



**SUNCOKE ENERGY
CODE OF BUSINESS
CONDUCT and ETHICS**

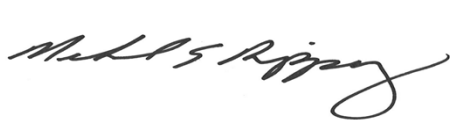
April 9, 2018

A MESSAGE FROM OUR LEADERSHIP

Ethical conduct is the cornerstone of how the SunCoke Energy team does business. Our continued success relies on our reputation, which is built on the decisions and actions of every employee, officer and director of SunCoke Energy and its subsidiaries. We are each responsible for embracing the highest level of ethical behavior in all situations.

This Code of Business Conduct and Ethics, together with our Core Values, establish the principles that guide our daily actions. Whether we are working with customers, vendors, business partners or neighbors, it is essential that we always act with integrity. That means being honest, following the letter and spirit of the law, honoring our commitments and doing what is right – without compromise.

SunCoke Energy is more than just a publicly traded company; it is a well-respected brand known for quality, professionalism and corporate responsibility. As SunCoke Energy representatives, we all share the important work of protecting our reputation for ethical behavior and sound conduct.



Michael “Mike” G. Rippey
Chairman and Chief Executive Officer
SunCoke Energy



Katherine T. Gates
Senior Vice President, General Counsel
and Chief Compliance Officer
SunCoke Energy



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OUR CORE VALUES AND MISSION

<p>Excellence</p> <p>Expect the best from yourself, remove obstacles, inspire and support others, embrace diversity, celebrate success.</p>	<p>Innovation</p> <p>Master the science and process, create a better way, find a better solution, push the envelope.</p>	<p>Commitment</p> <p>Deliver results, be accountable, work as a team, continuously improve and grow, communicate effectively.</p>
<p>Integrity</p> <p>Do what is right, say what you mean, do what you say, earn trust, treat others with respect.</p>	<p>Stewardship</p> <p>Provide safe, reliable, and environmentally sound operations for our people and their families, our customers, and the communities where we do business.</p>	<p>Our mission is to fuel our steel customers with coke, coal and power. We will grow our business globally, expand with current and new customers, and operate our assets efficiently and responsibly.</p>

Adhering to our Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics sets forth the basic principles that guide the day-to-day business activities of all employees, officers and directors of SunCoke Energy and its subsidiaries (collectively, “SunCoke Energy”). Detailed information regarding the specific types of circumstances referenced in this Code can be found in our comprehensive Compliance Policies, which are listed in Appendix A (see page 15) and are available on the Legal Department site on SunCoke Connect.

SunCoke Energy’s brand and reputation are our most valuable business asset and must be upheld by ethical conduct in each and every interaction with vendors, customers, competitors, communities, investors, employees and the government.

Each employee, officer and director must abide by this Code and all relevant policies, act in good faith and with integrity in the performance of his or her responsibilities and in compliance with all applicable laws, rules and regulations.

Any waiver of this Code for executive officers or directors may be made only by the Board of Directors or a Board Committee and will be disclosed promptly as required by law or stock exchange regulation.

Ethical Decision Making

This Code should guide the spirit of our actions, but it will not always provide sufficient insight to the appropriate course of action. When in doubt regarding your intended course of action, consult with your immediate supervisor or the Compliance Team. When faced with a situation in which you question whether you are making the ethical choice, ask yourself the following questions:

- Would my actions uphold the spirit and goals of our Code?
- Would my actions tarnish our brand or reputation?
- Would my actions inspire trust among my colleagues, supervisors, customers and competitors?
- Is this a fair and honest course of action?
- Could I explain this action to my colleagues, supervisors, family and the general public with a clear conscience?
- Is my intuition telling me that this may not be the appropriate action to take?

If you have difficulty answering these questions, you should probably reconsider your intended course of action and consult the Compliance Team or the Compliance Policies. If an action feels inappropriate, then it probably is.

Adhering to our Code of Business Conduct and Ethics (CONTINUED)

Guidance and Reporting

Consistent with our commitment to ethical behavior, all employees, officers and directors must report any suspected policy violations to the Compliance Team directly or by using the SunCoke Workplace Ethics and Compliance Program, a confidential 24/7 reporting hotline and website. The program can be accessed by calling the toll-free 24/7 number: (877) 918-1997, or by visiting the website:

<https://suncoke.alertline.com>.

Training

SunCoke Energy is committed to ensuring that all of our employees are familiar with the information necessary to perform our job responsibilities in accordance with our core values. On an annual basis, employees, officers and directors will be required to review this Code and certify that they understand what it requires. Throughout the year, employees are expected to be familiar with the specific Compliance Policies that are relevant to their day-to-day activities, and where appropriate, to undergo specialized training. Employees subject to specialized training requirements will be notified by the Compliance Team.



Call the toll-free 24/7 number:

(877) 918-1997

visit the website:

<https://suncoke.alertline.com>

Avoiding conflicts of interest

A conflict of interest exists when an employee, officer or director is faced with divided loyalty caused by using his or her position at SunCoke Energy for personal benefit, or situations where there is a conflict between personal interests and employment responsibilities. No employee, officer or director may receive improper personal benefits, or arrange for personal benefits, for a relative, friend or business associate. Actions may not be taken in which a private interest interferes with an individual's ability to advance the interests of SunCoke Energy or to perform corporate work objectively and effectively.

Nepotism

In order to avoid conflicts of interest caused by personal relationships, our Nepotism Policy prohibits the employment of family members of an employee or those in an intimate relationship with an employee under any of the following circumstances: (i) where one party would have line authority (or practical power) to supervise, appoint, compensate, evaluate, remove or discipline the other party; (ii) where one party would be responsible for auditing the work of the other party; (iii) where other circumstances might lead to potential conflict among the parties or conflict between the interests of one or both parties and the best interests of SunCoke Energy; or (iv) where there is no direct supervisory authority, but one of the parties is an officer or director of SunCoke Energy.

What happens when a conflict of interest is reported or discovered?

You must promptly and fully disclose a conflict of interest to the Compliance Team as soon as it becomes known. This disclosure obligation extends to knowledge of any conflict of interest involving another person associated with SunCoke Energy.

Management will take all necessary actions to remove the conflict, which may include procedural safeguards, removal of an employee's discretion in the area of conflict, reassignment of job responsibilities, reassignment of the employee or prohibition against continued participation in the conflicting activity.

How should I evaluate whether a conflict of interest exists?

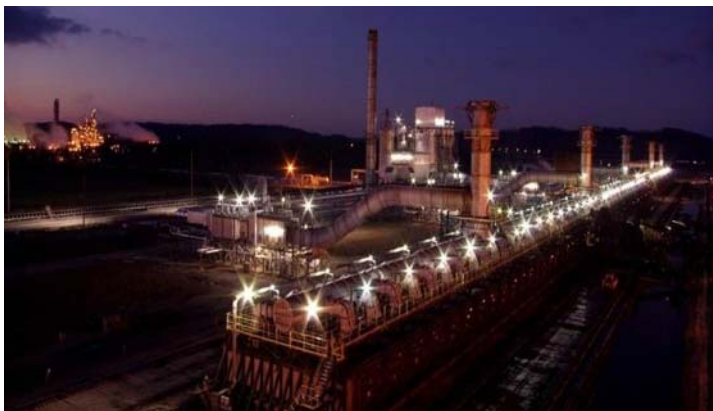
Employees, officers and directors should consult the Conflict of Interest Policy to understand where potential conflicts may exist. When it is not clear whether a conflict of interest exists, the determination should be made by the Compliance Team.

Ensuring accurate financial reporting and internal controls

All employees and officers are required to maintain accurate, complete and honest records of information to enable SunCoke Energy to make full, fair, accurate and timely disclosures to regulatory agencies and the public. SunCoke Energy maintains stringent internal controls to ensure that transactions are properly authorized, assets are safeguarded, operations are conducted in accordance with directives from the Board of Directors and management and that financial records are reliably maintained. All books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect corporate transactions and must conform to applicable legal requirements and the accounting standards of SunCoke Energy.

No false, misleading or fictitious entries may be made on SunCoke Energy's books and records. Unrecorded funds or assets may not be maintained. If an employee, officer or director is not sure whether a certain expense or transaction is legitimate, or how to properly account for the expense or transaction, he or she must ask his or her supervisor or the Controller's Department.

Business records and communications often become public, and all employees, officers and directors should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies.



Code of Ethics for Senior Officers

The Chief Executive Officer, Chief Financial Officer, Controller, General Auditor and other senior financial officers and employees have heightened responsibility to ensure full, fair, accurate and timely disclosure in the periodic reports that SunCoke Energy files with the Securities and Exchange Commission. These officers and employees must promptly bring to the attention of the management Executive Committee any material information that could affect such disclosures, and must promptly notify the Audit Committee of the Board of Directors of any information regarding:

- significant deficiencies in internal controls;
- any fraud involving management or employees having a significant role in financial reporting; or
- any material violation of law or regulation applicable to SunCoke Energy or any material violation of its Compliance Policies.

Ensuring appropriate retention of records

Records must be retained or destroyed according to the applicable laws and SunCoke Energy's Records and Information Management Policy. Records relevant to a pending or threatened government or SunCoke Energy investigation or other legal action must not be destroyed. SunCoke Energy prohibits any employee, officer or director from altering, destroying, mutilating, changing or concealing a record, document or other object, or attempting to do so, with the intent to impair the object's integrity or availability for use in an official proceeding. Specific guidelines regarding the appropriate retention of records can be found in SunCoke Energy's Records and Information Management Policy and corresponding Records and Information Management Program.

What if destroying a document seems to be in SunCoke Energy's best interests?

No matter the circumstances, it will never benefit SunCoke Energy to improperly or illegally destroy documents of any kind. In the event of litigation or a governmental investigation, the Legal Department will circulate instructions regarding the retention of relevant information and the suspension of normal rules for archiving and deleting electronic data. Employees, officers and directors should consult the Legal Department for instructions regarding document retention if the application of the instructions in a particular situation is unclear.



Proper use and disclosure of confidential information



What is considered confidential information?

All non-public information about SunCoke Energy must be protected as confidential information, as defined by the Corporate Disclosure Policy. Examples of confidential information include:

- Operational Information
- Business Development Transactions
- Significant Changes in our Management
- Major Litigation
- Trade Secrets and Technological Breakthroughs

Any questions regarding whether information is considered confidential should be directed to the Legal Department.

Confidential information is an asset of SunCoke Energy and may only be used for legitimate and approved business purposes. In addition, federal securities laws impose restrictions on disclosure of information, and the improper disclosure of confidential information can adversely impact business opportunities and tarnish our reputation and the public's perception of our products and services.

Only designated spokespersons are authorized to disclose confidential information. Detailed information about disclosures can be found in the Corporate Disclosure Policy.

In addition, use of confidential information for personal financial benefit, such as to trade in stocks or bonds, or to "tip" others who might make an investment decision on the basis of this information is unethical and illegal, and is prohibited. Details regarding this prohibition can be found in the Insider Trading Policy.

Ensuring vigorous competition and fair dealing

SunCoke Energy achieves competitive success through honest dealing and superior performance, not unethical or illegal business practices. You must avoid any situation in which SunCoke Energy or its employees, officers or directors could be accused of conspiring with competitors, using coercive or unfair tactics on customers or suppliers or entering into illegal arrangements with competitors or participating in any illegal restraints on trade.

What is prohibited?

Prohibited transactions include any express or implied arrangements with competitors to fix prices, to divide markets, to limit supplies, to rig bids, to restrict distribution channels or to engage in any other type of improper restraint of trade. SunCoke Energy always competes vigorously, engages in arm's length transactions with competitors, sets prices independently and makes independent decisions about customers and suppliers.

Employees, officers and directors may not seek to acquire competitive information, such as confidential production, cost or pricing data from a competitor, or to steal a competitor's confidential information. No employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Additional information can be found in the Antitrust and Fair Competition Policy.



Avoiding improper entertainment and gifts

In appropriate circumstances, the exchange of business courtesies, such as gifts, meals, entertainment and travel, can help strengthen business relationships and further business objectives.

What am I allowed to give or receive as a business courtesy?

As a general rule, business courtesies may be provided or received if they are ordinary and customary under the circumstances and of modest value. It is essential that the provision or receipt of business courtesies not cloud business judgment or present a conflict of interest. Note that the following courtesies are never permitted:

- Gifts given or received in the expectation of, or as a reward for, the provision of business.
- Gifts or entertainment that may tarnish the reputation of SunCoke Energy.
- Gifts, meals or entertainment that are provided to prevent the recipient's ability to act in the best interest of his or her company.

In addition, employees performing certain functions may also be subject to additional or more stringent limitations by a department policy. Further guidance regarding business courtesies can be found in the Gifts, Entertainment and Sponsored Travel Policy.

What about reporting business courtesies?

Business courtesies (given or received) in connection with SunCoke Energy valued at \$250 or greater for a single occurrence, or involving a single individual, or \$500 or greater for multiple occurrences involving a single individual during a calendar year, must be reported using the online gift reporting tool provided on the Legal Department site on SunCoke Connect (or, in the case of our outside directors, the applicable BoardVantage site).

What about travel expenses?

Infrequently, it may be appropriate for customers, suppliers or other business associates to pay for travel-related expenses for SunCoke Energy personnel, or for SunCoke Energy personnel to pay for travel expenses of a business associate. As with other business courtesies, such arrangements must be customary and ordinary under the circumstances and must be reported where the value thresholds are exceeded.



Maintaining an harassment-free and discrimination-free workplace

Attracting and retaining a top-caliber, diverse workforce requires that everyone have an equal opportunity to participate, contribute and advance at SunCoke Energy. We are committed to providing a work environment that is free of all types of harassment and discrimination, where all employees are evaluated based on their abilities and quality of work. SunCoke Energy requires that equal employment opportunities are afforded to all qualified individuals, without regard to race, color, ancestry, religion, sex, sexual orientation, national origin, age, pregnancy, physical or mental disability, citizenship status, veteran status, gender identity or expression, genetic information or any other characteristic or status that is protected by federal, state or local law. This applies to all employment decisions, including recruiting, hiring, tenure of employment, and all terms and conditions of employment.

What will SunCoke Energy do when harassment or discrimination is suspected?

SunCoke Energy promptly and thoroughly investigates all allegations of harassment or discrimination. SunCoke Energy does not tolerate any form of harassment, such as slurs, derogatory gestures or messages, or display of objects that would create a hostile work environment. Examples of unacceptable conduct include:

- Derogatory comments based on racial or ethnic characteristics.
- Unwelcome sexual advances.
- Violent or threatening behavior.
- Discrimination on the basis of race, gender, national origin, age, religion, sexual orientation or other legally protected characteristics.
- Displaying sexually explicit material in the workplace.

Employees, officers and directors should consult the Anti-Discrimination Policy, Equal Employment Opportunity Policy and Anti-Harassment Policy for additional information.



Maintaining the health and safety of our employees and the environment

SunCoke Energy's operations reflect our values of safety, integrity and respect for people and the environment. The products and services of SunCoke Energy are designed, provided and handled to meet obligations to customers and to appropriately manage risks to human health and the environment.

Each employee has a responsibility for maintaining a safe and healthy workplace by following safety and health rules and practices, and reporting accidents, injuries and unsafe equipment, practices or conditions. SunCoke Energy maintains appropriate health, safety and environmental compliance programs to help ensure a safe workplace. Compliance with SunCoke Energy's quality processes and safety requirements is essential to minimize the risk of dangerous or unhealthy working conditions.

SunCoke Energy has robust programs to maintain compliance with laws and regulations, enhance employee and contractor safety, and minimize environmental effects and risks. Our compliance objectives include prevention of health, environment and safety incidents, as well as timely informing appropriate officials, employees, contractors, customers and the public of any significant health, safety or environmental hazards related to our facilities. SunCoke Energy verifies conformance through programs, including internal and external audits, and constantly strives to meet objectives that facilitate sustained performance improvement.



Maintaining a workplace environment free from substance abuse

Consistent with SunCoke Energy's core values, it is our policy to maintain a workplace environment that is free from substance abuse and its negative effects on our employees. SunCoke Energy employees are required to be fit for duty and capable of performing their responsibilities in a safe and productive manner. Substance abuse poses safety concerns and directly leads to health, attendance and productivity issues. SunCoke Energy is focused on the needs of our business and the expectations of our employees while approaching substance abuse issues compassionately, and with an emphasis on deterrence and rehabilitation, not just employment status.

What is prohibited?

The unauthorized use of, or being under the influence of or impaired by, alcohol or certain illicit drugs is prohibited while engaging in SunCoke Energy business or while on SunCoke Energy premises. You should consult the Substance Abuse Policy for more details on such prohibitions and for guidance with regard to the improper use of prescription drugs or medications that may affect your ability to safely perform your job duties.

How is this enforced?

A central component of enforcement is drug testing, conducted before an employee is hired, after an accident occurs, when there is reasonable cause and randomly under a non-biased selection method.

Who is eligible to be tested?

All salaried and hourly employees of SunCoke Energy who are not covered by a collective bargaining agreement are eligible to be tested. Union employees are subject to similar policies established in their respective collective bargaining agreements. Contractors and vendors hired by SunCoke Energy are expected to provide proof of similar policies in place at their organizations.

Additional information can be found in the Substance Abuse Policy.



Appropriately interacting with government personnel and foreign governments and persons

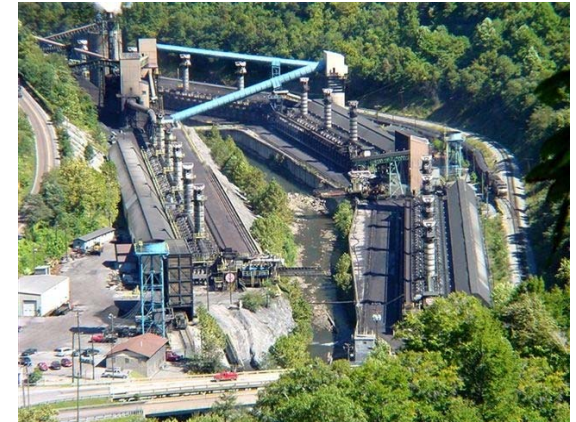
Avoiding improper payments to government personnel

SunCoke Energy conducts business with the highest level of integrity and in full compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”). Consistent with the FCPA, SunCoke Energy prohibits the payment by SunCoke Energy personnel or agents of “anything of value” (i.e., anything with objective or subjective value, such as cash, entertainment, promises of future employment or charitable contributions made at the request of a foreign official) to a foreign official for any purpose. The application of the FCPA can be complicated, and further guidance is provided in the Anti-Corruption Policy.

In addition, the U.S. government regulates the type of business courtesies that can be given to U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules is prohibited. State and local governments, as well as foreign governments, may have similar rules. Where the application of these rules is unclear, you should consult with the Compliance Team.

Export Controls and Sanctions

The United States government maintains laws and regulations governing the international conduct of SunCoke Energy. The restrictions on dealings with governments and persons in certain countries subject to embargo are detailed in the Export Controls and Economics Sanctions Policy.



The term “foreign official” includes:

Both traditional government officials, members of public organizations and even employees of a government-owned or government-controlled company. Every employee of these companies, regardless of level, is considered a “foreign official.”

Reporting illegal or unethical behavior without fear of retaliation

SunCoke Energy has established the SunCoke Workplace Ethics and Compliance Program to uphold the highest standards of ethical and legal behavior. If you suspect any potential or actual violations of law or corporate policies, it is your obligation to report those potential violations to the Compliance Team directly or by using the SunCoke Workplace Ethics and Compliance Program. The program is administered by a third party and is available 24 hours a day/7 days a week. Calls and online submissions are anonymous, unless the notifying party chooses to disclose his or her identity.

SunCoke Energy does not permit retaliation in the workplace based upon the good-faith reporting of misconduct or the exercise of legal rights, including the use of the compliance reporting system. SunCoke Energy takes all allegations of retaliation seriously, investigates them promptly and responds appropriately.

Are the hotline calls and online submissions really confidential?

Yes. Our compliance reporting system is operated by an independent third party and all calls and submissions are completely confidential. You are not required to disclose any identifying information about yourself.

All issues raised regarding financial or accounting matters will be brought to the attention of the General Auditor, and all material issues related to financial or accounting matters will be brought to the attention of the Audit Committee of the Board of Directors.



Call the toll-free 24/7 number:

(877) 918-1997

visit the website:

<https://suncoke.alertline.com>

When should I submit a report?

The SunCoke Workplace Ethics and Compliance Program may be used to report any concerns regarding compliance with any law or regulation, compliance with this Code or adherence to any compliance or other SunCoke Energy policy.

APPENDIX A

In addition to the matters addressed in this Code, employees, officers and directors are required to comply with all other SunCoke Energy policies, as amended from time to time, including but not limited to the following policies, some of which cover, with more specificity, matters addressed in this Code:

- Anti-Corruption Policy
- Anti-Discrimination Policy
- Anti-Harassment Policy
- Antitrust and Fair Competition Policy
- Conflict of Interest Policy
- Corporate Disclosure Policy
- Electronic Mail Usage Policy
- Equal Employment Opportunity Policy
- Export Controls and Economic Sanctions Policy
- Gifts, Entertainment and Sponsored Travel Policy
- Insider Trading Policy
- Nepotism Policy
- No-Retaliation Policy
- Privacy Policy
- Prohibited Payments and Political Contributions Policy
- Records and Information Management Policy
- Regulation FD Policy
- Substance Abuse Policy

