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Subject	Ryerson Human Rights Policy Statement		
Issue Date	5/15/2015	Effective Date	5/15/2015
Applies to:	All Directors, Employees, Suppliers and External Consultants		
Applies to Business Unit	All Business Units		

As set forth in our Code of Ethics and Business Conduct (“Code”), Ryerson Holding Corporation and its subsidiaries (together “Ryerson”) are committed to conducting business in conformance with the highest standards and in an ethical, legal and socially responsible manner. This extends to our relationships with customers, suppliers, competitors, shareholders, our employees, and the communities in which we operate.

Ryerson strives to foster safe, inclusive and respectful workplaces that respect human rights, and we seek to do business with reputable business partners who are committed to the same. We are committed to non-discrimination and freedom from harassment and require that Ryerson and our suppliers refrain from knowingly entering into relationships that directly or indirectly (a) expose employees to undue health and safety risks, or (b) use child, prison, or forced labor or other exploitative practices which in any way rely on or encourage human trafficking.

Ryerson understands that there may be different legal and cultural environments applicable to its suppliers, but we expect our suppliers to meet the following minimum requirements.

Compliance with Laws, Regulations and Published Standards

Our Code requires that all Ryerson transactions must be conducted in accordance with all applicable U.S. and foreign laws. In order to do business with Ryerson, suppliers must comply with all applicable laws, codes or regulations of the countries, states and localities in which they operate, including, but not limited to, laws and regulations relating to health, safety and labor practices. Our suppliers must require their suppliers (including temporary labor agencies) to do the same.

Labor Practices

Ryerson expects its suppliers to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. At a minimum, Ryerson requires our suppliers to comply with the following standards:

- a. Suppliers shall not use any forced labor, whether in the form of prison, indentured, bonded or otherwise.
- b. Suppliers shall not employ child labor. Suppliers must comply with local laws regarding the minimum age of employees. The minimum age for workers must be at least: (i) of an employment age consistent with International Labor Organization guidelines

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- pursuant to ILO Convention No. 138 which can be found at http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138; or (ii) the age for completing mandatory (compulsory) education; or (iii) the minimum age established by law in the supplier's country.
- c. Suppliers shall provide wages for regular and overtime work and benefits that at least meet legal requirements.
 - d. Suppliers shall not require workers to work more than the maximum hours of daily or weekly labor set by local laws.
 - e. Suppliers shall treat each employee with dignity and respect. In no event shall Suppliers' workers be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.
 - f. Suppliers shall follow prohibitions against discrimination as set forth in the Code. Suppliers shall not discriminate in their employment practices on the basis of race, color, religion, gender, age, physical or mental disability, sexual orientation, national origin, creed, veteran status, marital status, HIV-positive status, social or economic class or any other basis prohibited by law.
 - g. Suppliers shall recognize and respect the rights of their workers to free association in accordance with local labor laws and established practices.
 - h. Suppliers shall make every effort to insure that their suppliers and subcontractors follow practices that are in accordance with this Policy and the Code.

Compliance

To monitor and insure compliance with Ryerson's policies, upon request, suppliers will be required to certify that they will:

- a. Comply with all applicable laws and regulations and require their suppliers to do the same;
- b. Comply with Ryerson's standards of ethical and business conduct and Labor Practices as set forth in the Code and this Policy;
- c. Not use any form of slavery or human trafficking in their supply chains; and
- d. Use their best efforts to hold their suppliers to Ryerson's principles as set forth in the Code and this Policy.

Any supplier or employee of Ryerson who becomes aware of violations of this policy should notify us by calling our compliance hotline at 1.800.435.1171 or electronically via www.mysafeworkplace.com.

We will evaluate our relationships with suppliers on an ongoing basis to ensure continued compliance with this policy. We reserve the right to request additional documentation from our suppliers regarding labor practices and adherence to this policy and the Code. Suppliers who do not comply with these requirements will be reviewed by our supply chain organization with regard to future business.