



STELCO

SUPPLIER CODE OF CONDUCT

Stelco Holdings Inc. and its subsidiaries, including, but not limited to, Stelco Inc., (collectively referred to as “**Stelco**” or the “**Company**”), are dedicated to conducting business in a lawful and ethical manner. Stelco expects its suppliers, vendors, and contractors (collectively referred to as “**Suppliers**”) to share this commitment and adhere to the business conduct standards outlined in this Supplier Code of Conduct (“**Supplier Code**”).

As a valued Supplier to Stelco, we kindly request that you review the Supplier Code and indicate your understanding and compliance by completing the on-line form found here: [Stelco Code of Conduct Compliance Confirmation](#)

1. **Business Ethics and Compliance with Law:** The Supplier shall conduct its business in an ethical and transparent manner. The Supplier shall use reasonable diligence when sourcing Stelco orders to ensure that materials are sourced ethically, such that any goods, materials or equipment procured from a third party does not, directly or indirectly, support efforts or operations of any group that is involved in violent conflict or the violation of basic human rights. The Supplier must comply with all applicable laws and regulations and must not engage in any corrupt or illegal activities. In particular, no Supplier shall supply goods (“Conflict Minerals”) to Stelco that are obtained from sources that finance or benefit armed groups in any “Covered Country” as defined in Section 1502 of the *Dodd-Frank Wall Street Reform and Consumer Protection Act*.
2. **Environment, Sustainability and Climate Change:** The Supplier shall use commercially reasonable efforts to minimize the environmental impact of its operations. The Supplier shall comply with applicable environmental laws and regulations and shall take commercially reasonable steps to reduce its carbon footprint so as to promote environmental sustainability and limit any negative contribution to climate change.
3. **Forced Labour and Child Labour:** The Supplier shall not use Forced Labour or Child Labour in any form, as such terms are defined in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)*. The Supplier must ensure that all employees are of legal working age and are not subjected to any form of exploitation. The Supplier will take necessary steps to prevent the use of Forced Labour or Child Labour in their supply chain.
4. **Human Rights:** The Supplier shall respect human rights and ensure that its operations do not violate any human rights. The Supplier must ensure that its employees are treated with dignity and respect, and that they are not subjected to any form of harassment or discrimination.
5. **Health and Safety:** The Supplier shall provide a safe and healthy working environment for its employees. The Supplier must ensure that all employees are trained in health and safety policies and procedures and that the Supplier and its employees and contractors comply with applicable health and safety laws, regulations, policies and procedures.

Suppliers shall maintain documentation that reasonably demonstrates their compliance with this Supplier Code. Upon reasonable advance written request, such documentation shall be made available to Stelco. Failure to comply with this Supplier Code may result in the discontinuation of a Supplier’s business relationship with Stelco.

If a Supplier or any of its employees becomes aware of a breach or potential breach of this Supplier Code, they are asked to notify Stelco at PBI.Purchasing@Stelco.com