

November 12, 2015

**AMERICAN IRON AND STEEL INSTITUTE
WHISTLEBLOWER POLICY**

This whistleblower policy of the American Iron and Steel Institute (“AISI” or the “Institute”) (a) encourages directors, officers and employees to come forward in good faith with credible information on illegal practices or serious violations of adopted policies of AISI, (b) specifies that AISI will protect the person from retaliation, and (c) identifies where such information can be reported.

Encouragement of Reporting

AISI encourages complaints, reports or inquiries about illegal practices or serious violations of the Institute’s policies, including illegal or improper conduct by AISI itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. However, this policy does not apply to personnel matters, such as allegations of discrimination or harassment, which should be pursued via AISI’s employment policy procedures.

Protection from Retaliation

AISI prohibits retaliation by or on behalf of the Institute against directors, officers or employees for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. AISI reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Where to Report

Complaints, reports or inquiries should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the General Counsel or President of the Institute. If both of those persons are implicated in the complaint, report or inquiry, it should be directed to the Treasurer of the Institute. These officers shall investigate any complaints, reports or inquiries

received and report any credible allegations of illegal or improper conduct to the AISI Board of Directors.

Anonymous Reports

Whistleblower reports may be made anonymously. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. Anonymous reports can be made by letter to the General Counsel or President of the Institute at the following address:

American Iron and Steel Institute
ATTN: Whistleblower Report
25 Massachusetts Avenue, NW
Suite 800
Washington, DC 20001