
ELIMINATING FORCED LABOR FROM OUR SUPPLY CHAIN

Nucor Corporation (“Nucor”) strives to ensure that forced labor is eliminated from our supply chain. We value our teammates and business partners and strive to treat everyone who works with us with dignity and respect. Nucor’s Supplier Code of Conduct and Human Rights Policy, available at www.nucor.com, prohibit the use of forced labor. Nucor cannot and will not tolerate the use of forced labor in any part of our organization and will not conduct business with entities that engage in forced labor.

Production of Pig Iron in Brazil

Pig iron is an intermediate iron product created by smelting raw iron ore at high temperatures with a reducing agent. For pig iron produced in Brazil, this agent is charcoal derived from sustainable forestry products. The charcoal production process in Brazil is labor-intensive and often takes place in relatively remote and inaccessible areas. In the past, some producers of charcoal created difficult working conditions, which included the use of forced labor and armed surveillance. Such practices are inconsistent with Nucor’s human rights and other labor policies and practices.

Nucor has taken a proactive approach to ensure that pig iron manufacturers in Brazil making pig iron for use in our steel mills do not use charcoal that has been produced utilizing forced labor. Our practices include the following:

- **Implementation**
 - The David J. Joseph Company (“DJJ”), a wholly owned subsidiary of Nucor, is responsible for implementing Nucor’s policies with respect to our pig iron suppliers in Brazil. DJJ is one of the world’s largest scrap and scrap substitute brokers.
 - Nucor’s management and its board of directors review on an annual basis the implementation of, and risks associated with, Nucor’s pig iron procurement policies.
- **Licensing and Certifications**
 - Nucor requires that any pig iron sourced from Brazil come only from pig iron manufacturers that have been duly licensed by the Brazilian government.
 - Nucor requires all manufacturers of charcoal-based pig iron in Brazil to become signatories to the National Pact to Eradicate Slave Labor in Brazil and members of the Institute of the National Pact for the Eradication of Slave Labor.

- Nucor requires that each Brazilian pig iron manufacturer who sells pig iron to Nucor certify that no involuntary labor was used in the manufacturing process. Such certification must be made annually as well as with respect to each shipment of pig iron to Nucor.
 - Nucor requires each pig iron manufacturer to sign and comply with Nucor's Supplier Code of Conduct, which provides in pertinent part that "Suppliers must not utilize involuntary labor of any type."
- Diligence and Monitoring Listings of Brazilian Ministry of Labor and Employment
 - The Brazilian Ministry of Labor and Employment publishes a "Dirty List" that contains the names of employers in Brazil who have been determined by the Ministry to have not maintained fair, ethical and legal working conditions.
 - Nucor retains a Brazilian law firm and through DJJ conducts screening and continuous monitoring of charcoal manufacturers using various tools, including the Dirty List. Any charcoal manufacturer listed on the Dirty List must be promptly removed as a supplier of charcoal by any pig iron manufacturer supplying Nucor with pig iron.