

## **ESSAR Steel Algoma Inc.**

### **CORPORATE DISCLOSURE POLICY**

Essar Steel Algoma Inc. (“Algoma” or the “Company”) seeks to ensure that any communications of Company information are timely, factual, accurate and in compliance with the Company’s obligations under its senior secured credit facilities and the indenture governing the Company’s senior notes due 2015, and with applicable laws. It is therefore important that Algoma personnel comply with prescribed procedures and policies to govern the disclosure of Company information. This Corporate Disclosure Policy (this “Policy”) sets forth those procedures and policies.

#### **APPLICATION OF POLICY**

1. Unless otherwise noted, this Policy applies to all of Algoma’s officers, directors, employees and authorized representatives (collectively, each referred to as an “Algoma Employee”).

#### **THE GENERAL PRINCIPLE**

2. Algoma Employees should not discuss internal Company matters or developments relating to the Company which relates in any way to non-public material information with anyone outside of Algoma (including, without limitation, family members, relatives and friends), except as required in the performance of his or her employment duties. Similarly, Algoma Employees should not discuss Company affairs which relate in any way to non-public material information in public or quasi-public areas where conversations may be overheard or participate in or host Internet chat rooms or bulletin boards which discuss such information.

3. It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of an issuer’s securities or if such information would be expected to affect the investment or voting decisions of a reasonable investor, or if the disclosure of the information would be expected to alter significantly the “total mix” of information in the marketplace about an issuer.

#### **AUTHORIZED SPOKESPERSONS**

4. Unless otherwise approved by Algoma’s Board of Directors or the Chief Operating Officer, the only persons authorized to discuss Company matters with the media, securities industry professionals (e.g. securities analysts, investment bankers and investors) or Company security holders are as follows: the Chief Operating Officer, the Chief Financial Officer, Vice President, Legal and Manager of Corporate Communications (each an “Authorized Spokesperson”), and, as applicable, such officers of the Company as may participate in such discussions with such Authorized Spokesperson(s).

#### **DISCLOSURE COMMITTEE**

5. In order to ensure compliance with this policy, any applicable legal requirements and the continuity, accuracy, completeness and currency of information disseminated by the Company to the public and applicable regulatory authorities, the Chief Operating Officer, the Chief Financial Officer and the Vice President, Legal shall constitute the Disclosure Committee of the Corporation (the “Disclosure Committee”) and shall review and approve all public filings or disclosures of the Company prior to such information being disseminated to the security holders, the public or filed with any applicable regulatory authorities. Such members shall serve at the pleasure of the Audit Committee or until such time as they resign therefrom.

6. All such information should be forwarded, at least 24 hours prior to the targeted release or filing date, as applicable, to the Disclosure Committee for its review and approval. Any approvals required to be given by the Disclosure Committee hereunder may be given by any two members thereof.

7. The Disclosure Committee shall report to the Chief Operating Officer on not less than a quarterly basis as to those matters required to be reported on pursuant to the Company's senior secured credit facilities or the indenture governing the Company's senior notes due 2015 or under applicable law, and to the Audit Committee of the Board as a whole from time to time, as to matters within its mandate.

## **DISCLOSURE OF NON-PUBLIC MATERIAL INFORMATION**

8. Except in accordance with the procedures set forth in this Policy, no Algoma Employee, may ever discuss or otherwise disclose non-public material information with any person outside the Company.

## **DISCLOSURE OF QUARTERLY EARNINGS INFORMATION**

9. Quarterly earnings information regarding the Company shall be disclosed in accordance with the Company's obligations under its senior secured credit facilities and the indenture governing the Company's senior notes due 2015, or as otherwise required by applicable law.

## **DEALING WITH THE PRESS, GENERAL MEDIA AND INDUSTRY COMMUNICATIONS**

10. All press releases to be issued by or on behalf of the Company and any of other public communications should be forwarded to the Disclosure Committee for review and approval with reasonable advance notice prior to dissemination.

11. This Policy acknowledges that the Company, including other than Authorized Spokespersons, communicates on a regular basis in the ordinary course of business with its customers, suppliers and other third parties other than investors, by means of media communications, interviews, speeches, industry conference presentations and otherwise. Such communications are not, in and of themselves, subject to this Policy except in those instances where such communications are disseminated through communication channels which reach or which could reasonably be expected to reach analysts or other members of the financial media or investment community in general, or where such communications may involve the dissemination or discussion of non-public material information. In such event, such information should be submitted to the Corporate Disclosure Committee with reasonable advance notice, for purposes of the Committee's review and approval. In the event of any doubt as to whether or not information in a particular instance should be referred to the Disclosure Committee for consideration prior to distribution or discussion.

12. If any individual (including a securities industry professional, Company security holder, government official, media representative, etc.) contacts an Algoma Employee seeking information regarding the Company, that individual must notify the outsider that in accordance with this Policy, all such inquiries are to be directed to an Authorized Spokesperson.

13. If an Algoma Employee becomes aware that there has been an inadvertent disclosure of non-public material information, he or she should immediately contact a member of the Disclosure Committee.

14. It is Algoma's policy not to participate in, host or provide links to any chat room, bulletin board or newsgroup on the Internet which deals with the Company or any of its securities. The Company's employees will not participate in, and will advise the Manager of Corporate Communications if they become aware of any such chat room, bulletin board or newsgroup. The

Manager of Corporate Communications periodically monitors chat rooms, bulletin boards and newsgroups on the Internet in order to identify discussions about Algoma.

### **WEBSITE DISCLOSURE**

15. The Disclosure Committee shall be responsible for reviewing and approving in advance any financial and other material information to be posted on the Company's website. The Disclosure Committee shall also periodically review and audit the Company's website so as to ensure the accuracy, completeness and currency of the information posted thereon.

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*As noted above, it is critical that all Algoma's Employees adhere to this Policy. If any person has questions regarding how this Policy should be followed or interpreted, please contact a member of the Disclosure Committee for clarification.*

Adopted by the Board of Directors
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