

# ArcelorMittal USA LLC

## Fair & Equal Treatment Policy



### A. Equal Employment Opportunity

To provide equal employment and advancement opportunities to all individuals, employment decisions at ArcelorMittal are based on merit, qualifications, and abilities. We do not discriminate in employment opportunities or practices on the basis of race, sex, sex stereotyping, religion, creed, color, national origin, citizenship, disability, handicap or medical condition, pregnancy (which includes pregnancy, childbirth and medical conditions related to pregnancy, childbirth or breastfeeding), age, military status, marital status, sexual orientation, gender identity, ancestry, protected veteran status (defined to include status as a disabled veteran, recently separated veteran, active duty wartime or campaign badge veteran, or Armed Forces service medal veteran), or any other basis prohibited by law. We will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship to ArcelorMittal. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees who have questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their manager and/or the Human Resources department. Employees can raise concerns and make reports without fear of reprisal.

If you are a member of the bargaining unit, you may also contact the Joint Committee on Civil Rights ("JCCR"), which is established at each location covered by the collective bargaining agreement to review and investigate matters involving civil rights. All complaints to a member of the JCCR will be shared with the Committee for appropriate handling. All complaints will also be treated with sensitivity and kept as confidential as possible.

Engaging in any type of unlawful discrimination or harassment of another employee, contractor, or visitor will be cause for disciplinary action, up to and including termination of employment.

### B. Non-Discrimination, Anti-Harassment Policy, and Non-Retaliation Policy

ArcelorMittal is committed to a work environment in which all individuals are treated with respect and dignity. Each and every employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, ArcelorMittal expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice and harassment. In accordance with these commitments, it is the policy of ArcelorMittal to forbid sexual and all other forms of unlawful harassment, as well as any inappropriate or unprofessional conduct, whether or not such conduct rises to the level of unlawful harassment. ArcelorMittal will not tolerate any conduct that violates this policy; anyone found to be in violation of this policy will be subject to discipline, up to and including discharge.

This policy extends to each employee at every level of our organization. Specifically, no employee, supervisor, manager, contractor, customer, guest, vendor, or any other individual with whom we do business shall discriminate against, harass, or treat inappropriately or unprofessionally anyone on the basis of race, sex, sex stereotyping, religion, creed, color, national origin, citizenship, disability, handicap or medical condition, pregnancy (which includes pregnancy, childbirth and medical conditions related to pregnancy, childbirth or breastfeeding), age, military status, marital status, sexual orientation, gender identity, ancestry, protected veteran status (defined to include status as disabled veteran, recently

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separated veteran, active duty wartime or campaign badge veteran, or Armed Forces service medal veteran), or any other basis prohibited by law. Unlawful harassment and inappropriate/unprofessional conduct serve no legitimate purpose; they have a disruptive effect in the workplace and undermine the integrity of the employment relationship.

In keeping with ArcelorMittal key values, all employees are responsible for preventing unlawful harassment and inappropriate or unprofessional conduct by behaving in a professional, business-like manner and treating each other with respect at all times.

Although it would be impossible to provide a definition that would cover every form of unlawful harassment, such harassment has been found to include the following:

**Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when: (a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (b) submission to or rejection of such conduct is used as a basis for an employment decision affecting that individual; or (c) the purpose or the effect of such conduct is to interfere substantially with the affected individual's work performance or to create an intimidating, hostile or offensive work environment. Some examples of unwelcome behavior that can be construed as sexual harassment include, but are not limited to: sexual advances, propositions, off-color jokes, touching, physical assault, sexually explicit or suggestive objects or pictures, references to a person's body parts, request for sexual activity, and/or sexually explicit conversation.

**Other Forms of Harassment:** Verbal or physical conduct relating to an individual's race, religion, creed, color, national origin, citizenship, disability or handicap or medical condition, pregnancy (which includes pregnancy, childbirth and medical conditions related to pregnancy, childbirth or breastfeeding), age, military status, marital status, sex, sex stereotyping, sexual orientation, gender identity, ancestry, protected veteran status as defined above, or any other basis prohibited by law when this conduct: (a) has the purpose or effect of creating an intimidating, hostile or offensive working environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities. Some examples of conduct that may constitute prohibited harassment include, but are not limited to: slurs, jokes, cartoons, stereotypes and statements with regard to any other basis prohibited by law. We take allegations of unlawful harassment and inappropriate/unprofessional conduct very seriously.

If you believe that you are the victim of such conduct, you should clearly and directly communicate to the offending individual that his or her conduct is unwelcome, and request that the offensive behavior immediately stop. Regardless of whether you communicate with the offending individual, you should also immediately report the matter to your manager, your Human Resources Representative, the Legal Department, and/or the Workplace Compliance Hotline at 1-888-242-7305.

If you are a member of the bargaining unit, you may also contact the Joint Committee on Civil Rights ("JCCR"), which is established at each location covered by the collective bargaining agreement to review and investigate matters involving civil rights. All complaints to a member of the JCCR will be shared with the Committee for appropriate handling. All complaints will also be treated with sensitivity and kept as confidential as possible.

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In order to help ArcelorMittal investigate and resolve your concerns, please document or otherwise record each incident of alleged unlawful harassment or inappropriate or unprofessional conduct, if possible. Such documentation should include the date, time, place, a description of what was said or done, and a description of the surrounding circumstances.

All such complaints will be promptly and thoroughly investigated. If it is determined that unlawful harassment or inappropriate/unprofessional conduct has occurred, management will take appropriate corrective and/or disciplinary action against the offending party, up to and including discharge. Due to the sensitive nature of such complaints, all such matters will be treated with particular care and shall remain, to the extent possible, confidential. To ensure all complaints are properly investigated, all employees are required to cooperate fully and to provide accurate and complete information. Failure to do so will result in disciplinary action, up to and including discharge.

The Company hopes that any incident of unlawful harassment can be resolved through the internal process outlined above. All employees, however, have the right to file formal charges with their state human rights department or the federal Equal Employment Opportunity Commission (EEOC).

Retaliation against any person who has complained about unlawful harassment or inappropriate, unprofessional conduct, filed a charge of unlawful harassment, or otherwise participated in an investigation of unlawful harassment or inappropriate/unprofessional conduct will not be tolerated. Furthermore, no supervisor, manager, or officer has the authority to require you to tolerate or agree to any conduct that violates this policy in order to receive any job benefit, including, but not limited to, compensation, duties, assignments, or promotions. These activities will result in severe discipline, up to and including immediate discharge.

We trust that all employees of the Company will continue to act responsibly to establish a pleasant work environment free of unlawful harassment and inappropriate/unprofessional conduct.

### C. Pay Transparency Policy

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

If you believe that you have experienced discrimination contact OFCCP  
1.800.397.6251 | TTY 1.877.889.5627 | [www.dol.gov/ofccp](http://www.dol.gov/ofccp)