‘Doing the Right Thing’
Our Code of Conduct

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1 Introduction

OneSteel Manufacturing ("**we**" or "**us**") are committed to instilling and continually reinforcing a culture across the company of acting lawfully, ethically and responsibly. We expect you to be familiar with our values and commit to meeting the standards required of you.

These standards go beyond mere compliance with laws and regulations - **we expect you to do the right thing.**

They embrace the values which are essential to our continued success and involve acting with honesty, integrity and in a manner that is consistent with the reasonable expectations of investors and the broader community.

It includes being, and being seen to be, a 'good corporate citizen', for example by:

- acting with respect for human rights;
- creating a safe and non-discriminatory workplace;
- dealing honestly and fairly with suppliers, customers and each other;
- acting responsibly towards the environment; and
- only dealing with business partners who demonstrate similar ethical and responsible business practices.

This Code of Conduct ("**Code**") applies to anyone employed or engaged by a OneSteel Manufacturing, including employees (whether permanent, fixed-term or temporary), contractors, secondees, management, agents and directors ("**you**"). You are required to familiarise yourself with and act in accordance with the Code.

You are expected to act in accordance with the Code in all activities undertaken in the course of or in connection with your employment or engagement.

Contravening the Code may be considered misconduct and may result in disciplinary action up to and including the termination of your employment or other engagement with a OneSteel Manufacturing.

2 Purpose

This Code sets out the standards of conduct we expect of you.

The Code requires you to adhere to the law and our policies, as amended from time to time. The standards set out in this Code cannot, and do not try to, anticipate every situation which may raise a legal, ethical or moral issue.

You need to exercise sound judgment when evaluating an issue of business conduct. If you are in any doubt, you should seek advice before acting.

3 Code of Conduct Expectations

You must conduct yourself lawfully, and with openness, honesty, fairness, and integrity – to do the right thing.

This means that you must, in the course of or in connection with your employment or engagement with OneSteel Manufacturing:

a) behave in accordance with our stated values;
b) comply with all relevant laws and regulations, including but not limited to the criminal law, overseas laws where applicable, and laws that regulate competition and consumer protection, protection of the environment, workplace health and safety, anti-bribery and corruption, and tax.
c) comply with our policies, as updated from time to time;
d) comply with all lawful and reasonable directions given to you;
e) behave honestly and with integrity;
f) not engage in any form of bribery or corruption (including the offering or acceptance of gifts or hospitality in excess of the common courtesies associated with the ordinary and proper course of business);

g) treat everyone you interact with in your work with courtesy and respect, and not engage in bullying, discrimination, or harassment of any kind (including sexual harassment) or victimisation;
h) ensure that we provide a workplace that is psychosocially safe.
i) behave ethically and responsibly in your approach to business decisions, including ensuring that such decisions are made on commercial grounds, and that any information you gather in respect of our competitors is done in a lawful and ethical manner;
j) not improperly use our name or your position or authority with us for personal gain (or to gain an advantage or benefit for another person), or in work in competition with us;
k) take the highest level of care to ensure that financial integrity is maintained;
l) behave with due care and diligence in fulfilling the functions of your position;
m) disclose any actual, potential or perceived conflicts of interest and act in the best interests of OneSteel as a whole;
n) always comply with all relevant occupational health and safety legislation, regulations, and policies, and attend and undertake your work without being under the influence of drugs or alcohol;
o) protect any of our property under your control and not use such property for personal purposes, without our express and clear written prior approval; and
p) not engage in conduct which may affect the good reputation and integrity of OneSteel.

You are required to comply with our policies, as in place from time to time.

In particular, the following policies should be read in conjunction with the Code of Conduct:

a) Anti-Bribery and Corruption Policy;
b) Gifts, Hospitality and Sponsored Travel Policy;
c) Respectful Workplaces Policy;
d) Conflict of Interest Policy;
e) Occupational Health and Safety Policy;
f) Privacy Policy;
g) Whistleblower Policy;
h) Psychosocial Safety Policy.

4 Code of Conduct in practice

4.1 Reporting a breach of the Code

If you suspect that any fraudulent or unethical behaviour has occurred, or are concerned that any conduct by any director, officer or employee may be in breach of an applicable law or this Code, you have a responsibility to speak up. We would rather hear about issues early than let issues grow.

Actual or suspected breaches of this Code can be reported to Faircall on 1800 500 965, or Human Resources.

Some reports of breaches of this Code may be disclosures that qualify for protection under Australian Whistleblower Law. For further information, please see our Whistleblower Policy.

If we determine that it is appropriate to do so, we may investigate allegations of breaches of the Code. If we find that there has been a breach of the Code, appropriate disciplinary and remedial action may be taken, depending on the nature of the breach.

What constitutes appropriate disciplinary or remedial action will depend on the circumstances, and may include training, coaching, counselling, formal warnings, demotion and/or termination of employment.

We may inform relevant regulators and/or law enforcement bodies where we consider it is appropriate to do so.

Some reports of breaches of this Code may be disclosures that qualify for protection under Australian Whistleblower Law. For further information, please see our **Whistleblower Policy**.

4.2 Consequences for breaching the code

If we determine that it is appropriate to do so, we may investigate allegations of breaches of the Code. If we find that there has been a breach of the Code, appropriate disciplinary and remedial action may be taken, depending on the nature of the breach.

What constitutes appropriate disciplinary or remedial action will depend on the circumstances, and may include training, coaching, counselling, formal warnings, demotion and/or termination of employment.

We may inform relevant regulators and/or law enforcement bodies where we consider it is appropriate to do so.

4.3 More information

If you have any questions about the Code, please see the table below for who to contact.

If you have a question about…	**Contact**
Whether a proposed course of action could breach the Code.	Your immediate manager. If you are not comfortable speaking to your immediate manager about your query (for example, if they are asking you to do something you are not comfortable with or think may be in breach of the Code), please contact your HR Manager or Head of Legal.
You would like to report a breach of the Code.	Faircall on 1800 500 965 (for calls from outside Australia dial +61 2 9335 8785) Human Resources or Legal Team. Other eligible recipients are set out in the Whistleblower Policy.
You are unsure about the law or regulations in an area in which you work.	Legal or HR
You would like more information about the Code.	Legal or HR