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# POLITICAL DISCLOSURES AND LOBBY OVERSIGHT REPORT

Nucor Corporation ("Nucor") takes a multi-faceted approach to political engagement. As the nation's largest steel producer, we engage in direct outreach to ensure that the public and our leaders understand the challenges facing our economy, our industry, and our company. Through a variety of communication strategies, we provide information to promote an understanding of issues of critical importance to Nucor and our shareholders.

# **Lobbying**

Nucor engages in lobbying activities on all levels of government that ensure the company's interests are adequately considered by federal, state, and local political leaders. Federal law requires the filing of regular, detailed lobbying reports with the U.S. Senate and the U.S. House of Representatives in which Nucor discloses federal lobbying activities that are undertaken on our behalf. State lobbying activities are also subject to detailed registration and disclosure requirements, which vary state-to-state.

- Nucor's Federal Lobbying Report
- Nucor's State Lobbying Reports

# **Political Spending**

Nucor does not make contributions to political candidates, parties or committees at the federal level using corporate funds. Political contributions at the federal level are permitted through the voluntarily employee-funded Nucor Corporation Political Action Committee ("PAC"). Nucor also does not make independent political expenditures or electioneering communications using corporate or PAC funds.

Nucor divisions make contributions to state and local candidates, political parties, and committees in jurisdictions where applicable by law.

• Nucor's State & Local Political Contributions

All political contributions by Nucor on the federal, state, and local levels are made to entities that promote the interests of our company and advance public policy goals without regard for private political preferences of individual executives, officers or directors. Nucor makes contributions to certain 501(c)(4) tax-exempt organizations that we believe further the goals of Nucor and the communities in which we operate. Nucor does not make contributions to Super PACs using corporate funds.

• 501(c)(4) Tax-Exempt Organizations

Nucor has made contributions to 527 groups and/or political associations to help advance Nucor's public policy interests on the state level.

Nucor's 527 Contributions

Year to date, Nucor has not made contributions in support of ballot measures and did not make such contributions between 2021 and 2024.

### **Political Action Committees**

Nucor has established the Nucor Corporation Political Action Committee, which is a federal political action committee. Nucor has also established several state PACs. Certain Nucor teammates are permitted to voluntarily contribute to federal and/or state PACs as permitted by law. These PACs engage Nucor teammates in the political process and enable us to speak with a unified voice on matters of importance to Nucor. Nucor PACs contribute to candidates who understand and support our industry. The PACs also communicate with our teammates about the impact of public policies on Nucor and the steel industry and give our teammates opportunities to interact with our elected officials. A financial summary of Nucor's federal PAC activity is reported in filings with the Federal Election Commission and is publicly available. Nucor's state PACs disclosure reports are filed according to state laws and are publicly available.

- Nucor Corporation Federal Political Action Committee (FEC)
- Nucor's State Political Action Committees (List)

# **Trade Associations**

Nucor also maintains memberships in <u>various trade associations</u> that we believe share and will further the goals of Nucor. Such associations provide both a useful forum for discussing issues of general industry significance and a powerful platform for advocating positions on issues of importance to the members. While associations in which Nucor is a member may occasionally take positions on issues that are not representative of Nucor's, overall, we believe that Nucor's membership in such associations is in the long-term interest of Nucor and our shareholders.

# **Oversight & Compliance**

All of Nucor's lobbying and advocacy activities are managed by our Public Affairs Team, who report to our Executive Vice President of Business Services and General Counsel. This arrangement ensures not only that such activities comply with applicable law, but also that all activities further the long-term interest of Nucor and our shareholders. Nucor's Vice President and General Manager of Public Affairs and our Executive Vice President and General Counsel have the final authority over all corporate political spending decisions.

Nucor's lobbying activities are subject to review and oversight by our Board of Directors. In accordance with its charter, the Governance Committee develops and oversees Nucor's policy on political expenditures and reviews Nucor's political expenditures, payments to trade associations, and any such expenditures and payments that may be used for political purposes. The Governance Committee is chartered to recommend to the Board any changes with respect to Nucor's policy on political expenditures.

Our Public Affairs Team presents a summary of its structure, initiatives and expenditures to the Board regularly, which includes contributions to trade associations and other tax-exempt organizations that may be used for political purposes. The Team's key areas of focus are also reviewed and discussed with the Board. In recent years, these areas have included trade, infrastructure investment, sustainability of steel, and economic development. All politically related activity by Nucor and its teammates must comply with applicable law and Nucor's <a href="Standards of Business Conduct & Ethics">Standards of Business Conduct & Ethics</a>.

### **Public Policy**

Nucor engages actively with policymakers to educate them on issues that impact our company, our communities, and our industry. Nucor's public policy priorities and core values inform our corporate political spending decisions. Our top issues in recent years are outlined below.

#### Trade

On a level playing field, American manufacturers can compete with anyone in the world. Enforcing the rules of trade to prevent dumping and illegal subsidies ensures a healthy, global free market for goods. The Section 232 steel tariffs continue to be effective in keeping dumped steel imports out of the U.S. market. We continue to support and defend the Section 232 program with Congress and the Administration.

#### Tax

We support policy that drives innovation, encourages investment, and advances growth in the manufacturing sector.

#### Infrastructure Investment

America's infrastructure is a critical resource for our national defense and economic security. We are supportive of recent long-term Federal investments in our nation's infrastructure, clean energy and semiconductor production. We continue to advocate for increased investment in our nation's transportation, water, energy and other critical infrastructure, and for provisions that streamline permitting and approval of large infrastructure projects.

### **American Jobs**

We support Buy America policies to ensure that U.S. taxpayer dollars are spent on American-made products like steel. In addition to the economic and jobs benefits, steel made in the U.S. is cleaner than imported steel. Projects built with American tax dollars should go to creating American jobs. Strong Buy America provisions ensure that government spending on goods and infrastructure support American workers and American jobs.

### **Sustainability and Climate**

We promote the superior sustainability of steel produced in the U.S. in terms of recycled content, recyclability, and emissions and energy reductions. The American steel industry is the cleanest and most energy efficient of the leading steel industries in the world. Nucor has already achieved and will continue to meet greenhouse gas emission intensity benchmarks for the steel industry that are part of the Paris Climate Agreement. As international or domestic climate standards used to measure and report steel carbon emissions are developed, we support a technology agnostic approach that is focused on actual emissions.