

COMMUNICATION & RELEASE OF INFORMATION – POLICY #77

Introduction

This policy outlines the Company's guidelines, expectations and requirements related to:

- Use of devices to capture photographs, video and/or audio while on ArcelorMittal Dofasco property;
- Requests from journalists or other media representatives;
- Requests received from third parties (often but not exclusively, suppliers) or joint venture partners of the Company for testimonials or endorsements by ArcelorMittal Dofasco for their products or services;
- Company information to be presented or posted publicly by any party, including speeches, presentations, or commentary;
- Participation or attendances at which Employees may be identified as an employee or representative of the Company; and
- Posting to on-site Company bulletin boards.

1. Photographs, video, audio

1.1 Visitors: In order for a Visitor to take photographs or video or record audio on ArcelorMittal Dofasco property, *prior permission* must be granted from the relevant Business Unit or Department Manager under which the work and request is originating. In addition to any contractual obligation owed to the Company, all Visitors must comply with the following:

1. Visitors must follow ArcelorMittal Dofasco Health and Safety policies.
2. No Employees are to be in photos or video or be recorded without expressed written consent in the [form](#) attached to this policy. (Form to be completed by the recorder.)
3. No logos or brand marks are to be shown.
4. No proprietary information may be shared.
5. Corporate Affairs must approve the publication of any photos, video or audio captured. (Contact Manager, Corporate Affairs).

For the purpose of this policy, "Visitor" means:

- (i) any third party who performs work or provides services on ArcelorMittal Dofasco property, including all on-site service providers, construction contractors, outside carriers, and subcontractors, and their respective employees and agents;
- (ii) any joint venture partner or affiliate of the Company and their respective employees and agents attending any ArcelorMittal Dofasco property ; and
- (iii) any other visitor to any ArcelorMittal Dofasco property.

NOTE: No Visitor may copy any Company information or draw/sketch any equipment or facilities.

Given the relationship between the Company and Visitors that fall within the category outlined in paragraph (ii) above, *prior permission* to take photographs or videos or to record audio is likely to have been granted. However, it is important to inquire into the purpose, intended use and proposed

audience of such a photograph, video or recording to ensure compliance by the Company with its obligations to its stakeholders. The relevant Business Unit or Department Manager can assist in determining that the necessary permissions have been obtained.

1.2 Employees: Employees (i.e. permanent, casual, interns, co-ops and summer students) of the Company (“Employees”) must follow all protocols, procedures, work instructions and policies in their relevant Business Unit and/or Department, and of the Company and ArcelorMittal if using a personal or work issued camera/recording device either on the Company network or otherwise. Employees that post content (including text based commentary) related to their work at ArcelorMittal Dofasco to external channels, including social media sites, must comply with the following:

1. Employees must follow ArcelorMittal Dofasco Health and Safety and relevant Business Unit and/or Department policies, procedures, protocols and work instructions;
2. You must inform other Employees and other individuals if they are to be in a photo, video or audio recording and the intended use of it, and it is strongly recommended that you obtain expressed written consent.
3. No logos or brand marks of third parties are to be shown. It is important to not provide an endorsement to third parties.
4. No proprietary information may be shared.
5. Postings must not reflect negatively on the Company or any of its employees, customers or suppliers, and must adhere to the following policies and procedures: Business Code of Conduct; Information Technology Usage; Respect and Behaviour in the Workplace; Mobile Telecom; Human Rights; and Social Media.

NOTE: No Employee may copy any Company information or draw/sketch any equipment or facilities.

2. Speeches, articles for publication and public attendances

Advance written notification to Corporate Affairs must be given by an Employee of any public event attendances at which such Employee might or will be identified as an employee or representative of the Company.

All public speeches in which the presenter is identified as an Employee of or service provider to ArcelorMittal Dofasco and/or the presentation is related to or references ArcelorMittal Dofasco must be approved, *in advance*, by the Corporate Affairs and Legal Departments.

If the speech or presentation is of a technical nature, or may otherwise contain confidential or proprietary information, including any Company policies, procedures, protocols or work instructions, the Technical Submissions Approval Procedure must be followed.

NOTE: Company approved PowerPoint presentation forms and Company overview information are available for download on the ArcelorMittal Dofasco Team Site under “Quick Links - Identity Tools”.

3. Media

All media inquiries and requests (i.e. newspapers, magazines, radio, television, online news, trade association publications, etc.) must be referred to Corporate Affairs. Contact Manager, Corporate Affairs.

4. Endorsements/Testimonials

“Testimonials” and/or “endorsements” is defined as any public statement (written or verbal) by, or attributed to, ArcelorMittal Dofasco that indicates/implies satisfaction with a relationship with a third party and/or its goods or services.

There are benefits that third parties derive from publicly advertising or disclosing ArcelorMittal Dofasco’s use of, and/or satisfaction with, their products or services. However in most cases, there are limited benefits to the Company when entering into or granting such Testimonial or Endorsement arrangements. In fact, some additional risks may be created including potential reputational and legal risk to the Company. Requests of this nature also require several internal resources to manage, provide and monitor information related to the requests. The policy of ArcelorMittal Dofasco with respect to the receipt of requests from third parties for participation in Endorsement or Testimonial arrangements, including co-branding and licenses to use ArcelorMittal Dofasco logo or images, is as follows:

- ArcelorMittal Dofasco does not generally provide Endorsements or Testimonials.
- In certain limited circumstances, ArcelorMittal Dofasco may make an exception where the benefits are deemed by management to outweigh the risks. In such circumstances, *prior written approval* must be obtained from:
 - Corporate Affairs Department
 - Legal Department
 - Purchasing Department
 - Applicable Business Unit and/or Department General Manager and Vice President

The Company is aware that processes and policies similar to the above are undertaken by third parties when the Company seeks testimonials or endorsements from them.

5. Bulletin Boards

All notices for posting on Company bulletin boards must be approved, *in advance*, by the applicable area Business Unit or Department Manager. All such notices should have a posting date and removal date stated thereon.

Release and Consent to Photo, Video, or Voice Recording

The undersigned _____ (the "Subject") hereby acknowledges that he or she will be, and consents to being, photographed, video-recorded, and/or audio-recorded, as applicable, for the purposes of:

(such photographs, video recordings, or audio recordings collectively, the "Works"), by

_____ (the "Recorder").

The Subject acknowledges that ArcelorMittal Dofasco G.P. (the "Company") may not own, control, or direct the ultimate use of, the Works.

By signing this release and consent, each of the Subject and the Recorder agree to release the Company, its affiliates and each of their directors, officers, employees and, agents (collectively, the "Released Entities") from and against any and all claims which either the Subject or the Recorder may have against the Released Entities for invasion of privacy, right of publicity, ownership or property right, or any other claim arising from the use of the Works by the Recorder or otherwise, however modified, adapted, or reproduced.

By signing this release and consent, each of the Subject and the Recorder respectively confirm each is not a minor that each has read this release and consent in its entirety and fully understands and agrees with its contents.

Dated this ____ day of _____, 20__.

Subject: _____
Name: _____ (Witness)

Recorder: _____
Name: _____ (Witness)

Revision History

- The Communication & Release of Information Policy is being revised and refreshed to reflect changes in technology processes and terminology, the Video Standard Operating Procedure, and Employee Social Media usage.

7/8/16

- Replaced "General Administration" with "Corporate Administration" in Section 4.

2/11/2015

- Job title for approvals updated to Vice President. Section 2, Media referrals includes any and all social media.

12/17/2012

- To clarify the use of camera-equipped communication devices (cell phones, iPods, Personal Digital Assistant (PDAs), etc.) on Company property.

3/2/2010

- Job titles updated.

5/15/2009

- Expanded explanation to include all picture taking devices requiring approval for usage on Company property.

12/3/2004