

California Transparency in Supply Chains Act Disclosure

At Cleveland-Cliffs Inc., we are committed to doing the right thing in all our business dealings. Our respect for each other and our commitment to acting with integrity and fairness around the world means that we always support individual human rights.

The California Transparency in Supply Chains Act of 2010 requires certain companies doing business in California to disclose efforts to eliminate slavery and human trafficking in their supply chains. Cliffs is committed to upholding the values associated with the United Nations' Universal Declaration of Human Rights to ensure safety and human rights are protected wherever we operate. We have a zero-tolerance policy for the use of child labor, forced labor or human trafficking practices, and we will not knowingly do business with any consultants, contractors, suppliers or business partners who violate this policy. At this time, Cliffs does not engage in the actions described in Section 3(c)(1)-(5) of the California Transparency in Supply Chains Act of 2010. We do expect that all consultants, contractors, suppliers, and business partners with whom we work will adhere to the ethical principles contained in the OneCliffs Way of Doing Business and our Human Rights Policy (both available on our public website).

This statement is made in compliance with the California Transparency in Supply Chains Act of 2010 and is not directed nor is it to be interpreted under any other law or regime.