

ONESTEEL LIMITED
CONTINUOUS DISCLOSURE
POLICY AND PROCEDURES

Introduction

OneSteel is subject to ASX (Australian Securities Exchange) Listing Rules.

ASX Listing Rule 3.1 sets out the continuous disclosure requirements that an entity must satisfy. Continuous disclosure is the timely advising of price-sensitive information to keep the market fully informed. Under the Corporations Act, sanctions apply for a failure to comply with continuous disclosure requirements.

The Rule states:

- 3.1 Once an entity is or becomes aware of any information concerning it that a reasonable person would expect to have a material effect on the price or value of the entity's securities, the entity must immediately tell ASX that information.

Note: Section 100D of the Corporation Act defines material effect on price or value. As at 1/7/96 it said for the purpose of section 1001A a reasonable person would be taken to expect information to have a material effect on the price or value of securities if the information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, or buy or sell, the first-mentioned securities.

- 3.1A Listing rule 3.1 does not apply to particular information while all of the following are satisfied.

3.1A.1 A reasonable person would not expect the information to be disclosed.

3.1A.2 The information is confidential and the ASX has not formed the view that the information has ceased to be confidential.

3.1A.3 One or more of the following applies:

- It would be a breach of a law to disclose the information.
- The information concerns an incomplete proposal or negotiation.
- The information comprises matters of supposition or is insufficiently definite to warrant disclosure.
- The information is generated for the internal management purposes of the entity.
- The information is a trade secret."

- 3.1.B If the ASX considers that there is or is likely to be a false market in an entity's securities and asks the entity to give it information to correct or prevent a false market, the entity must give ASX the information needed to correct or prevent the false market.

Listing rule 19.2 says:

“An entity must comply with the listing rules as interpreted:

- in accordance with their spirit, intention and purpose;
- by looking beyond form to substance; and
- in a way that best promotes the principles on which the listing rules are based.”

The following policy and procedures have been adopted to ensure OneSteel complies with its obligations.

Disclosure Process

The General Manager, Investor Relations & External Affairs (or in his absence the Chief Financial Officer or Company Secretary) oversees disclosure. He should be informed in advance of any information to be disclosed, or that might require disclosure, in sufficient time for him to form a view in relation to OneSteel's disclosure obligations.

The General Manager, Investor Relations & External Affairs must obtain endorsement concerning any proposed disclosure from the Chief Financial Officer, endorsement from the General Counsel and approval from the Managing Director. If the view is formed that disclosure is or may be required, the approval of the Chairman will also be obtained. (If there is any doubt, the matter should be referred to the Chairman.)

The Company Secretary is responsible alone for releasing the information to the ASX. That process is not complete until the ASX confirms receipt of the announcement. The Secretary advises when this confirmation has been received and the information is clear for general release.

Where practicable, the Secretary should be made aware of any proposed disclosure well in advance to ensure his availability. The information to be released should be transmitted to the Secretary on a timely basis to ensure the release process is not delayed.

When the ASX confirms receipt, the information is posted on the OneSteel web site to make it accessible to the widest audience as soon as possible. Material should only be published after advice is received from the General Manager, Investor Relations & External Affairs.

In addition to the above, there is a positive obligation on the company to disclose material information to the ASX immediately.

The Company Secretary has authority to release procedural notifications.

Analysts briefings

Slides and presentations to be used in briefings should be approved by the Managing Director. The information should be posted on the company web site when cleared.

Discussion should be restricted to clarifying information presented. A post-briefing review should be held to consider whether any other price sensitive information has been inadvertently disclosed. If it has, it should be announced immediately to the ASX and then posted on the company website.

If a question is raised that can only be answered by disclosing price sensitive information, an answer should be declined, or it should be taken on notice. The information should then be released to the ASX before responding.

In circumstances where presentations will contain information not previously disclosed then these presentations are to be lodged with ASX prior to the making of the presentations

Company Spokespersons

The following people are authorised to speak to analysts, media etc on behalf of the company:

- Company generally:
 - Chairman
 - Managing Director & CEO
 - Chief Financial Officer
 - General Manager, Investor Relations & External Affairs

- Individual businesses:
 - Respective Executive General Managers in consultation with the
 - General Manager, Investor Relations & External Affairs

The above people can clarify information that the company has released publicly through the ASX, but they should avoid commenting on other price sensitive issues.

Rumours, leaks and inadvertent disclosures

If information has been leaked or inadvertently disclosed, the General Manager, Investor Relations & External Affairs should be informed so he can determine whether the information may require disclosure to the ASX.

Responding on financial projections and reports

Comments on market analysts' financial projections should be confined to errors in factual information and underlying assumptions. Any response which may suggest that the company's, or the market's current projections are incorrect should be avoided. The way to manage earnings expectations is by using the continuous disclosure regime to establish a range within which earnings are likely to fall.

Announcements by Steel & Tube Holdings Limited (STH)

It should be assumed that any release of information by STH to the New Zealand Stock Exchange must be released simultaneously to the ASX unless it is decided, on a case by case basis, that release to the ASX is unnecessary.

Reviewed 16 June 2008