



# Global Compact



Communication on Progress Report  
Ryerson Inc.  
2009

## □ Commitment to Doing Business With Integrity

Ryerson Inc. and its subsidiaries and affiliates are committed to the highest standard of ethical and business conduct. This standard encompasses our relationships with customers, suppliers, competitors, shareholders, our employees and the neighborhoods in which we operate and it is critical to both our business success and our outstanding reputation in the community!

It is the responsibility of every employee, director and independent contractor to comply with the Ryerson Code of Ethics and Business Conduct and the letter and spirit of the law.

All salaried and hourly office employees in the U.S. and Canada are expected to review the Code of Ethics and Business Conduct and certify their compliance with the law, the Code and the Company's policies annually.

MySafeWorkplace is the Company's independent Compliance Hotline hosted by a third party vendor for reporting violations of the law, the Code or any of the Company's policies. Hotline calls are routed directly to an independent call center with bi-lingual call-takers. The call center can be reached through the Compliance Hotline at 1-800-435-1171 or via the Internet at [www.mysafeworkplace.com](http://www.mysafeworkplace.com).

# CEO's Commitment to Doing Business With Integrity



The United Nations Global Compact, is an international platform for encouraging and promoting good corporate principles and learning experiences in the areas of human rights, labor, environment and anti-corruption. Ryerson Inc. is proud to participate and be a signatory of the Communication on Progress Report.

At Ryerson Inc. our Code of Ethics and Business Conduct is the baseline of our Compliance Program summarizing the laws governing our business and expressing our commitment to honest and equitable relationships with our customers, competitors, suppliers, colleagues, government agencies and the communities in which we work. At Ryerson we have zero-tolerance for unethical behavior.

Our individual decisions and actions affect Ryerson's integrity and our reputation in the workplace. As a leader in the metals industry, Ryerson encourages its employees to report questionable practices within the context of our Compliance Program without the fear of reprisal. We expect every employee and independent contractor to comply with the Ryerson Code of Ethics and Business Conduct and the letter and spirit of the law.

We are proud of the many environmental impacts that we have achieved. Since our primary product is metal, we have implemented programs to recycle excess material to be re-melted and reused. In addition to steel recycling, we also support the efforts of Safety Kleen in their reclamation of over 140 million gallons of used oil. Select locations participate in soda can and paper recycling as well.

Ryerson has begun the process of establishing a baseline of our GHG emission and our carbon footprint so that we can report meaningful and measurable results in the future. We have worked with our mill suppliers and our customers to ensure that RoHS compliant products can be produced where needed to support the elimination of chrome and other carcinogenic products that are sometimes present in the metals industry.

We also support the United Way and encourage all of our employees to give generously to support the many programs that are funded by United Way participants.

Our plants strive to be safe places to work. We continually work to reduce our lost-time injury rates and set high standards in our facilities around the world. We are proud of the diversity of our work force, as well.

We believe that profitability is perfectly compatible with fair and ethical business practices. Ryerson's support of the principles in the Global Compact will help us ensure a sustainable future for generations to come and we're proud to participate.

Stephen E. Makarewicz, President and CEO

# Principles



**Principle 1** - Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence

**Principle 2** - Businesses should make sure that they are not complicit in human rights abuses

**Principle 3** - Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

**Principle 4** - Business should support the elimination of all forms of forced and compulsory labor

**Principle 5** - Businesses should support the effective abolition of child labor

**Principle 6** - Businesses should eliminate discrimination in respect of employment and occupation

# Commitment



- ❑ The Company is committed to providing equal opportunity, maintaining a harassment-free and safe work environment, and administering employment-related activities in a nondiscriminatory manner. The Company expects employees to behave professionally in the workplace, to conduct themselves in a civil, courteous and respectful manner with fellow employees, and with customers, vendors and others with whom we come in contact.
- ❑ The Company prohibits discrimination against employees or applicants based on race, color, religion, age, citizenship, national origin, physical or mental disability, veteran status, gender, sexual orientation, marital status, HIV-positive status, or social or economic class. The Company bases its employment decisions, and expects its employees to conduct Company business, on merit, without discrimination based on any of the factors set out above.
- ❑ Ryerson's management team is respectful of its employees' rights to join and form independent trade unions and to freedom of association without fear of intimidation or reprisal.

# Systems



- ❑ The Company has put many systems in place strengthening their commitment to fair labor practices, free of discrimination and harassment, and respecting human rights within their sphere of influence.
  - ❑ Code of Ethics and Business Conduct
  - ❑ Harassment Policy
  - ❑ Equal Employment Opportunity -- Affirmative Action Policy
  - ❑ Whistleblower Protection Policy
  - ❑ Compliance Training
  - ❑ Annual Certification of Compliance with Ryerson Inc.'s Code of Ethics and Business Conduct
  - ❑ MySafeWorkplace Anonymous Reporting System

# Actions



- ❑ Ryerson Inc. is committed to providing equal opportunity, maintaining a harassment-free and safe work environment and administering employment-related activities in a nondiscriminatory manner.
  - ❑ We provide safe and healthy working conditions to ensure the ongoing safety of our employees and visiting suppliers and customers.
  - ❑ The Company prohibits discrimination against employees or applicants based on race, color, religion, age, citizenship, national origin, physical or mental disability, veteran status, gender, sexual orientation, marital status, HIV-positive status, or social or economic class.
  - ❑ Potential employees are required to show valid identification and proof of age before being hired.
  - ❑ We provide annual compliance training to U.S. salaried and hourly office employees.
  - ❑ U.S. and Canadian salaried and hourly office employees certify annually their Compliance with Ryerson Inc.'s Code of Ethics and Business Conduct.
  - ❑ Ryerson's Labor Relations management team sits down at the bargaining table and negotiates every union contract to an amicable conclusion.

# Principles



**Principle 7** - Businesses should support a precautionary approach to environmental challenges

**Principle 8** - Businesses should undertake initiatives to promote greater environmental responsibility

**Principle 9** - Businesses should encourage the development and diffusion of environmentally friendly technologies



# Commitment



- ❑ Ryerson and its subsidiaries and affiliates are committed to responsible environmental policies in their operations and to compliance with environmental laws and regulations. The Company supports domestic and international efforts to conserve energy and natural resources while pursuing appropriate economic development.

To accomplish these objectives, the Company:

- ❑ integrates responsible environmental policies, programs and practices into each business unit as an essential element of management;
- ❑ plans, installs, maintains and operates facilities in compliance with applicable environmental laws and regulations;
- ❑ encourages research and development related to environmental-control technologies and more efficient utilization of natural resources, materials and energy, and
- ❑ educates, trains and motivates employees to conduct themselves in an environmentally responsible and safe manner.

# Systems



- ❑ The Company's commitment to high ethical and business standards encompasses the relationships with our customers, suppliers, competitors, employees and the communities in which we operate. Our Code of Ethics and business Conduct is the framework governing our business practices. The systems we have implemented support our efforts to improve the environment, including:
  - ❑ employee paper and soda can recycling programs at select locations;
  - ❑ wooden skid recycling programs;
  - ❑ ink and toner recycling program with our office supply partner, Staples; and,
  - ❑ recycling program for steel re-melting.
  - ❑ Ryerson complies with all applicable discharge, permit and other requirements where applicable.

# Actions



- ❑ Ryerson supports efforts to improve the environment that include:
  - ❑ Working with Safety-Kleen at most of our locations for oil recycling. Every year Safety-Kleen returns more than 140 million gallons of used oil to the market place as clean pure motor oil.
  - ❑ The availability through our suppliers of RoHS compliant (chrome free) products.
  - ❑ Spill prevention and response as part of the Ryerson Safety Policy.
  - ❑ Reducing cardboard consumption by down gauging all of its protective edge guard from 0.120 to 0.100.

## Principle 10 - Businesses should promote and adopt initiatives to counter all forms of corruption, including extortion and bribery



- Commitment
  - Ryerson Inc. has a strong commitment to high ethical standards. Every day employees may be faced with challenges that test their ethical principles. The Company's compliance training gives employees an opportunity to see people like themselves struggle with difficult ethical and legal decisions.
  
- Systems
  - Code of Ethics and Business Conduct
  - Compliance Training
  - Independent Anonymous Hotline
  - Policies covering Antitrust, FCPA, Anti-Fraud, Conflicts of Interest, Insider Trading, Whistleblower Protection
  
- Actions
  - Annual certification of the Code Disclosure Questionnaire for U.S. and Canadian employees.
  - Annual compliance training for U.S. employees includes training courses on ethical and legal issues that may surface every day in conducting our business. Training courses also include a Library containing relevant Company policies and a Quiz to be completed before a certificate is issued.
  - To ensure compliance, training and other compliance activities are managed and directed by our Law Department and the Chief Compliance Officer.
  - Employees can report concerns or potential violations of the Code, the law, or the Company's policies anonymously via the internet at [www.mysafeworkplace.com](http://www.mysafeworkplace.com) or through the Company's independent Hot Line at 1-800-435-1171.

# Performance Indicators (all principles)



- ❑ Annual certification of the Code Disclosure Questionnaire is distributed to both U.S. and Canadian employees. In January 2009, 2,064 employees received the questionnaire. To date, 1,849 employees have certified their compliance with the Code for the year 2008 and 215 are in process.
- ❑ To date in 2009 the Antitrust and Conflicts of Interest training courses have each been released to 1,755 U.S. employees. At this time 1,677 and 1,584 respectively, of our employees have completed these courses, with the remaining employees in process.
- ❑ Replacing HPS lighting with Hi-bay fluorescents has reduced electric power consumption at our largest facilities by 20 - 30%.
- ❑ Recycling over 300,000 lbs. of tissue paper received annually from incoming coils.