

## California Transparency in Supply Chains Act Disclosures

Kloeckner Metals Corporation and its subsidiaries (“Kloeckner”) is conscious of its role in society and responsibilities to its business partners, shareholders, employees and the general public. Kloeckner is committed to clear principles and value-oriented, ethical and lawful company management, and it expects the same of its suppliers.

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires certain companies doing business in California to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains.

Accordingly, the Act requires that we disclose the following:

**Verification** - Kloeckner does not, nor does it engage a third party to, conduct a formal process to verify that its product supply chain addresses risk of human trafficking and slavery. However, Kloeckner Code of Conduct specifically identifies the expectation that suppliers must comply with laws and regulations governing human trafficking and slavery as well as Kloeckner’s ethics and compliance standards. Failure to comply with these expectations and their related contractual obligations, may result in the termination of their contract.

**Auditing** - Kloeckner does not currently conduct supplier audits specifically for human trafficking assessment. However, we reserve the right to audit our suppliers should human trafficking Red Flags surface.

**Certification** - Kloeckner does not have a formal supplier certification process of human trafficking and slavery. However, Kloeckner’s purchase order terms and conditions require suppliers to certify compliance with all applicable federal, state, and local laws and regulations, including those pertaining to all acceptable labor practices and laws relating to slavery, human trafficking, and child labor. Suppliers are also expected to adhere to the standards and principals in its Code of Conduct, which states the expectation of compliance with laws and ethical business conduct, including those laws and principles prohibiting involvement in human trafficking and slavery.

**Internal Accountability** - Kloeckner requires its employees upon hire, and then biennially, to certify in writing that they comply with the Kloeckner Code of Conduct. This code requires compliance with all laws, which includes laws related to slavery and human trafficking. Failure to comply will result in appropriate action, up to and including dismissal. Employees are encouraged to report any and all violations of the Code of Conduct or other employment policies. Employees may utilize our company-wide anonymous hotline to report questionable behavior or actions.

**Training and Awareness** - Kloeckner has an extensive and comprehensive employee training program and ensures that all employees receive training on its values and standards. Core online compliance courses supporting the Code of Conduct as well as courses based on company policies, procedures, and role based modules, are assigned to and required to be taken by all employees annually. In addition, Kloeckner provides training on slavery and human trafficking, including training on mitigating related risks in supply chains, to those employees with direct responsibility for supply chain management.