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| Issuing Department: Law |  | Effective Date: October 1, 2022 |
| CHILD AND FORCED LABOR POLICY | | |

Metallus does not tolerate child labor or the exploitation of children, nor the physical punishment, abuse, or forced labor of any employee. While Metallus operates primarily in the United States and in a segment of the steel industry where there is low risk for the use of child or forced labor, we recognize our responsibility for eliminating the potential for child or forced labor from our supply chain.

Metallus strictly prohibits the use of child labor at any of our facilities and throughout our supply chain. Metallus ensures that all legal limitations regarding employment of persons below the age of 18 are followed and does not recruit individuals under the legal age of employment. We may support temporary internships of individuals who are below the legal age of employment so long as such individuals are closely supervised and their safety, health, development and education are not compromised in any way.

Metallus strictly prohibits the use of forced labor at any of our facilities and in our supply chain, as described in detail in our anti-trafficking policy (Combating Human Trafficking).

Any questions regarding this Policy should be referred to Metallus' Law Department.

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| Policy Written By: L. Hoffman | DATE: October 1, 2022 |
| Approval: D. Higgins | DATE: October 1, 2022 |
| Last Revision: Version 1 (Rebranded) | DATE: Feb 27, 2024 |