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Subject	PROCUREMENT		
Subtitle	Conflict Minerals Policy Statement		
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Applies to:	All Directors, Employees, Suppliers and External Consultants		
Applies to Business Unit	All Business Unit/Regions, Divisions, Corporate Offices and Service Centers		

CONFLICT MINERALS POLICY STATEMENT

Ryerson takes pride in in being a responsible corporate citizen, driven by dedication to our employees, customers, and the communities in which we operate. We demonstrate this commitment throughout our business, from ethical leadership and corporate governance to products that meet or exceed strict quality and compliance standards. Accordingly, we fully support the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”), intended to prevent the use of certain “conflict minerals” that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries (as defined in the Act).

In August 2012, the United States Securities and Exchange Commission (SEC) adopted final rules which require reporting and disclosures related to conflict minerals, as directed by the Act. The rules require publicly traded companies to annually report to the SEC whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

“Conflict minerals” refers to columbite-tantalite (coltan), cassiterite, wolframite, gold, and the derivatives tantalum, tin and tungsten, without regard to the location or origin of the minerals or derivative metals. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations.

Ryerson supports the humanitarian goal of ending violent conflict in the DRC, surrounding countries, and other Conflict Affected Areas around the globe and is committed to avoiding the use of conflict minerals in our products that either directly or indirectly contribute to the ongoing turmoil in these regions. Ryerson recognizes that it has a responsibility to source minerals ethically, regardless of our regulatory obligations, and perform due diligence to determine the origin of any minerals that may have been sourced from high-risk regions. As a public company listed on a United States stock exchange, Ryerson is in scope of the filing portion of the Dodd-Frank Act and conducts an annual Reasonable Country of Origin Inquiry (RCOI) and due diligence to support its filing.

Ryerson supports industrywide efforts to identify, reduce, and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries that are financing or benefiting groups committing human rights violations. In furtherance of this goal, Ryerson leverages industry standard data collection templates to enable the gathering of materials sources of origin and supplier due diligence efforts in accordance with the OECD Responsible Minerals framework.

Ryerson also tracks market expectations to broader Responsible Minerals and will continue to address trends in data collection efforts and due diligence expectations in accordance with the OECD Responsible Minerals framework.

Ryerson does not directly purchase any conflict minerals. We expect our suppliers to (both directly and indirectly) source any designated minerals from socially responsible sources, and we reserve the right to request—at any time from any supplier (and their upstream suppliers)—the declarations necessary to monitor or assess compliance with this policy. Suppliers to Ryerson are expected to establish their own conflict minerals policies, due diligence frameworks, and management systems that align with industry reporting standards and OECD due diligence framework. Suppliers’ programs should be designed to prevent conflict minerals from being included in the products sold to Ryerson.

Any supplier found to be in violation of our Conflict Mineral Policy, will be required to promptly implement a remediation plan. Ryerson reserves the right to conduct audit procedures to assess vendor supply chains and to confirm vendor compliance with our Conflict Mineral Policy. Continued noncompliance or lack of willingness to take steps to address issues of concern may ultimately lead to the termination of the supplier relationship.

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