

PRIVACY POLICY

voestalpine High Performance Metals (Australia) Pty Ltd recognises the importance of protecting personal information which it may be required to collect from individuals who become associated with our company. The purpose of the Policy is to ensure that any individual who provides information to voestalpine High Performance Metals (Australia) Pty Ltd is protected according to the Australian Privacy Principles (APP's) as set out in the Privacy Act 1988 (amended by the Privacy Amendment Act 2012) and the changes from 10 NPP's to 13 APP's

Exemptions from the Act include acts and practices of employers in relation to employee records. A general right of privacy exists so that employee records are handled in a manner that respects employee's rights and maintains confidentiality.

Our policy contains the following information:

- The kinds of personal information we collect and hold;
- How we collect and hold personal information;
- The purposes for which we collect, hold, use and disclose personal information;
- How an individual may complain about a breach of the APP's, and how we will deal with such a complaint; Whether we are likely to disclose personal information to overseas recipients; AND
- If we are likely to disclose personal information of overseas recipients – the countries in which such recipients are likely to be located if it is practicable to specify those countries in the policies.

For the purpose of this Policy 'information' is described as -

'Personal information' means information relating to an individual, including an opinion, which may be provided to voestalpine High Performance Metals (Australia) Pty Ltd as part of its credit reporting, employee records, contractors, service providers and sales and marketing in material form or not, and whether true or not. Such information may personally identify an individual or make the person's identity apparent.

'Sensitive Information' means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, or religious beliefs.

AUSTRALIAN PRIVACY PRINCIPLES (APPS)

APP 1 Open and Transparent Management of Personal Information

voestalpine High Performance Metals (Australia) Pty Ltd will make available its policy on the management of personal information. This will be free of charge. This policy and the privacy policy can be accessed on our website www.voestalpine.com/hpm

APP 2 Anonymity and Pseudonymity

Where possible, and practical, individuals will have the option of dealing with voestalpine High Performance Metals (Australia) Pty Ltd anonymously.

APP 3 Collection of Solicited Personal Information

Personal Information other than sensitive information

voestalpine High Performance Metals (Australia) Pty Ltd may collect and hold personal information such as your name, proprietors of organisations, address, telephone/mobile phone number, e-mail address, facsimile number, trade reference details and ABN.

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The company will only collect information that is necessary for its business activities and will be fair in the way this information is collected.

The Company will collect personal information directly from you, where practicable.

The reasons we collect personal information include, but are not limited to, setting up and administering a credit account for our customers, determine our customer requirements, to provide the appropriate service to our customers and assess our customer's satisfaction and ongoing needs.

When collecting information we will make you aware of the purpose for the collection, what we intend to do with the information, any law requiring collection, to whom the information may be disclosed and how you may access the information in the future.

Sensitive Information

voestalpine High Performance Metals (Australia) Pty Ltd will only collect sensitive information if the individual consents to the collection, if required by law or if certain other conditions are met.

APP 4 Dealing with Unsolicited Personal Information

If voestalpine High Performance Metals (Australia) Pty Ltd receives personal information and did not solicit the information then the Company will determine whether or not it would have collected this information under APP 3 if it had solicited the information.

APP 5 Notification of the Collection of Personal Information

Any time voestalpine High Performance Metals (Australia) Pty Ltd collects personal information about an individual we will take reasonable steps to notify the individual of such matters or otherwise ensure you are aware of such matters. When collecting information we will make you aware of the purpose for the collection, what we intend to do with the information, any law requiring collection, to whom the information may be disclosed and how you may access the information in the future.

APP 6 Use and Disclosure

voestalpine High Performance Metals (Australia) Pty Ltd will only use and disclose information

- if the individual has consented
- for the purpose it was collected
- to provide the products and services you require
- to administer and manage the provisions of these products and services including invoicing and collection of outstanding monies.
- Inform you of improvements in our products and services
- if it is related to law enforcement or crime prevention
- to our professional advisors, including our accountants, auditors and lawyers
- to government and regulatory authorities and other organisations as required or authorized by law

APP 7 Direct Marketing

voestalpine High Performance Metals (Australia) Pty Ltd will not use personal information about an individual for the purpose of direct marketing unless the individual would reasonably expect us to use or disclose the information for that purpose. We will provide, by simple means, requests from the individual not to receive direct marketing communications. We may use this information for the purpose of direct marketing if the individual has not made such a request to the organization.

APP 8 Cross-border disclosure of Personal Information

voestalpine High Performance Metals (Australia) Pty Ltd will only transfer personal information to related overseas companies if we believe that the recipient is subject to a law-binding scheme of contract that

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effectively upholds principles similar to APP's, the individual consents to the transfer or in other limited circumstances.

APP 9 Adoption, Use or Disclosure of Government related identifiers

voestalpine High Performance Metals (Australia) Pty Ltd will not adopt as its own identity of an individual an identifier assigned by a federal government agency e.g. Tax File Number or Medicare number (excludes ABN). We may disclose an identifier if we need to verify the identity of the individual for the business activities or for us to fulfil our obligations to an agency, or State authority or if it is required under an Australian law.

APP 10 Quality of Personal Information

voestalpine High Performance Metals (Australia) Pty Ltd will take all reasonable steps to ensure that personal information collected, used or disclosed is accurate, relevant, complete and up to date. However, the accuracy of the information depends to a great extent on the information you provide.

We, therefore, recommend that you notify us if:

- there are any errors in your personal information
- there are any changes to personal information such as name and address.

APP 11 Security of Personal Information

voestalpine High performance Metals (Australia) Pty Ltd will take all reasonable steps to protect personal information that it holds. This includes misuse, loss, unauthorized access, interference, modification or disclosure. This also includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

voestalpine High Performance Metals (Australia) Pty Ltd will permanently de-identify personal information no longer needed for any purpose. This principle applies to information collected before and after the commencement of the Act.

APP 12 Access to Personal Information

Individuals have a general right to access information about themselves subject by law to some exemptions. If an exemption applies, the use of a mutually agreed intermediary may allow sufficient access to meet the needs of both parties.

APP 13 Correction of Personal Information

If an individual can establish that information held about them is not accurate, relevant, misleading, complete and up to date voestalpine High Performance Metals (Australia) Pty Ltd will take reasonable steps to correct the record.

THE EMPLOYMENT RELATIONSHIP

Certain personal information may be exempt under the Act, such as employee records.

The Act will have a different impact on the various employment relationships such as:

- employer and employee relationship
- prospective employees during the recruitment stage; or
- contractors, subcontractors and consultants

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Employer/Employee Relationship

The impact of the legislation on the employment relationship between employers and employees is limited because of the current exemption relating to employee records. voestalpine High Performance Metals (Australia) Pty Ltd will collect, use and store employee records without having obligation to comply with the Australian Privacy Principles provided that these records are directly related to current or former employment relationship. The exemption does not apply to the company disclosing information to another organization such as workers compensation insurer – Australian Taxation Office.

voestalpine High Performance Metals (Australia) Pty Ltd will maintain good human resources practices by maintaining wherever possible the confidentiality of our employees personal information.

Prospective Employees

The employee records exemption does not apply to prospective employees. voestalpine High Performance Metals (Australia) Pty Ltd will have regard to the privacy of job applicants and the personal information they supply. Any information collected will remain confidential and this will apply to any information gathered from referees.

The type of personal information that may be collected in the recruitment process is applications forms, resumes, interview notes and reference information.

Any personal information collected about a prospective employee will not fall under the employee records exemption of the Act as there has not been an employment relationship established, therefore voestalpine High Performance Metals (Australia) Pty Ltd will comply with the Act when handling this information.

Personal information for unsuccessful applicants will be destroyed once a successful applicant has been appointed.

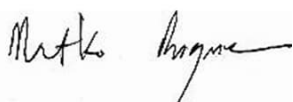
Contract Staff

Contractors, Subcontractors and Consultants are not employees of voestalpine High Performance Metals (Australia) Pty Ltd and therefore no employment relationship has been established, therefore personal information collected from these people will be subject to the Act.

Breach of the Act

An individual affected by a breach of the Act may bring a complaint in the first instance, to voestalpine High Performance Metals (Australia) Pty Ltd against whom the breach is alleged. If the matter is not resolved then a complaint may be taken to the Privacy Commissioner. The Commissioner has broad powers including the power to determine monetary compensation. Determinations of the Commissioner can be enforced by the Federal Court of Australia or Federal Magistrates Court. The Commissioner has also made clear an intention to use media publicity as a weapon against non-compliance.

Regards



Matko Bozanic
Managing Director
voestalpine High Performance Metals (Australia) Pty Ltd
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HRP05 – Privacy Policy
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voestalpine

ONE STEP AHEAD.