



Conflicts of Interest

In this Policy, you will find:

- ✓ Definition of a Conflict of Interest
- ✓ How to disclose a Conflict of Interest

Key Resources
➤ <i>Annex no. 1 – Conflicts Disclosure Form</i>

“Family Member”
Includes spouses, parents, siblings, children, and in-laws of the employee or his/her spouse and such other persons in the family or similar relation who is considered sufficiently close that harm inflicted to one of them would be reasonably felt by the other as his or her own harm.

1. POLICY

Potential Conflicts of Interest must be disclosed to the Company as soon as they are recognized. A cross-functional committee (the “Conflicts Committee”) will review disclosures and decide (1) whether an actual Conflict exists, and if yes (2) whether the Conflict may be mitigated by adopting certain measures or is prohibited. Employees must not engage in any activity that is determined to be, in the sole discretion of U. S. Steel Košice, s.r.o. (“USSK”), a prohibited Conflict of Interest.

2. APPLICABILITY

U. S. Steel Košice, s.r.o. (“USSK”) Employees and Executives. Any person who violates this policy is subject to disciplinary action in accordance with the USSK Working Order up to and including termination of employment.

3. DISCLOSING CONFLICTS

You must disclose actual or potential Conflicts and obtain approval from the Conflicts Committee before you or your Family Member engage in the activity, which could be considered as Conflict of Interest or potential Conflict of Interest. Conflicts must be disclosed using the Conflicts Disclosure Form (annex no. 1) and filled in form send to the following email address: compliance@sk.uss.com.

Key Definitions
<p style="text-align: center;">“Conflict” or “Conflict of Interest”</p> <p>Includes any situation in which an employee or their Family Member has personal loyalties, or financial or other interests, that could influence decisions made on behalf of U. S. Steel. Also includes any activity that conflicts with the reputation, principles, or goals of U. S. Steel, including, for example, activities that are:</p> <ul style="list-style-type: none"> ➤ Unethical or illegal; ➤ Interfere with the employee’s responsibilities at USSK; or, ➤ Involve the use of USSK’s resources, name, or image for non-Company business.

Examples of Conflicts of Interest
<ul style="list-style-type: none"> ➤ Self-Dealing: Making decisions on behalf of USSK for the good of yourself, your family, or your friends, rather than for the good of the Company ➤ Family Financial Arrangements: An employee’s Family Member receiving money, property, or other value from USSK ➤ Outside Employment: Working, consulting, or providing services for a business other than USSK ➤ Competitor, customer, or supplier of U. S. Steel: Having a working relationship or substantial interest in a competitor, customer, or supplier of USSK



Conflicts of Interest

- **Misuse of Confidential Information:** Using confidential Company information (such as knowledge of contracts, acquisitions, or supplier relations) for personal gain or for the gain of another
- **Investments:** Investment interests in a competitor, supplier, or customer of USSK (*this does not include investments through mutual fund, or other type of investment vehicle where the beneficiary does not designate specific investment options*)
- **Competing Property Interests:** Interest in purchase or sale of property or property rights in which USSK has or might have a competing interest.

If you have disclosed a Conflict (or potential Conflict), but the situation changes, you must submit a revised Conflicts Disclosure describing the change.

4. MEMBERSHIP IN STATUTORY BODIES AND PERSONAL OR FAMILY BUSINESSES

a. Non-Profit and For-Profit Organizations

You must submit a Conflicts Disclosure Form, if you wish to serve as a member of statutory body of a non-profit organization or business company other than USSK, or a subsidiary or affiliate of USSK or other than personal or family businesses. This does not apply in cases where USSK nominated you to position of member of statutory body.

The following criteria, among others, will be considered in individual situations:

- The nature of the activity of the organization.
- The effect upon the individual's internal responsibilities, the circumstances of the company upon whose board the individual is asked to serve, the time involved, including travel time and the extent of the legal and practical obligations assumed; and
- The potential for the employee to have a Conflict.

b. Personal or Family Businesses

Subject to the above restrictions, it is the policy of USSK not to interfere with employee's participation in a family or personal business, but employees should still submit a Conflicts Disclosure Form in cases where employee might have a Conflict or may appear to have a Conflict. It may be presumed, at the discretion of the Conflicts Committee: (a) that a business according to a sole proprietorship permit or other type of entrepreneurial or professional permit (unincorporated) or (b) entrepreneurial activities of an employee in a corporation or limited liability company having less than 5 stockholders is a personal or family business. At the same time corporation having 5 or more is not, unless in any such case the facts indicate the contrary.

c. No Indemnification

Unless USSK requests you to serve as a director or officer of a non-profit organization in writing (in which case you may be entitled to defense or indemnification, subject to applicable law), the Company will not defend or indemnify you against lawsuits related to your position on that board.

5. EXECUTIVES' CONFLICTS

The Conflicts Committee will review and opine on all Conflicts submissions, except the following requirements apply to potential Conflicts involving Executives:

- Executives who report directly to the President will have any potential Conflicts forwarded to the Vice president Subsidiaries and General Counsel for disposition
- The Vice president Subsidiaries and General Counsel will have any potential Conflicts addressed by the USSK President
- The USSK President will have any potential Conflicts addressed by the U. S. Steel General Counsel and Chief Ethics & Compliance Officer.

Annex No.1 - Conflicts Disclosure Form
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