

Protected Disclosures (Whistleblower) Policy

Application and compliance This policy applies to all of Steel & Tube and its subsidiaries (**Steel & Tube**)

Fundamental policy statement **This policy sets out the process for raising concerns about actual, anticipated or strongly suspected wrongdoings by any employee or more generally by or within Steel & Tube.**

Responsibilities

Persons	Responsibility
Company Secretary	Administration of the Policy
Audit & Risk Committee	Two yearly

Purpose of this policy

The purpose of this policy is to ensure that all those involved with Steel & Tube feel safe and confident about raising any concerns regarding serious wrongdoing, with Steel & Tube having a reporting and investigating framework which protects those making a disclosure from any repercussions.

The policy sets out what a serious wrongdoing is, who a serious wrongdoing can be reported to, and how Steel & Tube will address such wrongdoings. Reporting serious wrongdoing assists with the management of risk and encourages transparency and openness.

Steel & Tube follows all laws and practices that protect the rights of those who raise concerns about wrongdoings by any employee or more generally by or within Steel & Tube, including the Protected Disclosures Act 2000.

Scope and who the Policy applies to

This policy applies to all directors, managers, employees, temporary staff, contractors and consultants of Steel & Tube.

Serious Wrongdoing

Under this policy, a serious wrongdoing includes any act, omission or course of conduct that may include but is not limited to:

- Conduct or practices which are dishonest or breach any law
- Breach of any company policy
- Sexual harassment
- Bullying
- Inappropriate accounting, accounting controls or auditing
- Corrupt activities

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- Theft or fraud
 - Significant mismanagement or waste of funds or resources
 - Actions or behaviours that pose a serious risk to employee health and safety or Steel & Tube property and equipment
 - Conduct that is a serious risk to public health, public safety or the environment
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Confidentiality

Steel & Tube encourages those who report any concerns regarding serious wrongdoing to also provide his/her contact details, which will be kept confidential, in case further information is required and to update him/her on the investigation.

Steel & Tube understands that anonymity may be desired, in which case every effort will be made to protect and conceal the identity of anyone who reports his/her concerns.

Those we report any concerns regarding serious wrongdoing are encouraged to keep concerns confidential while an investigation is being carried out to avoid the investigation and the subject of the investigation being compromised before the concern is resolved.

Reporting Process

Any concern about a serious wrongdoing should be raised with:

- General Manager, People & Culture; and / or
- General Counsel.

Any allegation will be taken to the CEO (and General Counsel if he/she is not already aware of the allegation), unless the allegation involves one or both of these roles.

In circumstances where it is not suitable to raise a concern with the General Manager, People & Culture or General Counsel, the concern should be raised directly with the CEO.

If a person reasonable believes that he or she cannot approach any of the above because they may be involved or associated with the serious wrongdoing, the matter should be referred to the Chair of the Audit & Risk Committee or the Chair of the Board of Steel & Tube.

The concerns should be raised internally first unless the person believes on reasonable grounds that the matter is urgent and justified by exceptional circumstances or there has been no action or recommended action on the matter within 20 working days after the date that the allegation was made. In these circumstances, the allegation may be reported to an external public sector official or regulatory authority, as defined in the Protected Disclosures Act 2000.

Reporting

It is preferred that any allegation is made in writing and clearly identifies and describes the serious wrongdoing and the person(s) involved. Any allegation should include enough information about the incident or situation that allows for an investigation to be conducted.

Investigation process

The investigation process will vary on a case by case basis, as it is dependent on the exact nature of serious wrongdoing reported. All investigations will be conducted in a fair, reasonable, objective and efficient manner which resolves the issue in the most just manner. Those reporting concerns are encouraged to keep their concerns confidential while an investigation is conducted.

Once the allegation of the serious wrongdoing has been raised, the person who the allegation was raised with will have 20 working days to properly examine the allegation and decide on whether a larger scale in-depth investigation is required.

If contact details were provided, at the end of the 20 working day period the person who the allegation was raised with will report back to the person who has made the allegation with the outcome of the investigation.

The decision as to whether an investigation will be escalated will be considered in an unbiased and ethical manner. This will depend on the nature and severity of the allegation and the findings the initial investigation uncovers. A disclosure with detailed and substantiated allegations will make escalation a swifter process.

If a full investigation is pursued, it will be done so in a prompt and timely manner.

Any person alleged to be involved in a serious wrongdoing will have the right to answer the allegations. The person who submits an allegation can at any point during the investigation voice his / her concerns and be kept informed on the progress of the investigation.

Non-retaliation

Steel & Tube encourages an open and transparent work place, with disclosures of serious wrongdoing being a part of this.

Steel & Tube will not tolerate any person who discourages or disregards reporting serious wrongdoings and any person who retaliates against any alleged serious wrongdoing may be considered to be involved in an act of serious misconduct.

Good faith

All allegations must be made in good faith.

If an allegation is made that is not substantiated, and found to be made with either malicious intent or on a fraudulent basis, this will be viewed as serious misconduct and may lead to dismissal.

The protection under the Protected Disclosures Act 2000 and this policy will not apply.

Ownership & review

Approver: Steel & Tube Board
Reviewer: Audit & Risk Committee
Owner: Company Secretary
Review: Two yearly or as required
Date: 14 June 2018
