



Sustainable Procurement Policy

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

Last Update NEW

Overview In this policy, you will find:

- ✓ *The Company’s policy on addressing sustainability within its supply chain*
- ✓ *The Company’s policy on monitoring and engaging with suppliers on sustainability-related issues*
- ✓ *The Company’s policy on achieving responsible sourcing practices and supply chain visibility*

Who is responsible? This policy applies to all procurement- and sourcing-related decisions at the Company. This policy aligns with the Company’s Climate Change Policy, Environmental Management Policy and Supplier Code of Conduct.

1. CONTEXT

The Company recognizes the significance of a strong and dynamic supply chain that can withstand economic, environmental, and social risks. The Company understands that responsible sourcing practices are integral to achieving sustainable operations and upholding ethical standards throughout our supply chain.

The Company aims to mitigate these risks through responsible procurement and sourcing practices to maximize steel’s contribution to a sustainable society.

2. COMMITMENTS AND ACTIONS

The Company is committed to:

- Reducing carbon emissions of our operations, as well as supporting customers and suppliers in reaching their greenhouse gas (GHG) emissions reduction targets
- Managing environmental, social, and governance (“ESG”) risks in our own operations, along with supporting suppliers in managing their ESG risks
- Increasingly source input materials from suppliers that operate responsibly by incorporating responsible sourcing practices into supply chain functions and processes using our Supplier Code of Conduct
- Maintaining transparency in our efforts to source responsibly
- Promoting responsible sourcing practices throughout the supply chain
- Collaborating with our supply chain to achieve responsible sourcing practices as far upstream as possible
- Implementing and maintaining strict chain-of-custody practices

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- Performing regular supplier ESG performance assessments
- Mitigating supply chain ESG risks through the development of corrective action plans
- Tracking the purchase and sale of “Certified Steel” separately from “non-Certified Steel”
- Designating separate site storage areas for “Certified Steel” products.

The Company maintains a Supplier Code of Conduct, which is published on the corporate website and distributed to suppliers. It establishes minimum requirements for ethical and lawful business practices, human rights and working conditions, environmental stewardship, and responsible sourcing practices that apply throughout the supply chain.

The Company engages suppliers on topics covered by the Supplier Code of Conduct and health and safety programs that are in place. The purpose of this supplier engagement process is to help align suppliers with the Company’s expectations for sustainability, responsible sourcing, and to reduce risk within the supply chain.

The Company is working toward meeting the supply chain standards outlined by ResponsibleSteel and worldsteel, of which the Company is a member.

3. GOVERNANCE

The Company’s parent company U. S. Steel has an Executive Sustainability Committee, which oversees sustainability-related topics, including supply chain GHG emissions and supplier social and environmental responsibility. The Company has assigned the responsibility of implementing responsible sourcing practices to its Chief Sourcing Officer.

This policy shall be revised as needed by members of the Procurement and Sustainability teams.

4. REPORTING

U. S. Steel will provide annual reporting of its sustainability and responsible sourcing supply chain activities, including that of the Company, in the annual ESG Report.