

## CLEVELAND-CLIFFS INC. AND ASSOCIATED COMPANIES HUMAN RIGHTS POLICY

Effective Date: November 22, 2022

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Policy No: C-008

### APPROVED



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Lourenco Goncalves

Follow-up Review Date: As Needed

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### **Link**

[United Nations' Universal Declaration of Human Rights](#)

[United Nations' Guiding Principles on Business and Human Rights](#)

### **DISTRIBUTION**

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

### **MAINTENANCE RESPONSIBILITY**

Executive Vice President, Human Resources, Chief Legal and Administrative Officer & Secretary

1. **UNITS AFFECTED**

- 1.1. Cleveland-Cliffs Inc., 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 upholding the values associated with the *United Nations’ Universal Declaration of Human Rights* and the *United Nations’ Guiding Principles on Business and Human Rights*, to ensure safety and human rights are protected 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 and Code of Business Conduct and Ethics (“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 expects that all consultants, contractors, suppliers and business partners of the Company adhere to the principles contained in this Policy.

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.

5. **EMPLOYEE RELATIONS**

- 5.1. The Company is committed to providing all employees 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 to all persons consistent with employment requirements and qualifications;
- 5.2.6. complies with 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 and to not be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively; and
- 5.2.8. 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* and the *United Nations' Guiding Principles on Business and Human Rights* to ensure safety and human rights are protected 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's Code mandates that 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.