

<b>Issuing Department:</b> Law		<b>Effective Date:</b> October 1, 2022
<b>CONFLICT MINERALS POLICY</b>		

As a socially responsible company, Metallus has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights, comply with all laws and regulations, and follow a rigorous Code of Conduct.

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”), mandates supply chain traceability for publicly traded companies that use, make or sell products with “Conflict Minerals” (tin, tungsten, tantalum, and gold, as defined by Section 1502 of Dodd-Frank Act).

Metallus’ Corporate Purchasing Department manages compliance with the Conflict Mineral requirements of Dodd-Frank Act throughout our supply chain in accordance with internal policies and standards.

#### Expectations for Suppliers

In support of Metallus’ policy on Conflict Minerals, suppliers are expected to supply materials to Metallus that are “Conflict-Free”. The term “Conflict Free”, as defined in the SEC rules and used herein, implies that any necessary Conflict Minerals are either sourced outside of the Covered Countries (entailing the Democratic Republic of The Congo and adjoining countries) or are sourced from scrap or recycled sources.

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. Metallus expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

In the event Metallus determines that a supplier’s efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Metallus reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Under the definition of “DRC Conflict-Free,” products supplied to Metallus:

1. Do not contain tantalum, tin, tungsten or gold (3TG) as elements necessary to their production or functionality, or
2. If products supplied to Metallus do contain these minerals, the minerals must originate outside the DRC, come from scrap or recycled sources, or be supplied from smelters that have been validated by an independent private sector party to be

conflict-free. The list of compliant smelters and refiners is posted at [www.conflictreesmelter.org](http://www.conflictreesmelter.org).

<b>Policy Written By:</b> L. Hoffman	<b>DATE:</b> October 1, 2022
<b>Approval:</b> D. Higgins	<b>DATE:</b> October 1, 2022
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