Code of Business Conduct
A Message from the CEO

Working to the Highest Standard

Algoma is a leader in the North American Steel industry and the 2nd largest employer in Northern Ontario. We have the unique privilege of being a corporate leader in the Soo and assume the full responsibility that comes with it. Our actions have a huge impact upon our stakeholders and the broader community. Acting with integrity and modeling the right behaviours is critical to fulfilling our role as a good corporate citizen in the communities we operate in and supporting their healthy and safe development.

Integrity is therefore one of our core values that describes who we are, what we do and how we behave. As an organization we believe that integrity is required for corporate success. This Code is not meant to cover every eventuality, but rather to serve as a guide for all employees. It means always acting with honesty, fairness and transparency. It means respecting one another. It means respecting the communities and environment in which we operate and respecting the people whose lives we affect.

We rely upon the integrity, professionalism and ethical behaviour of all employees to preserve and sustain our reputation. Acting with integrity is about doing the right thing all the time and begins with behaving in compliance with our Code.

This Code serves to inform our suppliers, customers and other stakeholders of the standard of fair and ethical conduct one can expect from every interaction with Algoma Steel.

Working within it is a condition of continued employment for all employees starting with me.

When an employee is in doubt of the appropriate course of action or the proper interpretation in any situation, the matter should be discussed with their immediate supervisor, a Human Resource Manager or the General Counsel where appropriate.

Please read the enclosed document carefully, review it annually and keep it handy for future reference.

Mike McQuade
President and CEO
# CODE OF BUSINESS CONDUCT

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INTRODUCTION

Although the matters dealt with in this Code of Business Conduct (the “Code”) do not cover the full spectrum of employee activities or the challenges you will face in your daily work, they are indicative of Algoma Steel Inc.’s commitment to the maintenance of high standards of conduct and are descriptive of the type of behaviour expected from employees in all circumstances.

Every representative of the Company, including but not limited to an officer, director or employee of the Company, must demonstrate that, in all business relationships, he or she acted in integrity, is candid, free of inappropriate influence, and respectful of other stakeholders and of their legitimate interests.

In keeping with the spirit of the Code, the following questions should be considered before making any business-related decisions or taking any actions:

- Does this decision comply with the Company’s internal rules and regulations?
- Does this decision comply with the letter and spirit of the Code of Business Conduct?
- Can the decision be justifiably viewed as the most appropriate course of action?
- Could this decision, if made public, compromise the Company or be harmful to its reputation or its standing in the community?
- Be viewed as dishonest, unethical, or unlawful?
- Cause Algoma to lose credibility with its employees, customers, stakeholders or community

Acting with integrity

Using common sense and good judgment together with our Code and internal policies and procedures will usually be sufficient to ensure our business is conducted with integrity. Every employee, director and officer and all joint ventures under our control must follow this Code at all times when representing or working for Algoma. All persons including service providers, subcontractors and business partners will be required to act consistently with our Code when acting on our behalf or in our name.

Higher Standards for Leadership

Supervisors at all levels have additional responsibilities under our Code which include creating an open environment in which employees feel comfortable to ask questions, raise concerns and report misconduct. Leaders with
behavioural integrity are valued and promoted in the Company.

**Violations of our Code**

Violations of this Code, our employee conduct rules, our policies and procedures, directives or the law can have serious consequences including disciplinary action, up to and including dismissal. By extension, if a person in authority knows, or ought reasonably to have known, that a violation of the Code, employee conduct rules, the law or policies and procedures may have occurred and fails to take appropriate action, the person or group that has condoned the behaviour, as well as the alleged perpetrator, may be subject to sanctions under this Code.

**LAWS AND REGULATIONS**

Although an employee is not expected to know all the laws and regulations that govern the Company's activities, an employee must recognize and be familiar with the basic legal requirements applicable to his or her area of accountability. The leadership of the Company will regularly review the changing legal landscape and advise employees accordingly on matters relevant to the performance of their duties.

At all times, employees will comply with the letter and the spirit of applicable laws and regulations in Canada and in any other jurisdiction in which the Company carries on business. It is important to note that when there is a difference between legal requirements and our Code, we always apply the higher standard. If in doubt, contact the Vice President, Legal and General Counsel.

**ACCURATE RECORDING AND REPORTING INCLUDING ACCOUNTING RECORDS AND PRACTICES**

Timely, complete and honest recording of financial and non-financial information and the proper retention of our documents and records in accordance with our corporate policies is essential to our business and is important for our:

- Complete and accurate record of our performance and decisions taken;
- Legal and regulatory obligations;
- Ability to make accurate projections and business decisions;
- Credibility and reputation; and
- Responsibility to our shareholders and external stakeholders.

Every transaction between the Company and its stakeholders must be evidenced by the appropriate accounting and supporting documents and
must be reflected in the Company records promptly, accurately and completely. You must never instruct someone else to prepare or approve a false or misleading record or to do so yourself at the direction of another person.

No asset, liability or transaction is ever to be misstated or concealed from management, internal or external auditors or other persons, including governmental, regulatory and tax authorities. It is a violation of our Code to alter any document causing it to misstate what occurred or to conceal the true nature and intent of a transaction. Discrepancies in any records must be resolved with appropriate corrections and made transparent to persons who need to know of any such corrections.

Company records must be retained according to all applicable laws and our Company policies and guidelines. The destruction, concealment or alteration of any record that you have been instructed to make, distribute and/or keep is strictly prohibited. If you know or believe there is a possibility of any litigation or internal or external investigation involving any record in your possession or under your control, you must retain that record and produce it promptly when instructed to do so.

OUTSIDE ACTIVITIES

The Company encourages political, community and charitable activities by its employees, which could include elected or appointed and paid or voluntary participation in public or civic affairs, but acting on their own behalf and not as representatives of the Company. It is important that we are engaged in our community and this is often achieved through the volunteer work and efforts of our employees. Our employees have much to offer the broader community through their knowledge, resourcefulness, experiences and passion for what they believe in. That said, these outside activities should not result in inferior job performance or unauthorized time away from work. Employees should take care to ensure that through their volunteer activities, charitable or political work that they do not become involved in a real or perceived conflict of interest. Care must be taken at all times to ensure that employees do not engage with or represent the Company brand when making public statements or representations. This can include using your work e-mail address to solicit donations or to opine on public or company matters in the public or through social media.

COMPANY ASSETS

All employees are responsible for protecting our Company assets (tangible and intangible) and using good judgment to ensure that physical and intellectual property, as well as financial assets, are not willfully damaged, stolen, pilfered, misused or wasted. Company assets (including things like purchasing cards, computers, mobile phones, company vehicles) must be
used only for business purposes. This includes employee use of e-mail accounts and Internet access. (See "Electronic Communications" for full details.)

INTELLECTUAL PROPERTY

At Algoma Steel, we regularly produce valuable, non-public ideas, strategies, best practices and other kinds of business information, which we own and need to protect as intellectual property. This type of information gives us a competitive advantage and as such improper disclosure of such information is prohibited.

Employees must hold in strictest confidence, and not use, except for the benefit of the Company, or disclose to any person, firm or corporation without written authorization in accordance with the Corporate Disclosure Policy, any confidential information of the Company.

It should be understood that "Confidential Information" means any Company proprietary information, technical data, trade secrets or know-how, including, but not limited to, research, product plans, products, services, customer or vendor pricing and quality standards, contacts, critical material or service requirement(s) that could impact pricing and similar proprietary information, customer lists and customers, markets, software developments, inventions, processes, formulas, technology, designs, drawings, engineering, hardware configuration information, finances or other business information disclosed to the employee by the Company either directly or indirectly in writing, orally or by drawings or observation of parts or equipment. Confidential information does not include any of the foregoing items which has become publicly known and made generally available.

WORK PRODUCT

All forms of work product produced during the course of employment, with or without the use of Algoma's facilities and resources is and remains the sole and exclusive property of the Company. Work product includes all documents, e-mails, reports, photos, maps, drawings, field notes, patents, trademarks, copyrights and any data or document of any kind.

No work product can be shared externally without prior authorization.

PHOTOGRAPHY

All photography and videography within the steelworks requires written authorization as outlined on the Photography and Video Authorization form. General photography by employees, visitors, customers, suppliers, or guests is not permitted on the premises.
SURVEYS

From time to time employees will be called upon to participate in surveys with outside agencies and organizations. Only those surveys that are relevant to the business and whose results will be shared with the Company should be completed and both the content and act of participation must be pre-approved by the appropriate Level 4 manager of the department.

RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

Commercial Decision Making – All commercial decisions must be made in the best interest of the Company and cannot in any way benefit the employee making the decision. All employees must act in the Company’s best interest, avoiding completely any illegal understandings or agreements with any other person, organization or company. Violations on antitrust and competition laws should never be pursued or allowed. They will not be tolerated. In all regions where we compete for business, we are committed to competing vigorously but fairly for the benefit of our suppliers and customers.

Employees will not engage in conduct which violates any laws, in particular those competition laws which prohibit any kind of understanding or agreement with others regarding prices, terms of sales, division of markets, allocation of customers or any other practice which illegally restrains competition or is otherwise prohibited. Employees should never engage in any communication with competitors or suppliers about bids of others.

Relationships with Suppliers – Suppliers, whether they are bidding on a multi-million dollar contract or a small job, will be dealt with in a fair manner. Whether they receive or do not receive the order, they will be given every reasonable and fair opportunity for success. Employees will avoid doing anything that would give a potential supplier any preferred treatment when bidding for business. This includes sharing any non-public information about the activities of a supplier with another supplier.

No employee other than those in the Procurement department is authorized to request price quotes from a vendor unless they have received prior authorization in writing by Vice President, Procurement.

Dining and Social Gatherings – It is important that we are not improperly influenced through our interactions with a customer or supplier. This perception can be comprised when joining a customer or supplier for a meal or other similar social engagement (e.g. golf tournaments). Therefore in order that we can monitor these types of activities, you must report, in writing, all such occurrences to your Level 4 Manager within three days. Under no
circumstance can anyone attend, receive or request a lunch or dinner with a supplier unless it is the Company that is paying the bill.

**Non-work related Transactions or Services from a Supplier or Customer**

- To ensure full transparency in any dealing with a supplier or customer, all employees and Directors of the Company must disclose the commercial terms of any personal transaction with a supplier or customer with whom they interact in their capacity as a Company representative. Such disclosures shall be made to the Vice President, Legal and General Counsel and copied to Internal Audit within 3 days of completion of work.

**DEALINGS WITH PUBLIC OFFICIALS**

All dealings between employees and public officials are to be conducted in a manner that will not compromise the integrity or reputation of any public official, the employee or the Company.

Dealings with government representatives and agencies are to be "open and honest" and "official and formal." Any response to or from a government contact must be handled through established corporate channels.

Only those employees authorized to do so may communicate directly with the government, the media or public groups concerning Company business and affairs. The reason for this is that external stakeholders may perceive that public comment by individuals may be considered as Company policy when in fact it is not.

**STANDARD OF INTEGRITY**

Employees are forbidden to participate, whether directly or indirectly, in any bribes, facilitation payments, kickbacks, indirect contributions or similar payments. This is true, whether or not such payments might further the business interests of the Company. **Such payments or schemes are unlawful and if become known to any employee, the employee is obligated to report to the General Counsel or the Director of Human Resources.** Maintenance of a high standard of integrity by all employees is of the utmost importance.

**WORK ENVIRONMENT**

The Company expects every employee to work safely and to take all reasonable steps to protect the environment. Our work environment is rapidly changing and we welcome more diversity in our employee population. With more diversity comes a greater responsibility for all employees to be sensitive to the feelings and needs of others. We recognize that there are health and safety laws and regulations to protect all employees from unwanted or unwarranted harassment but expect our employees to go above and beyond these standards in creating a safe, welcoming, pleasant and productive work environment.
Safety - Employees are required to comply with all safety laws, regulations and departmental "work safe" procedures and Standard Operating Procedures. Constant vigilance in safety matters, both for themselves and others is to be a top priority for every employee.

Environmental Protection - The Company is committed to preserve and enhance the environment in the communities where it operates through responsible and environmentally-oriented operating practices. We are subject to many government regulations and environmental laws that set minimum standards. At Algoma we strive for a higher standard of conduct. The Company works closely with government and other groups on programs aimed at reducing emissions and the use of toxic substances in industrial processes. Employees are encouraged to participate in undertakings geared to improving the environment in both their workplace and their community.

Discrimination, Workplace Violence and Harassment - We promote a work culture where our individual differences bring to light different ideas and perspectives. We welcome diversity and a broader world perspective to allow us to continually evolve and reflect the communities in which we work and operate. Thus we value and promote a workplace that is inclusive and fair; one that fosters respect for all of our colleagues, customers business partners and community members.

The Company is committed to creating and maintaining a working and business environment which is free from violence, discrimination and harassment of any kind, including age, race, colour, religion, creed, sex, nationality, ethnic or place of origin, citizenship, language, political belief, marital or family status, pregnancy, sexual orientation, disability or any other prohibited ground of discrimination or harassment.

Sexual harassment may exist when unwelcome advances, requests for favours, or other forms of conduct of a sexual nature or related to a person's sex interfere with an individual's performance; create a hostile or abusive work environment; or affect decisions about that individual. The Company will not tolerate sexual harassment of any kind.

The Company will take very seriously any allegation of workplace violence, discrimination or harassment. If a person in authority knows, or ought reasonably to have known, that workplace violence, discrimination or harassment may have occurred and fails to take appropriate action, the person or group that has condoned the behaviour, as well as the alleged perpetrator, may be subject to sanctions under this Code.

CONFIDENTIALITY AND INSIDER TRADING

Employees shall not use for their own financial gain, or disclose for the use
of others, material or inside information obtained as a result of their employment with the Company. Information is 'material' if a reasonable person would consider the information important when deciding to buy, sell or hold company stock or to engage or dis-engage in a business relationship with us.

Employees may find themselves in violation of applicable security laws if they misuse information not generally known to the public.

Employees should be prepared to explain their transactions in securities (and debt instruments) of Algoma Steel and related companies on the basis of personal investment considerations. Officers and directors of the Company are subject to insider trading reporting requirements when applicable. In addition, all representatives of the Company privy to confidential financial data are subject to the Company's Insider Trading Policy.

**CONFLICT OF INTEREST**

A conflict of interest exists or a perceived conflict can exist if one has a direct or indirect financial or personal interest in a decision being made. We all must ensure that we avoid any situation, relationship or activity that might impair or even appear to impair, our ability to make objective and fair decisions when performing business or executing our responsibilities and accountabilities to the Company.

Employees must act in the best interests of the Company at all times. Decisions must be, and must be seen to be, independent of any personal interests arising from familial relations, business dealings, social ties, or other personal considerations.

Employees should avoid acquiring any interest or participating in any activities that would:

- Deprive the Company of the time or attention required to perform their duties properly;
- Interfere with or affect their judgment or ability to act solely in the best interest of the Company; or
- Otherwise conflict with the best interests of the Company.

A conflict of interest can arise when an employee has a personal interest, direct or indirect, in a supplier, customer or competitor of the Company or when an employee is engaged in outside employment or participates in an outside organization which may interfere with the employee's regular duties or affect the employee's working effectiveness. Employees are required to disclose promptly and in writing to the Director of Human Resources or to the Vice President Legal and General Counsel any such
actual or potential conflict. After an employee has disclosed a potential conflict, a determination will be made as to whether the employee should divest his or her interest or have his or her job function realigned.

Specifically, Algoma employees are expressly prohibited from working for contractors who perform work within the confines of Algoma Steel's steelworks.

The Company will not engage or work with employees who quit or retire from our employ who are subsequently employed with a supplier for a 12 month period after leaving. This is to ensure that there is no perception of an unfair ‘insider’ track to gaining contracts with Algoma.

By exercising common sense, discretion and sound judgment before offering or receiving any gifts or hospitality, we can avoid good intentions being misinterpreted. Modest gifts, entertainment and other benefits may be given to persons with whom the Company has business dealings or accepted by Company employees when they are:

- Reasonable in amount; and not made with the intent to influence the recipient within his or her area of responsibility;
- Consistent with generally accepted business practices and not in contravention of any law or regulation of this Code;
- Not in the form of cash, bonds or negotiable securities; and
- So limited in value that they are not an attempt to buy the recipient's favour as a bribe, payoff or other improper payment.

Any personal benefits received that exceed $100 per calendar year must be immediately reported, in writing, to the Director of Human Resources or to the Vice President Legal and General Counsel. If there is any doubt as to whether a personal benefit might exceed this limit, a disclosure must be made.

**ELECTRONIC COMMUNICATION**

The Company provides electronic mail, internet access and other applications and devices as an efficient means of business communication, and as a research and information tool. While the Company acknowledges that occasional personal use of e-mail and the Internet may not be inappropriate periodically, these tools are owned by the Company and were brought into the Company to improve customer service and increase productivity. Personal use of e-mail or the Internet should in no way adversely affect work performance or productivity.

In sending and receiving e-mail communications and attachments, you must
apply the same standards of care as used in hard copy communications. Likewise the rules associated with hardcopy document retention must be followed. It is prohibited to disclose or post externally (including to the media, social media sites and blogs or otherwise) internal Algoma information or communications without authorization.

Violation of these provisions may result in disciplinary action being taken against the user, up to and including dismissal. Some activities (among others) that will result in discipline are accessing or distributing pornography, gambling, posting of confidential information, harassment or any illegal activity.

Please be aware that you are not allowed to use or copy software or data from Algoma systems to private or non-authorized devices or storage systems.

**Company Property** - All computer equipment and accessories, personal computers, laptops, servers, and handhelds (purchased by Algoma), including without limitation to, any and all communications, documents, data, intellectual property developed, information and messages accessed, created, stored, sent, received or viewed using such equipment are the exclusive property of the Company.

**Representative of the Company** - When surfing the Internet or sending e-mail from Company computers, users are reminded that they are representatives of the Company to the outside world. Simply connecting to a website causes the user’s name and the Company Internet address to be recorded on that remote computer. Views expressed by a user in e-mail or on an internet site may be perceived as the views of the Company. Accordingly, users should identify themselves properly (i.e., they should ensure that a personal view is not interpreted as being that of the Company). All use of e-mail and the Internet should involve good judgment, common sense and careful discretion.

**Inappropriate Material** - Users are prohibited from accessing, posting, storing, downloading, transmitting and/or distributing information from inappropriate sites which might be illegal, threatening, abusive, libelous, defamatory, obscene, or viewed as offensive to others (e.g., pornography, racist literature and hate literature). Users are cautioned that accessing material which may be offensive to others may be in violation of the Company’s harassment policy. Sending harassing, threatening or other objectionable messages via e-mail is prohibited, as is sending unsolicited junk mail, for-profit messages or chain letters.

Monitoring of system e-mail sent within the Company is secure, although the
Company does not consider e-mail to be private communication by employees and reserves the right to monitor all Internet use and read any e-mail sent or stored within the system without further notice to the user. In addition, the Company has an Internet monitoring system in place which is able to track websites which users have visited.

REPORTING OF VIOLATIONS / WHISTLEBLOWER

Employees must report all perceived Code of Conduct breaches, things that seem questionable or wrong and other employees who commit unethical or illegal acts, and ask questions when in doubt. Employees are encouraged to identify themselves to assist in addressing their concerns, however they may choose to remain anonymous and the Company will respect their choice. It is Company policy that no retaliation will be permitted in respect to reports made in good faith. The Code is intended to serve as a guide for employee actions and decisions and for those of co-workers. Employees who believe that they or another employee are in violation of the policies stated in the Code have several options.

Concerns may be reported to one or a number of individuals including:

- The employee’s supervisor or manager
- Manager of Internal Audit
- A Human Resource Manager
- General Counsel

These contacts may have the information that employees need, or may be able to refer the matter to an appropriate source. There may, however, be times when employees prefer not to go to their manager or supervisor, or they may want to report a concern about their manager’s or supervisor’s conduct.

Confidential and Anonymous Reporting

Algoma employees may report any matters directly to the Audit Committee by letter or e-mail. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

- Letter: Employees may write directly to the Audit Committee about a specific concern or to report a violation. These letters should be addressed to: The Audit Committee, Algoma Steel Inc., 105 West Street, Sault Ste. Marie, Ontario P6A 7B4.

- E-mail: Employees may also contact the Audit Committee by e-mail at acommit@Algoma.com. Although e-mail from an employee’s office or
home computer is not anonymous, they may request that their identity be kept confidential.

Algoma Steel Inc. has retained CanaGlobe Compliance Solutions, an independent service provider, to receive all Whistleblower reports via the internet, telephone or fax.

Submission by internet to CanaGlobe:
- Go to [www.canaglobecompliance.com](https://www.canaglobecompliance.com) [direct link is https://whistleblower.canaglobecompliance.com/]
- Select the Whistleblowing option in the upper right hand corner
- Enter the Login ID: Algoma
- Enter the Password: ASI*648

Submission by telephone or facsimile:
- Toll Free in Canada and the United States: 1-888-650-7768
- When using the telephone service, you will be instructed to leave a voice message with the details of your complaint.
- The toll free number does not subscribe to call display.

When employees are uncertain about any situation, they should ask for guidance. They may use whatever method of communication with which they feel most comfortable. The important thing is that they get the guidance they need, report what they know, and get their questions answered.

**Treatment of Reports and Complaints** - When employees contact their manager, supervisor, Human Resources representative, the Manager of Internal Audit or the General Counsel, they can expect the following:

- Their question, report or complaint will be taken seriously;
- Information will be gathered in response to their questions or concerns;
- Their question, report or complaint will be forwarded to appropriate Algoma Steel management for follow-up;
- Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review;
- Complaints and concerns relating to accounting, internal accounting controls or auditing matters will be reviewed under the Audit Committee’s direction or by such other persons as the Audit Committee determines to be appropriate;
- Employees are obliged to cooperate with investigations relating to violations and complaints and must always be truthful and forthcoming in the course of these investigations;
- Prompt and appropriate corrective action will be taken when and as warranted; and
- Employees will not be subject to retribution if reporting was done in good
faith. (see "Retaliation is Prohibited" section below.)

**Retention of Reports and Complaints and Investigations** - The office of Algoma Steel Inc.'s Manager of Internal Audit will maintain a log of all reports and complaints related to accounting, internal accounting controls, and auditing matters; track their receipt, investigation and resolution; and prepare a periodic summary of reports and complaints for the Audit Committee.

**Retaliation is Prohibited** - Employees will not be discharged, demoted, suspended or suffer any adverse treatment if they provide information or assist in an investigation regarding conduct they reasonably believe is unethical or that constitutes a violation of law, this Code or Algoma Steel's other policies. This includes giving information in connection with an authorized investigation. However, Algoma reserves the right to discipline employees who make an accusation without a reasonable, good faith belief in the truth and accuracy of the information or if they knowingly provide false information or make false accusations. "Good faith" does not mean that they have to be right, but it does mean that they believe they are providing truthful information. Employees who believe that they have been unfairly or unlawfully retaliated against, may file a complaint with their manager or supervisor, the Human Resources Department or the General Counsel.

For a more detailed accounting of the notification process and the established procedure for responding to, and keeping records of complaints, see the Whistleblower Policy.

**Presumption of Innocence** - An employee against whom a report or complaint has been made will be presumed innocent unless the investigation reveals a violation has occurred.

**Disciplinary Process** - As noted previously, a violation of law, this Code or other Algoma policies may result in disciplinary action up to and including termination and/or legal proceedings.

**CONCLUSION**

Compliance with the letter and the spirit of the provisions of the Code of Business Conduct is a condition of employment for all employees, as well as a condition of contracting for suppliers. Contravention of this Code may result in disciplinary action including dismissal or termination of the contractual relationship. For more serious breaches, civil action on behalf of the Company may follow and possible criminal prosecution by the appropriate authorities.

A compliance certificate is to be completed at least once each year by certain employees as determined by the Chief Executive Officer and the General Counsel. These employees are required to certify to compliance on an annual basis as follows on the Compliance Certificate enclosed.
The Chief Executive Officer, with assistance from the Director of Human Resources and the Vice President, Legal and General Counsel, will enforce this Code of Business Conduct to ensure, so far as possible, that all employees and suppliers are aware of and comply with these guidelines.

The Communication and reinforcement of the Code will include the following:

- Distributing copies of the Code to employees, key suppliers and contractors;
- Overseeing the administration of on-going communication, training and education;
- Ensuring that the Code is reviewed annually with all employees and that all Exempt employees annually declare any conflicts;
- Monitoring compliance with the Code; and
- Reporting annually to the Audit Committee of the Board of Directors.

The Code of Conduct is supported by Company Policies, Procedures and Protocols. Related policies in force at the time this Code of Conduct was published include:

- Access to Corporate Information
- Accessible Customer Service
- Attendance Management
- Corporate Disclosure
- Document Retention
- Drug and Alcohol
- Electronic Communication
- Employee Conduct Rules
- Employee Well Being
- Expenditure Authorization Rules
- Health, Safety and Environment
- Hours of Work
- Medical Cannabis
- Multi Year Accessibility Plan
- Overtime
- Personal Time Recording and Approval
- Quality
- Return to Work
- Whistleblower
- Workplace Violence, Harassment and Sexual Harassment

These Policies, as well as all Company Procedures and Protocols are available to employees on the Company intranet under ‘Knowledge Sharing’.
The Code of Conduct is available to the public at www.algoma.com/aboutalgoma/governance.

WAIVERS

Waivers of this Code for employees may only be granted by Algoma Steel Inc.’s General Counsel in combination with the Director of Human Resources. However, any waiver of this Code for Algoma Steel executive officers or directors may only be made by the Algoma Steel Board of Directors and will be disclosed by Algoma Steel to the extent required by law, regulation or applicable policy.
Algoma Steel Inc.
CODE OF BUSINESS CONDUCT

COMPLIANCE CERTIFICATE

I have carefully read the Algoma Steel Inc. Code of Business Conduct in its entirety.

I understand the Code of Conduct fully.

I hereby agree to comply with the full provisions of the Code.

Employee Name (Please Print)  Name of Supervisor

Signature

Date:

Supervisors / Managers

I have discussed the Code's provisions, their interpretation and their applicability with all employees for whom I am directly or indirectly accountable. These employees understand and are in full compliance with the Code to the best of my knowledge, information and belief.