



a **U. S. Steel** company

CODE OF ETHICAL BUSINESS CONDUCT





Application

Big River Steel LLC's *Code of Ethical Business Conduct* (Code) applies to all of us – officers, and full-time and part-time employees of Big River. In addition to this Code, we are required to comply with applicable Big River Steel policies, procedures, plant work rules, and plant rules of conduct. Failure to follow them subjects us to disciplinary action, up to and including suspension or discharge. Big River Steel forbids retaliation against anyone who reports a suspected ethics or compliance violation in good faith.

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A Message From Our President & Chief Executive Officer



Integrity and ethical conduct are fundamental to Big River's core values and vital to our continued success as we maintain an intense, customer-centric focus on executing our world-competitive Best of BothSM steelmaking technology strategy. Maintaining ethical performance at U.S. Steel will advance our company beyond Best of Both to "Best for All" – the steel company with the best sustainable and differentiated products and service for our customers, best performance for our stockholders, and best place to work for our employees. It requires that we continue to foster an inclusive and diverse high-performance workplace culture that is rooted in the highest standards of excellence, accountability, initiative, fairness, and respect, regardless of title, duties, or location. Our adopted motto, "Do What's Right," captures this concept, but situations aren't always clear-cut. That's why we've established a comprehensive ethics and compliance program to assist us in incorporating the "Do What's Right" philosophy into everything we do.

The **S.T.E.E.L.** Principles that form the foundation of this *Code of Ethical Business Conduct* – **S**afety First, **T**rust and Respect, **E**nvironmental Stewardship, **E**xcellence and Accountability, and **L**awful and Ethical Conduct – have been adapted to reflect our "Best for All" strategy and highlight our focus on excellence and accountability. As always, our primary core value is "Safety First." The Code summarizes the company's requirements and expectations for our behavior and communicates important values that should govern all activities undertaken on behalf of Big River. The Code applies to all of us and sets forth principles that should guide our actions every day. No one is exempt from living these principles and leading by example.

Please take the time to carefully review this Code and consult it regularly. Use it as a resource if you have questions or concerns or if you need guidance. All employees should speak up if they observe or suspect that illegal or unethical conduct has occurred in connection with Big River business. When we don't voice our concerns, serious harm can be done to our reputation and our bottom line. Retaliation against those who raise concerns in good faith is strictly prohibited.

The real test for each of us comes when faced with a dilemma where the right course of action is not obvious or a decision that may require us to choose between what is easy and what is right. In such situations, we must never compromise our ethical values for any reason. Wherever we may work and whatever our role, we must remain committed to the principles that have guided U.S. Steel in our first 120 years and will remain the foundation for our future. I am proud of the way Big River employees demonstrate their commitment to "Do What's Right" at all times, and our company's continued success depends on our hard work and continued focus on operating at the highest ethical standards.

Now, as we like to say ...

Let's get back to work ... **safely.**

A handwritten signature in blue ink, appearing to read "David B. Burritt". The signature is fluid and stylized.

David B. Burritt
President & Chief Executive Officer



Our Commitment

Big River Steel is committed to doing business in an ethical and law-abiding manner because it is the right thing to do – for all of us.

We each have a personal responsibility to do what is right, and that means more than just complying with laws and regulations. It means living and abiding by our S.T.E.E.L. Principles:

- Principle 1 – **S**afety First
- Principle 2 – **T**rust and Respect
- Principle 3 – **E**nvironmental Stewardship
- Principle 4 – **E**xcellence and Accountability
- Principle 5 – **L**awful and Ethical Conduct

These principles are essential to the sound governance practices and good corporate citizenship that are necessary for our continued success.

Ethical behavior is part of our legacy. Big River Steel expects the highest ethical conduct from each of us, and living the S.T.E.E.L. Principles each day is an important component of our performance. This commitment to ethical conduct is also vital to recruiting and retaining the principled people we need to ensure the ongoing success of our company and our relationships with our customers and suppliers.



Know the Right Thing To Do

The Code sets forth the company's expectations for our behavior, consistent with the ethical and legal standards that keep our company competitive and, ultimately, help us to protect lives and livelihoods. Every day, we make decisions that affect our company's relationships with customers, suppliers, investors, and communities; our own relationships with co-workers; and Big River Steel's reputation. **The Code cannot specifically address every conceivable situation we may encounter in our business activities, but that does not relieve us of responsibility to always "Do What's Right."** When we are uncertain of what action to take, the Code provides guidance and resources to assist us in choosing the proper course. We must always comply with the spirit as well as the letter of the Code.

Certain conduct clearly steps over the line between right and wrong, violates company policy, and is prohibited by our Code. Sometimes, however, the proper choices and decisions are not clear because the ethical considerations in a particular situation are subtle or complex. If we ignore such issues and make a wrong decision, both the company and we as individuals may face serious consequences.

To help us determine the right thing to do, we should ask ourselves the following questions *before* acting:

- Are my actions consistent with the S.T.E.E.L. Principles?
- Am I treating others the way they would like to be treated?
- Do my actions meet the letter and spirit of applicable laws?
- Are my actions in compliance with the company's policies and procedures?
- Are my actions in the company's best interests?
- What would my supervisors, co-workers, family, and friends think of my actions?
- How would my actions look in the headline of a newspaper or sound to a jury?



Each of us plays an important role in the success of our company. The principles set forth on the following pages will guide us in making the right decisions.





PRINCIPLE ONE

Safety First

Big River Steel operates under the guiding principle that all safety-related incidents can be prevented and vests personal responsibility for operating under that principle in all of its employees and contractors. Our parent company maintained an industry-leading safety program for many decades before the passage and implementation of government regulations, such as the Occupational Safety and Health Act and the Mine Safety and Health Act.

SAFETY FIRST IS OUR PRIMARY CORE VALUE

Each of us wants to return home from work safely at the end of every day. In addition to keeping us safe, creating a safe workplace improves productivity, quality, reliability, and financial performance, and is simply the right thing to do. "Safety First" means taking personal responsibility for our own safety and that of our co-workers. We must follow safe work practices and create safe working conditions for everyone. We also take a 360° approach to safety, meaning that psychological safety is just as important as physical safety. Employees who feel accepted, respected, and valued for their contributions will do their best work and help our company thrive. This safety mindset is as essential to our success as the tools and technologies we use on the job. Safety is a part of our culture – a way of life for us, our families, and our co-workers.

Assess the Situation

The back-up alarm on my forklift is not functioning properly. The forklift operates well otherwise, and I can still move the material without the alarm. What should I do?

Stop using the forklift immediately and report the condition to your supervisor. Your supervisor has the responsibility to ensure that the equipment has been removed from service and that alternative equipment is available to perform the work in a safe manner. Your supervisor must also verify that the necessary repairs have been completed before the equipment is returned to use.

Our company's Health and Safety Policy defines the methods through which we continuously improve our safety processes to assess, reduce, and eliminate workplace risks and hazards. An engaged, empowered, and skilled workforce is essential to our efforts to identify potential risks and ensure that everyone understands the steps that are needed to eliminate or safeguard against hazards. The ultimate success of our safety and health program rests with each and every one of us. We all must do our part to ensure that all hazards are eliminated or addressed.

When incidents, with or without injury or illness, do occur or unsafe conditions are observed, they must be reported promptly. Ensuring that anyone who is in need of medical attention is promptly cared for is always the first priority. We must then thoroughly investigate every incident and implement appropriate corrective steps at the root cause level in order to prevent recurrence.

To further reduce the likelihood of incidents, we must also keep our workplace free of alcohol and illegal drugs (including the inappropriate use of prescription drugs) and wear required personal protective equipment at all times.

If you have a concern about safety issues or suspect a violation of our health and safety program or any laws or regulations, you should report it promptly to your supervisor, Safety, or the Ethics hotline. Examples include, but are not limited to, the following:

- Violation of a life-threatening standard practice
- Unsafe work conditions
- Housekeeping issues
- Personal Protective Equipment (PPE) concerns
- Procedure, practice, or rule violations
- Improperly or poorly maintained tools and equipment
- Inadequate training

Never assume that your department head already knows about the violation. When in doubt, it is best to speak up.

HOW TO REPORT A SAFETY INCIDENT:

If you are aware of a safety incident, you should report it to your supervisor or Safety promptly. You may also raise safety concerns through the Big River Steel Ethics hotline in any of the following ways:

Telephone:
1-844-681-0991

Internet:
bigriversteel.
ethicspoint.com

For more information, consult the *BRS Health and Safety Policy* and the *Alcohol and Drug Free Workplace Policy*.

Assess the Situation

I cut my hand on the job, but I think it just needs a bandage. If I report it to my supervisor, it may affect our department's safety performance reports. What should I do?

Report this injury to your supervisor, and he or she will ensure that you obtain proper medical attention. All injuries, incidents, and potentially unsafe conditions, no matter how minor they may seem to be, must be reported promptly. Your supervisor is also responsible for promptly investigating the incident and remedying any unsafe condition. Your prompt report will ensure that you receive any required medical treatment and may prevent someone else from sustaining a similar injury.



PRINCIPLE TWO

Trust and Respect



We must understand and appreciate the importance of inclusion and diversity.

The success of our company depends on all of us working together to achieve our common goals. We must build strong relationships with one another that are rooted in trust and respect and drive our culture of caring. By embracing the strengths and unique differences that each of us brings to our work, we respect and learn from one another, foster a high-performance environment, and encourage every employee to reach his or her full potential. We want all employees to trust that our diverse backgrounds are valued and celebrated. Big River Steel is working to implement U.S. Steel's Employee Resource Groups, several of which focus on inclusion and allyship of historically underrepresented groups in the workforce, support our increasingly diverse workforce and strengthen employee engagement and connection. In addition, U.S. Steel's Inclusion and Diversity Council, led by our CEO, drives our enterprise-level inclusion and diversity strategy across our company. Ultimately, our company is stronger – and we can serve our customers better – when we bring together our diverse experiences, backgrounds, and perspectives to create inclusive, well-rounded, and high-performing teams.

We value a work environment free of offensive, insulting, hostile, or intimidating behavior of any type, including that related to words, actions, documents, or pictures. We must conduct ourselves in the workplace

Assess the Situation

One of my co-workers told me that some people in our department have been making derogatory comments about homosexuality in his presence. He says it doesn't bother him and he's used to it. He wants me to stay out of it. What should I do?

Derogatory comments or jokes about sexual orientation or any other protected status are inappropriate in our workplace, even if not directed at an individual or if the individual is not offended. You have a duty to report these incidents, even if your co-worker asks you not to do so. You should also refer your co-worker to the *Sexual and Discrimination Harassment Policy* and encourage him to report these incidents.

without regard to race, color, religion, sex, gender identity, sexual orientation, national origin, citizenship, age, genetic information, physical or mental disability, military/veteran status, or any other protected status.

SEXUAL AND DISCRIMINATORY HARASSMENT

Sexual and discriminatory harassment undermines our efforts to maintain an inclusive and diverse high-performance culture, can negatively affect employee morale, and is unlawful. We will not tolerate such harassment, whether committed by our employees or by employees of suppliers, contractors, or customers. Just as harassment is inappropriate in the workplace, it is equally unacceptable when interacting with co-workers or representing Big River Steel outside of the office, such as on social media or at client meetings, industry gatherings, or networking events.

If you experience sexual or discriminatory harassment, or if you believe a co-worker is experiencing such harassment, you have both a right and a duty to report it promptly to management. You can report such harassment to your supervisor, your supervisor's direct supervisor, Human Resources, or the Big River Steel Ethics hotline. For more information on sexual or discriminatory harassment, consult the *Sexual and Discrimination Harassment Policy*.

PREVENTION OF WORKPLACE VIOLENCE

We should all be able to work in an environment free from violence and threats of violence. We will not tolerate any act of workplace violence on our property by any individual. If you are aware of a workplace violence incident or a potential threat, please ensure that the matter is reported to Security immediately. In addition, you may also report the matter to your supervisor, Human Resources, the Legal Department, or the Big River Steel Ethics hotline. For more information on workplace violence, consult the *Prevention of Workplace Violence Policy*.

We will not tolerate retaliation in any form against anyone who raises a good faith concern about sexual or discriminatory harassment or workplace violence.



Assess the Situation

My supervisor commented on my physical attractiveness and clothing, and it makes me uncomfortable. I'm so worried about this that it is starting to affect my work. I have asked her to stop, but she said that I'm being "too sensitive." What should I do?

Report the behavior to your supervisor's direct supervisor, or, if you are not comfortable doing that, report it to Human Resources or the Big River Steel Ethics hotline. Inappropriate and unwelcome advances of this kind are unacceptable and may be a form of sexual harassment.

While attending a department happy hour with co-workers, one of my colleagues repeatedly made inappropriate sexually suggestive comments to another co-worker, making her uncomfortable, but she doesn't want to make a big deal about it. What should I do?

Sexual and discriminatory harassment directed at a co-worker is not acceptable, even if it occurs after regular work hours or away from the office. Like any other workplace harassment, you have a duty to report an incident like this to your supervisor, Human Resources or the Big River Steel Ethics hotline.



PRINCIPLE THREE

Environmental Stewardship

Environmental stewardship and “Safety First” are inextricably linked. Just like safety, environmental stewardship is a core value of our company that is incorporated into our day-to-day operations, as well as our strategic corporate decisions. We must operate our facilities in an environmentally responsible manner and take steps to protect and preserve our shared natural resources. Doing what’s right for the environment is also doing right for our business. Our commitment to environmental performance begins at the top with regular oversight by our senior leadership, and we continue to increase environmental awareness through regular training of our employees. Additionally, as an ISO 14001 certified facility, we are committed to establishing and maintaining documented environmental management programs that adhere to environmental laws and regulations.

We are also leading steel manufacturing into a more sustainable future. Our commitment to innovation, which has been a hallmark of Big River Steel since our inception, is key to the sustainable operation of our facility and the delivery of sustainable products and solutions for our customers. Indeed, some of our most recent innovations are already contributing to efforts to create a more sustainable world, such as our lightweight advanced high-strength steels that can help meet automobile fuel efficiency standards and our high-efficiency electrical steel that enhances electric motor efficiency.

We are committed to being environmental stewards in the communities in which we live and operate and are also committed to supporting the achievement of the Responsible Steel Vision and Mission (2018). We consistently strive to increase our energy efficiency, reduce emissions, and conserve energy and other resources, while prioritizing the reuse and recycling of materials into our products to minimize our environmental footprint and improve sustainability.

For example, we recycle several million tons of scrap steel annually, and utilize slag from our steelmaking process for use as aggregate. We encourage our employees to apply proven continuous improvement and project management tools and suggest improvements that promote efficiency or reduce waste and emissions. With a vision of becoming a leader in sustainable steelmaking, we have also committed to achieving a significant reduction in our global greenhouse gas emissions and continue building our portfolio of steelmaking technologies. We have an industry-leading carbon emissions factor and are the first LEED-certified steel production facility in North America.

Each employee has a personal responsibility to act in an environmentally responsible manner. This means considering how all of our actions could impact the environment and taking appropriate steps to minimize any adverse effects, as well as pursuing innovative approaches and process enhancements to further reduce our impact. In addition, we must always comply with all environmental laws and regulations, as well as our environmental policies, practices, procedures, and initiatives. Failure to comply with environmental laws and regulations may result in criminal and civil penalties, as well as employee disciplinary action.

We are committed to compliance with all applicable laws, regulations and formal agreements in the jurisdictions in which we operate. Our obligation to ensure that Big River Steel acts in an environmentally responsible manner extends beyond just considering our own actions. We are required to immediately report any actual or potential violation of environmental laws, regulations, practices, procedures, or policies to our supervisors and to the Environmental Department. You may also contact the Legal Department, or the Big River Steel Ethics hotline with any environment-related concerns.

HOW TO REPORT AN ENVIRONMENTAL CONCERN:

If you have an environmental concern, you should report it to your supervisor or the Environmental Department promptly. You may also raise environmental concerns through the Big River Steel Ethics hotline in any of the following ways:

Telephone:
1-844-681-0991

Internet:
bigriversteel.ethicspoint.com

For more information, consult the *Environmental Management Policy*.

Assess the Situation

A 55-gallon drum of hazardous waste spilled onto the ground. We promptly addressed the spill and made all the necessary verbal notifications to the agencies, but regulations require us to submit a written follow-up letter regarding the spill to the state environmental agency. However, the agency official to whom I initially reported the spill told me over the phone that he does not see the need for the written report since the spill was relatively small and has already been cleaned up. Do I still need to send the written follow-up report?

YES. You must still send the written follow-up report. An agency official may tell you that a written follow-up report is not required for minor reportable events, especially if the official has a long and good relationship with our environmental personnel. However, Big River Steel could potentially be subject to enforcement from both federal and state agencies if your facility does not submit the report. We must meet all regulatory obligations, even if an agency official suggests otherwise.



PRINCIPLE FOUR

4 Excellence and Accountability

Excellence and accountability are critical to sustaining our high-performance culture. Through our pursuit of excellence, we continue to challenge ourselves to build a better, more sustainable future for our employees, customers, and communities. Accountability is critical to achieving excellence and, ultimately, to the success of our company. Accountability means taking initiative by proactively identifying what needs to be done, developing an action plan, and doing it. It also means aligning our actions to our goals, taking responsibility for our decisions, and timely execution on our commitments to our stakeholders.

We must hold ourselves – and each other – accountable for acting in a manner that reflects positively on Big River Steel and refrain from behavior that would harm the company's reputation or commercial position. We must always act in the best interests of the company when performing our duties and devote our efforts at work to achieving the company's business goals. Behavior that is motivated by – or even creates the perception that it is motivated by – personal relationships or personal gain violates our standards of conduct. We must also use Big River Steel's assets (including property, operating facilities, equipment, and accounts receivable, as well as our corporate identity, confidential information, trade secrets, business records, corporate information resources, and copyrighted material) for legitimate

Assess the Situation

My spouse and I were invited by the president of an engineering firm with which Big River Steel is considering doing business to be guests in his firm's private box at a professional football game. His invitation includes tickets to the game, a parking pass, food, and drinks. He told me that other Big River Steel employees, including my general manager, and their spouses have also been invited. May I accept the invitation?

The value of this entertainment most likely will exceed the limit set forth in the *Gifts and*

Entertainment Policy. Therefore, you must get written approval from the appropriate supervisory level before accepting the invitation by submitting a gifts and entertainment pre-approval form. The fact that other Big River Steel employees have been invited does not relieve you of responsibility for obtaining written pre-approval. In addition, you should consider how accepting this invitation may be perceived by your co-workers, subordinates, and other Big River Steel suppliers. Generally, it is a good idea to discuss any entertainment and gifts, regardless of value, with your supervisor before accepting them.

purposes and protect them from loss, damage, misuse, and theft. When we stay accountable to these standards, we can reach the level of excellence that all of our stakeholders expect from Big River Steel.

GIFTS AND ENTERTAINMENT

Exchanging gifts, entertainment, and business courtesies with customers, suppliers, or other current and prospective business partners may give rise to an appearance of impropriety. As a result, we should generally refrain from giving or accepting gifts or entertainment that are significant, are frequent, or otherwise would be – or could appear to be – inappropriate, unlawful, or in conflict with the best interests of Big River Steel. Instead, we may give and accept gifts and entertainment only when they are infrequent, of reasonable value, in support of our business relationships, and in compliance with company policies and procedures. We may never solicit gifts or entertainment, nor may we give or accept gifts of cash or cash equivalents, such as gift cards, stocks, bonds, or commissions. We must always respect the gifts and entertainment policies of our business partners, whether they are the same as or more restrictive than our own. For more information, consult the *Gifts and Entertainment Policy*, but please note that special rules set forth in the *Anti-Corruption Policy* apply if the intended recipient of a gift, entertainment, or other thing of value is a foreign official, including any employee of a wholly or partially non-U.S. state-owned or state-controlled entity.

CONFLICTS OF INTEREST

A conflict of interest exists when our personal financial interests or activities – or those of a family member – influence or interfere with performance of our job responsibilities or otherwise run counter to our obligation to act in the best interests of the company. For example, using confidential company information for personal gain represents a conflict of interest and could be illegal. Similarly, participation in a personal business, public office, or, in some cases, a not-for-profit organization may prevent us from devoting the time and effort necessary to fulfill our job duties and could be a conflict of interest. We must promptly disclose any

Recognize situations that may give rise to improper influences and disclose them to the company in a timely manner.

You can find links to policies and disclosure forms related to Gifts and Entertainment, Conflicts of Interest, and Workplace Relationships on the Big River Steel intranet (i.e. BRS Hub).

Assess the Situation

I have built an online business that has grown rapidly. When customers request information, I need to respond quickly. Is it all right to do this from work?

NO. Your primary responsibility, allegiance, and attention while at work must be to your assigned duties for Big River Steel. The situation you describe would detract from your ability to fulfill your job responsibilities. Any use of company property to operate a personal business violates our policy. In addition, your business must not compete with Big River Steel or appear to give rise to a conflict of interest under the *Conflicts of Interest Policy*.

My son just took a job with a company that supplies services to Big River Steel. His job is purely technical and will not involve direct contact with our company. Do I need to report this as a conflict of interest?

YES. Under the *Conflicts of Interest Policy*, you must promptly disclose this situation as a potential conflict of interest. The Conflicts Committee will determine whether a conflict actually exists based on your particular circumstances and provide appropriate guidance.

situation that may be or may appear to be a conflict of interest and comply with any guidelines or restrictions designed to address the actual or potential conflict. For more information and for forms and guidance regarding disclosure of potential conflicts, consult the *Conflicts of Interest Policy*.

When a possible conflict or appearance of a conflict arises because of a romantic or familial relationship, whether from an employment action (e.g., advancement, job change, new hire, reorganization) or otherwise, the situation must be disclosed to the Human Resources Department. Disclosure may be required even if there is not a direct reporting relationship between the co-workers. For more information on workplace relationships, consult the *Workplace Relationships Policy*.

FAIR DEALING

We must deal fairly with suppliers, customers, and other current or potential business partners. We are accountable for providing only honest and accurate information regarding our products and services, avoiding any misleading statements intended to gain a competitive advantage, and refraining from making disparaging or untrue statements about competitors.

RECORDS AND INFORMATION MANAGEMENT

Our company must create and maintain appropriate, accurate, and complete business records and information. These corporate records are critical to meet our business needs, and any falsification is a serious offense. All business information maintained in any medium, including paper and electronic, is the property of Big River Steel. We must retain business records and information for the period required by the company. This includes retaining records and information in accordance with hold notices issued by the company for litigation matters. We must also comply with applicable laws and company procedures governing the destruction of business records and documents after the required

Assess the Situation

May I accept a trade association's invitation to give a presentation about Big River Steel at an upcoming meeting?

You should discuss this invitation with your supervisor and get the appropriate approvals – including from the Legal Department, U.S. Steel's Corporate Communications, and, if the presentation would be financial or operational in nature, U.S. Steel's Investor Relations – before agreeing to speak at the meeting.

A supplier has asked me to provide non-public financial data related to operational costs, including costs to produce finished materials, to help that company obtain contracts unrelated to Big River Steel. Can I provide this information?

NO. Non-public financial data is confidential and generally may not be provided to outside parties without proper authorization.



retention period has expired. All employees are expected to fully cooperate with requests from internal and external auditors, Safety, Security, the Legal Department, and other authorized personnel to access company records.

CONFIDENTIAL INFORMATION AND DATA PRIVACY

We must safeguard and protect all trade secrets and other confidential company information in our possession or to which we have access, such as financial, operating, personnel, medical, legal, technical, or commercial information, as well as information provided in confidence to Big River Steel by others. We must not do any of the following:

- Use confidential information outside our job responsibilities or for personal benefit
- Discuss confidential information with anyone outside of the company, including family members, or with other employees, except on an as-needed basis and as otherwise authorized
- Provide confidential information about the company to any third party, unless specifically authorized and generally only after a non-disclosure or other appropriate confidentiality agreement has been executed
- Access or use the confidential information of others, including former employers, unless Big River Steel has entered into a written agreement with respect to such information and, even then, only for agreed-upon business purposes
- Transmit confidential information electronically using a device that was not authorized by Big River Steel

Appropriate steps to take to safeguard confidential information include identifying information as “Confidential,” securing computing devices and confidential information when not in use, disclosing confidential information only for legitimate business purposes, refraining from discussing confidential information in public areas, and taking precautions, such as encrypting data, when transmitting confidential information electronically. If you are uncertain whether a particular piece of information is confidential, presume that it is and safeguard it appropriately.

*We must
always hold
ourselves –
and each other
– accountable
for our actions
and decisions.*



PRINCIPLE FOUR: EXCELLENCE AND ACCOUNTABILITY

In addition, Big River Steel takes very seriously its obligation to safeguard all personal information it receives, generates, processes, and maintains. We must protect the privacy and confidentiality of Social Security numbers, protected health information, and other protected personally identifiable information (PII) contained in employment-related documents and other paper and electronic records in the workplace. Big River Steel has implemented policies and procedures designed to safeguard PII generated in the United States to comply with data protection laws, as they apply to our operations.

Our obligation to protect confidential information continues throughout our employment at Big River Steel and even after it ends. For more information, consult the *Protection of Confidential Information Policy*, the *Privacy Policy*, and the *Social Security Number Privacy Procedure*.

DISCLOSURES OF INFORMATION OUTSIDE OF BIG RIVER STEEL

Only certain officers of our parent, U.S. Steel, Investor Relations personnel, Corporate Communications personnel, and Government Affairs personnel are authorized to communicate with investment analysts, investors, the news media, or government agencies on behalf of Big River Steel. If you are contacted by any of these parties, you should not respond and should refer the request to the appropriate aforementioned resource or the Legal Department. Additionally, any presentation proposed for non-Big River Steel audiences must be provided to Corporate Communications with adequate time to review, obtain comments from relevant departments (e.g., the Legal Department, Investor Relations), and obtain any necessary senior leadership approvals before it is presented externally. The disclosure of confidential information through any form of social media, such as blogs, networking sites, or comment threads, is prohibited. For more information, consult the *Regulation FD Policy*, the *Protection of Confidential Information Policy*, the *Public Communication Policy*, and the *Social Media Policy*.

Assess the Situation

I just received a call on my desk phone from someone who claimed to be from the "help desk" and asked for my user ID and password to help me with my computer issue. I did just have a computer issue. Is it all right to provide this information in order to get my issue fixed?

NO. These types of calls are a common social engineering scheme, also known as "vishing" or voice phishing. Big River Steel IT personnel will never ask for your password. If you receive a call like this, do not provide any information, hang up, and call the

Global Service Desk (GSD) immediately to report a potential cybersecurity incident. For more information, consult the *Cybersecurity Incident Notification and Response Procedure*.

May I access company information remotely?

You may access some company information remotely, provided that you do so through a company-approved connection on a company-approved device, such as a Big River Steel laptop. Company information must not be saved on any non-Big River Steel equipment.

COMPANY INFORMATION RESOURCES

Big River Steel provides us with computers, software, and other communication and information resources, such as mobile devices, to perform our jobs. We must protect these resources and use them appropriately, responsibly, and for legitimate business purposes. We must protect the confidentiality, integrity, and security of the company's computer networks, applications, and data. Big River Steel retains all rights to the data and other information stored, processed, or transmitted on its computers, mobile devices, and networks. None of us should expect that such data or other information is private. We are prohibited from using the company's resources to create, access, store, or transmit pornographic, hostile, discriminatory, offensive, or other inappropriate material. In addition, we must ensure that all software, data, and other third-party proprietary materials loaded on or accessed by our computers are authorized, licensed, and approved for use. For more information, consult the *Use and Protection of Assets, Systems, and Intellectual Property Policy*.

SECURE COMPUTING

Safeguarding user IDs and passwords is a key element of information and network security, and we must always protect our login credentials from being used by unauthorized parties to access a Big River Steel computer or network. In addition, we must guard against other malicious attempts to access the Big River Steel network, such as through phishing emails or ransomware attacks. When transmitting information using Big River Steel computing resources, we must do so in full compliance with the *Protection of Confidential Information Policy*, which restricts disclosure of confidential information. In addition, company information should be sent only through authorized Big River Steel email accounts to the business email accounts of those with a need to know the information.

Big River Steel personnel may not use, download, or install any unapproved hardware or software when using company computers or mobile devices. Similarly, we generally may not connect a personal computer or device to any Big River Steel



Assess the Situation

I want to download free open-source software from the Internet on a Big River Steel device. I think Big River Steel would approve this download because it will make me more productive. Can I do this?

NO. Big River Steel policy does not permit you to download or install unauthorized software. Software that is freely available to an individual often requires a license for use by an enterprise or organization. In addition, Cybersecurity requires a review before obtaining any new software because these programs have the potential to compromise the security of our networks.



PRINCIPLE FOUR: EXCELLENCE AND ACCOUNTABILITY

network or use Big River Steel computers on external networks without connecting to the Big River Steel Virtual Private Network. Failure to comply with these requirements could expose Big River computing resources to malware or other cyber threats that could damage those resources or be used to steal company information.

INTELLECTUAL PROPERTY

Big River Steel's intellectual property, including patents, copyrights, trade names, trademarks, service marks, and trade secrets, is a valuable company asset. We must always be mindful of the proper use of these valuable assets by our employees and business partners. In addition, the integrity of the Big River Steel trade names, trademarks, and service marks must be protected by using them consistently, uniformly, and in compliance with Big River Steel policies. We must also ensure that third parties do not use our logos or marks without the prior approval of Big River Steel. For more information, contact the Legal Department or U.S. Steel's Corporate Communications, and consult the *Use and Protection of Assets, Systems, and Intellectual Property Policy*.

Similarly, we must respect the intellectual property rights of others and must not misappropriate other companies' trade secrets, infringe their patents, or use their corporate logos or marks without their prior written approval. Downloading, copying, reproducing, and forwarding any kind of visual or written works (including videos, movies, television shows, articles, books, magazines, website pages, and other publications) without consent of the owner or authorized licensor may violate copyright laws or license agreements. Also, computer software is protected by federal copyright law, even if a copyright notice or © symbol is not displayed. For additional information, consult the *Use and Protection of Assets, Systems, and Intellectual Property Policy* and the Legal Department to determine whether a particular publication or work is able to be copied or distributed.

Assess the Situation

I'd prefer to not carry my laptop when I travel or bring work home. May I save company documents to a personal mobile device or thumb drive?

NO. You may use only Big River Steel-approved or -issued computer equipment or mobile devices, such as thumb drives, mobile phones, or tablets, to store, access, compile, or maintain Big River Steel business information.



Assess the Situation

A favorite trade journal of mine has an online edition. We have always circulated the printed journal throughout the department using a routing list. Is it all right to forward this online edition to others?

NO. Always assume that copyright law protects a particular work. Although U.S. Steel has entered into a company-wide business license agreement with the Copyright Clearance Center that permits employees to engage in limited copying and internal distribution

of some protected works, it does not permit cover-to-cover photocopying, downloading, printing, or distribution of entire publications, either in hard copy or online. You should not copy or distribute hard copies or electronic versions of articles or other works either internally or externally without first determining whether such actions are permitted by law, by our subscription, or by our license with the Copyright Clearance Center.



PRINCIPLE FIVE

5 Lawful and Ethical Conduct

Each of us has a duty to conduct business ethically and in compliance with all applicable laws and regulations, including when interacting with our customers, suppliers, competitors, and other external parties. We must never take advantage of or provide special benefits to anyone – or even appear to do so – through manipulation, concealment, misuse of information, misrepresentation of material facts, or any other unfair or improper practices. Fraud, theft, embezzlement, inflated billings, falsified expense reports, and payment of kickbacks are all examples of illegal and unacceptable conduct.

Violations of applicable laws and regulations, even if unintended, may expose our company and the involved individuals to serious criminal and civil penalties. Investigating and defending allegations of misconduct, even when it is ultimately determined that no wrongdoing occurred, squanders resources and compromises the reputation of Big River Steel.

If you have any questions about compliance with applicable laws, regulations, or company policies and procedures, please consult an appropriate resource.

FINANCIAL REPORTING AND INTERNAL CONTROLS

Our parent, U.S. Steel, was the first company in the United States to hold an annual meeting of stockholders and to publish an annual report. Business has grown more complex since the beginnings of our company, but the principles by which we do business have never changed.

U. S. Steel, and by extension Big River Steel, is required by law to disclose accurate and complete information regarding its financial condition and results of operations. We are also required to maintain adequate processes and procedures controlling the effectiveness of accounting and financial reporting activities. We must maintain accurate books and records reflecting the business transactions and activities of the company and perform our responsibilities in compliance with the company's internal controls. Inaccurate, incomplete, or untimely recordkeeping and reporting may violate the law and result in liability to the company and individual employees. Employees, especially those involved in accounting or financial reporting activities, must understand and comply with all applicable accounting standards, laws, and

regulations, including, but not limited to, U.S. Generally Accepted Accounting Principles, U.S. securities laws and regulations, and the Sarbanes-Oxley Act of 2002 (SOX).

If you are aware of or suspect any situation involving the disclosure or recording of false, misleading, or confidential information, you should report it to the Big River Steel Ethics hotline, the Legal Department, or another company resource.

INSIDER TRADING

During the course of our employment, we may receive or gain access to certain information about U. S. Steel, including Big River Steel, or another company with which Big River Steel does business (such as a customer, supplier, or joint venture partner) that is “material, non-public information.” It is illegal and a violation of company policy to purchase or sell securities of U. S. Steel (or any other company) while you are in possession of material, non-public information about the company. Information is considered “material” if it would be considered important by a reasonable investor in making an investment decision or if it would likely affect the market price of the company’s securities. Information that would be considered material includes, but is not limited to, financial results, significant acquisitions or divestitures, significant product developments, changes in earnings or dividends, projections of future results or other guidance, new equity or debt offerings, stock buybacks, significant action by an enforcement or regulatory authority, significant cybersecurity incidents, and changes in management. Information is considered “non-public” until it has been widely disseminated to the general public through appropriate methods, such as a filing with the U.S. Securities and Exchange Commission or a press release.

In order to ensure compliance with the law and to avoid the appearance of improper conduct, employees and our immediate family members are prohibited from buying, selling, or otherwise trading in or transferring the securities of U. S.



Assess the Situation

It is month-end, and I have already spent or accrued up to my budgeted amounts. Can I hold a supplier invoice or otherwise not account for known liabilities until the following month?

NO. Excluding known liabilities during a month results in inaccurate financial reporting. If you have any questions about how to account for transactions, please contact the Accounting Department.

My department has streamlined our processes in order to be more efficient. May we stop performing or documenting the SOX controls associated with the prior processes?

It depends. If key SOX controls are not performed or documented, it could result in a control failure. As you streamline processes, you should work with the Internal Controls Department to update any SOX controls to ensure risks and control objectives are being satisfied. Performing and documenting controls for a process that is no longer utilized is not correct either and should be brought to the attention of the Internal Controls Department.



Steel or any other company while in possession of material, non-public information regarding U. S. Steel, Big River Steel or such other company obtained in the course of employment. In addition, we are prohibited from disclosing such information to others or making related investment suggestions or recommendations to others, a practice known as “tipping.” You may be subject to penalties under the insider trading laws if you provide or receive a tip, even if you do not trade on the inside information. Additionally, Big River Steel imposes quarterly “blackout” periods during which certain employees are prohibited from trading in the securities of U.S. Steel, regardless of whether they are in possession of material, non-public information. For more information, consult the *Insider Trading Policy*. If you are unsure whether you are permitted to trade securities based on the information you have or if you have reason to believe that any insider has engaged in insider trading or violated the policy, contact the Legal Department or the Big River Steel Ethics hotline.

ANTITRUST

Big River Steel must not engage in, or direct another to engage in, conduct that is potentially anticompetitive in nature. We must not take any action or enter into any formal or informal arrangement, discussion, understanding, or agreement with competitors that unfairly limits competition. Further, we must avoid even the appearance of such conduct. Big River Steel must compete independently in the marketplace in compliance with domestic and international antitrust and competition laws. Examples of antitrust violations include price fixing, bid rigging, agreements to allocate territories or customers, agreements to manipulate production volumes or quality, and group boycotts.

Assess the Situation

I recently began a new position at Big River Steel in a group that prepares financial statements and other public releases. I'm really excited about some of the new things the company is doing and think it would be a good financial decision for me to buy some shares of U.S. Steel stock. May I?

Under the *Insider Trading Policy*, Big River Steel employees are strictly prohibited from buying, selling, or otherwise trading in U.S. Steel securities on the basis of material, non-public information. If the information that leads you to believe the stock price will increase

is “material, non-public information,” as set forth in the *Insider Trading Policy* and under the insider trading laws, you may not buy, sell, or otherwise trade in U.S. Steel securities while in possession of that information. In addition, if you work in a group that prepares financial statements, you may be a “Covered Person” under the *Insider Trading Policy* and therefore must submit a Stock Transaction Pre-Clearance Request Form to the Office of the Corporate Secretary prior to buying or selling any U.S. Steel securities. Please contact the Legal Department to discuss your particular situation prior to transacting in any U. S. Steel securities.

If you have sales or marketing responsibilities or attend trade association or industry meetings where competitors are present, you must be particularly aware of these prohibitions and how to handle situations that give rise to antitrust concerns. When interacting with competitors in both formal settings, such as scheduled meetings, and less formal conversations or email exchanges, avoid discussions regarding competitively sensitive information, which includes, but is not limited to, pricing, costs, promotions and discounts, sales terms and conditions that could impact price, output and production capacity, product development, specific customers or suppliers, specific product or geographic markets, marketing activities, bidding strategies, key contracts, wages, benefits, or other topics that could impact Big River Steel's – or anyone else's – ability to compete in the market. Explicitly object to any discussion of these types of competitively sensitive topics and, if the discussions continue, make a "noisy" exit and remove yourself from the discussion and report the incident to the Legal Department. Leave no doubt that you refused to participate in any inappropriate discussions. If you have questions about applicable antitrust laws, consult the Legal Department before taking action.



Assess the Situation

My neighbor informed me that he is planning to sell his stock in U. S. Steel in the next few days because he needs money to pay for college tuition. I know that U. S. Steel's earnings report, which will be released in a week, will exceed market expectations. Can I tell my neighbor that he should "hang on to his stock" for another week or two?

NO. Under the *Insider Trading Policy*, Big River Steel employees are strictly prohibited from making any recommendations or expressing any opinions with respect to trading in Big River Steel securities on the basis of material, non-public information. Even if you do not disclose the specific information you have about Big River Steel, simply making an investment suggestion while in possession of, and based on, that information is a violation of company policy and the law.

Remember that you may need to seek pre-approval from the Legal Department before you provide business courtesies to a foreign official or retain a third party to act on the company's behalf.

The applicable pre-approval forms may be obtained on the Big River Steel intranet.

ANTI-BRIBERY AND ANTI-CORRUPTION

Big River Steel is committed to doing business with the utmost integrity and in full compliance with all applicable anti-corruption laws, including the Foreign Corrupt Practices Act (FCPA). Big River Steel does not tolerate any form of bribery or corruption, regardless of whether the intended recipient is a government official or a commercial business partner. Big River prohibits employees and anyone else acting on its behalf from making, offering, soliciting, or receiving bribes or other improper payments, including facilitation payments, which are payments made to secure routine governmental action.

Employees and third parties that support or act on behalf of Big River Steel must comply with the FCPA and other applicable anti-corruption laws. The FCPA prohibits directly or indirectly giving, offering, or promising money or any other thing of value (including entertainment, gifts, or employment opportunities) to a foreign official in order to obtain or retain business or secure any other improper business advantage. For this purpose, any individual employed by a non-U.S. governmental entity, public international organization, or a wholly or partially non-U.S. state-owned or state-controlled enterprise is considered a "foreign official." Big River Steel's *Anti-Corruption Policy* sets forth requirements for providing business courtesies to foreign officials.

Most anti-corruption laws, including the FCPA, prohibit both direct bribery and improper payments made or offered through third parties, such as agents, consultants, distributors, lobbyists, and subcontractors. Big River Steel expects all third parties acting on its behalf to abide by the same standards of conduct as its employees and to comply with all applicable anti-corruption laws. To this end, our *Supplier Code of Conduct* sets forth our expectations.

Assess the Situation

When I attended a recent trade association dinner, I was seated with a competitor's employees, one of whom began to talk about industry pressures and the possible effects they may have on her company's prices. Could I share our concerns about the same industry pressures and their effect on our prices?

NO. Even though you are members of the same trade association, discussing competitively sensitive information like pricing with any competitor could give rise to a violation of antitrust laws. Importantly, anticompetitive activity can occur even in casual settings like the one you describe. If a conversation with an employee of a competitor drifts into discussion of any competitively sensitive topic, such as pricing, you should promptly object, remove yourself from the conversation, and notify the Legal Department.

The *Anti-Corruption Policy* also requires that Big River Steel maintain adequate internal accounting controls and keep books and records that accurately reflect the company's business transactions in reasonable detail. False and misleading accounting entries and business records are prohibited. Big River Steel performs risk assessments and audits and engages in monitoring designed to prevent and detect corruption.

Anti-corruption laws are often complex and apply in a wide variety of contexts. As part of annual policy certification, employees must carefully review and attest to their compliance with the *Anti-Corruption Policy*, and they are encouraged to consult the Legal Department for further guidance at any time.

GOVERNMENTAL CONTACTS AND LOBBYING ACTIVITIES

When representing Big River, our contacts with government officials and personnel in the United States and abroad must comply with all applicable laws and regulations to avoid even the appearance of impropriety or improper influence. Employees engaged in lobbying activities at the federal or state levels should consult with Government Affairs in advance of such activities and may need to register as lobbyists and disclose these efforts. Supporting, assisting, or giving anything of value, such as gifts or entertainment, directly or indirectly to government officials or personnel must at all times be consistent with legal and ethical business practices. If you have questions about contacts with government officials or personnel, review the *Anti-Corruption Policy*, and consult Government Affairs or the Legal Department for guidance before taking action.

CAMPAIGN AND ELECTION ACTIVITIES

Big River Steel is committed to compliance with all applicable campaign finance and election laws, which strictly regulate whether and to what extent the company can support political causes. Big River Steel's support for political parties, candidates, and other political causes may be provided only through our parent company's Political Action Committee (U. S. Steel PAC).



Assess the Situation

At a trade association event, an employee of a competitor said that our respective businesses would do better if we reduced production for one of the product lines that we have in common. We weren't discussing prices, so is that an appropriate conversation?

NO. Big River must make its own independent decisions about its business operations, including production levels, based on business conditions and not based on any formal or informal agreement or coordination with competitors. Do not engage in this discussion and contact the Legal Department.

I plan to meet with a supplier in a country where it is customary to exchange gifts. The supplier is partially owned by that country's government. May I provide a gift to my contact?

In many parts of the world, it is standard practice to exchange business courtesies. However, any employee of an even partially state-owned company should be considered a "foreign official" for the purposes of complying with anti-corruption laws. You should review the *Anti-Corruption Policy*, which requires Legal Department pre-approval for any gifts other than infrequently provided Big River-logo items of nominal value.



PRINCIPLE FIVE: LAWFUL AND ETHICAL CONDUCT

Big River Steel employees may engage in personal political activities if they wish, and no employee's job will be affected by his or her political views or political contributions. Participation in personal political activities must be on our own time, at our own expense, and not on company premises, during company work hours, or while otherwise engaged in company business. Similarly, we must not use company resources (e.g., computers, phones, copy machines, etc.) for personal political activities, and Big River Steel cannot reimburse personal contributions to the U. S. Steel PAC or to political parties, candidates, or other political causes. In addition, we must not create the appearance that our personal political activities are sponsored by or being undertaken on behalf of Big River Steel. This is true even if we are supporting the same candidates that the U. S. Steel PAC supports.

ECONOMIC SANCTIONS, EXPORT CONTROLS, AND ANTI-BOYCOTT RULES

The United States enforces economic sanctions against various countries, governments, entities, and individuals to further foreign policy and national security objectives. Broadly speaking, these sanctions prohibit engaging in or otherwise facilitating transactions with sanctioned countries and parties. We must always comply with applicable sanctions, which requires knowing the identity of those with whom we do business and screening them against lists of sanctioned parties to help ensure compliance.

In addition to economic sanctions, the United States enforces export controls that prohibit unlicensed exports and re-exports of U.S.-origin goods, technology, technical information, and training to certain countries, to certain end users, and for certain end uses. Even transferring items to a foreign national located in the United States could violate export regulations if the item is controlled. As with economic sanctions, we must always know our business partners and ensure that any transfers of controlled items or technology are lawful.

Assess the Situation

My supervisor has encouraged me to attend a \$1,000 per person campaign fundraiser for a politician who has been very supportive on issues important to Big River Steel. Is it all right to attend and put this on my business expense report?

NO. The company may only support political candidates and parties through the U. S. Steel Political Action Committee or, on a limited basis where permitted by law, through corporate contributions. Whether you attend this fundraiser is a voluntary personal choice. If you decide to attend, you must do so on your own time and at your own expense, and you may not ask Big River Steel to reimburse you.



Finally, Big River Steel and its personnel may be penalized for participating in, supporting, or agreeing to comply with any foreign boycott imposed against a country friendly to the United States. In addition, certain foreign boycott-related requests may need to be reported to the U.S. government, even if Big River Steel does not participate in the boycott or respond to the request.

If you have questions regarding whether a particular transaction is prohibited by applicable economic sanctions or export controls or if you are asked to comply with a foreign boycott, please consult the Legal Department prior to taking action.

IMPORT COMPLIANCE

Big River Steel must fully comply with all laws and regulations governing the importation of goods into the United States, from sourcing merchandise through final payment. Consult the Logistics Department, or the Legal Department if you have questions regarding import compliance or your role in the process.

HUMAN RIGHTS AND LABOR RIGHTS

Big River Steel respects our employees' right to freedom of association and to engage in collective bargaining under the National Labor Relations Act. We respect human rights for all individuals, and we do not engage in or support child labor, forced labor, or human trafficking, and we expect the same of our suppliers. The company does not support companies that are known to utilize any form of child labor, forced labor, or human trafficking. If you have questions regarding these topics, please consult the Legal Department.

THE BIG RIVER ETHICS HOTLINE:

You may raise concerns in any of the following ways:

Telephone:
1-844-681-0991

Internet:
bigriversteel.ethicspoint.com



Do the Right Thing

We don't have to go it alone when we face an ethical dilemma or need guidance on an ethics or compliance issue. Using the resources described in this Code can help us with tough decisions or simply give us assurance that we are on the right track. We can also raise concerns with our supervisors, Human Resources, Big River Steel's General Counsel and Chief Compliance Officer, or the Big River Steel Ethics hotline. In addition, many of the policies discussed in this Code provide specific procedures for reporting issues or raising concerns to the appropriate people within the company. You can find contact information in the relevant policies on the Big River Steel intranet. These resources can help if you:

- **Have questions about the Code, policies, or procedures**
- **Have concerns about unethical or illegal activities**
- **Need advice about an ethical dilemma**

THE ETHICS HOTLINE

If you are aware of or suspect illegal or unethical conduct or a violation of this Code or our corporate policies, you should promptly report it. Good faith concerns can be raised through the Big River Steel Ethics hotline in any of the following ways, anonymously if you wish:

Telephone: 1-844-681-0991

Internet: bigriversteel.ethicspoint.com

The Ethics hotline is available 24 hours a day, seven days a week, and is managed by an outside service provider, independent of Big River Steel. U.S. Steel has a cross-functional committee that reviews the outcome of ethics and compliance investigations, ensuring transparency and robust dialogue on hotline reports. We are committed to remediating any substantiated issues, and employees are expected to cooperate honestly with company investigations. Any employee who knowingly makes a false report may be subject to discipline.



Big River Steel forbids retaliation (including discipline, discharge, loss of benefit, or penalty) against anyone for reporting suspected illegal or unethical conduct or cooperating in an investigation in good faith. For more information on the company's policies pertaining to the reporting of suspected illegal or unethical behavior, consult the requisite policy.

Assess the Situation

I prepare my supervisor's expense statements, and I noticed that he has been duplicating the same cash expenses from previous reports. When I brought this matter to his attention, he instructed me not to say anything and to submit the cash expenses. My co-worker told me not to get involved. What should I do?

You should report this situation immediately to your supervisor's direct supervisor. In addition to those reporting resources, you can always raise any concern to the Legal Department or the Big River Steel Ethics hotline.

I'm not certain that what I witnessed is illegal or unethical conduct. What should I do?

When in doubt, it is best to report your concern. As a guide, ask yourself the following questions:

- Does it appear to be a violation of the S.T.E.E.L. Principles, the Code, or our corporate policies and procedures?
- Does it appear to be dishonest?
- If I were doing this, would I be embarrassed to tell my family or friends?
- Could this harm the company in any way?

If you answered "yes" to any of these questions, you should speak up and report your concern.

Our Ethics and Compliance Program and Resources

This Code is an important component of Big River Steel's ethics and compliance program. Doing what's right must be embedded in the way we make decisions and conduct business. All of us should share the same commitment to promoting a high-performance culture based on excellence, accountability, integrity, and ethical conduct to maintain the long-term success of our company. Along with the Code, the following additional resources provide guidance:

COMPANY POLICIES

Going directly to the policies that cover certain situations provides us with guidance on what is expected of us and can help us determine the right thing to do. We certify our ongoing compliance with the Code of Ethical Business Conduct and key policies annually. Current versions of all corporate policies are available on the Big River Steel intranet home page.

NEWSLETTERS AND COMPLIANCE TIPS

To further ensure that employees understand the company's expectations and all applicable rules, the Legal Department periodically issues Ethically Speaking newsletters and Compliance Tips with information on key compliance topics, messages from senior management underscoring the importance of doing business with integrity, and summaries of current events that demonstrate the need to do business lawfully. These communications are intended to raise our awareness and provide reminders of the company's expectations for all employees.

TRAINING, RISK ASSESSMENTS, AND BENCHMARKING

Big River Steel provides training on a wide variety of ethics and compliance topics to its employees, featuring several training courses per year. We also provide training on demand to various groups within the company at their request. In addition, we periodically conduct risk assessments, benchmark our program against leading compliance practices, and conduct ethical culture surveys in an effort to continuously improve our ethics and compliance program and remain best in class.



You are encouraged to report any suspected unlawful or unethical conduct to your supervisor, Big River's General Counsel and Chief Compliance Officer, or the Big River Ethics hotline.

ADMINISTRATION

Big River Steel's General Counsel and Chief Compliance Officer and U. S. Steel's General Counsel and Chief Ethics & Compliance Officer, supported by the Legal Department, administers this *Code of Ethical Business Conduct*. The Code provides general principles and guidance to help you make ethical decisions and is not intended to address every possible situation. In addition, the overviews of applicable laws, regulations, and Big River Steel policies and procedures herein are not intended to provide a complete review of all requirements. Please direct any questions regarding the Code or any company policy or procedure to the Big River Steel General Counsel and Chief Compliance Officer.

DISCLOSURE

Nothing in this Code prohibits or restricts Big River Steel from taking any disciplinary action in connection with any matter pertaining to employee conduct, whether or not it is expressly discussed in the Code. This Code is not intended to create any expressed or implied contract with any employee or third party. In particular, nothing in this document creates any employment contract between Big River Steel and its employees.



Judge Elbert Gary

The Gary Principles

The Gary Principles are rooted in the business philosophy set forth a century ago by U. S. Steel's first chairman, Judge Elbert H. Gary, who believed in conducting business based on standards of honesty, openness, fair play, and decency – an uncommon attitude in the fiercely competitive American marketplace at the start of the twentieth century. He shared his beliefs in the nine plainspoken statements below.

I believe that when a thing is right, it will ultimately and permanently succeed.

The highest rewards come from honest and proper practice. Bad results come in the long run from selfish, unfair and dishonest conduct.

I believe in competition ... that the race should be won by the swiftest, and that success should come to him who is most earnest and active and persevering.

I believe that no industry can permanently succeed that does not treat its employees equitably and humanely.

I believe thoroughly in publicity. The surest and wisest of all regulation is public opinion.

If we are to succeed in business, we must do it on principles that are honest, fair, lawful and just.

We must put and keep ourselves on a platform so fair, so high, so reasonable, that we will attract the attention and invite and secure the approval of all who know what we are doing.

We do not advocate combinations or agreements in restraint of trade, nor action of any kind which is opposed to the laws or to the public welfare.

We must never forget that our rights and interests are and should be subservient to the public welfare, that the rights and interests of the individual must always give way to those of the public.

A Message From Our General Counsel and Chief Ethics & Compliance Officer and Our Deputy Chief Compliance Officer

Big River is committed to conducting business with the highest ethical values. When conducting business on behalf of U. S. Steel, we must not only comply with the laws, regulations, and rules that apply to our business, but we must make ethical decisions that protect the reputation and integrity of U. S. Steel and all of its employees. The *Code of Ethical Business Conduct* is the foundation of U. S. Steel's ethics and compliance program and guides us in fulfilling this charge.

Starting with the Gary Principles, our ethical values have underpinned our success for more than 100 years, and they will remain critical to our success in the future. We have built a strong ethics and compliance program and encourage all of you to take the time to carefully review our corporate policies and compliance-related communications, in addition to actively participating in ethics and compliance training programs. Those programs provide an opportunity for you to learn more about each of the subject areas covered in the Code, ask questions, and arm yourself with the knowledge needed to make appropriate decisions in your daily work.

The **S.T.E.E.L.** Principles – **S**afety First, **T**rust and Respect, **E**nvironmental Stewardship, **E**xcellence and Accountability, and **L**awful and Ethical Conduct – serve as guideposts that we must follow. We also expect that our contractors and business partners will act in accordance with our ethical standards and the S.T.E.E.L. Principles. When the S.T.E.E.L. Principles guide our actions and decisions, we foster an inclusive, diverse, and high-performing workplace, making our company that much stronger and more successful.

Look to the Code and consult the resources identified in it when you have concerns about unethical or illegal activities or need advice on an ethical dilemma. You are encouraged to report any suspected unlawful or unethical conduct to your supervisor, the U. S. Steel Ethics and Safety Line, or us at complianceofficer@uss.com. The Ethics and Safety Line is available 24 hours a day, seven days a week, and provides a convenient way to report suspected illegal or unethical conduct, anonymously if you wish. U. S. Steel has a strict policy prohibiting retaliation against anyone who raises a concern in good faith.

All of us play a vital role in reinforcing our company's commitment to ethical conduct, and we must hold ourselves – and each other – accountable for doing so. Our everyday pursuit of integrity and hard work will bring success that will set an example for others to follow.



Duane D. Holloway

Senior Vice President, General Counsel,
and Chief Ethics & Compliance Officer



Victoria McKenney

Deputy General Counsel –
Regulatory & Compliance and
Deputy Chief Compliance Officer



Duane D. Holloway



Victoria McKenney

A Message from Our Chief Operating Officer and Our Chief Compliance Officer and General Counsel

From our start in 2014, Big River Steel has been relentless in the pursuit of excellence. Our passion extends far beyond producing the highest quality steel in the industry. We are committed to our philosophy of “Do What’s Right” everywhere we do business. No matter the role, every Big River employee has a responsibility to act lawfully, ethically, and in the best interests of our company.

This Code of Ethical Business Conduct sets basic guiding principles for how we work together to create and deliver the best sustainable products and services for our customers, protect the value of Big River, and work with customers, suppliers, distributors, and others.

This code is based on the **S.T.E.E.L** Principles – **S**afety First, **T**rust and Respect, **E**nvironmental Stewardship, **E**xcellence and Accountability, and **L**awful Ethical Conduct. These principles will serve Big River as we continue to grow, providing guidance in situations when the right course of action is not readily apparent.

Big River Steel is determined to go beyond expectations for everything we do, and that success depends on our commitment to excellence. We all must lead by example and promote a culture of integrity by making ethical decisions and showing honesty and integrity through our actions and words.



Dan Brown
Chief Operating Officer



Lenore Trammell
Chief Compliance Officer
and General Counsel



Dan Brown



Lenore Trammell

Do what's right

BRS

bigriversteel.ethicspoint.com

 @bigriversteel

 Big River Steel