



ArcelorMittal

# ArcelorMittal - Whistleblower Policy

May 2019

## Scope

ArcelorMittal's Whistleblower Policy is intended for reporting of serious concerns with regards to possible irregularities or misconduct, including those relating to violations of code of business conduct, legal or regulatory requirements, fraud, incorrect or misrepresentation in accounting, auditing or banking matters, bribery or fraud within the scope of the ordinary business of ArcelorMittal and its subsidiaries.

In addition to this Group Whistleblower policy, ArcelorMittal also has Local whistleblower policies at country level, which have been adopted in order to comply with applicable local laws. All local policies are available on ArcelorMittal's website at <https://corporate.arcelormittal.com/investors/corporate-governance/our-policies> which policies shall supersede this Group policy in so far as they comply with applicable local laws.

ArcelorMittal and its subsidiaries have also established reporting processes relating to various specific areas or processes, which is the preferred route for reporting.



# Whistleblower Procedure

## Purpose

Without prejudice to local policies, the purpose of this Whistleblower Policy is to make available an avenue for employees and third parties to report on serious concerns with regards to possible irregularities or misconduct at ArcelorMittal. Additionally, this policy is also intended to support stakeholder expectation relating to our listing and compliance with the US Sarbanes Oxley Act of 2002.

## Reporting

A person who has a serious concern on possible irregularities or misconduct should report them using the best and most easily accessible channel in this regard.

Whistleblowing complaints may be made on the ArcelorMittal website or using hotlines made available in each country.

In addition, a person, may choose to use any of the following options to raise/report his/her concern or issue:

- In case of an employee, any issues or concerns may be reported to his/her supervisor or local/segment/Group management or the local/segment/Group heads of Legal or Compliance or Global Assurance Departments.
- In case of third parties, issues or concerns may be reported to a member of management, the head of local or group Legal Department, the head of local or Group Compliance Department, or the head of Global Assurance Department or its local representative, as the circumstances of the case may be;
- Employees or third parties may also use any other channels made available locally.

All relevant concerns routed through the above-mentioned alternative channels should be notified to the Global Assurance and Group Compliance functions.

## Treatment of Reported concerns

Reported concerns will immediately be distributed to the appropriate members of Global Assurance and Group Compliance functions.

## Disclosure to Public Authorities

In cases where there is a legal obligation to communicate the information to public authorities responsible for the prosecution of crimes or otherwise, the Group Head of Global Assurance in consultation with the Group General Counsel and Group Compliance and Data Protection Officer with the support of local Legal Counsel or Compliance Officer will forward or approve for local Legal Counsel or Compliance Officers to report to the relevant competent authority.

## Investigation

Investigations into allegations related to fraud and corruption will be undertaken primarily by the Global Assurance Department.

Matters unrelated to fraud and corruption, will be investigated by the appropriate internal functions and the corresponding report should be shared with Global Assurance.

All reported concerns will be dealt with as soon as reasonably practicable, taking into account the complexity and the nature of the issue.

External investigative resources may be used from time to time if required.

## Investigation result

All reported concerns made through the Whistleblower policy will be reported to the Group Audit Committee with information on the status or results of investigations conducted. The Group Audit Committee may decide on the next step based on the result of the investigation.

## Feedback

If the reporting person's identity is known, he/she will receive feedback about how the report has been dealt with, whether any corrective measures or process improvements have been recommended and if any further steps will be taken. No details will be released relating to specific individuals and the feedback might be of a general nature, taking into account the necessity to conduct further, related investigations, the interest of ArcelorMittal to keep its information confidential and the rights of any third parties.

## Confidentiality

Whistleblowing reports and subsequent investigation reports shall be treated with utmost confidentiality. Information shall be disclosed to employees or third parties on a strict «need to know» basis for the purpose of the investigations.

All employees involved in the Whistleblower Policy will maintain strict secrecy of the content of reports in accordance with applicable law.

Any public disclosure of reports or results of investigations will be authorized by either the Chairperson of Group Audit Committee or the by the Board of Directors.

Where deemed appropriate or required under applicable law, the Group Head of Global Assurance will keep the Group's external auditors updated about any ongoing and concluded investigations.

## Non-retaliation

ArcelorMittal will take the necessary measures to protect employees who have, in good faith, made reports through the Whistleblower Policy, against any retaliation.

## Document retention

The Global Assurance function will maintain a record of all reports, tracking their receipt, investigation and resolution.

Investigation reports and supporting information will be maintained for a minimum of 5 years from the closing of the investigation, except where otherwise required by local law.

## Personal Data

The receipt of concerns and subsequent investigation of allegations could involve the processing of personal data of employees or third parties.

Personal Data at ArcelorMittal is processed in compliance with applicable data protections laws including the European Union General Data Protection Regulation ("GDPR") and the ArcelorMittal Data Protection Policy and the ArcelorMittal Data Protection Procedure (also ArcelorMittal's Binding Corporate Rules).

Personal Data shall be collected only to the extent required to undertake the required investigations and shall be disclosed only to persons involved in the investigative and decision-making process, including third party service providers in certain cases.

ArcelorMittal shall retain any Personal Data contained in the whistleblowing report or investigative report in accordance with the applicable document retention policy.

Employees and third parties whose data is retained shall have the right to access, rectification, erasure and object to processing of their Personal Data. Employees and third parties may exercise this right in accordance with ArcelorMittal's Procedure on Data Subject Access Request or by sending an email to :

[DataProtection@arcelorMittal.com](mailto:DataProtection@arcelorMittal.com).