

## **NUCOR CORPORATION**

### **HUMAN RIGHTS POLICY**

Nucor Corporation (“Nucor”) is North America’s largest and most diversified steel and steel products company, with over 300 facilities predominantly in the United States, Canada and Mexico. Nucor is also North America’s largest recycler of any material. Nucor’s Human Rights Policy (the “Policy”) articulates Nucor’s commitment and responsibility to respect all human rights consistent with the core principles of the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

This Policy focuses on the areas of human rights that have been identified as priorities for Nucor and the steel and steel products industry. As a predominantly North American-based steel and steel products company, and as a result of an annual comprehensive risk assessment conducted by the company, we view our risk in the area of potential human rights violations as very low. We have robust compliance and screening processes and we believe Nucor has an excellent track record that demonstrates our commitment to respect human rights.

#### **PURPOSE**

This Policy sets out the principles for Nucor’s actions and behavior in relation to human rights. Adherence to this Policy, and Nucor’s continued business practices and operating procedures, foster an environment in which human rights are recognized and respected throughout our company and our supply chain. Compliance with this Policy, and Nucor’s other business practices and policies, demonstrates our commitment to eliminate human rights violations throughout our supply chain.

#### **SCOPE**

This Policy applies to all of our employees (“Teammates”) located at each Nucor facility. In addition, Nucor’s contractors, subcontractors, suppliers or other business partners are expected to comply with this Policy. We communicate and reinforce the importance of respecting human rights through our vetting process of our contractors, subcontractors, suppliers and other business partners and through contract provisions we enter into with third parties.

The Policy complements and brings together the human rights aspects from other Nucor policies and guidelines, which include Nucor’s Supplier Code of Conduct; Combating

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Trafficking In Persons; Eliminating Forced Labor; Health and Safety; Standards of Business Conduct and Ethics; Code of Ethics for Senior Financial Professionals; Policy on Affirmative Action; Equal Employment Opportunity; and Discrimination and Harassment policies and related guidelines. These policies may be found on our Nucor.com website. In implementing this Policy, Nucor's facilities are subject to the laws of the jurisdictions in which we operate, and we are committed to complying with all such applicable laws.

In the event Nucor's Policy, procedures and external commitments are more stringent than local laws, we operate in accordance with Nucor's higher standards. In situations where local law is less stringent than generally recognized international human rights standards, Nucor operates in accordance with the more stringent standard and its related policies and guidelines.

## **NUCOR COMMITMENTS**

### ***Nucor's Commitments to its Stakeholders***

Teammates: Nucor is committed to following the law and to respecting the human rights of its Teammates. Nucor recognizes the rights of our Teammates to join organizations of their own choosing. We develop our employment policies and practices with the aim to achieve universally fair and equitable treatment of all of our Teammates, including through health and safety oversight, education and training, incident management, industry-leading safety certifications, and competitive compensation and benefits. We are committed to educate and train our Teammates to be aware of and respect human rights in the workplace and in the communities directly impacted by our operations.

Business Partners: Nucor is committed to respecting human rights and to promoting fundamental fairness when engaging with our business partners, subcontractors, suppliers and customers. We maintain this commitment through proactive vetting of these relationships and through engagement, monitoring, testing, audit, certification and through our contract terms and conditions. We pay greatest attention to any contractors, subcontractors, suppliers, customers and other business partners operating in, or procuring from, areas where we identify higher risks of potential human rights concerns.

Communities: Nucor is committed to respecting the human rights of those in the local communities where we do business. Through local community outreach and through participation in local charitable and civic organizations we facilitate open communications and develop an understanding of the cultures, customs and values that prevail in the communities in which we operate. Additionally, Nucor is committed to complying with all applicable national, state and local laws, rules, regulations and ordinances, including the environmental laws and regulations affecting the communities in which Nucor operates.

## ***Specific Commitments***

### Commitment to Health and Safety:

Nucor is committed to ensuring the safety of its Teammates and the people potentially affected by our operations. This specific commitment is supported by our health and safety oversight procedures, company-wide incident management and reporting network, contractor oversight policies, contractor registration with applicable safety monitoring organizations, and stringent site access requirements for all Teammates, contractors and visitors. Further, Nucor has obtained safety recognitions for certain facilities utilizing industry-leading voluntary protection programs, audited best practices for safety and health procedures, and active participation in innovative programs working alongside government organizations and their employees committed to safety and health in the industrial workplace. Nucor strictly prohibits and considers it a violation of its policies if anyone retaliates against any Teammate for reporting or participating in the investigation of any health or safety violation.

### Commitment to Industry-Leading Labor Standards:

#### **Eliminating Forced Labor, Child Labor, Human Trafficking and all forms of Modern Slavery**

Nucor has no tolerance for any form of forced labor, involuntary labor, child labor, human trafficking or modern slavery in its operations and/or through its supply chain, including, but not limited to coercion, armed surveillance, physical threats or restraints, withholding of passports, the use of false or misleading recruitment practices, involuntary servitude, peonage, debt bondage, sexual exploitation, and any other trafficking-in-person activities of any kind. Nucor maintains training and awareness programs, reporting tools, investigations of any allegations containing credible information, procedures for stringent remedial measures, and penalties, including suspension, termination and/or referral to appropriate government authorities.

In any areas of heightened risk, Nucor engages with its contractors, subcontractors and suppliers to perform diligence, and to certify and audit supply chains to avoid directly or indirectly benefiting from or promoting any such forced labor, child labor, human trafficking, or other related activities.

#### **Eliminating Discrimination and Harassment; No Retaliation**

Nucor is committed to ensuring that each Teammate and potential Teammate is treated with fairness and dignity, including providing a workplace environment that is free from discrimination and harassment based on any individual's status. Nucor will not tolerate any form of discrimination or harassment in any aspect of its business and prohibits discrimination and harassment by or directed to any job applicant, Teammate, customer, outside vendor, consultant, contractor, supplier or other person working with or on behalf of Nucor. This commitment extends not only to behaviors in the workplace but also to any work-related setting outside the workplace, such as business trips, business meetings and business-related social events.

Nucor encourages Teammates, contractors, subcontractors and suppliers of all tiers to report any such alleged discrimination or harassment immediately to any supervisor, manager, general manager, human resources, or by calling a toll-free reporting number or “Hotline” that is posted on the company intranet, in company newsletters and at every Nucor facility. The Hotline permits anonymous reporting and is monitored by a third-party. Accordingly, any discriminatory practice or form of harassment is not tolerated, and may subject any violator to suspension, termination and/or referral to appropriate government authorities. Additionally, Nucor strictly prohibits, and considers it a violation of this Policy, if anyone retaliates in any way against any Teammate for using the complaint procedures or participating in an investigation.

### **Providing Competitive Compensation and Benefits**

Nucor is committed to the fair treatment of Teammates through competitive compensation and benefits. Nucor rewards strong performance by a robust incentive compensation system for substantially all Teammates. Nucor maintains industry-leading profit-sharing plans and offers scholarship programs for Teammates’ dependents. Since 1974, Nucor has contributed more than \$100 million to support the higher educational needs of Nucor family members and the educational needs of those in the communities we serve. Nucor’s commitment to competitive compensation and benefits have helped Nucor achieve an industry-leading employee retention rate exceeding 90%.

### **Upholding Conditions of Employment**

Nucor complies with all laws regarding conditions of employment, including, but not limited to applicable labor laws, base and over-time working hours and compensation, teammate breaks, access to clean water and sanitary facilities, and personal protection equipment for Teammates.

### **Community Engagement and Environmental Practices**

Nucor is committed to robust engagement with local communities that may be affected by Nucor’s operations, including avoiding or otherwise mitigating any involuntary resettlements, respecting indigenous peoples’ rights and engaging in proper treatment of any affected people.

Nucor is committed to compliance with all applicable environmental laws, rules and regulations. Additionally, Nucor is engaged in identifying, preventing and mitigating any impact on the local environment or communities, maintaining sufficient or protected lands surrounding our facilities, instituting industrial noise mitigation initiatives, and sponsoring beautification projects for surrounding communities.

Nucor prepares publicly-available sustainability reports that review and otherwise set goals to strengthen Nucor’s’ positive impact on the communities in which we operate. Nucor invests millions of dollars every year on capital projects associated with environmental regulation and compliance, and 100% of industrial process water used at Nucor’s steelmaking divisions is recycled multiple times. Nucor regularly supports non-profit organizations that promote community recycling efforts. Further, Nucor regularly

promotes storm water management projects, and assists in conservation efforts and endangered species rehabilitation projects.

Additionally, where feasible Nucor engages commercially in solar, wind and other sustainable power technologies. Some of Nucor's efforts include the use of solar fields, solar panels installed on manufacturing buildings and rooftops, solar carport systems, and wind energy infrastructure.

## **GOVERNANCE AND ACCOUNTABILITY**

Responsibility for the implementation of this Policy lies with Nucor's General Counsel, our executive management team and the most senior executive responsible for each facility with oversight from our Board of Directors.

## **IMPLEMENTATION AND COMPLIANCE**

Nucor's implementation of this Policy occurs through our enterprise reporting teams, facility management teams, human rights diligence procedures, supplier reviews, quality audits, environmental, contract and corporate governance procedures, and Nucor's commitment to continuous improvement in all aspects of our business.

Implementation is supported by Nucor's General Counsel, our executive management team, senior officers, managers, supervisors, internal auditors, external auditors, procurement personnel, legal team, human resources team, environmental team, and our public affairs and community relations teams.

In the event any Teammate becomes aware of any potential or actual human rights issue within Nucor's business operations or supply chain, that Teammate is required to report the issue. Reporting may be done through the Hotline, to the Teammate's immediate superior, any senior executive responsible for the applicable facility, or to Nucor's General Counsel. Any credible reported issues will be addressed via a thorough review process and appropriate corrective action by Nucor's senior management. Nucor strictly prohibits any retaliation against any person who reports or participates in the investigation of any alleged or actual human rights violation.