gender identity, national origin, disability or protected veteran status. The Company has established an audit and reporting system to allow for effective measurement of its affirmative action activities.
- 3.3. To implement this policy, the Company will:
- 3.3.1. recruit, hire, train and promote qualified persons in all job titles, without regard to any legally protected group status, as referenced in the Company's EEO Policy;
 - 3.3.2. ensure that employment decisions are in accord with principles of equal employment opportunity by imposing only valid job requirements; and
 - 3.3.3. ensure that all personnel actions and employment activities such as compensation, benefits, promotions, layoffs, return from layoff, and Company sponsored programs, will be administered without regard to any legally protected group status, as referenced in the Company's EEO Policy.

- 3.4. The Chief Executive Officer reaffirms support for the Company's Affirmative Action Policy and delegates overall responsibility for the implementation of the affirmative action activities to the Executive Vice President, Human Resources.

4. **PAY TRANSPARENCY POLICY**

- 4.1. The Company will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant.
- 4.2. Employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the Company; (c) consistent with the Company's legal duty to furnish information; or (d) in connection with an essential job function for a legitimate business reason.

5. **REPORTING PROCEDURE**

- 5.1. If an employee believes that they have experienced or becomes aware of conduct prohibited by this policy, they must immediately report the conduct to any of the following: the Human Resources Manager at their work location, the Corporate Human Resources Department (216.694.7513), or the Ethics and Compliance Hotline (800.866.2416).
- 5.2. The Company will investigate the report promptly, impartially, and in as confidential a manner as possible, and will take corrective action where appropriate. Employees are expected to cooperate fully in the investigation of such reports.
- 5.3. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have in good faith: (a) filed a complaint; (b) assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of this policy; (c) opposed any act or practice made unlawful by this policy; (d) exercised any other right protected by this policy; or (e) have otherwise sought to obtain their legal rights under, or opposed any act or practice made unlawful under, any federal, state or local EEO law. Any employee or applicant who believes they have been subjected to such treatment must immediately report it, utilizing the reporting procedures outlined above. Any employee who the Company determines has violated this

policy will be subject to disciplinary action, up to and including termination of employment.