

# Prevention of misconduct and Whistleblowing Policy

Approved by the Leadership Team on 2019/06/14, updated on 2022/10/06

*Note: This policy is released in English. In case of divergence between the English version and other translated versions, the English version will prevail.*

**Scope:** This policy applies to any irregularity involving Aperam employees as well as stakeholders, consultants, vendors, contractors, external agents and any other parties having a business relationship with Aperam.

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## PURPOSE

Aperam is committed to prevent fraud and misconduct from occurring and to develop an anti-fraud culture. Incidents of non-compliance with Aperam's Code of Conduct (for instance discrimination, harassment, fraud, corruption, or deliberate misconducts with regard to Health, Safety and Environment policies as well as data security and privacy) will not be tolerated.

In order to facilitate the reporting and the confidential submission by employees of serious irregularities, Aperam has established a Whistleblowing hotline. The purpose of this Policy is to provide a framework to promote a secure Whistleblower process.

## SCOPE

The Aperam Whistleblowing hotline does not replace regular and internal information and reporting means and procedures. It is an additional mechanism at the disposal of all employees of Aperam to report serious breaches to our Code of Conduct related but not limited to :

- Workplace Health, Safety and Environment
- Human Rights
- Conflicts of interests
- Fraud and corruption
- Cyber security & Data privacy.

This policy should be read in conjunction with the Aperam Code of Business Conduct, the principles of which should be fully supported herein.

*For more guidelines on this topic* ➤

## PRINCIPLES

### Prevention

As prevention is essential, specific guidances are provided to our employees with clear rules of conduct if they are exposed to risks or dilemmas related to human rights, business partnerships, confidential information, dealing with public officials as well as donations, gifts, entertainment and travel. Adopting the accurate ethics and compliance programs are part of Aperam commitment for preventing fraud and misconduct.

*For more guidelines on this topic* ➤

### Everyone's commitment

Employees together with the management are expected to be vigilant and to play an active part in the reporting of misconduct.

All employees who have a reasonable basis for believing that misconducts have occurred, based on facts and not on hearsay, have a responsibility to refer them to their immediate supervisor or higher level of management, to the Compliance Officer or the Head of Global Assurance (Internal audit department).

However, if the employee is concerned about the response or lack of response, or if he/she feels unable to talk to anyone mentioned above, he/she can use the Aperam Whistleblowing hotline.

## References

◀ Link to the Aperam Whistleblowing hotline : [www.aperam.com/alert](http://www.aperam.com/alert)



For more, see [Aperam policies](#)

- ▶ Code of Business Conduct
- ▶ Human Rights policy
- ▶ Anti-corruption and Money laundering policy
- ▶ Gift and Entertainment Policy

## Processing of reports

All reports made with good faith will be treated seriously and in a timely manner. Where appropriate, an investigation will be undertaken. Within seven days after receiving the report, the whistleblower will receive a confirmation of receipt.

The Audit and Risk Management Committee of Aperam Board of Directors, composed entirely of independent directors, will receive a list of all complaints made through the Aperam Whistleblowing hotline.

*For more guidelines on this topic* ➤

## Confidentiality & non-retaliation

Aperam guarantees that all reports and respective information will be treated strictly confidential and will only be shared with the persons with a legitimate need to know. The name of the whistleblower will never be communicated. Aperam will not tolerate retaliation, actual or attempted, against anyone who has, in good faith, made reports through the Aperam Whistleblowing hotline, or provided information or assistance for the purpose of the investigation. Aperam condemns any kind of discrimination, harassment, victimization being adopted against Whistleblowers such as (but not limited to):

- suspension, dismissal, demotion or withholding of promotion;
- transfer of duties, change of location of place of work, reduction in wages, change in working hours;
- a negative performance assessment or employment reference;
- imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
- coercion, intimidation, harassment or ostracism;
- discrimination, disadvantageous or unfair treatment;
- blacklisting or equivalent measures which may entail that the person will not, in the future, find employment in the sector or industry;

On the other hand, allegations made groundless but to harm others' reputation will be sanctioned.

*For more guidelines on this topic* ➤

## Investigation

1. The Global Assurance Forensic department is responsible for the investigation of all suspected fraudulent acts. Investigations will be carried out independently of the line management and without regard to the suspected wrongdoer's length of service, position/title. The Forensic department will have free and unrestricted access to all company records and premises and the authority to examine, copy, remove all or any portion of the contents of files and other storage facilities within the scope of their investigation. The Forensic department will treat all information received confidentially and will protect the reputation of all concerned.
2. For topics not related to fraud (eg. human rights or environmental topics), a specific nominated contact person that will have received training about investigation methodology, will organize the investigations with the help of the relevant department and according to the same principles of confidentiality and



◀ Aperam Whistleblowing hotline offers to file a report by phone (toll free access for each country), through the web access link relevant to your country or via an application reachable by QR code (see posters in your country). All reports made are documented in writing.

All details about how to reach the Whistleblowing hotline are available on :

[www.aperam.com/alert](http://www.aperam.com/alert)



◀ In case of reports made through our Whistleblowing hotline, the whistleblower can decide to remain anonymous. In that case, the identity of the Whistleblower will not be disclosed to Aperam. All communication will be handled confidentially and anonymously by the Whistleblowing hotline provider.

independence from the line management. The conclusions of the investigations will be shared for validation with the Compliance Officer and concerned Leadership Team members and if necessary, the Compliance Committee could request further investigations to be made by the Global Assurance Forensic department.

Within three months after receipt of the report the whistleblower will receive a feedback on the status and outcome of the assessment providing elements of a general nature about how the report has been dealt with.

Cases of serious nature (financial fraud, reputation risk...) will be presented to the Audit and Risk Management Committee based on appraisal from the Compliance Committee and/or the Global Assurance department.

## Subsequent actions

If an inquiry determines that it is reasonably certain that illegal activities have occurred, the Global Assurance Forensic department will issue a report to the designated level of management, to the Legal department, and if appropriate, to the Leadership Team and to the Aperam Audit and Risk Management Committee.

If necessary, Aperam will make all evidence collected during the course of an investigation available to legal and law enforcement agencies and will pursue the prosecution of all parties involved in criminal activities. Appropriate actions will be taken to recover assets lost as a result of fraud or dishonest activities.

In all cases where the evidence is sufficient to warrant disciplinary action, such action will be taken in compliance with all applicable laws.

## Data Privacy & Document retention

According to data protection regulations, any employee identified through the Aperam Whistleblowing hotline has a right to access to his/her personal data and request, as applicable, its correction or removal, except if these rights cannot be ensured in compliance with mandatory regulations or pursuant to a legally enforceable order.

As required by the law, reports will be generally kept for 5 years after their conclusion unless they have been found unsubstantiated and can be deleted with no delay.