

Human Rights Policy

I. Commitment and Purpose

Worthington Enterprises, Inc. (the “Company”) is committed to conducting business and creating shareholder value in an ethical manner, which includes the protection and promotion of Human Rights. This Human Rights Policy outlines the Company’s efforts and expectations with respect to ensuring Human Rights are upheld across all aspects of its operations.

II. Approach, Governance and Oversight

This Policy has been drafted to align the Company’s efforts with the principles outlined in the Universal Declaration of Human Rights, the International Labour Organization (ILO) standards, the United Nations Guiding Principles on Business and Human Rights; and the law of jurisdictions in which the Company, its subsidiaries and affiliates do business.

The Company’s Legal and Ethics teams provide oversight and review, and report to the Board of Directors via the Audit Committee and Compliance Council, to ensure the Company’s policies and practices continue to align with evolving laws, regulations, and expectations of shareholders, customers, partners, and valued stakeholders. To promote transparency and accountability, a summary of all reported Human Rights concerns – including the number, nature, and status of cases – is provided quarterly to the Company’s Board of Directors.

III. Human Rights Training

As part of the Company’s mandatory onboarding procedures, all employees receive introductory education regarding the Company’s position on Human Rights, its related-policies, and employees’ obligations to uphold Human Rights in the course of their employment. The aforementioned training includes review of the Company’s comprehensive Code of Conduct, which defines the Company’s commitment to legal and ethical behavior and provides employees with guidance on business conduct and reporting misconduct. Employees also receive additional Human Rights related training appropriate for their specific role within the Company’s operations.

IV. Assessment and Due Diligence

Ensuring the protection and promotion of Human Rights is every employee’s responsibility. As such, employees at all levels of the organization are encouraged to utilize the Company’s Open Door Policy and/or ethics reporting mechanisms to notify management of suspected violations of this Human Rights Policy and related opportunities for improvement. All reported concerns are investigated by our compliance and legal teams led by our Ethics Officer.

Additionally, the Company endeavors to ensure external partners and suppliers adhere to the Company’s expectations with respect to Human Rights. To that end, the Company takes certain

actions which include surveying suppliers, performing due diligence within the framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and retaining third-party service providers to assist in reviewing the Company's supply chain.

V. Reporting

The Company has an Open Door Policy and encourages all employees to approach management at any level with concerns or questions regarding the Company's Code of Conduct, including Human Rights, and any potential business conduct that has occurred or is occurring. The Company also maintains a 24/7 anonymous Ethics Line and online reporting site for the reporting of suspected ethics violations. The Company has zero-tolerance for retaliation against whistleblowers who raise a concern in good faith.

Ethics Line: U.S. 877-263-9893

Online Reporting Site: worthington.ethicspoint.com

Where we identify that our business operations have caused or contributed to a violation of this Human Rights Policy, we will take appropriate steps to provide or support remediation.

VI. Expectations

It is the Company's expectation that all employees will conduct their business in an ethical manner, complying with guidance in this and related policies, the Company's Code of Conduct, and all applicable laws and regulations. Additionally, the Company expects that its affiliates, partners, and suppliers will conduct their business in an ethical and conscientious manner, complying with all applicable laws and regulations, contractual obligations, and the Company's Supplier Code of Conduct if applicable.

VII. Human Rights at the Company (Internal)

A. Equal Opportunity

The Company understands that its people are its most valuable asset. As such, and as described in the Code of Conduct's provisions for Equal Opportunity, the Company is an equal opportunity employer and bases hiring, transfer, promotion, compensation, disciplinary, and other employment-related decisions on job-related qualifications, abilities, and performance, free of any consideration prohibited by applicable law or regulation.

B. Harassment & Discrimination

As detailed in the Non-Harassment/Non-Discrimination section of the Code of Conduct, it is the Company's policy and each employee's responsibility to provide a workplace free of unlawful and

inappropriate harassment or discrimination by managers, other employees, or other parties conducting business with the Company.

C. Workplace Safety, Security, and Violence Prevention

The overall safety and well-being of all Company employees is of the utmost importance. As per the Code of Conduct's provisions for Safety and Health, the Company and its employees share the responsibility of ensuring a safe, secure, and violence-free workplace exists. This is accomplished through the establishment and enforcement of appropriate rules and procedures, and adherence to safety-related laws and regulations at each of the Company's locations.

D. Human Trafficking, Involuntary or Forced Labor, and Child Labor

The Company has zero tolerance for any form of Human trafficking or forced, involuntary, slave or child labor in the conduct of its business operations or supply chains.

E. Compensation, Employment Standards, and Collective Bargaining

The Company strives to observe fair labor and employment practices and to abide by all applicable laws and regulations pertaining to compensation, employment standards, and employee collective bargaining.

F. Anti-Corruption

The Company is committed to engaging in ethical and lawful business competition and, per the Code of Conduct, strictly prohibits corruption, bribery, money laundering, or other such unethical uses of funds or gift. This includes compliance with the U.S. Foreign Corrupt Practices Act (FCPA) – as such, FCPA training is required for those employees who may interact with foreign government officials, divisional compliance managers and compliance officers.

G. Data Privacy and Protection

The Company respects the privacy of employees, customers, and third parties and adheres to all data privacy laws and regulations applicable in jurisdictions in which it does business. In accordance with the applicable provisions of the Code of Conduct, Company information systems are used only for their intended purposes, with information not to be improperly disclosed, modified or endangered, and access to Company information resources not to be made available to any unauthorized person. Additionally, the Company has adopted a comprehensive policy for the stewardship of Personal Identifiable Information. In order to ensure the Company's data protection efforts meet the requirements of all locations in which the company does business, executives involved with compliance for data protection and privacy issues receive additional training in the European Union General Data Protection Regulation (GDPR).

H. Community Engagement

As a responsible corporate-citizen, the Company takes a proactive approach to promoting Human Rights through its encouragement of employee volunteerism and through contributions to the

Worthington Companies Foundation, a charitable fund supporting worthwhile causes like health, human services, youth & education and civic causes.

VIII. Human Rights in the Value Chain (External)

A. Ethical Labor Practices

The Company insists that its suppliers comply with the provisions outlined in its Supplier Code of Conduct, which prohibit a supplier from engaging in Human Trafficking or the use of forced, involuntary, slave or child labor. These prohibitions are in addition to the expectation that suppliers will comply with all applicable laws and regulations in their jurisdictions related to employee health and safety, compensation, discrimination, association, and employment practices.

B. Conflict Minerals

In compliance with Rule 13p-1 under the Securities Exchange Act of 1934, and in an effort to ensure the Company's business operations do not directly or indirectly fund or benefit armed groups, the Company undertakes reasonable country-of-origin inquiries regarding sources of tin, tantalum, tungsten and gold utilized in the manufacture of its products. The Company's Conflict Minerals Policy requires that the Company's suppliers obtain and provide information, certifications and documentation demonstrating compliance with the Policy's requirements.

C. Anti-Corruption

As described in the Supplier Code of Conduct, the Company expects that its suppliers will operate ethically and conscientiously. Therefore, suppliers should not tolerate corruption or bribery, antitrust violations, parts counterfeiting, or make business decisions which create, or appear to be, conflicts of interest.

IX. Voluntary and Required Disclosures and Related Policies

For the purpose of transparent communication with interested shareholders and stakeholders, the Company voluntarily publishes public disclosures pertaining to the subject matter of this and related policies annually in its Corporate Citizenship and Sustainability Report. Additionally, required filings, including specialized disclosure reports related to Conflict Minerals, can be found on the [Worthington Enterprises website](#).

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