

Frequently Asked Questions (FAQ)

SSAB Ethics Line reporting system

What is the Ethics Line reporting system?

It is a central internal reporting channel enabling employees within SSAB and third parties to report misconduct that would otherwise not be reported in complete anonymity. The Ethics Line reporting system utilizes the SpeakUp® system, which is designed to facilitate an effective dialogue between employees and the internal investigator. The platform has a fully integrated web, mobile app and hotline reporting in a single communication tool.

Who operates the Ethics Line reporting system?

The system is operated by a third party, People Intouch, an independent Dutch company. People Intouch is responsible for processing all messages. The company is based in Amsterdam.

When is the Ethics Line open?

The Ethics Line system is available 24 hours a day every day of the year.

Is it difficult to make a report?

The platform creates a low barrier dialogue and starting a dialogue is as simple as leaving a voicemail or sending a text message.

How can I make a report?

You can make a report through the web, mobile app and hotline.

Can I report anonymously?

Yes, you can, but we encourage you to identify yourself and to provide as much detail as possible regarding your concern. Providing this information makes it easier to investigate your concerns and achieve resolutions quicker.

Can I leave a message in my native language?

Yes, you can generally leave a message in your native language. Simply choose one of the specific language options available when leaving your message. Responses will be in the same language you used when reporting.

Is the Ethics Line open for external parties (customers, suppliers, job applicants, former employees, volunteers etc.)?

Yes, the Ethics Line is open for external parties (customers, suppliers, job applicants, former employees, volunteers, etc.). You can find more information on SSAB's website.

What type of situations should I report?

The Ethics Line system is designed for employees to report suspected violations of local laws or regulations, our Code of Conduct, Directives, Instructions or corporate policies, or other concern you may have.

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 on what SSAB considers to be serious non-compliance:

- bribery or 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.

If I have a concern, shouldn't I just report it to my manager, or human resources and let them deal with it?

When you observe some behavior that you believe violates local laws or our Code of Conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager or HR or use local internal reporting channels when available. We recognize, however, that there may be circumstances in which you are not comfortable reporting the issue in this manner. It is for such circumstances that we have made the Ethics Line available to you as an alternative reporting tool. We would rather you report anonymously (where permitted by local law) than keep the information to yourself.

Why should I report what I know?

We all have the right to work in a positive environment. With that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and

productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to report?

They certainly do. In fact, they *need* you to report. You know what's going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people.

I'm aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. So, if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I'm not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Ethics Line system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

How much information shall I provide?

We recommend that you be as specific as possible when reporting. Examples of information that should be included in a report are:

- a) Date, time and place of the incident
- b) A description of what happened, and if relevant your part in the reported incident
- c) Names and positions of persons concerned
- d) Witnesses, if any
- e) Other useful information to understand and investigate the incident

Where do these reports go? Who can access them?

Reports are only made available to a limited number of dedicated individuals within the company (the Ethics Steering Group) who are tasked with evaluating reports. Each of these report recipients has had training in keeping these reports in the utmost confidence and is a qualified specialist handling reports.

Can SSAB trace my connection data?

No, the Ethics Line system is operated by People Intouch. SSAB has no access to the connection data. Phone details or IP-addresses will never be disclosed to SSAB.

What if I want to be identified with my report?

You can identify yourself. We encourage you to identify yourself and to provide as much detail as possible regarding your concern. Providing this information makes it easier to investigate your concerns and achieve resolutions quicker.

How quickly can I check for a response?

SSAB strives to respond within one week.

I want to remain anonymous, but would like to receive a response; how can I manage?

The SpeakUp system will give you a unique case number. Please make sure to write this down carefully and that you create a password. This case number enables you to listen to or read the response from SSAB when you return to the system. You can also register an email address where you will receive notifications that there is new information pertaining to your report available.

I filed a report – 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. All reports will be handled professionally and confidentially. People will only be involved on a need-to-know basis depending on the nature of the matter reported. If necessary, people who add expertise can be included in the investigation. Under no circumstance will a matter be referred to an employee of SSAB who is the subject of any report or is otherwise an inappropriate person to assist with the investigation.

Sometimes you will be asked follow-up questions. You will receive feedback after the acknowledgement of receipt, where 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 persons subject to investigation, are entitled to confidentiality.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

The SpeakUp system will give you a unique case number. Please make sure to write this down carefully and to choose and remember a password. This case number enables you to access the response from SSAB when you return to the system. We strongly suggest that you return to the site in order to answer any questions that the company may have. You and the company have now entered an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Ethics Line correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity (where permitted by local law).

Am I protected from retaliation?

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.