

SPEAK UP POLICY

ADDITIONAL PROTECTIONS

BlueScope is committed to supporting and protecting anyone who speaks up to report a genuine concern that BlueScope or any of its people have engaged, or are engaging, in improper, illegal or unethical conduct. In some countries where we operate, local laws impose specific obligations and give specific protections in relation to certain types of disclosures. The specific protections are set out below. If you would like more information about the protections available to you we encourage you to contact your local Ethics and Compliance representative, or ethics@bluescope.com.

AUSTRALIA

You may be entitled to specific protections under Australian law if you report misconduct concerns in Australia, or which relate to our Australian operations.

To qualify for protection under Australian law, the report must be made to:

- Your [local Ethics and Compliance representative](#);
- The Ethics & Compliance team, who may receive disclosures via ethics@bluescope.com;
- A member of the BlueScope Board;
- A member of the Executive Leadership Team;
- An auditor, or member of an audit team conducting an audit of BlueScope;
- An actuary of BlueScope;
- Australian Securities and Investments Commission (ASIC) or the Australian Prudential Regulation Authority (APRA); or
- A legal practitioner for the purpose of obtaining legal advice or legal representation in relation the operation of the whistleblower provisions in the Corporations Act or the Tax Administration Act.

If your concern relates to a breach of any Australian tax law or misconduct in relation to BlueScope's tax affairs the report may also be made to:

- The Commissioner of Taxation;
- a registered tax agent or Business Activity Statement (BAS) agent engaged by BlueScope; or
- any other employee or officer who has functions or duties that relate to the tax affairs of BlueScope.

DO I NEED TO BE A BLUESCOPE EMPLOYEE?

You do not need to be an employee of BlueScope to qualify for protections under Australian law. The following people may be entitled to these protections:

- a current or former officer (including a director or secretary);
- a current or former employee or contractor;
- a current or former supplier of goods or services (whether paid or unpaid) or an employee of a supplier; and
- a relative, including a dependant or spouse (or that spouse's dependants) of any of the above persons.

WHAT MUST THE REPORT RELATE TO?

To qualify for protection under Australian law, you must have reasonable grounds to suspect that the information being disclosed concerns misconduct or an improper state of affairs or circumstances in relation to BlueScope. This is very broad and includes (but is not limited to) breaches of Australian law and conduct that represents a danger to the public or the financial system.

If the report relates to a breach of any Australian tax law or misconduct in relation to BlueScope's tax affairs:

- if the disclosure is made to the Commissioner of Taxation, you must consider that the information may assist the Commissioner to perform his or her functions or duties under a taxation law in relation to BlueScope;
- if the disclosure is made to a BlueScope recipient, you must have reasonable grounds to suspect that the information indicates misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of BlueScope and that the information may assist the BlueScope recipient to perform functions or duties in relation to BlueScope's tax affairs.

You will not qualify for protection under Australian law if your report relates to a personal work-related grievance (as defined in the Corporations Act).

PROTECTIONS

Confidentiality

If you make a report that qualifies for protection under Australian law, your identity, or any information that is likely to lead to you being identified, must be kept confidential unless one of the following exceptions applies:

- you consent to the disclosure of your identity
- the disclosure is made to ASIC, APRA or a member of the AFP; or

- the disclosure is made to a lawyer to obtain legal advice or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act or the Tax Administration Act;
- disclosure of information about you (other than your identity) is reasonably necessary for the purposes of investigating the suspect misconduct, and all reasonable steps are taken to reduce the risk that you will be identified.

Any person who discloses the identity of a person who makes a qualifying report, or information that is likely to identify that person, commits an offence (subject to the exceptions noted above).

Protection from detriment

No one may cause any detriment, or threaten to cause detriment, to you on the basis that they believe or suspect that you or any other person made, may have made, proposes to make or could make a report that qualifies for protection. If you suffer detriment you may be entitled to compensation or other remedies under Australian law.

Any person who engages in detrimental conduct commits an offence.

Other protections

If you make a report that qualifies for protection under Australian law:

- you cannot be subject to any civil, criminal or administrative liability (including disciplinary action) for making the report;
- no contractual or other remedy may be enforced, and no contractual or other right may be exercised, against you on the basis of the report; and
- the information you disclose cannot be used against you in criminal proceedings or in proceedings for the imposition of a penalty – other than proceedings in respect of the falsity of the information.

EFFECTIVE DATE

1 July 2019