

# WHISTLEBLOWER POLICY

## 1. PURPOSE

At Australian Steel Mill Services Pty Ltd (ASMS) we are committed to acting fairly, ethically and with integrity in all our actions. In striving for the highest standards of conduct, we encourage our people and those we interact with to Speak Up when they think an action or decision is not right, is not in line with our Code of Conduct or the law.

## 2. SCOPE AND WHO THE POLICY APPLIES TO

This policy applies to any person who is:

- a current or former employee
- a current or former Officer (i.e. director or company secretary)
- a contractor (including apprentices, sub-contractors and employees of contractors)
- a supplier (including employees of suppliers)
- a service provider who is providing or has provided goods or services to ASMS
- a relative, dependent, or spouse of any of the above.

## 3. REPORTABLE CONDUCT

You may report or disclose under this policy if you have reasonable grounds to believe that a Company officer, employee, contractor, supplier, consultant, or other person who has business dealings with the Company has engaged in conduct (Reportable Conduct) which is:

- failure to comply with, or breach of legal or regulatory requirements
- breach of ASMS code of conduct or other ASMS policies, standards or codes
- dishonest, fraudulent, or corrupt activity
- criminal activity
- modern slavery, which exists if a person is not working of their own free will, is treated like property, or is seriously exploited or abused. Examples of modern slavery are human trafficking, slavery and slavery-like practices, forced labour, servitude, early and forced marriage, debt bondage and forms of child labour
- breaches of privacy
- unauthorised use of ASMSs confidential information
- a danger, or represents a danger to the public or financial system
- harassment, discrimination, victimisation, or bullying.

## 4. HOW TO SPEAK UP

ASMS has an open-door policy and encourages employees to share their questions, concerns, suggestions, or complaints with their Supervisor/Manager. If you are not comfortable speaking with your Supervisor/Manager or you are not satisfied with your supervisor's response, you are encouraged to speak with the General Manager, or email [whistleblower@asms.com.au](mailto:whistleblower@asms.com.au)

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## 5. CONFIDENTIALITY

The identity of the whistleblower will be protected and not disclosed without their consent, unless required by law. Any information provided will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## 6. PROTECTION FROM DETRIMENTAL TREATMENT

You will not be penalised or subject to any detriment for Speaking Up. It is unlawful to cause detriment to you or another person on the belief or suspicion that a report has been, or will be, made, regardless of whether the report was made. ASMS will not tolerate such unlawful behaviour.

## 7. CONSEQUENCES FOR FALSE REPORTING

While ASMS encourages the reporting of any suspected wrongdoing, it also expects that all reports are made in good faith. Any individual who knowingly makes a false report or provides false information in connection with a report may be subject to disciplinary action, up to and including termination of employment, or other appropriate legal action.

## 8. WHAT HAPPENS ONCE A REPORT IS MADE?

All reports of misconduct under this Policy will be dealt with promptly, fairly, and objectively. ASMS's response to a report will vary depending on the nature of the report and the amount of information provided. Your report may be addressed and resolved informally or through formal investigation.

While Speaking Up does not guarantee a formal investigation, all reports will be properly assessed and considered and a decision made as to whether it should be investigated. Where appropriate, a person being investigated will be provided with details of the report that involves them (to the extent permitted by law) and be given an opportunity to respond.

Assuming your identity is known and where appropriate, you will be kept informed and updated during the following key stages of the investigation:

- when the investigation process has begun
- while the investigation is in progress
- after the investigation has been finalised

There may be some circumstances where it may not be appropriate to provide details of the outcome to you. You will not be provided with a copy of the investigation report.

The General Manager will report the findings and actions directly to the Board of Directors.

## 9. CHANGES TO THIS WHISTLEBLOWER POLICY

This Whistleblower Policy may change from time to time. Any updated versions of this Whistleblower Policy will be posted on our website and will be effective from the date of posting.