

AK STEEL DEARBORN WORKS
RULES OF CONDUCT
DECEMBER 10, 2018

AK Steel Dearborn Works believes that the majority of our employees are dedicated and hard-working employees who believe in adhering to Company rules, policies and procedures. On occasion, some employees choose to circumvent or to blatantly ignore Company rules. While we hope that such occurrences will be infrequent, violations of Company rules cannot be ignored. The Company will take corrective actions, when an employee's job performance or conduct falls short of AK Steel's standards. Such action will range from written warnings to discharge. This means that, as a general rule, employees will be given an increasingly severe penalty each time an offense is committed. Some types of misconduct, however, are so intolerable that discharge may be imposed for the first offense. The Company reserves the right to impose discipline based upon the totality of the circumstances involved.

As you review the following rules, please keep in mind that this list is not intended to be exhaustive. It is merely intended to provide you with examples of the types of conduct that can result in disciplinary action. Violating any one of the rules listed below will result in discipline, up to and including discharge. The specific discipline issued will depend on the nature of the offense and the particular circumstances at the sole discretion of the Company.

Misconduct that will result in immediate discharge in most cases:

1. Theft (including attempted theft or aiding in a theft), unauthorized possession, removal or appropriation of property belonging to the Company, an employee, contractor, customer, guest or vendor.
2. Falsification of timekeeping records, including but not limited to, fraudulently/willfully entering time for another employee or knowing or permitting another person to make time entries on your behalf (including, but not limited to, fraudulent entries into the time keeping system), or receiving payment for time not worked.
3. Falsification of applications and other documents - employment applications or any Company record (including, but not limited to, unemployment or workers' compensation applications, sickness and accident forms, FMLA documents or other leave forms and requests) or the unauthorized or unjust receipt of benefits for which you are not entitled under the terms of the Company's plans or programs, including SUB benefits or federal or state programs.
4. Falsifying or misrepresenting the reason for a leave of absence or obtaining other employment during a leave of absence.
5. Falsification of Company production, maintenance or safety records.
6. Falsification or misrepresentation of factual circumstances for personal financial gain or time off.
7. Committing an act of violence in the workplace and/or violating the Company's Harassment and Workplace Violence Policy, including any activity or behavior that (either physically, verbally or through any others means) promotes, encourages, threatens, or creates a hostile or intimidating work environment.
8. Possession, use or sale of any firearm, weapon of any kind, explosives or fireworks or any hazardous or bio-hazardous materials.
9. Possession of alcohol, marijuana or any illegal substance on company property including the parking lot.
10. Under the influence of alcohol, marijuana or other substances while on company property including the parking lot.
11. The intentional defacing, damaging, destruction of, or sabotage of Company, employee, contractor, customer, guest or vendor property.
12. Deliberately restricting work performance, concealing defective work, or encouraging or assisting others to do so.
13. Tampering with safety equipment, fire prevention/protection devices, emergency exits, evacuation routes or other acts that exhibit a disregard for the health or safety of others in the facility.

AK STEEL DEARBORN WORKS
RULES OF CONDUCT
DECEMBER 10, 2018

14. Willful misconduct or gross negligence at work, while performing one's job or while operating equipment, machinery or motorized vehicles.
15. Participating, aiding or approving conduct that is in conflict with the interests of the Company, including, but not limited to disclosing confidential or proprietary information about the Company and its business, as well as, offering to take or taking a bribe or kickback or offering or providing a bribe or kickback to someone else.

Misconduct that will result in discipline from written warnings, suspensions, or up to and including discharge depending upon the facts and circumstances of the violation.

16. Violation of Safety Rules including but not limited to Lockout/Tryout, Confined Space Entry, Fall Protection, Mobile Equipment Operation, environmental protection requirements, personal protective equipment, or defeating safety device or guard.
17. Involvement in sexual harassment and other unlawful harassment/discrimination against fellow employees, contractors, customers, vendors and other visitors.
18. Engaging in any unlawful activity or engaging in indecent, immoral or disorderly conduct or creating or contributing to unsanitary conditions.
19. Gambling on the premises including: cards, running numbers or other games of chance.
20. Insubordination (refusal or failure to perform work assigned or to comply with instructions issued by authorized personnel).
21. Abusive, threatening, or intimidating language, or the use of profanity or disrespectful tone towards subordinates, fellow employees, supervisors, visitors, contractors, or vendors.
22. Negligence in the performance of one's duties or improper conduct.
23. Negligence, carelessness or recklessness that results in the waste of Company materials and/or product.
24. Carelessness at work, while performing one's job duties or while operating equipment, machinery or motorized vehicles.
25. Failing to remain in a state of readiness during any downtime while on work time.
26. Failing to maintain satisfactory work performance.
27. Inattention or carelessness while on the job.
28. Failure to maintain and record appropriate and accurate production records.
29. Failure to follow specified job procedure(s).
30. Unauthorized use, misuse or accidents with Company vehicles.
31. Sleeping on the job.
32. Job Abandonment or unauthorized absence from work area or absence from assigned job duties without the approval of supervision.
33. Being in an unauthorized area of the facility, including the Company parking lots during work hours.
34. Unauthorized leaving company premises.
35. Creating or failing to report an unsafe condition to supervision.
36. Failure to promptly report an accident, incident or injury to supervision.
37. Providing false or misleading information regarding a workplace accident, injury, incident or during a Company investigation or refusing to provide information during a Company investigation.
38. Unauthorized taping or recording of any meeting, communication or exchange among or between personnel, including the use of recording devices where their use is unknown by any other person being recorded.
39. Failure to cooperate in any investigation or search conducted by or on behalf of the Company.
40. Interfering with other employees on the job.
41. Engaging in horseplay, scuffling, or other behavior that is in disregard of Company safety or work standards.
42. Reading newspapers, books, etc. except as required for job performance, and/or except during lunch/break time.
43. Use or possession of unauthorized electronic devices in the workplace, for example, laptops, televisions, video or DVD players, video game systems, tablets, etc.

AK STEEL DEARBORN WORKS
RULES OF CONDUCT
DECEMBER 10, 2018

44. Use of cell phones in working area during working time for non-work related matters. Failure to return promptly from a leave of absence or vacation upon expiration of leave or vacation.
45. Violation of the Attendance Policy.
46. Violation of Company housekeeping rules.
47. Smoking in any building on Company property. Smoking is also prohibited in outside areas that surround entrances or exits and in Company vehicles.
48. Failure to complete Company paperwork or attendance forms for training and other administrative information when instructed to do so by management.
49. Violation of Company policies not otherwise outlined above.

Copies of Company Policies are located on the AK Steel intranet page. Copies may also be requested from the Labor Relations department. It is every employee's responsibility to review these policies and abide by them as if contained in these Rules of Conduct. Some of the policies are listed below.

- Safety and Health Rules and Instructions
- Corporate Policy for Health and Safety, Environmental & Quality
- Equal Employment Opportunity Policy
- Harassment and Workplace Violence
- Code of Business Conduct and Ethics for AK Steel Directors, Officers and Employees
- Insider Trading and Anti-hedging Policy
- Written Information Security Policy
- Absenteeism Control Policy
- Substance Abuse Program

The above Rules of Conduct are intended to provide employees with an overview of the Company's rules of conduct, but it is not all-inclusive. Other detrimental conduct, not necessarily listed here, may lead to disciplinary action up to and including termination of employment as determined at the sole discretion of the Company. Numbering of the above rules of conduct is for reference purposes only and does not indicate that any rule is greater or lesser in severity than another.

