



Sexual and Discrimination Harassment Policy

Company Big River Steel LLC and its subsidiaries (collectively the “Company”)

Last Update NEW

Overview The purpose of this policy is to describe the Company’s policy prohibiting Sexual or Discriminatory Harassment and the requirement to report instances of Sexual and/or Discriminatory Harassment.

1. POLICY

It is the policy of U. S. Steel and its subsidiaries, including the Company, that no employee or applicant for employment will be subjected to Sexual or Discriminatory Harassment.

All Company managers are responsible for enforcement of this policy.

2. APPLICABILITY

This policy applies to Company Directors, Officer and Employees and covers all conduct that arises in the course of or relates in any way to Company business.

3. KEY DEFINITIONS

3.1 Discriminatory Harassment shall mean the use of epithets, slurs, negative stereotyping, ridicule, or any other offensive, insulting, intimidating, or hostile conduct, with a nexus to the workplace, towards an individual or group, regardless of form (e.g. written, oral, graphic, electronic, social media), that relates to race, color, religion, gender, sexual orientation, gender identity, national origin, citizenship, age, physical or mental disability, genetic information, or status as a past, or present member of, or applicant to, the uniformed services.

3.2 Sexual Harassment shall mean any unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual nature whenever:

- 3.2.1** Submission to such conduct is explicitly or implicitly made a term or condition of employment;
- 3.2.2** An individual’s response to such conduct is used as the basis for employment decisions; or,
- 3.2.3** Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment includes, but is not limited to, sexual jokes; sexual innuendoes or gestures; prolonged staring or leering at another; inappropriate, unwelcome, and offensive touching of another; an open display in the workplace of sexually related material, such as photographs, drawings, etc.; a supervisor’s request or acceptance



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of a sexual favor from a subordinate employee in exchange for a tangible job reward or detriment or an express or implied promise of such a reward or detriment; and a physical sexual assault of any kind.

Sexual harassment can be same-sex or opposite-sex.

4. YOU MUST NOT

4.1 Engage in Sexual or Discriminatory Harassment

Directors, officers, employees, and non-employees under the Company's control must not engage in any act of Sexual or Discriminatory Harassment.

In addition to violating this policy, some acts of Sexual or Discriminatory Harassment may violate federal, state, or local laws. Sexual or Discriminatory Harassment under this policy will be viewed under a reasonable person standard, taking into consideration the perspective of individuals of the same race, color, religion, gender, sexual orientation, gender identity, national origin, citizenship, age, physical or mental disability, genetic information, or military/veteran status as the individual subjected to the alleged harassment.

4.2 Retaliate Against Anyone for Making a Good Faith Report

You must not retaliate against anyone for submitting a good faith report of Sexual or Discriminatory Harassment.

5. YOU MUST

5.1 Report Sexual or Discriminatory Harassment

Any employee or applicant for employment who believes that he or she has been subjected to an act of Sexual or Discriminatory Harassment, or who has knowledge of such conduct involving others, must promptly report the incident.

Reports may be made to your supervisor (if a report involves your direct supervisor, you may report to your supervisor's supervisor), Human Resources, the Legal Department, or the ethics hotline which is available 24 hours a day, seven days a week, and provides a convenient way to make reports, anonymously if the reporter chooses. The ethics line may be reached in any of the following ways:

- Telephone: 1-844-681-0991
- Internet: www.bigriversteel.ethicspoint.com

If the report involves a director, officer, or executive, please report the matter promptly to the Legal Department or the ethics hotline.

Intentionally false and/or malicious reports of Sexual or Discriminatory Harassment will not be tolerated and may result in discipline.

6. OTHER REQUIREMENTS

6.1 Policy Publication

Management will inform current employees, new employees, and applicants for employment of this policy prohibiting Sexual and Discriminatory Harassment and of their right and responsibility to report any Sexual or Discriminatory Harassment that they experience or of which they are otherwise aware. The policy will be made available to all employees on the Company's HUB.

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6.2 Investigation of Reports

Management will conduct a prompt and appropriate investigation of any report alleging Sexual or Discriminatory Harassment in violation of this policy. All employees shall cooperate in the investigation of any such report as required. Each report will be investigated by individuals who can and will exercise independent judgment and investigate free from inappropriate pressure or influence. Each investigation shall be conducted on a confidential basis to the extent practicable.

As warranted, management will take corrective action, including disciplinary action, up to and including termination.

Following an investigation and implementation of any appropriate corrective measures, management will advise the reporting party of the results of the investigation.

