

ArcelorMittal Tubular Products Al-Jubail Group

ANTI-HARASSMENT POLICY

(EXCERPT)

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1. INTRODUCTION

1.1 **THIS ANTI-HARASSMENT 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 committed to promote, and values, a work environment free of physical, verbal or psychological harassment and discrimination. This includes any unwelcome comments or actions regarding race, colour, ethnicity, creed, ancestry, age, gender, national origin, marital status, pregnancy, childbirth or related medical condition.

1.3 It is AMTPJ Group's commitment that any form of harassment in the workplace will not be tolerated. All AMTPJ Group employees (the **Employee/s**) are to treat one another fairly, with courtesy, respect and dignity without resorting to any form of verbal or physical abuse whatsoever regardless of seniority or status. All reported incidents and allegations of harassment will be promptly investigated. AMTPJ Group's management is committed to resolving all instances of harassment as soon as it becomes aware of them, even if there are no formal complaints. Any Employee should, therefore, report any and all incidents of harassment in the workplace, especially before they become severe or pervasive.

1.4 This Policy was approved by the AMTPJ Group's board of directors (the **Board**) and shall be effective as of *13 April 2022*. This Policy supersedes any other policy previously applicable at any entity of AMTPJ Group and concerning the subject matter hereof.

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

2. HARASSMENT

2.1 Harassment may generally be defined as an abusive behaviour towards another which could take many forms. It is characterized by single or repeated acts, words, gestures, implications and other forms of communication or interaction or other unwelcome conduct which undermines the dignity or the physical or psychological integrity of the victim, interferes with an individual's work performance or creates an intimidating, hostile, or abusive work environment. Harassment also includes retaliation or threat of retaliation for reporting harassment or threatening to report harassment.

2.2 The above definition of the term harassment aims at a providing a general understanding of what action or inaction amounts to harassment; abuse of authority, i.e., the improper use of a position of influence, power or authority against another person, is another form of harassment. It particularly includes influence on the career or employment conditions of an Employee, including appointment, assignment, contract renewal, performance evaluation or promotion.

2.3 Abuse of authority often manifests itself in conduct that creates a hostile or uncomfortable (and thus unproductive) work environment, including the use of intimidation, bullying, threats, blackmail or coercion. Supervising Employees, especially managers and all senior management, must always be considerate of their position of authority. Such position may affect and impact the response by Employees when reacting to any requests or advances (especially ones that are not professional or

work-related).

2.4 Sexual harassment is a specific form of harassment and occurs where the following are made towards another person:

(a) unsolicited and unwelcome sexual advances, requests to engage in sexual activity or to provide sexual favours;

(b) unsolicited and unwelcome comments or remarks of sexual nature, unwanted social invitations for non-work-related meetings; or

(c) other verbal or physical conduct of a sexual nature, such as inappropriate physical conduct (assault, unwanted touching or repeatedly standing too close); inappropriate jokes, teasing, stories, suggestive gestures; making, showing or posting sexually demeaning or offensive videos, pictures, cartoons or other materials; insults based on gender; etc.

2.5 Harassment is many times used to condition promotions, awards, training or other job benefits. For the avoidance of doubt, harassment of Employees is also deemed to have occurred if any qualifying behaviour happens outside working hours or workplace but has the effect of interfering with an individual's work performance or creating an intimidating, hostile, or abusive work environment.

2.6 AMTPJ Group also prohibits any violence in the workplace, i.e., any act or threat of physical violence including bullying, which may include a spectrum of behaviours that could generate a reasonable concern for safety at the workplace or affect colleagues in the workplace or the work environment. Workplace violence includes but is not limited to physical attacks (such as hitting, shoving, pushing or kicking); threatening behaviour (such as shaking fists, destroying property, throwing objects or other similar conduct); verbal or written threats (such as intimidating language, any expression of intent to inflict harm). Any act of workplace violence shall be considered harassment for the purpose of this Policy and shall be dealt with in accordance with the provisions of this Policy.

2.7 What may **NOT** be considered an act of harassment?

(a) Situations of conflict and tension are at times inevitable and are not necessarily considered harassment.

(b) Managers are responsible to manage their direct reports effectively which means they are frequently meant to take decisions that have a significant impact on individual Employees. Such decisions may manifest themselves in the assignment of work tasks, performance monitoring, talent development initiatives, amongst other things. Managers must also communicate on sensitive matters, such as performance feedback, leaves and attendance, or participation in disciplinary proceedings. Such managerial actions, decisions and communications to Employee(s), when taken in good faith and in adherence with AMTPJ Group’s applicable policies and procedures cannot be considered harassment.

3. PREVENTIVE ACTION

3.1 Prevention of harassment is a shared individual and organizational responsibility. Each Employee, particularly at supervisory levels, is responsible for building a positive work environment and a culture of trust and tolerance, free of all forms of harassment. Each of AMTPJ Group’s entities shall ensure that appropriate mechanisms are put in place such as but not limited to managerial learning

plans that include modules on anti-harassment, conflict prevention and resolution.

3.2 All line managers have a specific responsibility within their own teams and shall be accountable for taking early action on potential or actual harassment. Once they are aware of any such situation, they must immediately speak with the parties concerned and ensure appropriate action is taken always taking into consideration the best interest of both AMTPJ Group and the parties concerned.

3.3 Failure on the part of line managers to fulfil their obligations under this Policy may amount to a breach of duty and will reflect negatively on their performance appraisals and may lead to administrative and/or disciplinary action taken against them.

4. INFORMAL REPORTING OF AN ALLEGED ACT OF HARASSMENT

4.1 An Employee may choose but is under no obligation to first utilize an informal mechanism to report an alleged act of harassment, adopting one or more of the following options:

(a) Where the Employee feels it is safe to do so, inform the alleged offender (orally, or in writing) to stop the offensive behaviour, or to take certain action as the case may be;

(b) Seek a discussion with his/her line manager, or the line manager's manager;

(c) Seek a discussion with his/her head of department;

(d) Seek a discussion with a representative of AMTPJ Group's Legal, Ethics and GRC Department.

4.2 Any of the individuals referred to in clause 4.1 (b) to (d) may - in consultation with the Employee - refer an informal report of an act of harassment for formal investigation pursuant to clause 5. hereof.

4.3 An Employee may file a Formal Complaint (as defined in clause 5. hereof) where s/he is not satisfied with the outcome of any of the options pursued pursuant to section 4.1 hereof.

5. FORMAL REPORTING OF AN ALLEGED ACT OF HARASSMENT

5.1 Where an Employee does not wish to pursue the informal approach to report an alleged act of harassment pursuant to clause 4.1 above for whatever reason, or where the Employee wishes to report on the basis of anonymity, the Employee may resort to the relevant helpline in order to formally file a complaint.

5.2 Helplines are available as is a toll-free service to Employees provided by an independent third-party services provider based out of the United Kingdom.

5.3 The helpline is a portal for reporting, amongst other things, an alleged act of harassment and is available in many languages including but not limited to Arabic and English and shall be utilized by Employees to formally report an alleged act of harassment (a **Formal Complaint**). When filing a Formal Complaint, the reporting individual may choose to reveal his/her identity, or report on the basis of anonymity.

5.4 A Formal Complaint is either filed by way of:

(a) calling the toll-free hotline on

(i) for JESCO: 800 844 2067

(ii) for AMTPJ: 800 844 2067

or

(b) filling in the form which may be accessed through the portal found at

(i) for JESCO: www.safecall.co.uk/clients/jesco

(ii) for AMTPJ: www.safecall.co.uk/en/clients/amtpj

6. FALSE AND MALICIOUS REPORTING OF AN ALLEGED ACT OF HARASSMENT

6.1 False and/or malicious reporting of an alleged act of harassment is likely to result in a hostile working environment and may have serious reputational implications for AMTPJ Group, its Employees and any wrongly accused innocent individual. Further, false and/or malicious reporting unnecessarily drains AMTPJ Group's resources who will need to spend valuable time investigating and dealing with any such false and/or malicious reporting. False/malicious reporting of an alleged act of harassment 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 an alleged act of harassment may constitute a cause of action for defamation.

6.2 The panel set up pursuant to the AMTPJ Group Formal Complaints Resolution Procedure (the **Panel**) shall be responsible for establishing whether a certain conduct qualifies as false and/or malicious reporting.

7. OBLIGATIONS OF REPORTING

7.1 Any Employee who has knowledge of an alleged act of harassment is encouraged to either informally or formally report such alleged act of harassment pursuant to clause 4. and 5. hereof and is strictly prohibited from conducting any investigation of facts and matters on his/her own accord.

7.2 Subject to the provisions of this Policy, Employees must keep any occurrence of any harassment or alleged harassment confidential and are not permitted to discuss any such confidential matters with other Employees or any third party.

8. CONFIDENTIALITY; NO ADVERSE ACTION

8.1 Any report of an alleged act of harassment 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.

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

8.3 Anyone who either:

(a) breaches confidentiality assured under 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 act of harassment);

(b) takes retaliatory action or retribution against another who has either reported an alleged act of harassment or participated in an alleged act of harassment;

(c) reports of an alleged act of harassment falsely or with malicious intent,

will be subject to disciplinary action.

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9. FORMAL COMPLAINTS RESOLUTION

9.1 […]

10. INTERIM MEASURES

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11. INVESTIGATION AND RECOMMENDATION

11.1 […]

12. PANEL REPORTS AND IMPLEMENTATION OF RECOMMENDATION

12.1 […]

13. RECORD KEEPING

All Reports, Recommendations and notes/records prepared in relation to action taken pursuant to this Policy shall be retained in accordance with the relevant provisions of AMTPJ Group's policies and procedures and documents of a similar nature.

14. POLICY IMPLEMENTATION

14.1 AMTPJ Group shall ensure that this Policy is disseminated to all its Employees. All Employees must be made aware of the content of this Policy including the formal complaints resolution procedures 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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