



# **NEW MILLENNIUM**

*A Steel Dynamics Company*

## **SUPPLIER CODE OF BUSINESS CONDUCT**

The following principles describe the business practices and ethical standards we expect from our suppliers, both in their dealings with our companies and otherwise. We count on the integrity and good judgment of each of the suppliers with whom we partner.

### **Business Ethics**

Suppliers are expected to have and regularly enforce their own comprehensive codes of business conduct (or comparable policy) that prohibit unethical or unlawful behavior in all aspects of its business. We also expect our suppliers to have effective processes and procedures in place, including both internal and external means to report, identify and promptly mitigate any wrongful behavior, including an optional reporting method to preserve anonymity and suitability protections to prevent retaliation against persons who may file complaints. We are committed to the highest ethical standards, which commitment flows naturally from our responsibilities to our customers, our investors, our vendors and suppliers, our families, the communities where we live and work, and to each other.

### **Conflicts of Interest**

Suppliers are expected to make business decisions on the basis of merit and not based upon any other factors, such as personal relationships, gifts, favors, hospitality, receipt of unsupportable fees or commissions, personal loans, special invoicing, or anything else of direct or indirect value or significance unrelated to the merits of the business decision.

### **Foreign Corrupt Practices Act and Bribery**

Suppliers are expected to not engage in bribery or the payment or receipt of kickbacks in the conduct of their businesses. This policy prohibits any employee, consultant, or other agent acting on such person's behalf or on behalf of the company from directly or indirectly paying, receiving or facilitating any kickbacks or engaging in commercial bribery—that is, providing value to an agent or government official without the knowledge of the agent's principal, with the intent that the agent will influence the principal's commercial conduct. We also expect our suppliers to be vigilant in assuring compliance with the U.S. Foreign Corrupt Practices Act, as well as applicable anti-bribery laws of any foreign governments, which prohibit the making or offering of any payment to any person or foreign official to induce that person or official to affect any governmental act or decision or to assist the company in obtaining or retaining business or in directing business to any person.

### **Fair Competition**

Suppliers are expected to compete fairly and legitimately on a level playing field and to comply in all respects with federal, state, and foreign antitrust and other competition laws.

### **Regulatory Compliance**

Suppliers are expected to conduct their businesses in compliance with all applicable federal, state, local and foreign statutes, rules, and regulations governing the purchase and sale of goods and services, as well as United States and applicable foreign securities laws.



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## **Conflict Minerals**

Suppliers are expected to (a) determine whether Conflict Minerals (within the meaning of the Dodd-Frank Wall Street Reform and Consumer Protection Act) are contained within and necessary to the functionality or production the products we may purchase from them, and, if so required, and if requested by us, (b) determine and report to us the origin of the identified Conflict Minerals, and (c) certify to us that the materials supplied are either (i) free of Conflict Minerals, (ii) have been verified as Conflict Free, or (iii) are exempt.

## **Labor**

### **Discrimination and Harassment**

Suppliers are expected to provide equal employment opportunities to all employees and applicants for employment, as well as in connection with work assignments, opportunities for advancement, compensation, training, discipline, transfer, leave of absence, layoff, recall and termination. All such job-related considerations shall be based solely on merit and job-related qualifications and abilities, without regard to race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, genetics, age, marital or veteran status, the presence of handicaps or disabilities, or any other basis protected by law.

Suppliers are expected to not tolerate any harassment of any employee relating to the employee's race, color, religion, creed, sex, sexual orientation, gender identity or expression, national origin, genetics, age, marital or veteran status, the presence of handicaps or disabilities, or any other basis protected by law.

### **Safety**

Safety is the most critical element of our core values. Suppliers are expected to prioritize the safety of their employees by, without limitation, providing safe and healthy working environments and meeting or exceeding all legal standards for occupational health and safety.

### **Compliance with Employment Law**

Suppliers are expected to operate their businesses in conformity with employment laws, meaning employees will be paid in compliance with applicable laws including overtime and working hours limitations and child and forced labor laws.

## **Sustainability**

Suppliers are expected to be good stewards of the environment. Suppliers must comply with all environmental laws and regulations regarding waste and emissions. We encourage suppliers to employ recycling programs to minimize waste, to minimize energy and water usage, and to otherwise pursue opportunities to reduce their impact on our physical world.