

California's Transparency in Supply Chains Act

Joseph T. Ryerson & Son, Inc. ("Ryerson") is committed to high standards of business ethics and integrity as reflected in Ryerson's core values and our Code of Ethics and Business Conduct ("Code"). As a part of these standards, Ryerson is committed to the protection and advancement of human rights and supports the goals and objectives of SB 657, California's Transparency in Supply Chains Act (the "Act").

Ryerson's commitment to ensuring that its supply chain is maintained in a socially responsible way includes an expectation that suppliers not use forced or child labor in any form, including human trafficking and slavery, to produce the products and materials they provide to Ryerson. Ryerson's promotion of ethical business practices is reflected in its Code, which is distributed to all employees and easily located on our external and internal websites. All Ryerson employees are required to acknowledge and adhere to our Code, and we routinely offer training on these policies to all employees. Furthermore, Ryerson policies are constantly being reviewed and updated, and the [Ryerson Human Rights Policy](#) Statement has been put into place specifically to address Ryerson's stance against human trafficking and slavery.

Effective January 1, 2012, the Act requires the following disclosures as to our efforts to eradicate slavery and human trafficking from our direct supply chain:

Verification of Supply Chain. Ryerson's Code of Ethics and Business Conduct currently requires that all transactions must be conducted in accordance with all applicable U.S. and foreign laws. Ryerson has implemented the [Ryerson Human Rights Policy](#) Statement for our suppliers specifically addressing slavery and human trafficking. This policy requires suppliers to refrain from the direct or indirect use of forced labor or any forms of human trafficking and to verify that their supply chains address these issues. Verification is being handled internally by Ryerson rather than by a third party.

Audit. Ryerson's updated policies use several tools in our assessment of where there may be risk of forced or compulsory labor. We require material suppliers to complete a certification in which they must indicate whether their practices are consistent with Ryerson's policy, whether they train their employees in these principles and whether they hold their suppliers to these principles. These results will be reflected in Ryerson's approved supplier list. We are currently evaluating the usage of targeted audits based on our evaluation of supplier certifications and other risk indicator criteria.

Supplier Certification. Our material suppliers are required to certify compliance with our Code and policies as they relate to (a) adherence to all applicable U.S. and foreign laws, and (b) the prohibition on the use or support of human trafficking and slavery.

Accountability and Training. As stated above, Ryerson is committed to the highest standards of ethical and business conduct. Ryerson requires that all directors, officers, employees, and consultants comply with our Code of Ethics and Business Conduct, which can be found at <http://www.ryerson.com/en/~media/www/Files/2014CodeBooklet.ashx>. Upon hire, Ryerson requires all employees to read and acknowledge receipt and understanding of the Code. Employees receive assigned training related to the Code and must re-certify this acknowledgement annually. The Code requires, among other things, that the employee will comply with all applicable laws and regulations and provides a reprisal-free method for employees to report violations of the Code, the law, or any Ryerson policy, including the Ryerson Human Rights Policy, by any supplier. Human trafficking and slavery is a violation of such laws and, thus, constitutes a violation of our Code as well as a violation of Ryerson's Human Rights Policy.