

Human Rights Policy

Purpose

This Human Rights Policy (the “Policy”) sets out the principles that guide the actions and conduct of Algoma Steel Group Inc. and its subsidiaries (collectively, “Algoma Steel” or the “Company”) in relation to human rights.

Algoma Steel is committed to conducting its business in a manner that reflects a culture of mutual trust, honesty, and respect. Together with integrity, fairness, and professionalism, these values form the foundation of our relationships and are essential to the long-term success and sustainability of our business.

In this context, Algoma Steel is committed to respecting and upholding human rights in accordance with applicable laws and internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the core conventions of the International Labour Organization.

Adherence to this Policy, together with Algoma Steel’s business practices and operating procedures, supports an environment in which human rights are recognized and respected throughout our operations and supply chain.

Scope

This Policy applies to all employees working at or on behalf of Algoma Steel. Contractors, subcontractors, suppliers, and stakeholders are also expected to operate in a manner consistent with this Policy.

Algoma Steel communicates and reinforces the importance of respecting human rights through its policies, procedures, supplier expectations, and contractual arrangements. This Policy complements and should be read in conjunction with other Algoma Steel policies, including the Code of Business Conduct and Ethics, Vendor Code of Conduct, Workplace Violence, Harassment, and Sexual Harassment Policy, Health and Safety policies, and compliance and whistleblower programs.

In implementing this Policy, Algoma Steel is subject to the laws of the jurisdictions in which it operates and is committed to complying with all applicable laws. Where Algoma Steel standards or internationally recognized human rights principles are more stringent than local laws, Algoma Steel will seek to apply the higher standard, subject to applicable law.

Algoma Steel Commitments

Algoma Steel is committed to respecting the human rights of individuals connected to its operations, including employees, contractors, business partners, and the communities in which it operates.

With respect to employees and workers on our site, Algoma Steel is committed to providing a workplace where individuals are treated with dignity, fairness, and respect. The Company maintains employment practices



designed to support equitable treatment, including providing safe and healthy working conditions, wages and working hours in accordance with applicable laws, and respecting freedom of association and collective bargaining rights. Algoma Steel promotes a workplace free from discrimination, harassment, and retaliation and supports ongoing awareness and understanding of human rights within the workplace.

In its relationships with business partners, Algoma Steel is committed to conducting business with organizations that share its commitment to human rights. The Company expects suppliers, contractors, and other partners to comply with applicable laws and uphold internationally recognized human rights standards. This includes prohibiting forced labour, child labour, human trafficking, and all forms of modern slavery, as well as providing safe and fair working conditions. Algoma Steel reinforces these expectations through engagement, communication, and risk-based oversight. These expectations are reinforced through contractual obligations, supplier codes of conduct, risk-based due diligence processes, and, where appropriate, audit and monitoring rights.

Algoma Steel is also committed to respecting the rights of individuals and communities connected to its operations. The Company engages with local communities in a responsible and respectful manner, recognizes the importance of Indigenous rights, including principles of meaningful consultation and engagement, and considers the social and environmental impacts of its operations.

Human Rights Due Diligence

Algoma Steel maintains a risk-based human rights due diligence framework designed to identify, assess, prevent, mitigate, and account for potential and actual human rights impacts associated with its operations and supply chain.

This framework includes:

- Periodic risk assessments of operations and supply chains
- Supplier screening and onboarding procedures
- Integration of human rights considerations into procurement and contracting processes
- Monitoring and, where appropriate, auditing of higher-risk suppliers and activities
- Remediation processes where adverse impacts are identified

Algoma Steel seeks to continuously improve its due diligence processes in line with evolving regulatory expectations and industry best practices.

Specific Commitments

Algoma Steel is committed to protecting the health and safety of employees, contractors, and all individuals at its site. This commitment is supported by established health and safety programs, incident reporting and investigation processes, and contractor safety requirements. The Company strictly prohibits retaliation against any individual who reports or participates in the investigation of a health and safety concern.

Algoma Steel has a zero-tolerance approach for forced labour, child labour, human trafficking, or any form of



modern slavery and takes appropriate action where such risks or incidents are identified. This commitment applies to both its operations and supply chain and is supported through policies, training, risk assessments, due diligence activities, and appropriate corrective actions where concerns are identified.

The Company is committed to maintaining a respectful workplace and does not tolerate discrimination or harassment in any form. This commitment applies to all individuals connected to Algoma Steel's operations, including employees, applicants, contractors, suppliers, and business partners. Individuals are encouraged to raise concerns through established reporting channels, and retaliation for doing so in good faith is strictly prohibited.

Algoma Steel complies with applicable laws relating to conditions of employment, including wages, working hours, and workplace conditions, and is committed to providing safe working environments supported by appropriate protective measures.

The Company is also committed to operating in a manner that respects the environment and the local community in which it operates. This includes a commitment to compliance with applicable environmental laws and regulations and taking steps to identify, prevent, and mitigate impacts associated with its operations.

Rights of Indigenous Peoples

Algoma Steel respects the rights of indigenous peoples and their relationship to the lands, waters and ecosystems that may be affected by our business activity. Algoma Steel recognizes the important role which business has in fostering reconciliation with Indigenous Peoples as outlined in the Truth and Reconciliation Commission: Call to Action 92 "Business and Reconciliation." In this spirit, Algoma Steel will also strive to implement the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), as applicable under law. Where appropriate, we are committed to engaging in dialogue with Indigenous groups when developing, operating and decommissioning energy infrastructure on or in proximity to lands where they exercise rights and interests.

Governance and Accountability

Responsibility for the implementation of this Policy rests with Executive Management.

Oversight of human rights matters is provided by the Board of Directors, directly or through its designated committee(s), which receive periodic updates on human rights risks, due diligence activities, and related performance indicators.

Management is responsible for integrating human rights considerations into business operations, risk management processes, and strategic decision-making.



Implementation, Compliance and Reporting

Algoma Steel implements this Policy through its operational and management systems, compliance and ethics programs, risk management processes, supplier engagement practices, and training initiatives.

Any employee or stakeholder who becomes aware of a potential or actual human rights concern is encouraged to report it through Algoma Steel's Legal Department at EmployeeCode@Algoma.com or through Algoma Steel's whistleblower reporting channels. All concerns will be reviewed and addressed appropriately, and retaliation against individuals who report concerns in good faith is strictly prohibited.

Algoma Steel may report on its human rights approach, risks, and performance through its public disclosures, including sustainability reporting and filings made pursuant to applicable legislation, including modern slavery reporting requirements.

Review

This Policy will be reviewed periodically to ensure continued alignment with legal requirements, regulatory expectations, and evolving best practices.

Approved by the Board of Directors of Algoma Steel Group Inc on May 8, 2026.

