

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

Effective Date: August 15, 2017

Supersedes: C-008 (October 1, 2014)

Policy No: C-008

**APPROVED**



Follow-up Review Date: As Needed

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Lourenco Goncalves

**UNITS AFFECTED**

Cleveland-Cliffs Inc. and its consolidated subsidiaries and associated companies

**TABLE OF CONTENTS**

**PAGE NUMBER**

1. UNITS AFFECTED	2
2. SCOPE	2
3. PURPOSE	2
4. INTERACTION WITH LOCAL COMMUNITIES	2
5. EMPLOYEE RELATIONS	2
6. HUMAN RIGHTS	3

**Link**

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

**DISTRIBUTION**

Company's Intranet: <http://www.onecliffs.com>

**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 A PRINTED COPY MAY BE OUTDATED.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 GLOBAL POLICY PORTAL.

1. **UNITS AFFECTED**

1.1. Cleveland-Cliffs Inc. ("Cliffs"), its consolidated subsidiaries, and associated companies including partnership mines (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 will use its best efforts to see that all consultants, contractors, suppliers and business partners of the Company adhere to 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. As a mining company, 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 will:

5.2.1. obey the local laws and regulations in all of the countries in which we operate;

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

5.2.3. prohibit the employment of forced or child labor within the Company

and among third parties that it does business with;

5.2.4. provide equal employment opportunity to all persons consistent with employment requirements and qualification; and

5.2.5. prohibit discrimination or harassment in the workplace.

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. Also, 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.