

OneSteel Limited Diversity Policy

POLICY STATEMENT

OneSteel recognises the benefits arising from employee, management and Board diversity and seeks to promote a corporate culture which embraces and values diversity, particularly given its global footprint and its employment of people in Australia, New Zealand, Asia and North and South America.

It is OneSteel's intent at all times to embrace and derive value from a diverse workforce, and to comply with our legal obligations, as well as with accepted governance expectations, with respect to diversity.

OneSteel is committed to ensuring that all of its processes relating to the attraction, development, retention and reward of its employees maximise the corporate benefit that arises through having a highly skilled, diverse and engaged workforce.

For the purposes of this policy, "diversity" refers to acceptance, respect and understanding that each individual is unique, with individual differences. This can be along the dimensions of race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other ideologies. At OneSteel, it is also seeking to maximise value through the exploration and harnessing of these differences in a safe and positive environment.

This policy applies to OneSteel Limited and companies owned and controlled by OneSteel.

GENDER DIVERSITY

Through the MD & CEO and Senior Management, the Board ensures that internal policies, procedures and processes are in place and reflect the Company's commitment to diversity generally, but also deal specifically with gender diversity.

This includes, but is not limited to:

- establishment of clear objectives and measures in relation to gender diversity, including in its global operations, which will be reviewed at least annually by the Human Resources Committee;
- under the direction and guidance of the Executive General Manager, Human Resources, allocating responsibility to a OneSteel officer for monitoring and reporting against gender diversity objectives and measures;
- the continued development of a corporate culture which embraces and values gender diversity, as reflected in policies such as OneSteel's Code of Conduct;

- practices in recruitment and selection which are non-discriminatory, promote diversity and aim to increase the participation of women in talent pipelines. Current examples include graduate recruitment, senior leader targeted search and focussed programs in regional areas;
- participants in talent development programs are selected with consideration of diversity, so as to position OneSteel to have a highly skilled and diverse leadership base;
- remuneration practices reward and retain employees equally based on performance and potential, regardless of gender;
- the Chairman is responsible for ensuring that Board appointments are managed in a way that values diversity (including, but not limited to gender diversity), whilst also maximising the governance capacity of the Board. Where appropriate, this may involve a formal review of the skills and diversity requirements for a new appointment, as well as the selection protocols to be applied; and
- addressing the matter of diversity in its Annual Report, including reporting on the level of female representation across the OneSteel workforce and Board.

WORKFORCE FLEXIBILITY

OneSteel recognises the benefits that flow with managed flexibility for all staff and accordingly has a range of policies which support employees optimising the balance between work and personal considerations.

These include:

- generous paid maternity, paternity and adoption leave which have contributed to a greater than 90% return to work rate for female employees; and
- workforce flexibility policies and practices that provide opportunities for employees to balance their work and personal responsibilities. These include progressive return to work following parental leave, working from home, job sharing, temporary and permanent part time employment and transition to retirement arrangements to name some of the options available.

ETHNIC AND CULTURAL DIVERSITY

OneSteel's operations are increasingly global and rely on the capability of highly skilled local staff to execute business plans.

To that end, OneSteel:

- is committed to global remuneration policies which balance the need for movement of skilled employees across national boundaries and the need to attract, develop, retain and reward local employees. This is supported by the International Assignment Policy and our current plans to broaden access to an Employee Share Plan in a range of countries;
- has established formal and informal networks across the major countries in which it operates to share learning, build an appreciation for the challenges faced in different geographies and accelerate the development of organisational capability. These exist, for example, in Operations, Marketing, Safety and Human Resources; and
- provides a learning and accelerated development platform which gives employees across all geographies equal opportunity to perform to their potential and compete successfully for other roles within OneSteel.

REVIEW, MEASUREMENT AND REPORTING

On an annual basis, diversity is reviewed across OneSteel.

This includes a review of:

- activities and progress with respect to those processes referred to above;
- specific actions undertaken to increase diversity;
- the proportion of women at all levels in the Company;
- other appropriate measures of diversity across the organisation; and
- Board objectives with respect to diversity.

ANNUAL REVIEW AND BOARD APPROVAL

Approved by the OneSteel Limited Board on 20 June 2011.