



BlueScope

Guide to Business Conduct



As a leading global steel company, BlueScope is judged not only by the profits we make but by the way we act.

Choosing to do what is right

In the words of Our Bond, 'Our strength is in choosing to do what is right'.

Our reputation relies on ethical and lawful conduct in Company activities. Every day, in our interactions with customers, suppliers, shareholders and others, our business conduct is on display. Every employee and director is responsible for acting consistently with Our Bond and with the Company's policies, guidelines and standards.

It is sometimes difficult to recognise when there is a business conduct issue. The BlueScope Guide to Business Conduct sets out our basic principles of business conduct. The foundations of the Guide to Business Conduct are the beliefs outlined in Our Bond. By working in accordance with these principles, you can be confident you are acting appropriately.

The Guide is not all encompassing. It is a practical framework to help you decide what is right. If you are unsure about any aspect of business conduct, you should ask your supervisor or manager. If you are unable to discuss the matter with them, you should seek help from a relevant functional manager or contact the Company's externally managed Business Conduct Reporting Service. Further information on this service, including Hotline numbers and email addresses are in the "Where to go for assistance" section of the Guide.

You will also see references throughout the Guide to particular BlueScope policies and procedures (accessible via the BlueScope Intranet), and these should be read for further clarification.

By acting fairly, ethically and with integrity, you will be helping to create lasting benefit for yourself, your colleagues and the entire Company.

Paul O'Malley

Managing Director & Chief Executive Officer

OUR BOND

WE AND OUR CUSTOMERS PROUDLY BRING INSPIRATION, STRENGTH AND COLOUR TO COMMUNITIES WITH BLUESCOPE.

OUR CUSTOMERS ARE OUR PARTNERS.

Our success depends on our customers and suppliers choosing us. Our strength lies in working closely with them to create value and trust, together with superior products, service and ideas.

OUR PEOPLE ARE OUR STRENGTH.

Our success comes from our people. We work in a safe and satisfying environment. We choose to treat each other with trust and respect and maintain a healthy balance between work and family life. Our experience, teamwork and ability to deliver steel inspired solutions are our most valued and rewarded strengths.

OUR SHAREHOLDERS ARE OUR FOUNDATIONS.

Our success is made possible by the shareholders and lenders who choose to invest in us. In return, we commit to continuing profitability and growth in value, which together make us all stronger.

OUR COMMUNITIES ARE OUR HOMES.

Our success relies on communities supporting our business and products. In turn, we care for the environment, create wealth, respect local values and encourage involvement. Our strength is in choosing to do what is right.

Principles of Conduct

Our Bond is the expression of the values of BlueScope, and the way in which the Company and its employees should conduct our business. It also forms the basis upon which BlueScope's policies, standards and guidelines rest.

Our detailed business policies and guidelines apply to all employees. The values of Our Bond and the principles of conduct expressed below, apply to non-executive directors as well as employees. Commitment to the values of Our Bond must be demonstrated by the leaders of the Company.

Our customers are our partners

When representing BlueScope, our standards as a minimum require that:

- we deal with others fairly and honestly;
- we act with integrity in our business dealings, avoiding improper practices;
- we are not influenced by considerations which are irrelevant or inappropriate to BlueScope's business;
- we act in a manner that ensures BlueScope has a reputation for proper conduct and being true to its word; and
- we do not give or accept gifts or other benefits that could influence the way we, or our customers or suppliers, do business.

Our people are our strength

For BlueScope employees and contractors, our standards as a minimum require that:

- we maintain a safe work environment;
- each employee contributes to the effectiveness of the team;
- we treat all employees and candidates for employment fairly and on merit;
- each employee is encouraged to develop and achieve their potential; and
- we take responsibility for the matters which we control.

Our shareholders are our foundation

In managing BlueScope shareholders' funds, our standards as a minimum require that:

- we communicate to shareholders and the market in a full, timely and frank manner;
- we are accountable for our actions to BlueScope shareholders;
- we manage BlueScope's funds and resources appropriately and that funds and resources are not used to provide unreasonable benefits for ourselves or others;
- we only use BlueScope's property for the purpose of the business; and
- we do not seek to obtain an advantage for ourselves or others from information not generally available.

Our communities are our home

In operating within communities, our standards as a minimum require that:

- we respect the laws, customs and approach to business of the communities in which we operate;
- we conduct ourselves in a way that respects the apparent purpose of any laws under which we operate;
- where possible, we strive to adopt the highest standard of conduct that applies in any of the communities in which we work, even where this exceeds the standards of a particular community;
- we are committed to the efficient use of resources, preventing pollution and reducing environmental impact of our operations and products; and
- we are accessible and responsive to the needs of local stakeholders.

Policies and Guidelines for Employees

BlueScope has adopted a number of policies and guidelines to assist employees to act in line with Our Bond.

All BlueScope employees are accountable for acting in line with the Company's policies and guidelines. Employees may face disciplinary action for failures to comply with a policy or guideline, up to and including dismissal.

Consultants, contractors and business partners working with or for BlueScope should be informed of relevant policies and guidelines and of the requirement that they act in accordance with them.

Supervisors and managers will be held accountable for BlueScope's policies and guidelines being followed. Proper business conduct is in our long-term interests because it creates loyalty and trust in our people, customers, shareholders, the communities in which we operate, and other stakeholders.

Where policies and guidelines involve activities that are regulated by laws, the Company and employees must comply with the relevant laws, in addition to BlueScope's policies and guidelines. Compliance with laws is vital to ensure that the Company acts, and is seen to act, with integrity.

The laws and regulations which apply to the Company's business are detailed and extensive. Whether particular conduct complies with relevant laws may require legal advice. Employees should always contact a member of the BlueScope legal team if they have any questions.

Set out in the Guide are a range of business conduct topics that are fundamental to BlueScope. There are additional policies and guidelines which may be relevant to an employee's work (some of which are referred to below), and these should be consulted by each employee.

If any employee believes that an incident of business misconduct may have occurred, they should follow the procedure set out in the Guidelines for Reporting and Responding to Suspected Business Misconduct. These guidelines set out mechanisms on how reports of suspected misconduct may be made, and explains how BlueScope will respond to those reports.

Copies of the policies referred to in this Guide are available from the BlueScope Intranet.

Relevant policies and guidelines

- Guidelines for Reporting and Responding to Suspected Business Misconduct

Fair Dealing Competition and Consumer Law

Competition

Competition law aims to regulate the way in which companies act so that competition is encouraged.

Collusive trade practices, such as price fixing, are prohibited by law and in certain circumstances can result in criminal sanctions. Companies are also absolutely prohibited from specifying a minimum resale price for goods and services, regardless of the effect on competition. Many other activities which lessen competition in a market may also be prohibited. The Company takes these laws seriously and does not condone breaches of the law.

Employees should always seek legal advice before making decisions that may involve competition law issues. Examples include pricing decisions, exclusive supplier or customer arrangements, alliances or marketing arrangements.

Consumer protection laws

The Company is subject to consumer protection laws in all of the countries in which it operates, including in relation to product safety standards, consumer guarantees in relation to certain products and services and obligations in respect of advertising and the making of representations.

The Company is also prohibited from engaging in unconscionable conduct. Employees must always ensure that in their dealings with customers, suppliers or other third parties, they act fairly, in good faith and do not apply undue influence, pressure or engage in unfair tactics.

Misleading and deceptive conduct

All employees must act in a manner which is not misleading or deceptive when dealing with customers, suppliers or other third parties, or other employees. Employees must act truthfully and fairly when pursuing BlueScope's legitimate business interests, ensuring at all times that their words, omissions or conduct do not contribute to misunderstandings on the part of others who may be dealing with BlueScope.

The Company has a trade practices compliance program which includes training for relevant employees. Employees are expected to be aware of their obligations in this area and it is essential that you read the policy and, if required by the policy, participate in the training provided. For further information you should consult a member of the BlueScope legal team.

Relevant policies and guidelines

- Competition and consumer law policy

Equal Employment Opportunity and Anti-Discrimination

All BlueScope employees are to be treated fairly and equally.

BlueScope selects employees and contractors on the bases of merit and the fundamental requirements of each job. BlueScope also supports the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.

BlueScope opposes behaviour in the work place that may offend, humiliate or intimidate employees or others. Behaviour which falls below the standard expected of all BlueScope employees includes bullying, physical or sexual harassment and other offensive behaviour such as jokes of a sexual or racist nature.

Employees should consult the Company's policies and guidelines in this area for more information of the types of conduct which are inappropriate or discriminatory.

Employees experiencing discrimination or harassment should inform their supervisor, manager or human resources representative for assistance. Employees acting in a discriminatory or inappropriate manner will be subject to disciplinary action up to and including dismissal.

Further information about the Company's employment and anti-discrimination policies and guidelines is available on the BlueScope Intranet.

Relevant policies and guidelines

- Global Recruitment Policy
- Diversity Policy
- EEO Policy
- EEO and Anti-Discrimination Guidelines

Safety, Health and Environment

BlueScope's Health, Safety, Environment and Community Policy and the related HSE Management Standards and Procedures have been prepared to help all employees work to achieve the Company's commitments in these areas.

Safety

The Company aspires to a goal of zero harm to people. This goal is based on the principles that working safely is a condition of employment, employee involvement is essential, management is accountable for safety performance, all injuries can be prevented, training employees to work safely is essential and all operating exposures can be safeguarded. These principles provide the focus for the Company's safety management system.

The Company has extensive safety procedures and guidelines which all employees should become familiar with. Further information can be obtained from supervisors or managers and the BlueScope Intranet.

Drug and alcohol consumption

Every employee is responsible for taking appropriate steps to prevent workplace injuries and illnesses and for contributing to a safe and healthy work environment.

Employees must not be impaired by illegal or legal drugs, including alcohol, while at work or when conducting Company business.

Employees must also ensure that where they may be affected by substances such as prescription or over the counter medication which could impair their performance at work, they consult with their supervisor or manager before commencing work.

Poor work performance or conduct caused by alcohol or drug use, or significant impairment that creates a safety risk, is regarded as serious misconduct, and employees may be subject to disciplinary action, up to and including dismissal.

Alcohol and drug use can affect work performance, posing health and safety risks to employees. For this reason, some BlueScope businesses have introduced alcohol and drug testing, supported by programs to assist employees with alcohol and drug problems. Employees may be subject to alcohol and/or drug testing in accordance with the requirements of particular sites to reduce this risk and this may involve the testing of breath or body fluids. The primary aim is to discourage abuse and offer help and access to confidential treatment.

Employees can obtain further information by contacting a member of your local human resources team or referring to the Alcohol and Other Drugs Policy on the BlueScope Intranet.

Environment policies

At BlueScope we care for the environment. We are committed to the efficient use of resources, reducing and preventing pollution, and product stewardship.

Specific environmental policies deal with environmental management systems, environment monitoring, incident reporting and crisis management. Employees who operate at sites where environment matters are monitored should become familiar with the specific policies. These can be found on the BlueScope Intranet under HSEC Policies.

Relevant policies and guidelines

- Health Safety Environment and Community Policy
- Health, Safety and Government Standards and related Procedures
- Safety Beliefs
- Environmental Principles
- Alcohol and Other Drugs Policy
- Travel Safety Policy
- Crisis and Emergency Management Policy

Company Information

Confidentiality

Use of confidential information is restricted, and disclosure of confidential information requires clear authority. Confidential information can be used where required in the proper course of an employee's duties or where it is permitted in writing by a supervisor or manager.

Employees and contractors must also, both during and after their employment with BlueScope, use their best endeavours to prevent the publication or disclosure of any confidential information. Importantly, upon termination of an employee's employment or a contractor's contract, all confidential information which is possessed and relates in any way to the business or affairs of the Company, must be returned to the Company.

Confidential information includes, but is not limited to, trade secrets, marketing information, customer information, research and development, technical information, financial lists, business plans, designs, drawings, techniques, processes and all intellectual property in any form belonging to BlueScope.

Intellectual property

Employees who participate in the development of processes or products that will be used by BlueScope, or who have access to the results of work, must treat these things as the property of BlueScope both during and after their period of employment with BlueScope.

Works, ideas, concepts, designs, inventions, models and developments ("Works") may be able to be protected by the Company as intellectual property. Intellectual property covers copyright, rights to inventions such as patents, designs and trademarks.

Employees must provide to BlueScope all Work produced during the course of their employment or with use of any of BlueScope's time, materials or facilities or other resources.

Employees should ensure that in any third party arrangements such as any research and development or other services arrangements that appropriate provisions are entered into to protect the Company's rights in any resulting intellectual property. Employees should contact the Legal Department for assistance.

BlueScope has all rights to this kind of work and to the extent that the Company considers it necessary, each employee agrees to transfer these to the Company legally without delay.

Personal information and privacy

In order to conduct its business, BlueScope collects personal information from a range of different sources, including employees, suppliers and customers. BlueScope supports the collection of personal information ethically and lawfully and in a fair manner which is not unreasonably intrusive.

Personal information is information that discloses the identity of an individual, or the identity of the individual is reasonably ascertainable from the information and can include name, contact details, occupation, and age. Personal Information remains personal information regardless of whether it is in the public domain or not.

All personal information of employees is handled in accordance with the Company's Employee Privacy Policy.

Company Information

Personal information collected by the Company from third parties such as customers and suppliers, is handled in accordance with the Company's Privacy Policy.

Employees collecting personal information on behalf of the Company must inform the person involved of the purpose for which information is collected and be aware that, subject to some limitations, the person will be able to gain access to the information collected on request. Personal information should only be collected if reasonably necessary for one of the functions or activities of the Company. Steps must be taken to ensure that data is reasonably accurate and current and that data is stored no longer than reasonably necessary.

Employees should ensure that the person from whom the information is being collected is aware of the Company's Privacy Policy and how to access it.

Employees must ensure personal information is stored securely and that it is protected from misuse, interference or loss, and from unauthorized access, modification or disclosure. The protection and confidentiality of personal information is regulated in many of the jurisdictions in which the Company operates. If employees have questions under this policy or relevant laws, they should seek advice from their Manager or the Legal Team.

The BlueScope Privacy Policy contains further information which employees should also be familiar with.

Relevant Policies and Guidelines

- Information Security Policy
- Privacy Policy
- Internet Privacy Policy

Information Systems

BlueScope employees use a wide range of information systems to conduct business (e.g. voice mail, facsimile, the Internet, electronic mail, etc.). Employees are responsible for protecting Company information communicated or stored using these systems.

The Company's electronic communications systems are Company resources and all electronic communications are regarded as Company records. Offensive material (which includes pornography, violent or racist material) is not permitted on BlueScope devices or systems in any form.

- Employees have access to Company information systems to assist them in performing their jobs. Minor personal use is permitted if it is unrelated to outside business activities and does not interfere with Company business or the performance of work responsibilities. Significant personal use is not permitted.

The principles applying to Information

Systems can be summarised as follows:

- BlueScope computing resources must be used for legitimate BlueScope business purposes;
- BlueScope technology resources must not be used for purposes which are illegal, inappropriate or present an unauthorised risk to BlueScope; and
- Each user is accountable for their own actions, will be individually authenticated and monitored and is responsible for their own account and allocated assets.

A small amount of private telephone and e-mail use is acceptable, provided it does not interfere with normal work. Usage should be consistent with the Company's guidelines of business conduct. For e-mail, the sending of jokes or other "junk mail" is not appropriate. Employees should be aware that the Company monitors the use of information technology systems, including Internet, intranet, email and social media related communications. Security monitoring cameras are also deployed in many BlueScope facilities.

For further information employees should see the detailed policies, standards and guidelines available from Information Services or on the BlueScope Intranet.

Relevant policies and guidelines

- Information Technology Usage Policy
- Information Security Policy
- Data Classification Policy

Using Company Funds and Property

Detailed policies on the proper use of Company resources are set out below. Any suspected improper use of Company resources should be reported to management directly or through the mechanisms described in the Guidelines for Reporting and Responding to Suspected Business Misconduct.

Proper use of Company resources

BlueScope has significant investments in property and resources to carry out its business. Equipment, tools, resources and funds are provided to employees to perform their allocated duties.

Employees must not use Company funds, property, equipment, or other resources for personal benefit. In addition, employees are responsible for safeguarding the Company resources under their control, including information, and for maintaining accurate records regarding the use of these resources.

In discharging their duties, employees should consider, among other things, the following:

- At all times employees should use Company funds ethically and effectively. Expenditures must be reported accurately and in a timely way;
- An accurate and auditable record of all financial transactions relating to the Company must be maintained in accordance with generally accepted accounting principles. No entry should be made in the Company's records that distorts or disguises the true nature of any transaction;
- Disposal of Company accounts, records and other documentation should be in accordance with any applicable BlueScope standards and guidelines; and
- Where employees are provided with a Company credit card or purchasing card, the purpose of the card is to cover expenses incurred while conducting BlueScope business, including reasonable expenditures for entertainment. Use

of Company credit cards for personal expenditure is not permitted.

Misuse of Company funds or property

Instances of fraud, misappropriation or misuse by their very nature represent unacceptable behaviour and should on all occasions be reported.

BlueScope considers fraud to consist of dishonest acts or omissions made with the object of obtaining money or other benefits, or of evading a liability. Misappropriation includes, for example, theft of cash or any other Company asset (including information), or the unauthorised taking of any benefit at the Company's expense, by any persons.

Apart from fraud and misappropriation, it is possible to misuse Company resources or funds in other ways including using Company resources or funds in a manner which is inconsistent with the purpose for which they are made available to the employee.

Practically, misuse of Company resources or funds will be viewed in the same manner as fraud or misappropriation.

Among other things, unauthorised removal of Company equipment, supplies, or other resources is regarded as theft. Similarly, Company resources must not be sold, loaned, or donated without management approval.

Also, employees should take appropriate precautions to prevent theft, damage, or misuse of Company resources. For example, unattended buildings, storage areas and Company vehicles should be locked when they are not in use.

Relevant policies and guidelines

- Guidelines for Reporting and Responding to Suspected Business Misconduct
- Financial Governance Framework and Related Policies

Conflicts of Interest

Avoid conflicts with personal interest

Employees should not engage in activities or hold or trade assets that involve, or could appear to involve, a conflict between their personal interests and the interests of BlueScope (i.e. conflict of interest), without full disclosure to, and the approval of, an appropriately authorised manager.

Circumstances of this kind could compromise or appear to compromise the employee's ability to make impartial business decisions.

In particular:

- Neither employees nor their immediate family members should hold positions, or have relationships with, or interests in a competitor, customer, partner, or supplier of BlueScope that would create a conflict of interest. Conflicts of interest would not usually arise out of merely holding shares in such a company that is listed on a stock exchange. However, conflicts would arise if, for example, an employee had shares in a family company that was a supplier to BlueScope and the employee was able to influence decision-making regarding the award of contracts to that company.
- Other than in exceptional circumstances where particular arrangements may be authorised, no employee should be in a position of influence regarding the employment conditions (e.g. work assignment, compensation, etc.) or performance assessment of a family member.
- Employees should not take additional employment with outside organisations or operate their own business if the employment or activity will create an actual or perceived conflict of interest (e.g. employment with a competitor, customer, or supplier).

Employees must advise their supervisor or manager of situations that could involve an actual or perceived conflict of interest and remove themselves from any discussion or activity involving the conflict. It is the supervisor or manager's responsibility to ensure that the matter is properly reviewed, including whether it is appropriate for the employee to engage in any discussions or activities that involve the conflict.

Profiting from your position with the Company

Business opportunities may arise as a result of an employee's access to Company property or information or because of the employee's position within the Company. Third parties may approach employees with business opportunities because of an expectation that the Company has the resources and commercial interest to pursue the opportunity. Alternatively, an employee may identify a business opportunity in the course of, or as a consequence of, their position with the Company.

Business opportunities of this sort belong to the Company and employees must not seek to take advantage of Company property, information or their position within the Company, or business opportunities arising from these, for personal gain or to compete with the Company.

Relevant policies and guidelines

- Guidelines for Reporting and Responding to Suspected Business Misconduct
- Securities Trading Policy

Travel, Entertainment and Gifts

The BlueScope Intranet has detailed policies on Travel, Entertainment and Gifts. Employees should become familiar with these policies. A brief description of the policies on Travel, Entertainment and Gifts is set out below.

Travel

Employees are to conduct travel and entertainment in accordance with this guide and relevant Company and divisional policies.

Safety and security standards should be adhered to at all times and employees should familiarise themselves with BlueScope's Asset Protection Policy and the detailed guidelines set out in the travel section of the BlueScope Intranet prior to travel.

Employees should use the contracted suppliers of domestic and international travel, transport and accommodation. Any private travel attached to business travel is to be approved prior to bookings being made. Spouse or companion accompaniment at Company expense is only allowable in special circumstances and with the prior approval of a member of the Executive Leadership Team.

Entertainment

On occasion, employees will be required to entertain clients and business associates. Valid entertainment expenses include meals and events such as theatre and sporting events taken with potential or actual clients where a business discussion takes place during, immediately before or immediately after the event. This entertainment is dependent upon the existence of a business relationship which could benefit the Company. When more than one employee is present at a business meal or entertainment event, then the most senior officer must pay and claim the expense. Employees in the same location should not entertain each other and expect the Company to pay the expenses.

Gifts

Employees must exercise the utmost care about giving or receiving business-related gifts. This applies to direct payments and payments in kind, including the provision of cash, cash equivalents such as gift cards, goods or services, personal favours and entertainment (e.g. meals, travel, etc.). Any offer of free travel and/or accommodation is to be declined other than in exceptional circumstances with the prior written approval of a member of the Executive Leadership Team (ELT) or in the case of a member of the ELT, with the approval of the Managing Director or the Chairman. If there is a valid business purpose to attend, then BlueScope is to pay any travel and/or accommodation costs. The giving or receipt of cash gifts is not acceptable in any circumstance.

Accepting or offering gifts of moderate value is acceptable in situations where it is legal and in accordance with local business practice (i.e. where the exchange of gifts is customary and the gifts are appropriate for the occasion).

However, employees must not give or accept gifts of any kind in circumstances that could be reasonably regarded as unduly influencing the recipient or creating business obligation on the part of the recipient. If there is any doubt, the situation should be referred to management.

It is important not to give any impression that there may be an improper connection between any gift or hospitality and business opportunities. Ensuring your supervisor is aware of any gifts or hospitality you receive promotes transparency and avoids any suggestion of a conflict of interest.

Where our businesses have introduced a policy requiring employees to register gifts received or given, employees in those businesses should ensure they comply fully with those policies.

Travel, Entertainment and Gifts

Relevant policies and guidelines

- Travel, Entertainment and Gifts Policy
- Travel, Safety Policy
- Asset Protection Policy

Giving and Receiving Inappropriate Payments, Financial Inducements, Facilitation Payments and Political Contributions

Financial Inducements

Employees may sometimes come under pressure to make payments or payments in kind to induce others improperly to grant permits or services to which BlueScope would not generally be entitled. Employees must never make or agree to these payments.

Under no circumstances will BlueScope approve any irregular payment or payment in kind to win business or to influence a business decision in the Company's favour. The Company will not tolerate bribes, "kick-backs", secret commissions and similar payments. Moreover, they may expose BlueScope and relevant employees to criminal prosecution and serious penalties under laws of other countries, as well as those of the country in question. This policy extends beyond Company employees to people engaged to represent the Company.

Bribery is unlawful in most countries. There are potential serious consequences, including imprisonment, in the case of payments to public officials or employees of state-owned business.

Facilitation Payments

It is not uncommon in some countries for employees to be asked to make relatively minor payments, more by way of a gratuity, to lower level officials or government employees. These payments (sometimes called "facilitation payments") are sought to expedite routine services or administrative actions provided or performed by those individuals. BlueScope is opposed to making payments of this kind, and every effort should be made to resist them except in circumstances where an employee's personal safety is compromised.

If any doubt exists, guidance should be obtained from senior management in the relevant business unit, as well as a member of the BlueScope legal team if necessary.

Political Contributions

BlueScope's policy is not to contribute funds to any political party, politician or candidate for public office. However, the Company or individuals representing it may incur costs for attendance at events hosted by a political party for briefing purposes or for the purpose of meeting and having dialogue with political figures which contributes to the public debate of policy issues that may affect the Company in the countries in which it operates.

Relevant policies and guidelines

- Guidelines for Reporting and Responding to Suspected Business Misconduct
- Political Donations Policy

Use of Third Parties and Agents

Business practices or other conditions in certain countries require the use of agents or third parties to represent BlueScope's interests. In many cases these representatives can arrange negotiations and services more efficiently than otherwise might be possible.

These representatives may be employed, for example, in relation to the marketing of BlueScope products or the development of domestic investment opportunities. They must be carefully chosen because improper conduct could damage BlueScope's reputation and expose the Company and individual employees to legal or other sanctions.

The following steps must be taken before appointing a representative:

- the representative's reputation and qualifications should be thoroughly checked. There should be no history of improper business practices and no relationships should exist that could improperly influence decisions;
 - BlueScope's commitment to anti-bribery and opposition to corruption and its expectation that its representatives adhere to this same standard should be communicated to and accepted by any representative;
 - BlueScope's policy on financial inducements should be communicated to and accepted by the representative;
 - legal requirements governing the representative's use of agents and third parties should be investigated to ensure that the proposed arrangement complies with all applicable laws;
- the proposed fee should be reviewed to ensure that it is reasonable for the services being rendered and that it does not provide incentives to act improperly. Any payment to a representative for services provided in connection with obtaining an order or benefit for BlueScope or a subsidiary must be no more than an amount that would be openly payable by local commercial standards;
 - adequate performance monitoring against agreed Guidelines should be in place to ensure that the representative meets BlueScope's expectations regarding business conduct and commercial performance at all times; and
 - exit procedures and confidentiality undertakings should be established to enable the arrangement to be terminated quickly in the event of improper or ineffective performance, and the protection of BlueScope's confidential information.

Management approval is required before finalising representative arrangements. If in any doubt about the use of representatives, employees should raise their concerns with a higher level of management. If there is any doubt about whether a proposed arrangement meets the criteria outlined above, or a representative is suspected of improper behaviour, the situation must be referred to the appropriate head of the relevant Business and a member of the BlueScope legal team for consideration.

Relevant policies and guidelines

- Guidelines for Reporting and Responding to Suspected Business Misconduct
- Regional policies on use of Third Party Agents

Trading in BlueScope Shares

BlueScope employees have the opportunity to share in the Company's success through participation in one of the employee ownership share plans or through direct purchases. However, employees who hold BlueScope shares may be restricted from trading them and may be subject to the laws prohibiting "insider trading".

BlueScope has a Securities Trading Policy. This prohibits trading in BlueScope shares for most of the year by Restricted Persons (essentially, executives, direct reports to executive leadership team members, directors as well as specified others). If an employee is uncertain whether or not he or she is a Restricted Person and if so whether or not a share trading blackout period is in force, he or she should consult the Securities Trading Policy or a member of the BlueScope legal team.

Insider trading essentially prohibits share trading on the basis of "inside information", which is information not generally available, and if it were generally available, would have a material effect on the price of BlueScope shares. In some instances it could also extend to the shares of BlueScope's ASX-listed competitors, customers, partners (including joint venture partners) or supplier companies.

Generally, an employee must not buy or sell shares, or arrange for another person to do so, if the employee has "inside information". Employees must also avoid passing on "inside information" to others.

The "insider trading" laws are complex and extensive, and also provide a number of exceptions to the prohibition against insider trading.

Questions of what is "inside information" or when might the insider trading prohibitions apply are matters for legal advice. Employees with further questions should consult the Securities Trading Policy or a member of the BlueScope legal team.

Relevant policies and guidelines

- Securities Trading Policy

Where to Go for Assistance

Getting further information or advice

If you have questions concerning a particular business conduct issue, or what the Company's policy is in relation to a particular area, you should first consult this Guide. The BlueScope Intranet sets out in further detail of specific policies which have been referred to in this Guide.

If there is an issue which requires advice, you should first consult your supervisor or manager. If necessary, your supervisor or manager will be able to direct you to the person within the Company best able to address the issue. If you are unable to discuss the matter with your supervisor or manager, you should:

- address the issue to the person within the Company with responsibility for the specific subject area; or
- contact the Business Conduct Reporting Hotline (contact details set out below).

Business Conduct Reporting Hotline

The Business Conduct Reporting Service ("Hotline") is a facility managed externally by Deloitte Digital. The Hotline does not have caller identification and the source of the call will not be traced. Anonymous calls will be accepted by the Hotline. However, employees are encouraged to identify themselves. Contact may be made to the Hotline either from within or outside Australia.

Reports can be made through the following channels:

Online

www.bluescopesteelconducthotline.com

User Name: bluescope

Password: Password1!

The website username and password will be posted on the BSL Intranet and may be changed periodically.

Telephone

Open 24 hours a day. You will be provided with the option of leaving a recorded message in a foreign language, or be connected to an operator who will ask you a series of questions about the suspected misconduct. Contact details are:

Australia	1800 052 122
USA	1855 212 2675
NZ	0800 563 465
Singapore	800 6167 065
Vietnam	+61 3 9667 3613 (not toll free)
Thailand	0018 0061 12804
Malaysia	1 800 81 6577
Indonesia	001 803 61 001
North China	108006100449
South China	108002611371

Anonymous calls will be accepted by the hotline and will be acted upon to the extent possible.

Experience shows it can be difficult to fully investigate anonymous calls if information is limited. It is therefore useful for the investigation team to be able to communicate with the Caller. To assist with this, all Callers will be provided with a unique reference number and will be encouraged to call back so that they may have the opportunity to provide any further information and may be kept informed of how their disclosure is being progressed.

Email

You can send an email to:

bluescopesteel@deloittedigital.com

Where to Go for Assistance

Post

You can send a letter to:

BlueScope Business Conduct Reporting Hotline
Reply paid 12628
A'Beckett Street, Melbourne VIC Australia, 8006

What is a business conduct issue?

It is often difficult to recognise when there is a business conduct issue, especially at work where interaction with other employees, different perspectives and business pressures can override awareness of some of the risks associated with decisions.

If you have any doubts about the appropriateness of your behaviour, ask yourself the following questions before you act:

- is my behaviour, or the decision I am about to make, in line with Our Bond and BlueScope's values?
- could my behaviour directly or indirectly cause injury or endanger anyone's health? (In this case, do not take the action creating the risk.)
- would my behaviour comply with all relevant laws and regulations?
- would my behaviour violate any Company policies or standards?
- would this behaviour make me feel uncomfortable or uneasy?
- could I feel comfortable telling my work colleagues, family and friends about my behaviour?
- how would this behaviour appear to others if it was described in the newspaper headlines or on the television news?

Violations of company policies, guidelines and standards

All employees are expected to adhere to the Company's policies, guidelines and standards. Employees who violate these policies or standards may be subject to disciplinary action up to and including dismissal.

If the situation involves a violation of law, the matter may also be referred to the appropriate law enforcement authority for consideration. Supervisors and managers will be held accountable not only for their own business conduct but also that of their staff.

If any employee becomes aware of, or suspects that there has been, non-compliance with the Company's policies or guidelines, the employee must report the instance immediately to their line manager or the Business Conduct Reporting Hotline (contact details set out above).

The procedure that will be followed to investigate and respond to suspected business misconduct is set out in the Guidelines for Reporting and Responding to Suspected Business Misconduct. Those Guidelines set out the responsibilities of employees, managers, the Business Conduct Panel, the Hotline operator and BlueScope's human resources team in reporting, handling and responding to allegations of suspected business misconduct.

Employees who, in good faith, report instances of non-compliance by employees with BlueScope's policies and guidelines, will not be subject to any retaliatory or discriminatory action.

Where to Go for Assistance

Employees who harass other employees who report non-compliance will be subject to disciplinary action, up to and including dismissal.

The Guidelines for Reporting and Responding to Suspected Business Misconduct provide details about the protections that BlueScope offers to employees who make disclosures of suspected misconduct.

Business Conduct Panel

Responsibility for the implementation of the Company's business conduct policies and standards lies with line management. To support the effective implementation, BlueScope has established the Business Conduct Panel.

The Business Conduct Panel's objectives are:

- to support high standards of ethical conduct consistent with Our Bond ;
- to provide a mechanism for sharing experience across the Company in relation to business conduct issues; and
- to regularly review this Guide and, when necessary, modify it or produce supplementary guidance.

The Business Conduct Panel is sponsored by and reports to the Company Secretary and comprises the Corporate Counsel Governance, Group Financial Controller and VP Internal Audit, together with the nominated executive representatives from the Business Unit(s) in relation to which the allegation has been made.