



# APERAM WHISTLEBLOWER CHARTER

## 1. Purpose

Aperam aims to conduct its business activities not only in compliance with applicable laws and regulations, but also in a fair and transparent manner by adopting the highest standards of professionalism, honesty and integrity.

Aperam is committed to create a working environment within which employees feel able to bring to the attention of the Company, concerns and complaints about particular incidents of wrongdoing, without fear of criticism, dismissal or retaliation of any kind.

Thus, in order to facilitate the reporting and the confidential submission by employees of the Company of concerns and complaints, Aperam has established a Whistleblowing Line which is operated and maintained by an independent company.

The purpose of this Charter is to provide a framework to promote a secure Whistleblower process. It protects employees wishing to raise in good faith serious irregularities within the Company which fall within the scope of this Whistleblower Charter.

## 2. Scope

The Aperam Whistleblowing Line does not replace regular and internal information and reporting means. It is intended as an additional mechanism at the disposal of all employees of the Aperam Group to report serious and sensitive wrongdoings relating to questionable accounting, auditing, internal controls or banking matters and financial corruption within the business of Aperam and its subsidiaries.

When compatible with local laws and regulations, the Aperam Whistleblowing Line will also enable the employees to report any act prohibited under the Aperam Anti-fraud policy.

The Aperam Whistleblowing Line shall not be used for reporting general business complaints, product issues or grievances about an employee's personal employment situation. Any submission not related to the here above mentioned matters will be disregarded and destroyed.

### **3. Principles**

If an employee of Aperam has a concern about possible malpractice falling within the scope of the Aperam Whistleblowing Line, he/she should raise it in the first instance with his/her immediate supervisor or higher level of management or the Head of Combined Assurance 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 Line.

In every case, employees who decide not to use the Whistleblowing Line can not be punished; therefore any abusive report will be punished.

### **4. Reports**

Reports can be made either through the web address or the local hotlines available detailed in the section of the Aperam website or by mail to the Secretary of Aperam Audit & Risk Management Committee, 12C rue Guillaume Kroll, L-1882, Luxembourg, Grand Duchy of Luxembourg.

Aperam strongly encourages employees to mention their names on the reports because investigation cannot be possible unless sufficient corroborating evidence to justify the commencement of an investigation is provided.

Moreover, the identification of the author of an alert (whistleblower) will contribute to:

- make him/her aware of their responsibilities about the reports made through the Aperam Whistleblowing Line
- limit the risk of slander
- organize protection against potential retaliation
- to ensure a better handling of the report.

### **5. Processing of the reports**

All reports made under this Charter will be taken seriously. Where appropriate, an investigation of the complaint may be undertaken. This action will depend on the nature and gravity of the concern. If the investigation substantiates that fraudulent activities have occurred, the Combined Assurance department will issue a report to the designated level of management and, if appropriate, to the Management Committee and to the Audit & Risk Management Committee.

The Audit & Risk Management Committee will receive a list of all complaints made through the Aperam Whistleblowing Line and a follow-up report on actions taken.

## **6. Investigation results**

All results of investigations conducted will be presented at the Audit & Risk Management Committee which may 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.

## **7. Feedback**

The whistleblower 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 Aperam to keep its information confidential and the rights of any third parties.

## **8. Confidentiality**

Reports made in the scope of this Charter will be treated confidentially to the extent possible, and appropriately investigated under the oversight of the Audit & Risk Management Committee. All employees involved in the Whistleblower Process will maintain strict secrecy about the content of any reports. Any disclosure of reports or results of investigations will need to be authorized by either the Chairman of the Audit & Risk Committee or by the Board of Directors.

## **9. Non-retaliation**

Aperam will not tolerate retaliation, actual or attempted, against anyone who has, in good faith, made reports through the Aperam Whistleblowing Line, or provides information or assistance for the purpose of the investigation. The Company condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistleblower.

## **10. Retention of records and documents**

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

Where required by the law, reports that have been found unsubstantiated will be deleted and data relating to reports about substantiated concerns will be deleted within two months after the investigation completion. If a disciplinary procedure or legal proceeding is initiated against the person incriminated in the report or the author of an abusive report/alert, data relating to report will be conserved until the end of the procedure or according to the law requirements.

Since data relating to a report is transmitted to the Chairman of the Audit & Risk 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.

The name of the whistleblower will never be communicated to the person incriminated in the case.

Any employee identified through the Aperam Whistleblowing Line has a right to access to his/her personal data and request, as applicable, its correction or removal.