



ArcelorMittal

# Communication Policy

## Short description

ArcelorMittal places considerable importance on effective communication.

## Scope

Relevant to all employees of the ArcelorMittal Group, including its subsidiaries and affiliates worldwide. The policy covers all forms of communication – written, electronic and verbal.



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## For effective communication

### 1. Purpose

ArcelorMittal is a listed company and as a consequence it is under the obligation to promptly communicate any information to the public that could have a significant effect on the price of its securities, such as shares and bonds.

The ArcelorMittal Communication Policy establishes a set of principles to ensure that communication across ArcelorMittal is effective and appropriate and responds to the diverse information needs of all our stakeholders. The purpose of this policy is to help preserve and enhance the Company's reputation, both internally and externally, and to help ensure that relevant information reaches the targeted audience in the right format and at the right time. It is key for every ArcelorMittal employee to understand the value of effective communication. Accurate and timely communication with stakeholders is integral to a business' risk management process.

### 2. Principles

Communication at ArcelorMittal is guided by the following principles:

- 1. Authorised spokespersons:** Communication with stakeholders, media and financial markets must be aligned with the Company's official stance and strategy and must only be done by duly authorised Company spokespersons. Any person not authorised to speak or write on behalf of the Company, asked by the media, shareholders (internal or external) or market analysts, or other stakeholders must decline to comment and refer them to the Corporate or local Communications team. Any employee who does not follow this rule may be held personally liable for his/her actions.
- 2. Responsible individual behaviour:** All ArcelorMittal employees should, in their daily work, behave as if they were representatives and ambassadors of the Company. Therefore, each employee should be committed to preserving and enhancing ArcelorMittal's reputation. Any illegal or offensive behaviour or statement, including via social media accounts, which could cause damage to the Company should be avoided. The core values of Sustainability, Quality and Leadership that underpin the ArcelorMittal brand should be reflected in everything we say or do.

Inside information may only be disseminated through an authorised channel (Company press releases). Each employee should keep any inside information about ArcelorMittal strictly confidential and not trade in ArcelorMittal securities while in the possession of inside information in line with the Insider Dealing Regulations.

- 3. Transparency:** ArcelorMittal is committed to providing the public with clear, accurate and reliable information at all times. We seek to establish close relationships with our stakeholders, both internal and external, through regular communication, integrity and transparency.
- 4. Two-way communication:** ArcelorMittal believes in clear, accurate and reliable top-down and bottom-up communication through all levels of the organisation. Efficient two-way channels of communication ensure that employees understand, are aligned with and help the Company achieve its business objectives. The communication with all stakeholders, internal and external, must proceed in line with the Company's official stance and strategy.
- 5. Presenting at conferences:** When speaking at conferences, the presentation should be checked with Corporate Communications, Legal and Investor Relations in advance.
- 6. Official language:** ArcelorMittal recognises the rich linguistic diversity within the Group. However, English has been identified as the official language of the Group, and the learning and use of this language should be promoted.
- 7. Fair and prompt disclosure:** ArcelorMittal recognises the value of communicating company-related information in a timely and non-selective manner. Publicly available information on company related matters should be released to all internal & external stakeholders and to the public simultaneously.
- 8. Confidentiality:** All ArcelorMittal documentation, correspondence and company-related information, unless and until publicly available must be treated as confidential. Non-public information from or concerning suppliers, customers, employees, agents, consultants and other parties must also be protected in accordance with legal and contractual requirements, including the ArcelorMittal Data Protection Procedure, when applicable.
- 9. Compliance:** This policy should be read in conjunction with the ArcelorMittal Code of Business Conduct. ArcelorMittal is committed to complying with all applicable laws and stock exchange rules on the disclosure of financial and other information about the Company. Furthermore ArcelorMittal fully respects the legal rights of the employees in all countries. In case of contradiction between this policy and applicable laws, applicable laws shall prevail.