

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

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APPROVED



Follow-up Review Date: As Needed

Lourenco Goncalves

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Link

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

DISTRIBUTION

Company's Intranet: <http://www.onecliffs.com> and [AK Steel intranet](#)

MAINTENANCE RESPONSIBILITY

Executive Vice President, Chief Legal Officer and Secretary

WARNING: POLICIES ARE UPDATED PERIODICALLY, SOMETIMES PRIOR TO A RENEWAL DATE THAT MAY APPEAR ON THE COVER OF THE POLICY. **A PRINTED COPY MAY BE OUTDATED.** YOU ARE RESPONSIBLE FOR ENSURING THAT YOU ARE COMPLYING WITH THE CURRENT GOVERNING POLICY. THE CURRENT GOVERNING POLICY IS POSTED TO THIS POLICY PORTAL.

1. **UNITS AFFECTED**

1.1. Cleveland-Cliffs Inc. ("Cliffs"), 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 to ensure safety and human rights are protected wherever we operate. Also, the Company will obey the laws and regulations of the countries in which it operates.

2.2. The Human Rights Policy ("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 we operate. We endeavor to have open, transparent relationships with all of our 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 to work in a safe environment that is free of discrimination. We are also committed to the elimination of forced labor and the abolishment of child labor.

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 we operate;

5.2.2. adheres to applicable international standards for health and safety;

- 5.2.3. prohibits the employment of forced or child labor within the Company and among third parties that it does business with;
- 5.2.4. provides equal employment opportunity to all persons consistent with employment requirements and qualification;
- 5.2.5. complies with applicable wages and benefits laws and regulations;
- 5.2.6. complies with applicable working hours laws and regulations;
- 5.2.7. recognizes and respects the right of employees to freely associate and collectively bargain. no employee shall 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* to ensure safety and human rights are protected wherever we operate. The Company will obey the laws and regulations of the countries in which it operates.
- 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 our customers and suppliers, as well as our host communities, and our 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.