

Supplier Code of Conduct

Rev 1

May 1, 2024

OUR PHILOSOPHY CULTURE ENABLES STRATEGY



Our Philosophy

EARNINGS

Our first corporate goal is to earn money for our shareholders and increase the value of their investment. We believe that the best measurement of the accomplishment of our goal is consistent growth in earnings per share.

OUR GOLDEN RULE

We treat our customers, employees, investors and suppliers, as we would like to be treated.

PEOPLE

We are dedicated to the belief that people are our most important asset. We believe people respond to recognition, opportunity to grow and fair compensation. We believe that compensation should be directly related to job performance and therefore use incentives, profit sharing or otherwise, in every possible situation. From employees we expect an honest day's work for an honest day's pay. We believe in the philosophy of continued employment for all Worthington people. In filling job openings every effort is expended to find candidates within Worthington, its divisions or subsidiaries.

CUSTOMERS

Without the customer and their need for our products and services we have nothing. We will exert every effort to see that the customer's quality and service requirements are met. Once a commitment is made to a customer, every effort is made to fulfill that obligation.

SUPPLIERS

We cannot operate profitably without those who supply the quality materials we need. We ask that suppliers be competitive in the marketplace with regard to quality, pricing, delivery and volume purchased. We are a loyal customer to suppliers who meet our quality and service requirements through all market conditions.

ORGANIZATION

We believe in a divisionalized organizational structure with responsibility for performance resting with the head of each operation. All managers are given the operating latitude and authority to accomplish their responsibilities within our corporate goals and objectives. In keeping with this philosophy, we do not create excessive corporate procedures. If procedures are necessary within a particular company operation, that manager creates them. We believe in a small corporate staff and support group to service the needs of our shareholders and operating units as requested.

COMMUNICATION

We communicate through every possible channel with our customers, employees, shareholders, suppliers and financial community.

CITIZENSHIP

Worthington practices good citizenship at all levels. We conduct our business in a professional and ethical manner. We encourage all our people to actively participate in community affairs. We support worthwhile community causes.

Originally written by Worthington Industries Founder John H. McConnell





Supplier Code of Conduct

At Worthington Steel, we believe in treating our customers, employees, investors and suppliers as we would like to be treated. We expect that our suppliers conduct business in a way consistent with the unique principles and values of our company. This Supplier Code of Conduct is provided as a guideline to the basic requirements expected of our suppliers.

In addition to these requirements, suppliers must comply with all applicable laws, regulations and directives, and all obligations in any contract a supplier may have with us. We expect our suppliers to know and follow the laws that apply to them and their business, and to treat compliance with legal requirements as a minimum standard.

Occupational Health and Safety

At Worthington Steel, we expect our suppliers to fully comply with all applicable laws and regulations governing health and safety at work. Furthermore, they should use a health and safety management system to implement proactive measures that support accident prevention, minimize health risk exposure, and provide a safe and healthy environment for all who work at or visit their sites.

Labor and Human Rights

Minimum Work Age

Suppliers shall not use any form of child labor within their organization or purchase materials or services from companies using underage labor.

Forced Labor

Suppliers shall not use any form of forced, involuntary or slave labor or human trafficking within their organization or purchase materials or services from companies using forced, involuntary, or slave labor or human trafficking.

Discrimination

Suppliers are expected to promote equal opportunities and fair treatment of all employees in hiring and employment practices. Suppliers must comply with all applicable laws and regulations relating to discrimination in hiring, employment policies, harassment and retaliation.

Freedom of Association/Collective Bargaining

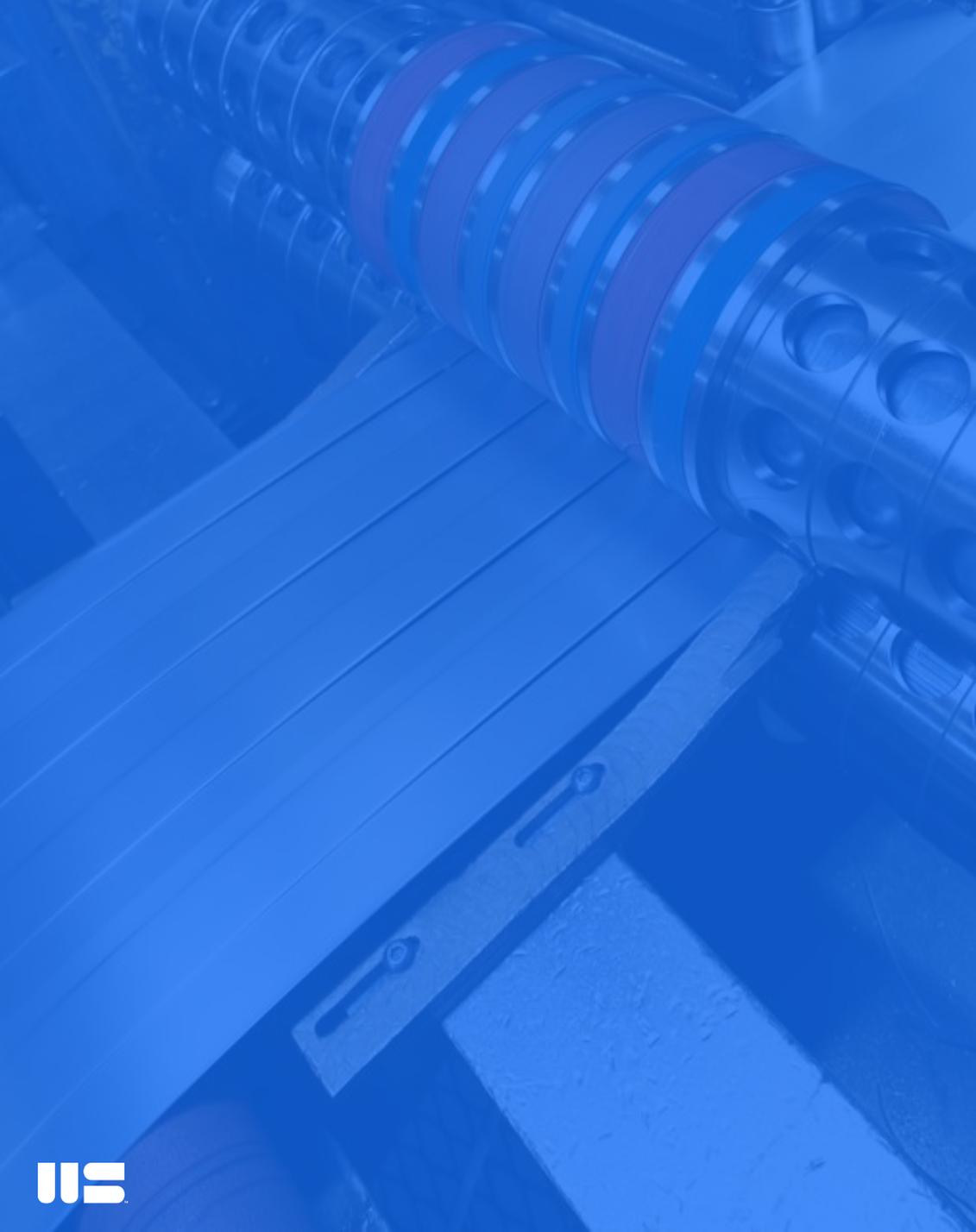
Employees' rights to free association and collective bargaining shall be recognized and respected, as far as legally permitted, without fear of reprisal, intimidation or harassment.

Compensation and Working Time

Suppliers are expected to comply with all applicable wage and working hours labor laws and regulations.

Diversity

Worthington Steel believes in the value of diversity and our suppliers are expected to be inclusive and ensure that employees and other stakeholders are always treated with dignity and respect.



Environmental Protection

At Worthington Steel, we expect our suppliers to fully comply with all applicable laws, regulations and standards in any jurisdiction in which they operate. Suppliers are expected to operate in a way that minimizes the impact on natural resources and protects human health and the environment.

Ethics in Business

Prohibition of Bribery/Corruption

Suppliers shall not tolerate corruption or bribery in any facet of business and shall ensure compliance with all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act. Suppliers, and those acting on their behalf, may not offer, promise, authorize, give or receive, directly or indirectly, anything of value to any person or entity if it is intended, or could reasonably appear as intended, to influence improper action, obtain or retain business, or secure an improper advantage.

Preventing Conflicts of Interest

Suppliers must not make business decisions that will create situations that are, or appear to be, a conflict of interest. Suppliers must be alert to actual or potential conflicts of interest and any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented.

Antitrust/Unrestricted Competition

Suppliers are expected to conduct business in a fair manner and comply with all applicable antitrust and competition laws and regulations.

Confidentiality

Suppliers are expected to keep Worthington Steel's business, financial and technical information confidential using appropriate safeguards.

Intellectual Property/Reputation

Suppliers are not authorized to use or register our name, logos, trademarks or other intellectual property without our express written permission. Suppliers must avoid any situations that may adversely affect our business interests or reputation.

Counterfeit Parts

Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, suppliers shall provide notification to recipients of counterfeit product(s) when warranted and exclude them from the delivered product.

Gifts and Entertainment

We expect our suppliers to refrain from providing personal gifts, favors, or business courtesies, including entertainment activities, to Worthington Steel employees or representatives, that are intended, or could reasonably appear as intended, to influence a business decision.

Supplier Relations/Cooperation

At Worthington Steel, we expect our suppliers to communicate and encourage their suppliers to comply with the minimum standards within this Code of Conduct. We expect all of our suppliers and their suppliers to cooperate fully with our efforts to assess and report information about our supply chain when required by our customers, our policies or applicable laws or regulations.

A close-up, black and white photograph of window blinds, showing the slats and the mechanism. The blinds are partially open, creating a pattern of light and shadow.

Recordkeeping/Certifications/ International Trade Laws

We expect our suppliers to maintain accurate books and records that reflect all transactions in an accurate and timely manner. We expect our suppliers to conduct due diligence on their suppliers and to disclose and certify to us upon request the locations of any supplier or sub-supplier facilities and the origin of materials and products supplied to us. Our suppliers must comply with all applicable trade, economic sanctions and import/export laws and regulations, including those issued by the U.S. government and any other countries into which our suppliers' products or materials will be imported.

Compliance with Supplier Code of Conduct; Reporting of Violations; Corrective Actions

This supplier code of conduct sets forth the minimum requirements that must be met by any of our suppliers and is in addition to any applicable terms and conditions, contracts or other policies applicable to our suppliers. We encourage our suppliers to have due diligence and management systems in place to monitor and maintain these requirements. Each supplier shall ensure that all suppliers, subcontractors, agents or other representatives it uses to fulfill obligations or commitments to Worthington Steel comply with the requirements of this supplier code of conduct.

Suppliers are required to promptly report to Worthington Steel any violations of this supplier code of conduct. If you become aware of or suspect any conduct or business practices that you believe may violate the supplier code of conduct, please notify your Worthington Steel point of contact directly.

Where we become aware of violations of the supplier code of conduct, our practice is to investigate these incidents to see if there is a way to work with our supplier to address the concern. However, we reserve the right to suspend or terminate all business relationship with any supplier who violates the supplier code of conduct or fails or refuses to cooperate with our investigation.



 **WORTHINGTON
STEEL**