



ArcelorMittal

Whistleblower Procedure

Short description

Process to follow in case of any serious concerns with regard to irregularities in accounting, auditing or banking matters or bribery.

Scope

Relevant to all directors, officers, employees of ArcelorMittal subsidiaries and any third parties.



Whistleblower Procedure

1. Purpose

In compliance with the Sarbanes Oxley Act of 2002, the purpose of the Whistleblower Process is to identify any serious concerns with regard to irregularities in accounting, auditing or banking matters or bribery at the earliest possible moment.

2. Scope

The Whistleblower Process is intended for the reporting of concerns with regard to possible irregularities in accounting, auditing or banking matters or bribery within the business of ArcelorMittal and its subsidiaries, not for general business complaints or product issues or grievances about an employee's personal employment situation.

3. Principles

Reports

If an employee of an ArcelorMittal subsidiary has a concern about possible malpractice falling within the scope of this Whistleblower Process, he/she should raise it in the first instance with his/her supervisor, a member of management, the head of the Legal Department or the head of Internal Assurance Department. However, if the employee is concerned about the response or lack of response, or if he/she feels unable to talk to his/her manager or anyone else mentioned above, he/she can use the Whistleblower Process.

Reports can be made either through the "Reporting accounting or auditing irregularities" section of the ArcelorMittal web-site or by letter to the Audit Committee, ARCELORMITTAL / BP 78 / L-5201 SANDWEILER / LUXEMBOURG.

Treatment of Reports

Reports received will immediately be distributed to the Chairman of the Board's Audit Committee, the Secretary of the Board's Audit Committee and the Company Secretary.

Any reports not related to accounting, financial auditing or banking matters or bribery will be disregarded, except when they relate to serious facts, i.e., when they affect the vital interests of ArcelorMittal or its employees' integrity or physical or mental wellbeing. In cases where there is a legal obligation to communicate the information to public bodies responsible for the prosecution of crimes, the Chairman of the Board's Audit Committee will instruct the Company Secretary to forward the report to the relevant competent authority.

If the report falls within the scope of the Whistleblower Process, the Chairman of the Board's Audit Committee will either instruct the Director of Internal Assurance to conduct an investigation or instruct the Company Secretary to ask the relevant Department or Subsidiary of ArcelorMittal to prepare a written report.

The Company Secretary will promptly inform any employee who is alleged to be involved in an accounting, financial auditing, banking or bribery issue of the facts alleged against him/her, as well as how to exercise his/her rights of access and correction. Such notice may be deferred for a very limited time period in order to secure any potential evidence.

All reports will be dealt with as soon as reasonably practicable, taking into account the complexity and the nature of the report.

Investigation result

All reports made through the Whistleblower Process will be placed on a list which will be tabled at the next meeting of the Audit Committee. All results of investigations conducted by the Director of Internal Assurance or written reports prepared at the request of the Company Secretary will be tabled at the next meeting of the Audit Committee. The Audit Committee will decide on the next step based on the result of the investigation and may decide either to make further investigations or to make recommendations to the Board of Directors for process improvements or corrective actions.

Feedback

The employee who submitted the report 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 interest of ArcelorMittal to keep its information confidential and the rights of any third parties.

Confidentiality

The reports will be disclosed only to the employees who have a "need to know" for the purpose of the investigations. All employees involved in the Whistleblower Process will maintain strict secrecy about the content of any reports made in accordance with applicable law. Any disclosure of reports or results of investigations will be authorized by either the Chairman of the Board's Audit Committee or the by the Board of Directors.

Non retaliation

ArcelorMittal will take the necessary measures to protect employees who have, in good faith, made reports through the Whistleblower Process, against any retaliation from managers or other involved parties.

Document retention

The Company Secretary will maintain a record of all reports, tracking their receipt, investigation and resolution.

Statistical information and data relating to the types of reports received and corrective measures taken will be maintained for a minimum of 5 years from the closing of the investigation, except where otherwise required by local law.

Data relating to a report that is found to be unsubstantiated will be deleted without delay.

Data relating to a report that is found to be substantiated will be deleted within two months after the investigation is closed, unless a disciplinary procedure or legal proceeding is initiated against the person incriminated in the report or the author of an abusive report.

Since Data relating to a report is transmitted to the Chairman of the Audit Committee who may not be located in a member State of the European Union, any transfer out of the European Union will be covered by a contract based on model clauses ensuring the same level of protection as in Europe.

Any employee has the right to access and correct his or her personal data, including any information available in the record of reports, and may do so by contacting the Company Secretary. However, the name of the person who submitted a report will not be communicated to the accused person by ArcelorMittal.