



ArcelorMittal

# Whistleblower Policy

## Purpose

Without prejudice to local policies, the purpose of this Whistleblower Policy is to make available an avenue for employees and third parties (persons and organizations, including stakeholders) to report on 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, along with adherence to the EU Whistleblowing Directive.



# Whistleblower Policy

## Scope

ArcelorMittal's Whistleblower Policy is intended for reporting of concerns with regards to possible irregularities or misconduct, including, but not limited to, those relating to violations of ArcelorMittal Code of Business Conduct, legal or regulatory requirements, environmental and social related violations and adverse impacts (including human rights), non-compliance with governance standards, incorrect or misrepresentation in accounting, auditing or banking matters, bribery or fraud within ArcelorMittal, its subsidiaries, affiliates and its value chain.

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.

Local policies shall supersede this Group policy in so far as they comply with applicable local laws and to the extent the local laws would set stricter rules than those set out in this Whistleblower Policy.

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

## Principles

### Reporting

A person who has a 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 websites ("Global Whistleblower Lines") at

- <https://corporate.arcelormittal.com/investors/corporate-governance/whistleblower> (online);
- <https://secure.ethicspoint.eu/domain/media/en/gui/105363/index.html> (online or by phone hotlines made available in each country).

Alternatively, 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.
- Local grievance mechanisms maintained by certain countries.
- By postal mail addressing a letter to the Audit and Risk Committee of ArcelorMittal, BP 78, L-5201 Sandweiler, G.D. of Luxembourg.
- 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, Group Compliance and Group HR functions where appropriate. All concerns pertaining to fraud matters must be notified to the Global Assurance Department.

## Treatment of Reported concerns

Reported concerns will immediately be distributed to the appropriate members of Global Assurance, Group Compliance, Group HR and/or appropriate local functions. All concerns pertaining to fraud matters must be notified to the Global Assurance Department.

## Disclosure to Public Authorities

Nothing in this policy prohibits or is intended to restrict or impede employees or third parties from exercising protected rights or otherwise disclosing information to law enforcement agencies, regulatory, or administrative agencies as permitted by law. If reasons to report externally would exist, this can be done with the relevant locally designated 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 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 by the Global Assurance Department.

Matters unrelated to fraud and corruption, will be investigated by the appropriate internal functions. The corresponding reports for concerns raised through the Global Whistleblower Lines must be shared with the Global Assurance Department.

Whistleblowing reports containing allegations against local top management should not be investigated at the local level and should be handed over to the Global Assurance Department for investigation.

All reported concerns will be dealt with as soon as reasonably practicable, taking into account the complexity, the nature of the issue and local applicable timing requirements, if any.

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

## Investigation result

All material reported concerns made pursuant to the Whistleblower Policy will be reported to the Group Audit Committee with information on the status or results of investigations conducted, while considering confidentiality requirements. The Group Audit Committee may decide on the next step based on the result of the investigation.

## Feedback

In accordance with local applicable requirements, the reporting person will receive an acknowledgement of the report's receipt, as well as appropriate 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, unless the report was raised anonymously. Feedback needs to be validated by the responsible legal counsel as required. 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 investigation.

All individuals involved in handling whistleblower reports 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 by the Board of Directors.

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

## Non-retaliation and protection

ArcelorMittal will take the necessary measures to protect reporting persons who have, in good faith, made reports through the company's whistleblowing channels, against any retaliation.

The level of protection is further determined by local law.

## Document retention

The Global Assurance and/or an appropriate local function in charge of the investigation 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 protection 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.

Data Subjects 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)

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