



Tailings Management Policy

In this Policy, you will find:

- ✓ The company's policy on tailings management
- ✓ Mission statement
- ✓ A framework for safe and responsible management of tailings
- ✓ Objectives
- ✓ Resource allocation
- ✓ Alignment with global standards
- ✓ Risk management processes
- ✓ Accountability

Key Resources	
➤	More information on Global Industry Standard on Tailings Management (GISTM)

1. TAILINGS MANAGEMENT POLICY

United States Steel (U. S. Steel) is committed to the safe and responsible management of tailings at our mining operations with the objective of preventing catastrophic failures. U. S. Steel will allocate appropriate resources to support tailings management activities, implement effective governance of tailings management, and promote an organizational culture that encourages learning, communication, early issue recognition, and prompt escalation of tailings-related concerns. We will also ensure emergency preparedness and post-incident recovery in the unlikely event a failure occurs, and implement a program for reviewing tailings safety, including independent review. U. S. Steel will provide resources (financial, personnel, etc.) to manage tailings in accordance with this policy. Tailings management is a core business function of the mines and is integrated with business planning and communicated to each business unit. As the portfolio of tailings facilities and associated risks may change with time, this policy will be re-evaluated on a

regular basis to ensure its continued effectiveness and relevance.

2. PURPOSE

The purpose of this policy is to establish a framework for the safe and responsible management of tailings at our mining operations. It demonstrates our commitment to implementing a corporate safety culture with the goal of preventing all incidents. The policy is aligned with U. S. Steel's commitment to sustainability, health and safety, environmental excellence, and business ethics. This alignment helps to ensure the corporate commitments and goals related to tailings management are aligned with and reflected in other enterprise corporate commitments. The policy outlines the governance of tailings management in alignment with GISTM standards to ensure effective management, oversight, and accountability for tailings at all stages of the mining operation.

3. ACCOUNTABLE EXECUTIVE

The Board of Directors ("Board") will designate one or more person(s) to be the Accountable Executive(s), who is/are accountable for the safety of the tailings facilities and for minimizing the social and environmental impacts in the unlikely event of a tailings facility failure as described by this policy.

The Accountable Executive(s) may delegate responsibilities for tailings management and the development and implementation of the systems needed for safe, responsible tailings management but accountability cannot be delegated. The Accountable Executive(s) directly reports or answers to the CEO (or to the Board in the case that a CEO is the Accountable Executive) on matters related to



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tailings management and should have regular communication with the Board (initiated either by the Board or the Accountable Executive(s)). A mechanism for holding the Accountable Executive(s) accountable should be documented.

The Board has designated the Senior Vice President – Raw Materials & Sustainable Resources, or such other senior vice president as may be responsible for mining operations, as the Accountable Executive.

Responsibilities of the Accountable Executive(s) include:

- Having accountability and responsibility for putting in place an appropriate tailings management structure.
- With authorization from the Board, Senior Leadership, or the CEO, ensures that the necessary resources are in place for tailings management.
- Demonstrating to the Board and CEO tailings are managed responsibly and in accordance with applicable legal requirements and standards.
- Delegating responsibility and authority for tailings management and defining the personnel responsibilities, authority, and reporting relationships to implement the systems needed for safe, responsible tailings management throughout the lifecycle of the tailings basin.
- Delegating responsibility and authority for the development of integrated closure plans to ensure tailings facility integrity post-closure.
- Being aware of the key outcomes of tailings risk assessments and how identified risks are being managed.

- Being accountable for a program of tailings management training and for emergency preparedness and response.
- Establishing a program for reviewing tailings safety, including independent review.
- Having scheduled communications with the Engineer of Record.
- Encouraging open, transparent communication among all employees and contractors regarding concerns about tailings facility integrity, safety, or compliance.
- Ensuring that a formal, confidential, and written process to receive, investigate and promptly address concerns from employees and contractors about possible permit violations or other matters relating to regulatory compliance, public safety, tailings facility integrity or the environment exists, which may be the Corporation's Safety & Ethics Line.

4. COMMUNICATION

Consistent with applicable legal requirements, this policy will be communicated to mining employees regularly to facilitate understanding of the policy to a degree appropriate to employees whose activities may affect tailings management directly or indirectly, and appropriate to their roles and responsibilities, posted visibly at relevant facilities, and publicly available. Any changes to this policy shall be communicated in a timely manner to all relevant personnel and stakeholders.

5. ENVIRONMENTAL & SUSTAINABILITY CONTEXT

U. S. Steel is committed to environmental stewardship, which means complying with environmental laws and regulations and acting in an environmentally responsible



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manner, including by minimizing environmental footprints and taking steps to protect and preserve our shared natural resources. This commitment is an integral part of doing business and a primary responsibility of each business unit and every employee. The Tailings Management Policy is critical to Best for AllSM strategy and sustainability efforts.

Tailings are the waste materials produced during mining activities that comprise of leftover processed rock or soil after extracting valuable commodities, in this case, iron ore.

“Tailings Facility”

Also known as Tailings Storage Facilities (TSF), a facility that is designed and managed to contain the tailings produced by the mine. Although tailings can be placed in mined-out underground mines, for the purposes of the policy, tailings facilities refer to facilities that contain tailings in open pit mines or on the surface (‘external tailings facilities’).

Key Definitions

“Accountable Executive”

One or more executive(s) who is/are directly answerable to the CEO on matters related to this Standard, communicates with the Board of Directors, and who is accountable for the safety of tailings facilities and for minimizing the social and environmental consequences of a potential tailings facility failure. The Accountable Executive(s) may delegate responsibilities but not accountability.

“Engineer of Record”

The qualified engineering firm responsible for confirming that the tailings facility is designed, constructed, and decommissioned with appropriate concern for integrity of the facility, and that it aligns with and meets applicable regulations, statutes, guidelines, codes, and standards. The Engineer of Record may delegate responsibility but not accountability.

“GISTM”

The International Council on Mining and Metals (ICMM), the United Nations Environmental Programme (UNEP) and PRI launched the Global Industry Standard on Tailings Management. The Standard was developed by a multi-disciplinary Expert panel, with input from a multi-stakeholder Advisory Group. The review involved extensive public consultation with affected communities, government representatives, investors, multilateral organizations, and mining industry stakeholders and is informed by existing best practice and findings from past tailings facility failures.

“Tailings”