

Organizational Structures That Work: Small Company Edition

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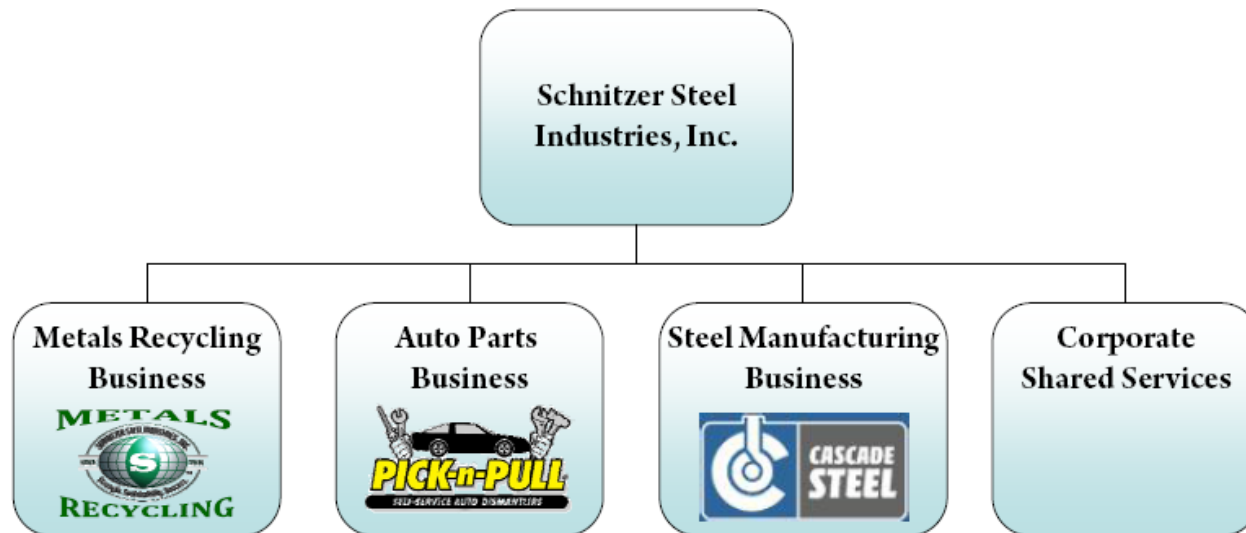


COMPLIANCE WEEK 2010

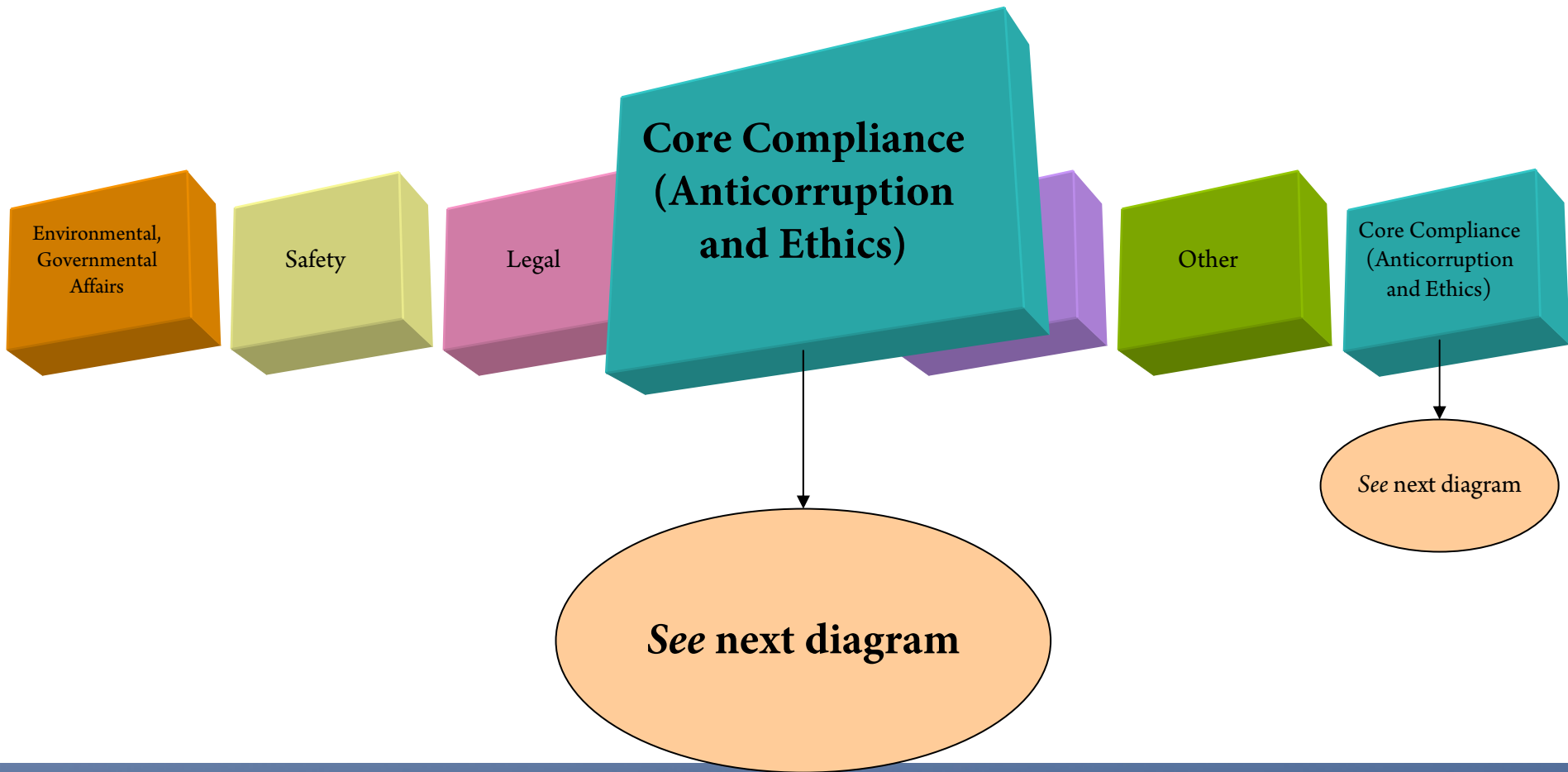
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Schnitzer is divided into three operating divisions and one shared services division

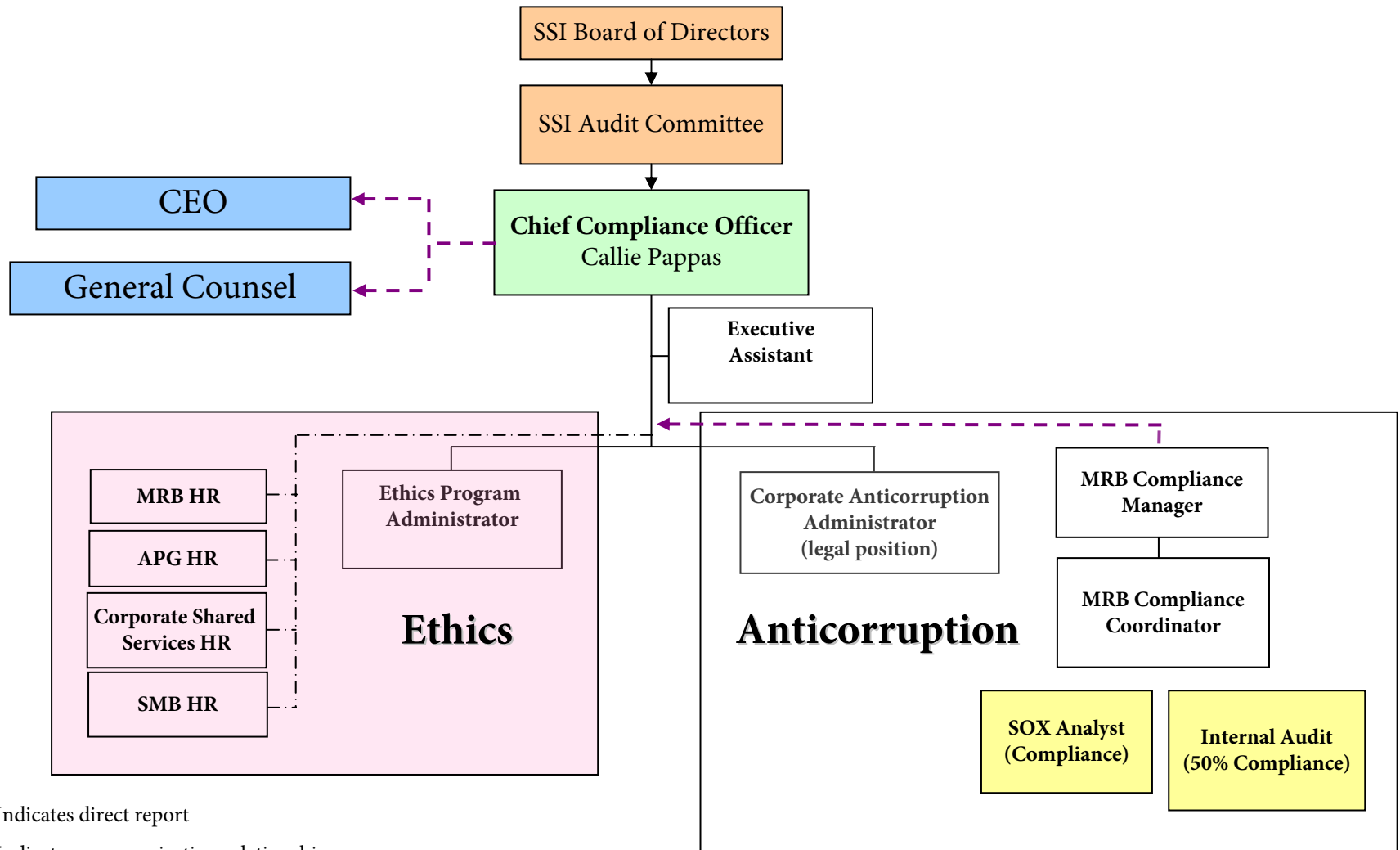
The Compliance function is structured to reach all employees in the most effective way possible



Schnitzer Steel's Compliance Responsibilities



Organization of Core Compliance Function



Key:
 —————> Indicates direct report
 - - - - - Indicates communication relationship

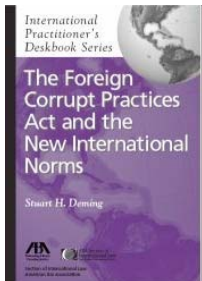
*These personnel have Compliance responsibilities within their functional group and support the Compliance Department.

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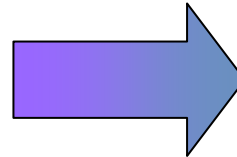
Ethics Program

- ☞ Whistleblower Hotline
- ☞ Code of Conduct Training
- ☞ Communication
- ☞ Compliance Officer Log



Anticorruption Program

- ☞ Bribery
- ☞ Money Laundering
- ☞ Terrorism



- ☞ Books and Records
- ☞ International Due Diligence
- ☞ Contract Administration
- ☞ Anticorruption Internal Controls
- ☞ Wire Transfer Controls and Payment Monitoring
- ☞ Designated Party Screening