



Code of Conduct
V02 July 2025

How We Work

**When we choose to do the right thing,
we strengthen and protect one another,
our communities and our business.**



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A message from the Managing Director and CEO

At BlueScope, choosing to do the right thing is important to all of us.



By making the choice to do what is right, each of us helps establish and sustain a work environment that reflects Our Purpose and upholds Our Bond.

This Code of Conduct outlines the principles that guide How We Work at BlueScope. It defines the ethical standards we adopt in our decision-making and lays out our responsibilities to preserve our reputation and strength as a business.

Please familiarise yourself with the Code of Conduct and ensure that you understand the expectations that apply to everyone who works at or on behalf of BlueScope. Regularly referring to this Code of Conduct will assist you in choosing to do the right thing and help you to navigate challenges with clarity and consistency.

If you notice something that doesn't seem right or if you feel our BlueScope values are not being upheld, please Speak Up.

Your voice is important and raising your concerns in a respectful and prompt manner will help BlueScope continue to deliver an ethical, supportive and safe environment for everyone.

As BlueScope continues to grow, transform and deliver, let's keep working together to do the right thing.

Mark Vassella
Managing Director and CEO

Message from the MD and CEO

Our Purpose

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Our Purpose

We create and inspire smart solutions in steel, to strengthen our communities for the future.

Our Purpose is why we exist, our reason for being. It sets the course for BlueScope and gives us the courage and the confidence to help deliver what matters to our communities around the world.

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Our Bond

Our Bond outlines the guiding principles strengthening our business. It identifies our key stakeholders, guides how we work together and conduct ourselves, and continues to be our benchmark for success and choosing to do what is right.

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 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 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 Local 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.

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We live our code

Topics

Know your responsibilities

Does it feel right? Take the Quick Test

Speak Up about your concerns

Take accountability



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Know your responsibilities

Doing the right thing is everyone's responsibility at BlueScope.

Who does this Code apply to?

This Code of Conduct applies to everyone who works at BlueScope, all around the world: officers, employees, contractors and third parties acting on behalf of BlueScope (our workers).

What is expected?

Throughout this Code of Conduct you will find information about 'Your Responsibilities' on specific topics.

But in all cases, it is your responsibility to:

- read and complete assigned training, understand and comply with this Code of Conduct;
- role model behaviour that is in line with this Code of Conduct, and pay attention to the safety and wellbeing of others;
- foster an inclusive environment where everyone feels safe to speak up without fear of retaliation;
- promptly report any incident, conduct or concern that is, or which might be, a breach of this Code of Conduct, BlueScope policies or the law;
- fully cooperate in any audits, assessments or investigations conducted or authorised by BlueScope; and
- support those who raise concerns and avoid conduct that breaches or puts confidentiality at risk.

Leaders and supervisors

Our leaders and supervisors are also expected to:

- demonstrate care for their team and colleagues, as well as themselves;
- encourage and exercise exemplary behaviour and ethical decision-making; and
- take action when a concern or potential issue is raised by workers. This includes giving timely feedback (if applicable) and pursuing appropriate consequences when warranted.

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Does it feel right?

This Code of Conduct sets out our expectations for how we work as we live Our Purpose and Our Bond. It helps us with making the right decisions. It helps us choose to do the right thing.

Choosing to do the right thing

We need to listen to ourselves when something doesn't feel right, or when we're unsure about something.

Our Quick Test will help you choose to do the right thing. If you answer 'no' to one or more of these questions, it probably doesn't feel right; and if it doesn't feel right, there's a good chance it isn't.

If you're still unsure, consult this Code of Conduct or speak to your manager.

Support is available

Support services, including Employee Assistance Programs (EAP) are available, free of charge, to all BlueScope workers and their immediate families. Through these services you can access professional advice to help cope with life's difficult issues. Refer to your local People team for further information.

Quick Test



Is it lawful?



Is it in line with Our Bond?



Do my instincts tell me it's right?



Would I feel comfortable saying or doing this in front of my family or friends?



If my decision appeared in a newspaper or online, would I feel comfortable?



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Speak Up » about your concerns

The BlueScope 'Speak Up' channels give you a choice of pathways to share your concerns or your knowledge about conduct or events that are not right or don't seem right to you.

You can access our [Speak Up policy here](#).

Your responsibilities

- You are expected to speak up as soon as possible if you believe that an action or decision is not right, or it is not in line with Our Bond, this Code of Conduct or any of our policies, standards, guidelines, procedures or the law.
- It is not okay to ignore these matters or walk past them.

Speaking up allows us to improve *How We Work*. It supports and protects our people and our business. It also helps BlueScope to understand issues so they can be made fixed.

What happens when I speak up?

All genuine Speak Up reports are taken seriously and are treated with appropriate confidentiality.

BlueScope does not tolerate any form of reprisal or retaliatory action for speaking up.

How can I speak up?

There are a number of Speak Up channels you can use to make a confidential report.

- » Talk to your manager
- » Talk to your Human Resources team
- » Talk to your local Ethics & Compliance representative
- » Send an email to ethics@bluescope.com, managed by BlueScope's Head Office in Melbourne, Australia
- » Contact BlueScope's externally managed reporting portal

On the internet:

www.bluescopesteelconducthotline.com

This site also provides instructions on how to lodge an online report or obtain details to make a report by ordinary post or fax.

Or by phone:

Australia - 1800 052 122
China - 400 963 6886
India - 000 8000 402 729
Indonesia - 001 803 61 001
Malaysia - 1 800 81 6577
Mexico - 01 800 123 9589
New Zealand - 0800 563 465
Singapore - 800 6167 065
Thailand - 0018 0061 12804
USA - 1 855 212 2675
Vietnam - 613 9667 3613

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Be accountable

Accountability fosters trust to create a more positive working environment for us all.

What happens if you breach the Code of Conduct, or any BlueScope policy?

If someone does not do the right thing BlueScope will hold the person or people involved to account for their wrongful actions.

However, BlueScope will always take context and circumstances into consideration. This means that if a breach occurs that cannot reasonably have been foreseen, we will not blame our workers.

BlueScope is committed to:

- educating all workers on BlueScope values and about their responsibilities, including under this Code of Conduct;
- making BlueScope policies available through the global and regional policy centres;
- providing workers with a variety of channels to ask for help or support, or to report concerns they may have about business or people conduct; and
- following the principles of procedural fairness throughout all investigations into events, issues or the conduct of any worker.

But...

BlueScope will take action, which may include disciplinary action up to and including termination of employment:

- for any unauthorised actions, or any intentional, reckless or serious breach of a BlueScope policy, guiding document, obligation or the law;
- if there is a pattern of breaches and the person or people involved are failing to learn from their mistakes, or are not committed to changing their behaviour; and
- for concealment of breaches, for neglecting to make reasonable inquiries or for deliberate ignorance.

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We are committed to health and safety

Topics

— Make your own and others' health, safety and wellbeing your priority



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Make your own and others' health, safety and wellbeing your priority

Our people are our strength, and that strength starts with our health, safety and wellbeing.

Your responsibilities

- Always follow BlueScope's HSE procedures and report anything that poses a risk to health and safety.
- Everyone is expected to demonstrate genuine care for others. If you are in a leadership or supervisory role, you particularly need to pay attention to the mental and physical wellbeing of your team and take the appropriate actions when a health, safety or wellbeing concern is raised.



Useful documents

Health, Safety, Environment and Community Policy
Health, Safety and Environment Standards
Alcohol and Other Drugs Policy

We recognise that work influences your health, safety and wellbeing. The influence is positive when together we effectively manage our physical and mental wellbeing at work.

BlueScope's integrated Health, Safety and Environment (HSE) management system exists to keep our people healthy, safe and well: our workers, our suppliers, our customers, our visitors, and the communities in which we work.

If you are in a leadership or supervisory role, you must ensure that all workers at our sites are made familiar with our HSE hazards, risk controls and procedures.

Act on health and safety incidents, risks and opportunities

Everyone at BlueScope has a role to play in empowering and supporting each other to identify risks, verify that our risk controls are effective and drive improvement opportunities to keep all our workers safe and well.

We expect our workers to be proactive about health and safety. Ask yourself: "Does this situation present a health and safety risk, or a risk to wellbeing, for me or others?"

If the answer is yes, or maybe, you have a responsibility to act.

Choose to do the right thing

Always

- ✓ Talk to your manager if you feel either physically or mentally unfit to work.
- ✓ Follow identified critical work procedures and only operate equipment when competent and authorised to do so.
- ✓ Assess situations for risks to health, safety and wellbeing, and immediately talk to someone if you notice they are not working safely.
- ✓ Be truthful during incident investigations and keep an open mind if questioned about whether your actions are safe.

Be prepared to have conversations

Safeguarding the health, safety and wellbeing of others means being prepared to have potentially uncomfortable conversations. Everyone needs to be open to providing, and receiving, constructive feedback.

If you notice something that's not in line with our HSE standards and/or has the potential to have an adverse impact on yours or others' wellbeing, no matter how small the issue may seem, you need to speak up.

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Never

- ✗ Knowingly act in a way that endangers yourself, others, equipment, or the environment. This includes attending work or operating equipment when under the influence of alcohol and/or drugs.
- ✗ Stay silent when procedures, processes, or instructions don't make sense.
- ✗ Assume someone else will report a health, safety or wellbeing risk.
- ✗ Abuse or threaten anyone with violence or have unauthorised firearms or other weapons at work.

We treat people with dignity and respect

Topics

Create diverse, inclusive and respectful workplaces

Respect human rights



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Create diverse, inclusive and respectful workplaces

We recognise and value the different skills, experiences, perspectives, and backgrounds that our people bring to BlueScope.

We're committed to providing a work environment where all workers on our sites feel they belong, are valued and accepted and can make a meaningful contribution to living Our Purpose.

Your responsibilities

- If you see or hear any behaviour that is inconsistent with what is outlined on this page, you must act. Support others in seeking help, including by making a confidential Speak Up report if needed.
- You are expected to always behave professionally and respectfully, with your co-workers and everyone else that you may interact with in the workplace.



Useful documents

Inclusion and Diversity Policy
Human Rights Policy
Speak Up Policy

We expect all people to be treated equally and have equal opportunities to grow, both personally and professionally, because it diversifies and strengthens their experience and leads to sustained business success.

Care for one another

BlueScope expects our workers to be proactive in looking out for the interests of others in the workplace.

Diversity is celebrated

We embrace diversity in all its forms by sharing knowledge, working collaboratively and being open to new ideas.

Clarity on responsibilities and provision of feedback

Everyone, but especially those in a leadership or supervisory role, needs to be clear in setting expectations to facilitate commitment and accountability.

We listen to and observe others to make sure they are feeling okay with their workload. We give and receive meaningful and respectful feedback.

Choose to do the right thing

Always

- ✓ Act fairly, consistently and respectfully with all people.
- ✓ Check if someone is okay if you think they may not be.
- ✓ Support new starters and help them understand our behavioural expectations.

No tolerance of bullying or harassment

Respectful behaviour is core to who we are at BlueScope and is aligned to Our Bond, and we are all responsible for meeting this standard.

BlueScope does not tolerate bullying, discrimination, intimidation, harassment, victimisation, vilification or offensive behaviour. All genuine complaints are treated seriously, and BlueScope supports and protects those who speak up.

Statement on sexual harassment

Everyone has the right to a safe and respectful workplace, free from all forms of sexual harassment and misconduct. BlueScope is dedicated to working towards preventing sexual harassment and discriminatory behaviour from occurring in the first place.

We will maintain the confidentiality of any reports of sexual harassment, whether experienced personally or witnessed in the workplace. We are committed to providing support and protection for any workers impacted.

We will continue to foster a culture where respect is paramount, and every worker feels supported and empowered.

Never

- ✗ Engage in conduct that could make a person feel disrespected or excluded.
- ✗ Disregard an idea or opinion because it is different from your own.
- ✗ Dismiss or make excuses for poor behaviour. We are all expected to follow the same rules, regardless of seniority.

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Respect human rights

BlueScope is committed to respecting and upholding human rights wherever we operate and throughout our supply chains.

We respect and support the dignity and human rights of all workers on our sites and believe that everyone must be treated fairly and without discrimination. We continue to work to ensure our business activities and practices are aligned with the United Nations Guiding Principles on Business and Human Rights.

We support the elimination of all forms of forced labour and the abolition of the worst forms of child labour.

We are committed to building awareness of human rights and have an established remediation process to guide our actions if issues are identified in our business or in our supply chain.

Our workplace

BlueScope is committed to providing workers on our sites with at least one full rest day per week. There are certain exceptions to this, such as planned maintenance and shut down periods, which require a thoughtful health and well-being plan and are only undertaken with the agreement of affected workers.

Our partners

We actively seek to partner with suppliers who share the core values expressed in Our Bond and the behaviours and standards in our Supplier Code of Conduct.

Your responsibilities

- If you believe any worker at BlueScope or in our supply chain is subject to treatment that is discriminatory, unfair or contrary to their human rights you need to speak up so the matter can be assessed, and if appropriate, addressed.

Choose to do the right thing

Always

- ✓ Report anything you believe could be in breach of someone's human rights or may involve forced labour.
- ✓ Monitor working hours for all workers on our sites.
- ✓ Treat contract workers with dignity and respect.

Never

- ✗ Engage contractors, suppliers or customers who do not share our commitments to human rights and addressing forced labour.
- ✗ Ignore a concern raised by workers.



Useful documents

Human Rights Policy
Supplier Code of Conduct

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Strengthen our communities

Be proactive in protecting the natural environment



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Strengthen our communities

Our communities are our homes; we work to strengthen them, creating opportunities for them to thrive.

Your responsibilities

- If you are contacted by a member of the community, you are expected to engage respectfully and pass on the information to your manager.



Useful documents

Strengthening our local communities guidelines

BlueScope is a prominent employer and partner in many of the communities in which we operate, and we support local economies.

We believe in respecting local values and communities' right to a safe and healthy environment.

Building sustainable partnerships built on trust

BlueScope partners with the communities in which our people live and work.

We look for opportunities for our people to volunteer or get involved in their community.

Responding to community requests and feedback

At BlueScope, we listen to members of the community when they have questions or raise concerns.

Choose to do the right thing

Always

- ✓ Promptly report any community complaints, feedback or requests to your manager so steps can be taken for BlueScope to respond.

Never

- ✗ Ignore a complaint, feedback or request from a member of the community or a community group.

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Be proactive in protecting the natural environment

We respect and strive to minimise the impact we have on the natural environment.

Your responsibilities

- We expect all our people to work together to help reduce our impact on shared resources such as raw materials, energy, greenhouse gas emissions and water.
- You must adhere to any procedures that have been established to protect the natural environment and be proactive in considering ways to minimise our impact.
- You are encouraged to get involved in our environmental recognition program.

Striving to minimise the impact we have on the environment means being proactive in our approach and using effective controls to eliminate hazards.

It also means that we are dedicated to using resources efficiently, preventing pollution and reducing the environmental impact of our operations, products and services.

Addressing climate change

We are committed to climate action and to embedding decarbonisation as part of our core business for a strong and sustainable future.

We expect all workers to work together to help reduce our impact on shared resources.

We also expect you to support any activities to lower our greenhouse gas emissions and be proactive in managing our climate risks and opportunities.

Choose to do the right thing

Always

- ✓ Minimise our environmental impact through prudent and efficient use of resources in all our operations, products and services.
- ✓ Take into account the concerns of our stakeholders, share lessons learnt and encourage practices that optimise environmental outcomes.
- ✓ Assess the environmental impacts, risks, controls and performance of contractors and suppliers before engaging them.

Going above and beyond

We encourage you to be proactive: go above and beyond. Think about ways we could improve our environmental management. Make suggestions and initiate discussions about responsible environmental management.

Leaving a positive environmental legacy is up to all of us.

Never

- ✗ Knowingly act in a way that endangers the environment or the communities in which we operate.
- ✗ Accept the exposure of people and the environment to risk.
- ✗ Assume that someone else will report an environmental risk or incident.



Useful documents

HSEC Policy, Standards and related Procedures

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- Compete fairly and lawfully
- Say no to bribery and corruption
- Take care when appointing third parties
- Safeguard BlueScope's ideas and innovations
- Use inside information lawfully and responsibly
- Represent BlueScope in the right way
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Compete fairly and lawfully

We are committed to complying with competition laws.

Your responsibilities

You are expected to promptly contact the Legal team:

- if you have any concerns that our conduct may breach competition laws, or a complaint is made to you about our competitive behaviour;
- if you suspect a competitor is acting in an anti-competitive way;
- before exchanging competitively sensitive information, directly or indirectly, with a competitor (outside of normal supply/acquisition arrangements with customers/suppliers);
- before executing any new cooperation arrangements with a competitor, including joint production, joint procurement marketing and shared logistics; or
- if contacted by a regulator about an issue related to competition.



Useful documents

Competition & Consumer Law Policy
Competition & Consumer Law Guiding Principles
Competition & Consumer Law Training & Tools
Business Unit Competition Law Standards and Guidelines

We compete vigorously but fairly and win customers on merit.

We avoid any form of engagement that would result in, or may create the appearance of, collusion between us and our competitors, or potential competitors.

All dealings with customers, suppliers and competitors are to be conducted with integrity, independence and in accordance with all aspects of applicable competition laws (also known as anti-trust laws).

Playing by these rules ensures BlueScope appropriately manages competition law risk. It also reinforces BlueScope's reputation and strengthens our standing in the markets where we compete.

Choose to do the right thing

Always

- ✓ Ensure all information you provide, or representations you make about our products and services, are accurate and can be substantiated.
- ✓ Act fairly and reasonably in all business dealings, including with those who have less bargaining power.
- ✓ Ensure that the values of any industry associations of which we are a member, align with Our Bond and our own publicly stated positions.

Our products and services

We proudly stand behind our products and services. When we engage with other parties, we deliver on product safety standards and provide consumer guarantees or warranties as required. We only make accurate and supportable claims in relation to our products and never act in a way that could be false or misleading.

We always work within appropriate terms and conditions of trade.

We avoid acting so harshly that it is against good conscience (also known as unconscionable conduct).

Never

- ✗ Communicate false or inaccurate information about BlueScope, our products or our competitors.
- ✗ Make, or attempt to make, deals or arrangements with competitors about how we, or they, engage with our consumers, suppliers or others.
- ✗ Seek to influence or control our customers' pricing.

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Say no to bribery and corruption

We conduct business with integrity.

Your responsibilities

- Never ask for, accept, offer or give bribes.
- Disclose any actual, potential or perceived conflicts of interest in accordance with your Business Unit Conflicts of Interest Standard.
- Handle gifts and entertainment transparently, maintain accurate records and make registrations in accordance with your Business Unit Gift and Entertainment Standard.



Useful documents

Business Unit Conflict of Interest Standard
Business Unit Gift and Entertainment Standard
Political Contributions Standard

Never accept or offer bribes

Bribery involves making or accepting an offer of something of value to improperly influence decision-making or the exercise of duties. It can occur when representatives of BlueScope deal with third parties or in dealings between BlueScope personnel.

BlueScope does not tolerate any form of bribery or corruption. Everyone must comply with all applicable anti-bribery and anti-corruption laws.

Manage conflicts of interest carefully

A conflict of interest occurs when your personal interests, actions or relationships affect, or appear to affect, your judgement, objectivity or independence in making business decisions. When making decisions, everyone is expected to act in BlueScope's best interest and avoid a conflict of interest to the extent possible.

In circumstances where you recognise that a conflict of interest may exist or arise, you must disclose it promptly by recording it in your local Conflicts Register and seek guidance on how to manage it.

Choose to do the right thing

Always

- ✓ Disclose any actual, potential or perceived conflict of interest in accordance with your Business Unit Conflict of Interest Standard.
- ✓ Register any gifts or entertainment you are permitted to give or receive in accordance with your Business Unit Gifts & Entertainment Standard.
- ✓ Use the [Quick Test](#) in this Code to help you determine if you are doing the right thing when confronted with a situation that is new or is not covered in a BlueScope policy, standard or guideline. Alternatively, you can always ask for help from your manager or a subject matter expert.

Take care when accepting or giving gifts and entertainment

An occasional gift or offer of entertainment is often viewed as a normal part of doing business, however it can create an actual or potential conflict of interest. You must always be mindful of the intention behind a gift or entertainment, and the perception it may create.

That's why BlueScope has established Gifts and Entertainment Standards for each Business Unit. Complying with the Standard that applies to you, including any restrictions, pre-approval and declaration requirements, will best protect you and BlueScope.

Political contributions

BlueScope will never endorse any political party, politician or candidate for public office. We may attend events hosted by political parties for economic briefing purposes, or to discuss matters affecting BlueScope. We may incur reasonable costs when we pay membership fees to attend such events, but these must be approved and disclosed in accordance with our Political Contributions Standard.

Never

- ✗ Give or accept cash or cash equivalents, such as gift cards or vouchers, to or from any external parties.
- ✗ Accept gifts or hospitality in return for an actual or perceived advantage, benefit, service or information.
- ✗ Give or accept anything of value during negotiations or tenders.

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Take care when appointing third parties

We engage with third parties who share our commitment to ethical and compliance standards.

Your responsibilities

- You must follow BlueScope's evaluation and onboarding processes and undertake an appropriate assessment of all potential third parties (including conducting any due diligence checks required) before engaging them.
- Convey our expectations to all third parties before they are engaged and obtain their commitment to meeting those expectations. This includes, where applicable, adherence to the principles in this Code and/or our Supplier Code of Conduct.



Useful documents

Global Third Party Engagement Policy
Global Third Party Due Diligence Procedure
Supplier Code of Conduct
Business Unit policy on the use of third party agents
Business Unit contract assessment tools

BlueScope may engage third parties when a legitimate business need has been identified.

Appointing the wrong third party could result in a contravention of sanctions or other laws or may cause harm to BlueScope's reputation.

For this reason, we carefully evaluate third parties we work with such as suppliers, agents, distributors and contractors.

Choose to do the right thing

Always

- ✓ Conduct an appropriate level of due diligence prior to engaging third parties and obtain required approvals.
- ✓ Ensure contracts clearly describe the purchase, transaction or cooperation, and stipulate the obligation for third parties to act ethically and comply with all applicable legislation and BlueScope policies.

How do we carefully assess any third parties?

To manage this risk, everyone must follow BlueScope's established third party onboarding processes.

This involves a careful evaluation of potential third party partners, including undertaking due diligence when appropriate, and ensuring our expectations of third parties are clear and agreed at the time they are engaged.

Never

- ✗ Turn a blind eye to abnormalities identified with third parties, e.g. unusual payment terms, negative media reports.
- ✗ Allow a third party to behave unlawfully, unethically or improperly on our behalf.

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Safeguard BlueScope's ideas and innovations

To get the most out of our hard work, we must identify and protect our intellectual assets, keeping them safe from unauthorised use.

Your responsibilities

- You must never transfer, delete, remove or share any of BlueScope's intellectual assets without approval.
- If you obtain approval to confidential information with third parties who are working with BlueScope, ensure you first obtain the appropriate approvals, and execute all necessary protocols or contracts.
- Even after you stop working for BlueScope, you must not retain or disclose any of BlueScope's intellectual assets.

We create valuable assets

At BlueScope we create ideas, inventions, innovations, ways of working, brands and other original solutions.

When we capture and protect these through patents, designs, copyright, trademarks and as confidential information, they become our intellectual assets. These assets help BlueScope, and our unique products, stand out in the market.

If you are unsure whether something is or could be a valuable intellectual asset, you can check by consulting our Global Intellectual Property Policy and by discussing it with your manager. When in doubt, keep it secure.

Some important things to know about intellectual assets

Intellectual assets you develop, or help to develop, while working for BlueScope are owned by BlueScope. Once you finish working with BlueScope you must never use any of these intellectual assets.

Sometimes when we're working with third parties, we need to share confidential information with them. If you do need to provide a third party with any confidential information, you must only share what is strictly needed by that third party to do their work and put in place proper protections before you do so.

It's important that we also show the same respect to the intellectual assets of others including our suppliers, contractors, customers and competitors.

Choose to do the right thing

Always

- ✓ Speak with your manager, a member of the Legal team or the Corporate IP team before sharing or disclosing any of BlueScope's intellectual property or other confidential information with someone outside BlueScope.
- ✓ Utilise BlueScope's standard contracts or obtain the Legal team's assistance if there is a need to depart from a BlueScope standard contract.

Never

- ✗ Keep copies of BlueScope documents once your employment with BlueScope ends.



Useful documents
Global Intellectual Property Policy

Message
from the
MD and CEO

Our Purpose

Our Bond

We live
our Code

We are
committed to
health and
safety

We treat
people with
dignity and
respect

We respect our
communities
and the
environment

**We protect
our business**

Use inside information lawfully and responsibly

Sometimes we have access to information about BlueScope, or third parties we deal with, that is considered inside information.

Your responsibilities

- You must never use inside information for personal gain. Information that you become aware of through your work at BlueScope must only be used so you can perform your role.
- Always consult the Securities Trading Policy before you buy or sell BlueScope shares. This will help you to understand whether you need to seek prior approval before taking any action.

We expect everyone at BlueScope to manage their knowledge of inside information lawfully and responsibly. Why? Because if this information were to be made available to the public, it could have a material effect on our share price or the share price of another company.

What is insider trading?

Insider trading is buying or selling shares of a publicly traded company by someone who has information that is not publicly available that could affect the share price of that company. This is against the law. We expect you to only use BlueScope's information (or that of third parties BlueScope may deal with) to the extent it is required to perform your job.

Inside information includes matters like trade secrets, budgets or financial information, large projects or transactions, changes to the business, including joint ventures, and material events like significant new contracts or potential litigation.

Choose to do the right thing

Always

- ✓ Inform your manager if you become aware of inside information that is not required for your role.
- ✓ Make sure you have read and understand BlueScope's Securities Trading Policy before buying or selling BlueScope shares.

How does this apply to me?

Insider trading laws apply not only to you but also to your friends and family. This is why it is important not share confidential company information with friends or family.

Additionally, certain roles at BlueScope are only allowed to trade shares in prescribed time periods because they are presumed to have access to inside information. You will be notified if you hold one of these roles. More information about this can be found in our Securities Trading Policy.

Never

- ✗ Share information about BlueScope, its partners, suppliers, customers and competitors that is not publicly available.
- ✗ Buy, sell or otherwise deal in BlueScope's shares or any other company's shares if you have inside information.
- ✗ Encourage someone else to buy, sell or otherwise deal in a company's shares based on inside information.



Represent BlueScope in the right way

We take pride in BlueScope and value the opportunity to represent it externally.

Your responsibilities

- You must contact Corporate Affairs or Investor Relations:
 - before engaging with investors, media, governments, or making comments publicly on behalf of BlueScope; or
 - If you receive and need to respond to a request for information from government or ministerial representatives.
- Exercise care when using social media and always be respectful.

There are protocols that help us to represent BlueScope in the right way when interacting with investors, media, governments, or making comments publicly. This includes using social media, speaking at conferences, or attending an external meeting on behalf of BlueScope.

As an employee, or contractor, of BlueScope, you are a representative of the business. As a publicly listed company, we are required to disclose information that is timely, accurate and complete so investors, and the public more generally, can make informed decisions.

So, to protect BlueScope and represent it in the right way, we must ensure that all information is accurate and not misleading. You must contact the Executive Affairs team or Investor Relations in the following circumstances:

- before having any contact with analysts and the investment community;
- for all site visits by investors and analysts;
- before making contact with media, or for all media requests or enquiries;
- before a public speaking engagement or conference presentation, if there is a potential for the activity to impact on perceptions about BlueScope at a Group level;
- for all requests for information from government or ministerial representatives.

Choose to do the right thing

Always

- ✓ Act responsibly when you are representing BlueScope.
- ✓ Identify yourself as a BlueScope representative if you refer to any of our people, products, services, competitors, customers or suppliers.
- ✓ Ensure all content you publish is factual and does not have the potential to negatively affect BlueScope, our people, our customers or business partners.

Using social media

We encourage the use of social media when our people use it in the right way, with sound judgement and common sense. If you are doing so as a representative of BlueScope, you must first speak with the Executive Affairs team or with Investor Relations.

We expect you to always exercise care when using social media, even in a personal capacity. Refrain from making misleading statements or sharing personal opinions that conflict with Our Purpose and Our Bond.

Even when you may not be referring to BlueScope directly, based on your profile, comments or social media posts, you may be seen as a representative of BlueScope.

Any inappropriate use of social media which damages the reputation of BlueScope, including personal posts on social or professional networking sites, video and photo sharing sites and forums is unacceptable.

Never

- ✗ Disclose or discuss information about BlueScope that is not publicly available.
- ✗ Engage with analysts and investment community without approval from Vice President Investor Relations.
- ✗ Comment on market or media rumours or speculation.



Useful documents

Continuous Disclosure Policy
Social Media Policy

Message from the MD and CEO

Our Purpose

Our Bond

We live our Code

We are committed to health and safety

We treat people with dignity and respect

We respect our communities and the environment

We protect our business

Protect our assets and maintain our records

We treat BlueScope's assets, resources and facilities with care.

Your responsibilities

- Only use BlueScope assets and resources for their intended purpose, and as required to do your job.
- Always maintain complete, accurate and timely business records.
- Maintain the confidentiality of confidential information.
- Ensure you only act within your delegated authority and seek approval for payments, transactions, travel and entertainment.



Useful documents

Financial Governance Framework
Corporate and Business Unit Delegations of Authority
Company Credit Card Policy
Global Business Travel and Entertainment Policy
Global Records Management Policy
Global Privacy Policy
Information Classification and Handling Standard

Assets and resources

We take all necessary precautions to safeguard our assets and resources including physical and non-physical property such as equipment, inventory, technology, money, data and confidential information.

Confidential information

Confidential information is any information that is not generally available to the public. Confidential information is an asset of BlueScope. That means:

- we only use confidential information to the extent required to do our job and only share it if there is a genuine need to do so;
- we don't disclose confidential information externally without first obtaining authorisation to do so, even if it is required by law or a legal process such as a court order;
- when sharing confidential information with a third party, we ensure that appropriate confidentiality obligations are in place; and
- confidential information is to be saved and stored only in BlueScope approved locations; this means that we do not save, copy or move our confidential information to public locations, send in email to our home email address or copy to an internet location that is not BlueScope's, without permission.

Choose to do the right thing

Always

- ✓ Protect BlueScope's assets from waste and damage.
- ✓ Prevent unauthorised personnel from accessing our facilities or assets.
- ✓ Securely store confidential information when away from your workstation.

Maintaining accurate business records

We maintain complete, accurate, timely and auditable records of all financial transactions in accordance with country-specific regulatory requirements and generally accepted accounting principles.

That means :

- we follow all financial controls and processes to minimise risk and protect BlueScope from fraud and loss;
- we ensure all BlueScope records, including financial, human resources, payroll and environmental records are accurate and are managed in accordance with our Global Records Management Policy and Privacy Policy;
- records need to be only stored in approved BlueScope locations and access to these records are only for the people that are authorised to and need to use the records to fulfill their role;
- we comply with all internal controls and accounting standards; and
- we ensure any expenses we incur, or approve, have a legitimate business purpose.

Never

- ✗ Engage in fraud, misappropriation or misuse of BlueScope's assets and resources.
- ✗ Remove any company assets from your workplace without prior permission.
- ✗ Sell, loan, donate or use BlueScope's property without approval from your manager.
- ✗ Leave your computer unlocked when away from your workstation.
- ✗ Access BlueScope's confidential information in public where it may be viewed by others.

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Use technology responsibly

Everyone working at BlueScope must safeguard its technology and use it appropriately.

Your responsibilities

- Do not use BlueScope's technology to access inappropriate material in any format, or in any setting.
- Only accept electronic information from trusted sources.



Useful documents

Information Security Policy
Artificial Intelligence Usage Guidelines
Global Social Media Policy
Global Social Media Guidelines

We are all responsible for safeguarding BlueScope technology and data.

Inappropriate use of our technology, systems or data may expose BlueScope to operational, commercial, and reputational risk, or cause the introduction of malicious software, or provide a pathway for security breaches leading to theft or loss of property (online or physically) and impact BlueScope's ability to make and sell steel and steel products.

If you are ever in doubt about whether information is coming from a trusted source, or if something just doesn't feel right, report it to the security team via the Global Cyber Security page on the intranet, your IT Help Desk or your manager.

Choose to do the right thing

Always

- ✓ Use technology for purposes that are permitted and reasonable.
- ✓ Protect BlueScope's data and devices from theft and misuse by locking and logging out of technologies when not in use and keeping your passwords secure.
- ✓ Promptly report unauthorised access or attempts to access BlueScope's technology or data to your manager and via the Global Cyber Security page on the intranet
- ✓ Protect the confidentiality, integrity and availability of any of our staff, customer and business partners' information.

Artificial Intelligence (AI)

When using AI in any form, we avoid putting BlueScope identifiable company or confidential information into AI tools that are not provided by BlueScope or approved via the Technology team.

Personal use of technology

Reasonable personal use of BlueScope technology or resources is acceptable if it:

- does not relate to outside business activities;
- does not involve BlueScope sensitive data;
- does not result in BlueScope incurring undue costs; and
- does not interfere with BlueScope's business or your responsibilities and performance at BlueScope.

Never

- ✗ Download or install unlicensed or unauthorised software or hardware.
- ✗ Share your BlueScope systems passwords with anyone else or leave them open and accessible to others.
- ✗ Allow someone else to log on and operate BlueScope's systems using your credentials.
- ✗ Upload BlueScope information to non-authorised AI systems, personal email accounts, or personal and unauthorised document or storage sites.

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Protect personal information

We protect the privacy of all individuals by treating their personal information responsibly, lawfully and with respect.

Your responsibilities

- Only ever collect, store or use personal information in accordance with BlueScope's Privacy Policy and applicable local laws.
- Ensure you delete or destroy personal information once it is no longer needed for the business purpose that it was obtained.



Useful documents

Global Privacy Policy
Global Standard – Management of Personal Information
Business Unit privacy policies and standards

We respect the personal information of others (being information which could identify an individual) and protect it from misuse, loss, and from unauthorised access or disclosure.

Collecting, holding and using personal information

When we collect personal information on behalf of BlueScope, we must advise the person whose information is being collected of our Privacy Policy.

We only collect personal information where and when it is necessary to conduct our business, and with the consent of the individual. We always take steps to ensure that the personal information we hold is accurate and current. We never use personal information for anything other than the business purpose for which we have collected it.

Choose to do the right thing

Always

- ✓ Check the legal requirements relating to the collection, use, retention and storage of personal information in your local jurisdiction. Speak with the Legal team if unsure.
- ✓ Immediately report actual or suspected unauthorised privacy disclosures to your manager or to Legal, or you can email privacyquestions@bluescope.com

Privacy and records management

BlueScope's Global Privacy Policy, together with Business Unit privacy policies, set out how and why information is collected, used, disclosed or stored and provides individuals with information on how they may access their personal information in certain circumstances. All personal information should be securely destroyed or de-identified once it is no longer needed for the purpose for which it was collected.

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