

## **GLOBAL GIFTS AND ENTERTAINMENT POLICY**

Commercial Metals Company and its subsidiaries (collectively referred to herein as “CMC”) are committed to the development of durable and long-term relationships with our customers, vendors, investors and communities where we operate. In furtherance of that commitment, CMC has adopted this Global Gifts and Entertainment Policy (this “Policy”). As a general rule, CMC employees may not accept anything from third parties that may influence the business decisions that they make on CMC’s behalf. CMC employees are prohibited from giving or accepting anything of value to or from a third party, except as provided in this Policy. This Policy should be read in conjunction with CMC’s Global Anti-Corruption Policy and the Travel & Expense Management Policy.

### **Gifts**

CMC employees may accept or give gifts of nominal value (\$150 or less), so long as such gifts are not meant to influence a party to obtain, retain, or direct business or to secure any improper business advantage, and so long as they do not create any appearance of impropriety. If gifts are repetitive or carry a perception of influence or obligation for the giver or the recipient, they are inappropriate and must be declined. CMC employees *may not offer or retain* any gift with a value over \$150 without the prior written approval of their divisional vice president or the Legal Department. As set forth below, gifts of cash or cash equivalents are not permitted in any circumstances.

Many third parties have their own rules on receiving gifts. CMC employees must comply with any such rules, to the extent that they do not conflict with the Code, any other CMC policies, or applicable laws and regulations.

Notwithstanding the foregoing, CMC employees may not give gifts or anything of value, either directly or indirectly, to a Government Official without first obtaining the written approval of the CMC Legal Department. A Government Official is broadly defined to include: (i) an officer or employee of a government or any department, agency or instrumentality thereof including state-owned or controlled companies; (ii) an officer or employee of a public international organization such as the United Nations, World Bank, etc.; (iii) a person acting in an official capacity for or on behalf of any such government, department, agency, instrumentality or public international organization; or (iv) a political party, political party official or candidate for political office. Government Official also means a family member of any of the individuals encompassed in categories (i) through (iv).

Expenses related to any gift must be recorded accurately and precisely in CMC’s books and records.

### **Entertainment & Hospitality**

Meals and entertainment for third parties (including customers and suppliers) must support the legitimate business interests of CMC and should be reasonable and appropriate under the circumstances. The exchange of social amenities (business lunches, entertainment, etc.) between CMC employees and third parties is acceptable when reasonably related to a clear business purpose and consistent with what is customary in a normal business relationship. Under no circumstances may CMC funds be used for any type of adult entertainment.

In addition to this Policy, all entertainment or hospitality provided to third parties must also comply in all respects with the Travel & Expense Management Policy. For any expense over \$150 per person, CMC employees must obtain the prior written approval of their divisional vice president or the Legal Department.

CMC employees must receive prior written approval of the CMC Legal Department before doing any of the following: (i) providing entertainment or hospitality to a public official (government employees, elected or appointed political officials, and employees of state-owned companies and international public organizations) or (ii) providing entertainment or hospitality outside of their home country.

Expenses relating to any entertainment or hospitality must be recorded accurately and precisely in CMC's books and records.

## **Reporting**

Any employee, officer, or director of CMC who is aware of or suspects an actual or imminent violation of this Policy, regulation, or applicable law or the provision or receipt of inappropriate gifts is required to report such information to a supervisor, management, or the CMC Legal Department. Upon receipt of a credible incident report or complaint, a prompt investigation will be conducted and documented. As warranted, findings of the investigation will be reported to the Audit Committee. The Audit Committee also receives periodic reports regarding any complaints, incidents and related findings. CMC prohibits retaliation of any kind against individuals who make a report of corruption or who participate in any investigation.

If any employee, officer or director wishes to anonymously report corruption or inappropriate gifts or any related activities, they may do so via the CMC Ethics Hotline at our U.S. number, (877) 534-0379, or the applicable international number or by a written description to either the Chief Legal Officer or the Chairman of the Audit Committee at P.O. Box 1046, Dallas, TX 75221.

Third-Party Representatives should promptly report to CMC any concerns about perceived unethical business practices by CMC's employees, officers or directors or other Third-Party Representatives to the CMC Legal Department at [compliance@cmc.com](mailto:compliance@cmc.com) or via the anonymous reporting methods described above.

If you have questions about this Policy, please contact the CMC Legal Department at [compliance@cmc.com](mailto:compliance@cmc.com).

June 2023