



TIMKENSTEEL SUPPLIER CODE OF CONDUCT

The core values of TimkenSteel Corporation are the foundation on which we conduct ourselves. We are committed to safety first, being customer driven, providing best-in-class quality, innovation, collaboration and operating in an ethical & responsible manner. We work with suppliers who share those core values.

TimkenSteel Supplier Code of Conduct addresses issues of particular importance in our global supply chain. It outlines the workplace standards and business practices that are consistent with our core values. We expect our suppliers around the world to adhere to this Code as we work together for mutual success.

A. CODE OF CONDUCT

1. General Principle: Supplier shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations.

2. Environment, Workplace Safety and Health: Supplier must comply with all applicable environmental laws and regulations. Supplier shall provide and maintain safe and healthy plant and office working conditions, and comply with all laws and regulations applicable to workplace safety and health.

3. Child Labor: Supplier shall employ only workers who meet the applicable minimum legal age requirement. Suppliers must also comply with all other applicable child labor laws.

4. Forced Labor: Supplier shall not use any involuntary or forced labor.

5. Wages and Benefits: Supplier must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

6. Non Discrimination: Supplier shall treat all its employees and applicants equally according to their individual qualifications, abilities, experiences and other employment standards. There will be no discrimination due to gender or gender identity, race, religion, color, national origin, ancestry, age, disability, sexual orientation, veteran/ military status or any other basis protected by applicable law.

7. Gift and Gratuity Policy: The offering, payment or acceptance of kickbacks, bribes or other illegal payments are prohibited and will not be tolerated. Also, TimkenSteel prohibits the offer or acceptance of any gifts or gratuities that the recipient reasonably would consider to be of substantial value. Any supplier that violates this policy risks immediate loss of all existing and future TimkenSteel business.

8. Conflict Minerals: To support our commitment to responsible sourcing, supplier must ensure that any tin, tantalum, tungsten or gold that is contained in the products it supplies to TimkenSteel is not sourced from the conflict region of the Democratic Republic of the Congo or any of its nine adjoining countries.

B. COMPLIANCE MONITORING

Supplier will allow TimkenSteel and/or any of its representatives or agents access to its facilities and all relevant records associated with the products and services provided to TimkenSteel. Supplier and TimkenSteel will establish a mutually agreeable date and time for access. However, risks to TimkenSteel's business may require immediate access to the products, services and associated records and supplier will accommodate TimkenSteel's access as required. Supplier must also provide TimkenSteel with additional information and certifications evidencing compliance, upon request by TimkenSteel.

C. APPLICATION TO SUB-CONTRACTORS

This Code also applies to any sub-contractor(s) to the supplier, providing goods or services to the supplier. Supplier is fully responsible for ensuring compliance by any such sub-contractor(s) as if it were the supplier itself. TimkenSteel reserves the right to audit the supplier's sub-contractors for compliance to the TimkenSteel Supplier Code of Conduct and supplier will accommodate TimkenSteel's audit as required.

D. EVENT OF VIOLATION

If the supplier does not comply with the TimkenSteel Supplier Code of Conduct, TimkenSteel requires that the supplier implement a corrective action plan to cure the non-compliance within a specified time period (furnished to TimkenSteel in writing). If the supplier fails to meet the corrective action plan commitment, TimkenSteel may terminate the business relationship, including suspending placement of future orders and potentially terminating current production. TimkenSteel reserves the right to hold supplier responsible for reasonable costs of investigating non-compliance.

E. NON-COMPLIANCE REPORTING

The TimkenSteel Supplier Code of Conduct applies to people and companies ("Suppliers") that do business with TimkenSteel. Contact your TimkenSteel representative with any questions on the Code.