

SPEAK UP POLICY

BLUESCOPE IS COMMITTED TO ENCOURAGING A CULTURE OF SPEAKING UP WHEN SOMETHING IS NOT RIGHT AND PROTECTING THOSE WHO DO

SPEAK UP)))

OUR COMMITMENT TO YOU

At BlueScope we are committed to acting fairly, ethically and with integrity in all that we do. In striving for the highest standards of conduct, we encourage our people and those we interact with to speak up when they think an action or decision is not right, does not reflect **Our Bond** or is not in line with the **Guide to Business Conduct** or the law.

We are committed to treating those who raise genuine concerns with respect and will ensure that they are supported and protected.

- may cause financial loss to BlueScope or damage to its reputation or be otherwise detrimental to BlueScope's interests; or
- involves any other kind of misconduct or an improper state of affairs or circumstances.

You do not need to be directly affected by an issue to raise it. When concerns are raised, it helps us identify and address the matter and improve how we work.

When you report a concern, we encourage you to be honest and open and provide as much information about the concern as possible.

APPLICATION

This is a group level policy. It applies to all businesses operated by BlueScope Steel Limited, its subsidiaries and its related entities.

This policy applies to:

- current and former officers, employees and contractors;
- current and former suppliers of goods and services (paid or unpaid), and their employees; and
- a relative or dependent of any person in the above groups.

WHAT TO REPORT

You should make a report if you have reasonable grounds to suspect that BlueScope or any of its people have engaged, or are engaging, in conduct that:

- is dishonest, fraudulent or corrupt (including bribery or other activity in breach of BlueScope's Anti-Bribery & Corruption Policy);
- is illegal (including conduct that might breach competition, anti-bribery, discrimination or other laws);
- is unethical or in breach of Our Bond, BlueScope's Guide to Business Conduct or any other BlueScope policy or procedure;
- endangers the health or safety of any person;

HOW TO MAKE A REPORT

Employees are encouraged to speak up to your manager, a member of BlueScope's People team or a member of BlueScope's Legal team.

We understand that in some circumstances you may not be comfortable speaking to your Manager or reporting a matter through normal business channels. If this is the case you can make a report by:

- contacting **your local Ethics and Compliance representative**; sending an email to the Ethics & Compliance team (ethics@bluescope.com); or
- contacting **BlueScope's Business Conduct Reporting Hotline**.

BlueScope's Business Conduct Reporting Hotline is an externally managed service which is available 24 hours a day, 7 days a week. Reports to the Hotline may be made anonymously.

If you have a personal work-related grievance (such as a conflict between you and another employee, a decision about your transfer or promotion or the terms and conditions of your employment), this should be raised with your Manager or a member of BlueScope's People Team, or under the applicable **People policy**.

Nothing in this policy prevents you from reporting a concern to an appropriate government authority or seeking legal advice on your rights.

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HOW WE PROTECT YOU

BlueScope is committed to the protection of all people who speak up under this policy.

In some countries where we operate, including Australia, there may be specific protections available to people who report suspected misconduct. More detail can be found on your applicable business site, via the intranet.

PROTECTING YOUR CONFIDENTIALITY

We know that speaking up takes courage and integrity and we commit to treating reports made under this policy confidentially.

If you make a report, BlueScope will not disclose your identity unless you consent, or disclosure is required by law or permitted by law.

We may disclose information about you (but not your identity) if it is reasonably necessary in order to investigate your report, but we will take all reasonable steps to reduce the risk that you will be identified. Any unauthorised disclosure of information will be a breach of this policy.

If you do not wish to disclose your identity to anyone at BlueScope, you may make an anonymous report by contacting **BlueScope's Business Conduct Reporting Hotline**.

PROTECTION FROM DETRIMENTAL TREATMENT

BlueScope is committed to protecting you from any detrimental treatment as a result of making a report under this policy.

Detrimental treatment can take many forms and includes:

- Dismissal from your position;
- Adjusting job duties to negatively impact you;
- Discrimination, harassment, bullying or intimidation;
- Psychological harm;
- Damage to your property, reputation or financial position; or
- Any other injury or unfavourable treatment connected with speaking up.

Any such detrimental treatment is a serious breach of this policy and should be reported immediately via any of the channels listed under the 'How to Make a Report' section of this policy.

BlueScope does not tolerate retaliation or adverse action related to a report under this policy and will take disciplinary action, which may include termination of employment, against anyone proven to have engaged in detrimental treatment against people who speak up or who participate in an investigation.

SUPPORTING YOU

BlueScope will ensure that you are supported during and after the investigation process in accordance with Our Bond, our HSE & People policies and the law. Support is available through the People team. Free professional external support, independent of BlueScope, may also be available in your local area. Refer to your local intranet site or speak to the People team for details.

HOW WE INVESTIGATE REPORTS

All reports made under this policy will be treated seriously and respectfully. Each report will be assessed and investigated in an objective and fair manner, and otherwise as is reasonable and appropriate having regard to the nature of the reported conduct and the circumstances.

Where appropriate, you will be provided with feedback in relation to the progress and/or outcome of the investigation (subject to considerations of the privacy of those about whom a report is made). Any person about whom a report is made under this policy will be treated fairly in accordance with Our Bond and our HSE & People policies.

Further details of the investigation process are set out in BlueScope's Guidelines for Assessing and Investigating Suspected Misconduct.

DUTIES OF EMPLOYEES IN RELATION TO SUSPECTED MISCONDUCT

BlueScope expects that any employee who becomes aware of actual misconduct, or who reasonably suspects misconduct, will make a report under this policy.

AVAILABILITY OF THIS POLICY

This policy is available on BlueScope's intranet, as well as externally on the BlueScope website. Training in relation to the policy is provided to all BlueScope officers, employees and contractors as part of their induction process and ongoing mandatory training.

If you require any clarification or information about this policy, please contact **your local Ethics and Compliance representative** or send an email to the Ethics and Compliance team email address (**ethics@bluescope.com**).

REVIEW

This policy will be reviewed from time to time to ensure it is operating effectively.

EFFECTIVE DATE

1 July 2019