



Code of Conduct for Cliffs Suppliers

This Code of Conduct defines the basic requirements placed on Cliffs' and its subsidiaries', affiliates' and partnerships' (the "Company's") suppliers of goods and services in connection with its contract with the Company.

The Supplier declares herewith:

Legal compliance

- to comply with the laws of the applicable legal system(s).

Prohibition of corruption and bribery

- to tolerate no form and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law.

Respect for basic human rights of employees

- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his or her will;
- to provide fair remuneration and to guarantee the applicable national statutory minimum wage;
- to comply with the maximum number of working hours consistent with applicable law;
- to comply with International Labor Organization Convention 138 regarding prohibition on child labor;
- to refuse to tolerate discriminatory practices or unacceptable treatment of employees.

Health and safety of employees

- to control hazards, provide a safe working environment, and take the best reasonably possible precautionary measures against accidents and occupational disease.

Environmental protection

- to act in accordance with the applicable statutory and international standards regarding environmental protection.

Supply chain

- to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
- to take reasonably diligent steps to eliminate the risk of illicit or counterfeit parts from infiltrating our supply chain;
- to comply with the principles of non-discrimination with regard to supplier selection and treatment.