

Human Rights Policy

Applies to: All employees, contractors, suppliers, and business partners

1. Purpose

At Worthington Steel, we believe in treating people with dignity and respect. Rooted in *Our Philosophy* and the *Golden Rule*, this Human Rights Policy reinforces our commitment to ethical conduct, workplace safety, and the elimination of forced labor. It reflects our internal standards and the expectations we extend to all suppliers, contractors, and third-party partners.

This policy aligns with the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and GRI 414: Supplier Social Assessment.

2. Scope

This policy applies globally across Worthington Steel operations and throughout our supply chain, including direct suppliers, vendors, contractors, and business partners.

3. Core Commitments

3.1 Safe Working Conditions

We are committed to providing and maintaining a safe and healthy work environment for all employees and expect the same from our suppliers. Specifically:

- Compliance with all applicable health and safety laws and regulations;
- Maintenance of safe equipment and proper use of safety procedures;
- Prompt reporting and corrective action on unsafe conditions;
- Prevention of workplace violence, harassment, or intimidation.

3.2 Prohibition of Forced Labor

Worthington Steel prohibits any form of forced, bonded, indentured, trafficked, or slave labor in our operations and supply chains. We expect all partners to:

- Ensure employment is voluntary;
- Not retain employee identity documents or restrict freedom of movement;
- Avoid recruitment fees charged to workers, and refund them if found;
- Follow ethical recruitment and employment practices.

4. Supplier and Contractor Expectations

All suppliers, vendors, and contractors must acknowledge and adhere to our Worthington Steel Code of Conduct, which includes:

- A zero-tolerance policy for child or forced labor;
- A commitment to safe, inclusive workplaces;
- Provisions to report and investigate violations.

While Worthington Steel does not require broad supplier audits, we reserve the right to:

- Request clarification on labor and safety practices;
- Engage with suppliers to remediate identified issues;
- Terminate relationships with suppliers who violate this policy.

5. Reporting and Enforcement

Employees and stakeholders are encouraged to report suspected human rights violations through:

- Their manager or HR;
- Our Ethics Officer;
- The confidential Code of Conduct & Ethics Line at 844-857-1391 or worthingtonsteel.ethicspoint.com.

Retaliation against individuals who report concerns in good faith is strictly prohibited.

6. Governance and Review

Responsibility for implementing this policy lies with Worthington Steel's Executive Leadership and Legal Department. This policy will be reviewed and updated periodically to ensure relevance and alignment with evolving best practices and regulatory expectations.