

AK Steel

Human Rights Policy

PURPOSE

This policy sets forth AK Steel's guiding principles for human rights. These principles are consistent with the following human rights guidelines and charters:

- The UN Universal Declaration of Human Rights;
- The OECD Guidelines for Multinational Enterprises; and
- The UN Human Rights Council Guiding Principles on Business and Human Rights.

POLICY

AK Steel personnel must follow the company's corporate policies and comply with all applicable laws and regulations related to human rights. AK Steel respects the human rights of workers and treats all people with dignity as recognized by the international community, and expects all of its employees, suppliers and contractors to do the same.

1. **Child Labor.** AK Steel will not use child labor. In no event will AK Steel employ any person under the age of 15, unless pursuant to a government-authorized job training or apprenticeship program that would clearly benefit the persons participating. AK Steel will not permit employees under the age of 18 to perform hazardous work for the company.
2. **Wages and Benefits.** AK Steel will pay wages in compliance with local applicable laws and regulations and will provide all legally mandated benefits. AK Steel will ensure that wages, benefits and deductions are detailed and explained clearly to all employees.
3. **Working Hours.** AK Steel will comply with local applicable laws and regulations governing employees' working hours, including overtime work.
4. **Forced Labor.** AK Steel shall not use any forced labor. All work performed for AK Steel shall be voluntary and all employees are free to terminate their employment. AK Steel shall not require the surrender of passports, other government-issued identification or work permits as a condition of employment.
5. **Freedom of Association.** All AK Steel workers may communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. AK Steel respects the rights of all workers to associate freely, to join or not join labor unions, bargain collectively, seek representation, and join workers' councils in accordance with applicable law.
6. **Health & Safety.** AK Steel is committed to providing a safe and healthy working environment for all personnel including contractors, service providers, visitors and the community in accordance with AK Steel's Occupational Health and Safety Policy. AK Steel is also committed to providing a right to safe water as a fundamental human right.

7. **Harassment.** AK Steel is committed to providing a workplace free of harassment in any form in accordance with AK Steel's Harassment and Workplace Violence Policy. AK Steel strictly prohibits and does not tolerate any form of harassment based on race, color, religion, national origin, age, military status, disability, sex, sexual orientation, gender identity, genetic information or any other characteristic protected by law.
8. **Non-Discrimination.** AK Steel does not tolerate discrimination with respect to employment and occupation in accordance with AK Steel's Equal Employment Opportunity Policy. AK Steel strictly prohibits and does not tolerate any discrimination based on race, color, religion, national origin, age, military status, disability, sex, sexual orientation, gender identity, genetic information or any other characteristic protected by law.
9. **Social Contribution and Community Engagement.** AK Steel is committed to the prosperity and development of the communities in which we work and to addressing societal challenges in cooperation with of those communities. AK Steel strives to engage with the people in those communities, including indigenous peoples and other vulnerable and disadvantaged groups.
10. **Environment.** AK Steel recognizes the importance of environmental considerations with respect to its facilities. AK Steel is committed to operating in compliance with all applicable environmental laws and to pursuing growth while continuously improving environmental performance, in accordance with AK Steel's Environmental Policy.
11. **Training.** AK Steel is committed to providing annual training on the Human Rights Policy through its annual Code of Conduct training module. The company actively monitors and audits internal compliance with the Code of Conduct.

AK Steel encourages all AK Steel suppliers and contractors to adopt and enforce policies in their own operations that are similar to those in this policy.

All AK Steel employees should report known, suspected or potential violations of this policy to local management, Human Resources or the Law Department. AK Steel prohibits retaliation against anyone who reports a known or suspected violation of this policy in good faith.

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