



Human Rights Policy

Respect for human rights is fundamental to how we work at Chicago Tube & Iron. We respect international human rights principles and endeavor to treat team members with the utmost respect and dignity. Chicago Tube & Iron is committed to fostering a culture that promotes diversity and inclusion and the health and safety of our team members, contractors, and the communities in which our team members live and work. Chicago Tube & Iron is further committed to compliance with applicable laws and standards related to labor practices and human rights.

This policy applies to all Chicago Tube & Iron locations, and all team members and contractors are expected to comply.

Our team members are critical to our success, and we respect each individual's human rights. We are committed to the following principles:

Diversity & Inclusion

We are committed to attracting, engaging, developing, and retaining a diverse group of individuals that reflect the communities in which we live and work. With our Core Values as a foundation, we're building a culture that empowers team members to be their authentic selves, strives to acknowledge and overcome bias, and cultivates leaders who value, encourage, and embrace diversity of thought and perspective.

We believe diversity is essential to accelerate the safe and profitable growth of Chicago Tube & Iron and recruit and select candidates for employment, promotion, demotion, transfer, layoff, recall from layoff, termination, training and compensation without regard to race, color, religion, sex, pregnancy, sexual orientation, gender identity, genetic information, national origin, ancestry, marital status, age, military or veteran status, disability or other status protected by applicable law.

We value and advance the diversity and inclusion of the people with whom we work and strive to provide equal opportunities for all individuals. We support women's and minority groups' rights. We are committed to equal opportunity in all aspects of the employment relationship and are intolerant of discrimination and harassment. We are committed to ensuring that we base all employment decisions on qualifications, skills, job-related abilities, performance, and other legitimate non-discriminatory factors relevant to the specific job.

Freedom of Association

We strive to create workplaces in which open and honest communications among team members are valued and respected. Chicago Tube & Iron team members may communicate openly with management regarding working conditions and practices without fear of reprisal, retaliation, intimidation, or harassment.

We respect our team members' right to freely associate, to join or not join a labor union, to act in concert for their mutual aid or protection, including collective bargaining, in accordance with applicable law, and to submit grievances without fear of retaliation.

Health & safety

Safety is one of Chicago Tube & Iron's Core Values. We are committed to providing a workplace that is free from recognized hazards that have the potential to cause occupational fatalities, injuries and/or illnesses or unsafe working conditions.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

We prohibit the hiring of underage persons. All team members must be in compliance with minimum age requirements under applicable law. In addition, Chicago Tube & Iron will not permit persons under the age of 18 to perform any work of a potentially hazardous nature at our manufacturing operations or other facilities.

Hours, Wages and Benefits

We seek to maintain compliance with applicable laws and regulations governing wages, working hours, overtime and benefits. We endeavor to compensate our team members competitively, relative to the industry and local labor markets in which we operate, and in accordance with terms of any applicable collective bargaining agreements. In addition, Chicago Tube & Iron prohibits requiring any individual to work in excess of any maximum hours set by local law.

Harassment and Discrimination

As described in Chicago Tube & Iron's Code of Business Conduct and Ethics, Chicago Tube & Iron strictly prohibits and does not tolerate harassment or discrimination based on race, color, religion, national origin, age, military status, disability, gender, sexual orientation, gender identity, genetic information or any other characteristic protected by law.

Community Relations

Corporate Citizenship is one of Chicago Tube & Iron's Core Values. We value the communities where our team members live and work. We recognize the importance of "family" and strive to balance our work and personal priorities. We recognize that constructive relationships with local communities are important. We seek to fulfill our business objectives as a responsible member of the community, sensitive to the social and environmental impacts of our operations.

Training

We regularly train team members on the policies and procedures that define how we conduct business. Team members are encouraged to identify any perceived violations of any policy and/or make recommendations to existing policies through contact with a supervisor or the Human Resources Department.

Reporting

Team members are encouraged to report any good faith complaints or concerns, or any violation of laws or regulations relating to the Company's financial statement disclosures, accounting, internal accounting or disclosure controls or auditing matters, disclosure violations or violations of its Business Ethics Policy, to the VP of Administration. The Company does not permit retaliation of any kind against team members for complaints submitted that are made in good faith.

This Human Rights Policy is aligned with Chicago Tube & Iron's Core Values and Code of Business Conduct and Ethics which sets forth additional principles and further describes our commitments and responsibilities to our team members, customers, shareholders, commercial counterparties, and the communities in which we operate.