1. OVERVIEW

Many countries have laws prohibiting making offers or payments, and giving gifts or other things of value to government officials to influence their actions. Many countries also have laws that prohibit people and companies from engaging in corrupt conduct even when it is committed outside the country. These prohibitions often also include bribes to private parties, as well as bribes to government officials.

BlueScope is committed to operating within the law wherever it does business and in a way that is consistent with “Our Bond” and the Company’s “Guide to Business Conduct”. This policy supplements those company documents by providing more specific guidance and additional governance requirements in relation to bribery and corruption.

2. WHAT IS BRIBERY & CORRUPTION?

“Bribery” is the offering of money or other incentives to persuade somebody to do something, especially something dishonest, illegal or improper.

“Corruption” is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption generally involve the undue influence of an individual(s) in the performance of their duty whether in the public or private sector.

“Facilitation payments” are unofficial payments (usually involving a small amount of money) to a government official to secure or expedite a routine transaction or service to which an individual or company is entitled.

“Government official” includes:

- an official or employee of a government, government agency, government owned enterprise or regulatory authority;
- an official or employee of a political party, or a political candidate;
- any official or employee of an international public organisation
- a member of the judiciary
- an individual who holds or performs the duties of an appointment, office or position created by custom or convention; or
- a person who is, or holds themselves out to be, an authorised intermediary of a government official.

3. KEY REQUIREMENTS FOR ALL EMPLOYEES

You must not commit, or be a party to, or be involved in bribery or corruption.

You must not offer or make facilitation payments directly or indirectly.

Payments which would otherwise be prohibited, may be made in circumstances where your personal safety is compromised. Any such payments must be reported as quickly as reasonably practicable to the Executive Leadership Team (ELT) member responsible for that group business or function.
Gifts, entertainment, travel and per diem reimbursements must not be given or received in circumstances where they could reasonably be regarded as reward or encouragement for preferential treatment. Offers of free travel and/or accommodation must be declined other than in exceptional circumstances with the prior written approval of a member of the ELT (or in the case of a member of the ELT, with the approval of the Managing Director or the Chairman). Subject to these prohibitions and to specific business or country policy requirements, you may accept or offer token gifts 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). Ensuring your supervisor is aware of any gifts or hospitality you receive promotes transparency and avoids any suggestion of a conflict of interest. Other requirements relating to gifts and entertainment are included in the company’s Guide to Business Conduct. If there is any doubt, the situation should be referred to your line manager. Determination of value and local business practice is country specific and is relative to the average local income and standard of living.

You must not contribute funds to any political party, politician or candidate for public office. Incurring reasonable costs for attendance at an event hosted by a political party is permitted only where:

- the event is for briefing purposes or for the purpose of meeting and having dialogue with political figures which contributes to the public debate on policy issues that may affect BlueScope; and
- such payment is approved by a member of the ELT.

You must not make charitable donations or sponsorships that could be perceived as bribes or payments to gain an improper business advantage.

You must not use an agent, consultant, contractor, advisor, business partner or other third party representing the interests of the Company (each a “Representative”) to do something that BlueScope is prohibited from doing itself, nor give anything of value to a Representative when there is a material risk that the Representative, in turn, will engage in prohibited conduct on BlueScope’s behalf. You must also ensure that Representatives are aware of the Company’s policies and expectations with respect to bribery and corruption. Due diligence is required on all Representatives, suppliers and other service providers with whom business is conducted by the Company. The extent of due diligence should be proportionate to the risk associated with the relevant country and/or activity.

Payments to all third parties must only be made to the contracting party in its home country, not to an offshore account or entity, other than with the prior written approval of the responsible ELT member.

Everyone at BlueScope has a responsibility:

- to be alert to warning signs in relation to bribery and corruption;
- to report actual or suspected violations of this Policy;
- to report any evidence that an agreement or arrangement with a third party lacks business integrity;
- to report any direct or indirect approach made to you that involves any activity relating to bribery or corruption; and
- to co-operate with any investigation or audit activities relating to matters covered by this Policy.

The primary reporting requirement is to your line manager, however if you feel that it would be inappropriate to report the matter to your line manager, you must report the matter to another member of management whose position is uncompromised and whose is more senior than you, or through the Company’s business conduct reporting service/hotline. Details of the Company’s business conduct reporting service are included in section 6 below.
All business records created and maintained by BlueScope must accurately reflect the underlying transactions and events. You must not be knowingly involved in falsifying, concealing, destroying or otherwise tampering with information, or creating misleading information.

You must complete any business conduct and specific bribery and corruption training directed by the Company.

4. KEY REQUIREMENTS FOR MANAGERS

You must take all reasonable steps to ensure that the people for whom you are responsible:

- are aware of and uphold the requirements of this Policy; and
- are aware of the mechanisms for reporting actual or suspected breaches of this Policy including the Company’s confidential business conduct reporting service referred to in section 6 below.

You must respond promptly and seriously to employees’ allegations, legitimate concerns and questions about bribery and corruption or other aspects of this Policy.

You must ensure that all allegations or suspected instances of bribery and corruption or other actual or suspected breaches of this Policy which you become aware of are escalated and reported in accordance with the Company’s Guidelines for Reporting and Responding to Suspected Business Misconduct, including by logging details on the Company’s business conduct reporting service (see section 6 below).

5. KEY REQUIREMENTS FOR ELT MEMBERS

You should take reasonable steps to ensure that:

- This Policy and other corporate requirements relating to bribery and corruption are accessible and understood by all employees.
- Existing systems such as performance management processes, employment and supply contracts, induction and industrial agreements are aligned with the requirements of this Policy.
- Policies, processes and procedures are in place to support compliance with this Policy and to assist in the prevention and detection of corruption. At a minimum, it is expected that all Group businesses have policies which are consistent with this Policy, covering:
  - gifts;
  - hospitality, entertainment and other expenses;
  - travel (including customer travel);
  - procurement processes;
  - attendance at political events;
  - charitable donations and sponsorship;
  - use of Representatives (including agents).

Depending on the level of corruption risk in a particular business or region, additional policies and procedures may be required.

- Investigation of allegations of suspected breaches of this Policy are carried out in accordance with the Business Conduct Investigation Protocols.
- In relation to dealings with Representatives (including agents) of the organisation that all contracts are in writing, reviewed by the Legal Team and on commercial terms.
6. BUSINESS CONDUCT REPORTING SERVICE

**Reporting Channels**

<table>
<thead>
<tr>
<th>Website Details</th>
<th>Email Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://www.bluescope.com">www.bluescope.com</a></td>
<td><a href="mailto:bluescope@deloitte.com">bluescope@deloitte.com</a></td>
</tr>
</tbody>
</table>

**Post Details**

BlueScope Business Conduct Reporting Hotline
Reply Paid 12628
A’Beckett Street
Melbourne VIC 8006
AUSTRALIA

**Hotline Telephone Contact Details**

<table>
<thead>
<tr>
<th>Country</th>
<th>Contact Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia</td>
<td>1 800 81 6577</td>
</tr>
<tr>
<td>Indonesia</td>
<td>001 803 61 001</td>
</tr>
<tr>
<td>North China</td>
<td>10 800 6100 449</td>
</tr>
<tr>
<td>South China</td>
<td>10 800 2611 371</td>
</tr>
<tr>
<td>Australia</td>
<td>1800 052 122</td>
</tr>
<tr>
<td>USA</td>
<td>1 855 212 2675</td>
</tr>
<tr>
<td>NZ</td>
<td>0800 563 465</td>
</tr>
<tr>
<td>Singapore</td>
<td>800 6167 065</td>
</tr>
<tr>
<td>Vietnam</td>
<td>+61 3 9667 3613 (not toll free)</td>
</tr>
<tr>
<td>Thailand</td>
<td>0018 0061 12804</td>
</tr>
</tbody>
</table>

7. BUSINESS CONDUCT PANEL

In addition to its role in overseeing investigation of specific allegations of bribery and corruption, members of the Company’s business conduct panel will meet quarterly to:

- share lessons learnt
- discuss best practice; and
- consider relevant regulatory developments.

Where relevant and material, the Panel will report matters discussed to the ELT and/or the ARC (as part of the quarterly Business Conduct Report).

8. DISCIPLINARY PROCEDURES

Disciplinary action will be taken, up to and including dismissal, for breaches of the requirements of this Policy, including for failure to report a breach, execute a required certification, co-operate with audit, or perform adequate due diligence. If the situation involves a violation of law, the matter may also be referred to the appropriate law enforcement authority for consideration.

9. OTHER RELEVANT BLUESCOPE’S POLICIES AND PROCEDURES

The following corporate policies and procedures are also relevant, at least in part, to avoiding bribery and corruption:

<table>
<thead>
<tr>
<th>Key policies and procedures</th>
<th>Location</th>
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</thead>
<tbody>
<tr>
<td>Guide to Business Conduct</td>
<td>Business Conduct link on your intranet home page</td>
</tr>
<tr>
<td>Guidelines for Reporting and Responding to Suspected Business</td>
<td>Business Conduct link on your intranet home page</td>
</tr>
</tbody>
</table>
### Key policies and procedures

<table>
<thead>
<tr>
<th>Misconduct</th>
<th>Business Conduct Investigation Protocols</th>
<th>Risk Management Policy and Process</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Business Conduct link on your intranet home page</td>
<td>Corporate Intranet: Corporate Governance/Risk</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Key policies and procedures</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anti-Bribery &amp; Corruption Policy and Procedure</td>
<td>Management</td>
</tr>
</tbody>
</table>

There are also business specific and regional policies which people need to be aware of and comply with.