

Information regarding the Ethics Line

First and foremost

We are committed to responsible business practices and will act with integrity in accordance with our Code of Conduct, SSAB-Instructions, policies and company standards and applicable laws and regulations. You will find the Code of Conduct, the Instructions and policies on the intranet. During your work, you may be confronted with ethical concerns or dilemmas. If you observe something that worries you, or that seems to violate our Code of Conduct, Instructions, policies or applicable laws, we encourage you to speak up to help us address the situation proactively.

We are committed to an environment where open and honest communication is the expectation, not the exception. We want you to feel comfortable in approaching your management team or a HR representative in situations where you believe violations of policies or standards may have occurred.

We understand that it takes courage to speak up, and in addition to our current open-door policy we are committed to providing you with an easy and safe way to raise your concerns. The Ethics Line is an essential part that enables us to protect our people, our company values, our stakeholders and society as a whole. No one should be alone when dealing with an ethical dilemma. In this document "Information regarding the Ethics Line" we clearly explain what your options are and how you can raise your concerns.

SSAB encourages all employees and external parties to report concerns as well as suspected wrongdoings and incidents of serious non-compliance in the Ethics Line system.

Scope

This document describes how you can speak up about suspected breaches of the Code of Conduct, other SSAB-Instructions and policies or applicable laws. Furthermore, it describes the process, so that you know what to expect, and the ways you will be protected when speaking up (confidentiality, anonymity, non-retaliation). This document applies to all employees and business partners (suppliers, customers etc).



When do I speak up?

As soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct, our Instructions, policies or applicable laws. We do not expect you to have all the answers, and encourage you to use what is described in this document as a reference point to determine if something is not right.

All reports are taken very seriously and will be followed up appropriately.

Employees cannot exempt themselves from the consequences of wrongdoing by self-reporting, although self-reporting may be considered in determining the appropriate course of action.

What should I speak up about?

We encourage you to speak up about suspected serious breaches of the Code of Conduct, our Instructions, policies or applicable laws, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behavior.

If you are unsure whether your matter can be reported, report it anyway, you will be notified via the system if the matter is out of scope. Here is some guidance what SSAB considers to be serious non-compliance:

- bribery and corruption
- irregularities concerning bookkeeping and financial reporting, internal accounting controls, auditing matters
- financial fraud
- violation of competition laws and antitrust laws
- violation of any environmental laws
- activities, which otherwise by law, treaty or agreement amount to serious misconduct (for example trade sanctions and export control)
- severe forms of discrimination and harassment
- use of child or forced labor or other human rights violations.

In certain countries, such as the United States, the Ethics Line may also be used to report suspected violations of other matters.

The information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual.

The Ethics Line is a dedicated whistleblowing channel and is not intended for issues related to products or services. If business partners want to discuss or report an issue related to our products or services, or have any other enquiry, they should contact their local sales representatives.

The Ethics Line is not an emergency service

The Ethics Line is NOT a 911 or emergency service. Do not use the Ethics Line to report events presenting an immediate threat to life or property. Reports submitted through the Ethics Line may not receive an immediate response. If you require emergency assistance, please follow your local procedures.

How do I speak up?

You can speak up and report your concern the following ways:

1. The main route for reporting is via the line organization. You have the opportunity to report to your manager. In general, it is your manager who is best placed to deal with your case. If, for any reason, you do not feel comfortable reporting the incident to your manager, or if your manager is in any way involved in the situation or has a conflict of interests in some other way, the incident may be reported to your next senior manager or an HR representative, or another appropriate person within the Legal Department, Internal Audit or the Sustainability function.
2. You can also report in accordance with established local procedures (internal reporting channels) where the matter is handled and investigated by locally appointed person(s) and you will find more information on the intranet where and when these local procedures are available. You also have the opportunity to report misconduct to one of the external reporting channels established by certain competent authorities or EU institutions, bodies or agencies. You can find more information on the intranet.
3. You can speak up via the confidential Ethics Line system and report anonymously as described in this document. The use of the Ethics Line is voluntary.

The Ethics Line system is operated by an independent service provider and is available 24/7. Via the Ethics Line system you can speak up or ask questions directly to the Ethics Steering Group based at HQ. The Ethics Steering Group consists of highly qualified specialists handling reports. You can speak up in your own language. You can file a report online through the web, the mobile app or via phone. Qualified colleagues will handle your report internally. You can decide to remain anonymous.

You will find contact information to the Ethics Steering Group and useful links on the intranet.

I spoke up. Now what?

If you submit a report, the Ethics Steering Group will send you an acknowledgement of receipt within seven days. Your report will be evaluated and assessed, and the appropriate course of action will be determined. Sometimes you will be asked follow-up questions. You will receive feedback as soon as possible (ultimately within three months) after the acknowledgement of receipt. You will be informed on the status of the complaint. Please note that we may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the implicated person, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information. Sometimes the alleged misconduct does not correspond to what can be reported in the Ethics Line (see section "What should I speak up about"). Furthermore, some countries restrict reports such that only employees in key or management functions may be the subject of a report. If this is the case, you will receive information on alternative routes for reporting your concern. The report will then be deleted.

If you have reported a problem that cannot be dealt with within the framework of the Ethics Line, the information in your report may, under certain circumstances, be shared with other persons within SSAB if this is necessary for us to fulfill obligations arising from law or other requirements with which we have voluntarily or contractually committed to comply. For example, information may be shared with:

- **HR** if the report concerns harassment, victimization or other matters that fall under labor law legislation. It may, for example, relate to information in a report about an employee being suspected of:
 - alcohol or drug abuse,
 - having sexually harassed a colleague, or
 - having been dismissed on grounds that may constitute discrimination.
- **The procurement organization** if the report concerns a supplier's conduct in relation to SSAB, its employees or the general public. Examples of this could be information about a supplier being suspected of having:
 - violated SSAB's Supplier Code of Conduct,
 - violated environmental legislation, or
 - hired workers who do not have a residence permit or work permit.
- **Legal** if the report concerns a customer's conduct in relation to SSAB, its employees or the general public. Examples of this could be information about a customer being suspected of having:
 - violated rules on anti-bribery and corruption,
 - violated environmental legislation, or
 - violated competition and antitrust laws

We may also share the information with recipients outside SSAB if we are required to do so by law, if there is an important public interest at stake, or if the information needs to be disclosed to the police and/or other enforcement or regulatory authorities.

When the Ethics Steering Group shares information with other persons within SSAB or with recipients outside SSAB, you will be informed of this, unless it prevents or complicates the purpose of sharing the information. If you have chosen to disclose your identity, this will continue to be treated confidentially. If the Ethics Steering Group believes that your identity needs to be disclosed in order to investigate your report after a handover, you will be contacted and consulted about this. Your identity will remain confidential and will not be disclosed to an investigative group without your permission. The report will then be deleted in the Ethics Line.



Protecting you, speaking up

Protecting your right to speak up is essential. Below, some key principles are highlighted:

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared with a limited number of people on a strict need-to-know basis. People who add expertise could be included in the investigation and have access to relevant data. Depending on the purpose of sharing, the Ethics Steering Group will (further) anonymise the information prior to sharing it. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake or the information needs to be disclosed to the police and/or other enforcement or regulatory authorities.

As described above, information in a report that cannot be handled within the scope of the Ethics Line can, under certain circumstances, be shared with other parts of the organization for further follow-up. The information will then be treated confidentially and anonymized to the extent possible.

In principle, we are obliged to inform any person under investigation that he or she is the subject of a report being investigated as soon as possible (this may be delayed if there is a substantial risk that this notification jeopardizes the investigation or the gathering of evidence.). Your identity will not be disclosed.

Solid Investigation procedures

The Ethics Steering Group is responsible for solid, confidential and precise fact-finding. Procedures are in place. See "Instruction regarding Ethics Line and internal reporting channels for whistleblowing" available on the intranet.

Anonymous

When reporting an issue in the Ethics Line, we encourage you to identify yourself and to provide as much details as possible regarding your concern. Providing this information better helps your concerns be investigated and resolutions achieved quicker. However, you can share information anonymously by using the Ethics Line. The Ethics Line makes safe dialogue possible in an anonymous way.

Safeguarding your Privacy

SSAB is committed to protecting the privacy of everyone involved in the Ethics Line process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our Employee privacy notice (available on the intranet) and our General Privacy Information (available on our website) and will only be used for the purposes explained in the Employee privacy notice and in the General Privacy information .

Non-retaliation

We encourage speaking up and any person that speaks up is protected. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated.

SSAB upholds a strict policy against retaliation. No person who upon reasonable grounds reports a possible violation of the Code of Conduct, other SSAB Instructions and policies, or applicable laws and regulations, or participates in the investigation thereof, shall suffer harassment, retaliation or an adverse employment consequence. An employee who retaliates against someone who has reported a violation upon reasonable grounds is subject to

disciplinary action as permitted by local laws. Any allegations that prove to be deliberately false or an abusive use of the reporting system may result in disciplinary action as permitted by local laws.

Protecting the implicated person

A person who is subject to a concern needs our utmost protection. The presumption of innocence is a leading principle. The Ethics Steering Group is responsible for protecting the rights of the implicated person - or otherwise involved - in any issue.

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Solid Investigation procedures

The Ethics Steering Group is responsible for solid, confidential and precise fact-finding. Procedures are in place to make sure this is achieved. See Instruction regarding Ethics Line and internal reporting channels for whistleblowing" available on the intranet.

Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to comment on the allegations

After an initial investigation the implicated person receives an opportunity to comment on the allegations.

The Ethics Line: a Dialogue

The Ethics Line system allows for anonymous dialogue with the reporter. The Ethics Steering Group has the right not to proceed with a case due to limited information.

Disciplinary actions

Disciplinary/corrective actions are to be decided by appropriate manager in consultation with HR representative. All disciplinary/corrective actions, including a follow-up of implementation, must be documented by the line organisation.

The Ethics Steering Group

The Ethics Steering Group consists of qualified professionals from the organisation. You will find more information in the "Instruction regarding Ethics Line and internal reporting channels for whistleblowing" available on the intranet.

The Ethics Steering Group is responsible for the handling of questions and Ethics Line reports. All reports coming in through the Ethics Line will be made available to the Ethics Steering Group. The Ethics Steering Group registers, monitors and is responsible for solid, confidential and precise fact-finding. Procedures are in place to ensure this, see "Instruction regarding Ethics Line and internal reporting channels for whistleblowing".



Internal Investigations should be carried out swiftly and to establish facts with minimum disruption to the business or the personal lives of employees; and to make sure that confidentiality and non-retaliation always are respected.

The Group Internal Audit Director is part of the Ethics Steering Group and is accountable for this document. The Group Internal Audit Director reports to the Audit Committee. All members of the Ethics Steering Group are protected against non-retaliation themselves.

[Contact details & Useful Links](#)

The Ethics Steering Group is the main point of contact for any questions. On the intranet you will find contact details and useful links.