

ArcelorMittal Tubular Products Al-Jubail Group

WHISTLEBLOWING POLICY

(EXCERPT)

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TABLE OF CONTENTS

1. INTRODUCTION 3
2. VIOLATION 3
3. INFORMAL REPORTING OF A VIOLATION 4
4. FORMAL REPORTING OF A VIOLATION 4
5. OBLIGATIONS WHEN REPORTING 4
6. FALSE AND MALICIOUS REPORTING OF A VIOLATION 5
7. CONFIDENTIALITY; NO ADVERSE ACTION 5
8. RECEIPT OF FORMAL COMPLAINT 5
9. COMPLAINT RESOLUTION 5
10. INTERIM MEASURES 5
11. INVESTIGATION AND RECOMMENDATION 5
12. REPORTS AND IMPLEMENTATION OF RECOMMENDATION 6
13. RECORD KEEPING 6
14. POLICY IMPLEMENTATION 6

1. INTRODUCTION

1.1 **THIS WHISTLEBLOWING POLICY** (this **Policy**) forms part of the corporate governance framework of ArcelorMittal Tubular Products Al-Jubail (**AMTPJ**) and its wholly owned subsidiary Jubail Energy Services Single Shareholder Limited Liability Company and any of their respective wholly owned subsidiaries including any subsidiaries wholly owned by the latter within or outside the Kingdom of Saudi Arabia (together **AMTPJ Group**).

1.2 AMTPJ Group is firmly committed to promote, and values, doing business in line with all rules, regulations and any other sources of law (together the **Law**) applicable in jurisdictions it operates in. All entities of AMTPJ Group endeavour to operate in compliance with the Law, applicable by-laws, any of its charters, policies, manuals and procedures and documents of similar nature at all times.

1.3 All employees of any of the AMTPJ Group corporate entities, directors of the AMTPJ board of directors (the **Board**), Board appointed committees, members of AMTPJ's executive committee(s), members of AMTPJ's Nomination and Remuneration Committee, members of the AMTPJ Audit and Compliance Committee (the **Committee**), consultants, contractors, suppliers and (future) business partners (collectively a **Concerned Party**/the **Concerned Parties**) need to be aware that they all play a decisive role in AMTPJ Group upholding such commitment

1.4 Any Concerned Party is encouraged to come forward and voice their concerns with respect to any violation (as defined in clause 2. of this Policy) with respect to the principles AMTPJ Group stands for as outlined in clause 1.1 of this Policy.

1.5 This Policy was approved by the Board on, and shall be effective as of 14 December 2022. This Policy supersedes any other policy previously applicable at any entity of AMTPJ Group and concerning the subject matter hereof.

1.6 This Policy shall be reviewed regularly, and any amendments hereto are subject to the approval by the Board.

2. VIOLATION

2.1 A **Violation** is defined as any misconduct, illegal act or failure to act in line with the Law or applicable by-laws, charters, policies, manuals, contractual relationships and procedures or instruments of similar nature. Any Concerned Party who has knowledge of such violation is required to report it, unless exempt under applicable law. A Concerned Party is also encouraged to report if s/he, in good faith, has serious concerns or reasons to suspect that a Violation may occur or may have occurred. Examples of a possible Violation are:

(a) Non-compliance with the AMTPJ Group Anti-Bribery and Anti-Corruption Policy and/or the AMTPJ Group Code of Business Conduct and Ethics;

(b) Improper practices or suspicious matters in financial reports;

(c) Conduct which is an offence or a breach of Law;

(d) Health and safety risks, including risks to the public as well as employees;

(e) Damage to the environment;

(f) Unauthorized use of funds owned by any AMTPJ Group entity;

(g) Any possible fraud and corruption;

(h) Misrepresentation or a false statement by, or to, a director, officer or employee or any of the AMTPJ Group entities regarding a matter contained in the financial records, reports or audit reports, or

(i) Deviation from full and fair reporting of any of the AMTPJ's consolidated financial condition.

2.2 Violation(s) covered under this Policy are not limited to a Violation committed by a Concerned Party or an employee but includes any Violation by external consultants, contractors, suppliers, (future) business partners and any other external party doing business with any entity of AMTPJ Group in any way.

3. INFORMAL REPORTING OF A VIOLATION

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4. FORMAL REPORTING OF A VIOLATION

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4.2 Separate helplines for each of AMTPJ and JESCO are available. This is a toll-free service provided by an independent third-party specialist services provider based out of the United Kingdom.

4.3 The helplines are a portal for reporting Violations and are available around the clock in many languages including both in the Arabic and English language and is utilized by Concerned Parties to formally report a Violation (a **Formal Complaint**).

4.4 When filing a Formal Complaint, the reporting individual may choose to reveal his/her identity, or report on the basis of anonymity.

4.5 A Formal Complaint is either filed through:

For **AMTPJ**:

(a) calling the toll-free hotline on *800 844 2067*, or

(b) filling in the form which may be accessed through the portal found at *www.safecall.co.uk/en/clients/amtpj*

For **JESCO**:

(a) calling the toll-free hotline at *800 844 2067*, or

(b) filling in the form which may be accessed through the portal found at *www.safecall.co.uk/clients/jesco*

5. OBLIGATIONS WHEN REPORTING

5.1 Any Concerned Party who, in good faith, has serious concerns or reasons to suspect that a Violation may occur or may have occurred is encouraged to either informally or formally report an occurrence of a Violation pursuant to clause 3. and 4. hereof and is strictly prohibited from conducting any investigation of facts and matters on his/her own accord.

5.2 Subject to the provisions of this Policy, Concerned Parties must keep any occurrence of a Violation referred to in clause 5.1 hereof confidential and are not permitted to discuss any such confidential matters with any Employee or any third party.

6. FALSE AND MALICIOUS REPORTING OF A VIOLATION

6.1 False and/or malicious reporting of a Violation is likely to result in a hostile and unproductive working environment and may have serious reputational implications for AMTPJ Group, employees and any wrongly accused innocent individual. Further, false and/or malicious reporting unnecessarily drains human resources who will need to spend valuable time investigating and dealing with any such false and/or malicious reporting.

6.2 False/malicious reporting of a Violation and false witness statements related to such false reporting may bring about disciplinary action against all of those involved in such false and/or malicious reporting. In certain circumstances, false/malicious reporting of a Violation may constitute a cause of action for defamation.

6.3 The panel referred to in clause 8.1 hereof shall be responsible for establishing whether a certain conduct qualifies as false and/or malicious reporting.

7. CONFIDENTIALITY; NO ADVERSE ACTION

7.1 Any report of a suspected Violation made in good faith and without malicious intent will be treated with utmost confidentiality and no disclosure thereof will be made unless required under applicable law.

7.2 Neither any of the AMTPJ Group entities nor any of its directors, Employees or agents must take adverse action against individuals reporting a suspected Violation in good faith and without malicious intent whether or not the report ultimately proves to be well founded.

7.3 Anyone who either:

(a) breaches confidentiality assured by this Policy in any way, *e.g.*, by disclosing or revealing the identity of the reporting individual, any particulars of his/her report or any information from the investigation file to any third party whatsoever (unless involved in the investigation process of the alleged Violation);

(b) takes retaliatory action or retribution against another who has either reported a Violation or participated in an investigation of suspected or alleged Violation;

(c) Reports of a Violation falsely or with malicious intent,

will be subject to disciplinary action.

7.4 […]

8. RECEIPT OF FORMAL COMPLAINT

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9. COMPLAINT RESOLUTION

9.1 […]

10. INTERIM MEASURES

10.1 […]

11. INVESTIGATION AND RECOMMENDATION

11.1 […]

12. REPORTS AND IMPLEMENTATION OF RECOMMENDATION

12.1 […]

13. RECORD KEEPING

13.1 […]

14. POLICY IMPLEMENTATION

14.1 AMTPJ Group shall ensure that this Policy is disseminated to all Concerned Parties. All Employees must be made aware of the content of this Policy in all detail.

14.2 Those new to AMTPJ Group shall be made aware of this Policy as part of their induction program/handbook. It is the responsibility of every manager to ensure that all his/her Employees are aware of this Policy.

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