

# Responsible Steel™ Certified Site



ACE/2022/100136

Presented to

## ArcelorMittal Méditerranée

### SITE NAME AND ADDRESS

ArcelorMittal Méditerranée, L'Audience,  
F13270 Fos-sur-Mer, France  
ArcelorMittal Méditerranée, av Martyrs Du Maquis,  
F48200 Saint-Chély-d'Apcher, France

### CLIENT NAME AND ADDRESS

ArcelorMittal Méditerranée, Siège Social, 6 rue André Campra,  
93200 Saint-Denis, France

Version of the ResponsibleSteel Standard and Assurance Manual that the site was  
audited against

ResponsibleSteel Standard version 1.1  
ResponsibleSteel Assurance Manual version 1.0

### ISSUE DATE

02 May 2022

### EXPIRY DATE

01 May 2025

### NEXT SCHEDULE AUDIT

Nov 2023 (TBC)

### CERTIFIED SINCE

02 May 2022

### CERTIFICATION SCOPE

PRODUCTION OF COKE, SINTER AND INTERNAL  
TRANSPORT OF RAW MATERIALS, PRODUCTION OF PIG  
IRON AND BY-PRODUCTS, PRODUCTION AND SERVICING  
OF SLABS, HOT ROLLED (PICKLED) COILS AND SHEETS,  
COLD ROLLED COILS AND SHEETS INTERMEDIATE AND  
END PRODUCTS.

### CERTIFICATION BODY

AFNOR Certification  
11, Rue Francis de Pressensé  
93200 Saint Denis  
France



Any facilities and associated activities that are directly related to steel making or  
processing, that are on-site or near the site and that have been included in the  
certification scope or audit scope

None

### AUTHORIZED CERTIFICATION BODY SIGNATURE

A handwritten signature in black ink, appearing to read 'Julien Nizri'.

Julien Nizri, General Manager

ResponsibleSteel™, 755 Hunter Street,  
Newcastle West NSW 2303, Australia

Validity of this certificate is subject to continued conformity with the  
applicable ResponsibleSteel Standard and can be verified at  
[www.responsiblesteel.org](http://www.responsiblesteel.org)

This certificate does not constitute evidence that a particular product  
supplied by the certificate holder is ResponsibleSteel certified. Products  
offered, shipped or sold by the certificate holder can only be considered  
covered by the scope of this certificate when the required  
ResponsibleSteel claim is clearly stated on sales and delivery documents.

CERTI-F-2119 01-2022



# Responsible Steel™ Certified Site

Annex



ACE/2022/100136

## ArcelorMittal Méditerranée

### SITES AND FACILITIES COVERED BY THE CERTIFICATE

Fos-sur-Mer: 1 sinter plant, 1 coke plant, 2 blast furnaces, 2 oxygen converters, 2 continuous casters, 1 in-ladle metallurgy treatment installation (vacuum degassing, chemistry refining, CAS-OB), 1 hot strip mill, finishing lines (1 pickling line, 1 temper mill, 2 shearing lines, 2 slitting lines).

Saint Chély d'Apcher: pickling, batch annealing, cold rolling, degreasing, annealing, coating, slitting.

### SUPPORT FUNCTION THAT CONTRIBUTED TO THE AUDIT

ArcelorMittal Headquarter, 24-26, Boulevard d'Avranches, Luxembourg City, Luxembourg

ArcelorMittal Europe – Flat Products & EPO (European Procurement Organisation), 24-26, Boulevard d'Avranches, Luxembourg City, Luxembourg

ResponsibleSteel™, 755 Hunter Street,  
Newcastle West NSW 2303, Australia

Validity of this certificate is subject to continued conformity with the applicable ResponsibleSteel Standard and can be verified at [www.responsiblesteel.org](http://www.responsiblesteel.org)

This certificate does not constitute evidence that a particular product supplied by the certificate holder is ResponsibleSteel certified. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required ResponsibleSteel claim is clearly stated on sales and delivery documents.

CERTI-F-2119 01-2022



# PUBLIC SUMMARY AUDIT REPORT

This is a concise public summary of the audit report for ArcelorMittal Méditerranée. The full version of the audit report is in the possession of the member company and the audited sites.

## Audit overview

<b>Member Name</b>	<b>ArcelorMittal Group</b>
<b>Audited entity name</b>	<i>ArcelorMittal Méditerranée</i>
<b>Number of sites</b> <b>Names &amp; location</b>	Two sites: Fos-Sur-Mer, Zone Industrielle Aile 22 village Entreprise Sollac, FR-13270 Fos-sur-Mer Cedex (cluster HQ) Saint-Chély d'Apcher, av Martyrs Du Maquis, FR-48200 Saint-Chély d'Apcher
<b>Certification scope</b>	ArcelorMittal Méditerranée operates as a cluster that designs, develops, produces and services flat steel products.
<b>Standard version audited against</b>	<a href="#">ResponsibleSteel Standard V1-1</a>
<b>Audit type and outcome</b>	Initial certification audit
<b>Certification body</b>	AFNOR Certification
<b>Audit Dates</b>	Stage 1: 6 - 7 september 2021 on-site Stage 2: 15 - 19 November 2021 on-site
<b>Number of auditors and audit days</b>	02 auditors 23 audit days (stage 1, stage 2 and reporting)
<b>Lead auditor declaration</b>	<p>The findings in this report are based on an objective evaluation of evidence, derived from documents, first-hand observations at the sites and interviews with site staff, workers and stakeholders, as conducted during Stage 1 and Stage 2 audit activities.</p> <p>The audit team members were deemed to have no conflicts of interest with the sites.</p> <p>The audit team members were professional, ethical, objective and truthful in their conduct of audit activities.</p> <p>The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p>

	It should be noted that audits are snapshots that rely on sampling. Sampling of interviewees, of documentation and records, of observed operations and activities. The auditors can therefore not exclude the possibility that there are non-conformities in addition to the ones identified during the audit activities.
<b>Next audit type and date</b>	Surveillance audit November 2023 (tbc)

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# Introduction

## About ResponsibleSteel

Our mission is to achieve net zero carbon emissions for the steel sector, and to enhance the responsible sourcing, production, use and recycling of steel.

We are a not-for-profit multi-stakeholder organisation founded to bring together business, civil society and downstream users of steel, to provide a global standard and certification initiative for steel. We have built a consensus on what sustainability looks like for steel - including the impacts of mining, steel production, the scrap metal supply chain, greenhouse gas emissions, water use, workers' rights, communities and biodiversity. We are the first global scheme for responsibly sourced and produced steel.

Our Members include steel makers, mining companies, automotive and construction companies as well as civil society organisations focused on labour rights, biodiversity, climate change and many other important issues.

## Overview of the certification process

Certification against the ResponsibleSteel Standard is voluntary and follows the process below:



Sites can apply to be assessed against the ResponsibleSteel Standard on a voluntary basis. Conformity with the Standard is verified by independent certification bodies and auditors. They study documentation provided by the site, review relevant media and scientific publications on the site, visit the site to see operations first-hand, and interview site management, process owners, shopfloor workers and external stakeholders such as authorities, community and civil society representatives. The assessment is summarised in an audit report that is reviewed by an independent Assurance Panel. Only if that Panel is satisfied with the quality of the audit and the resulting report, can a site with a positive certification recommendation be certified. A ResponsibleSteel certificate is valid for three years and certified sites have to pass a surveillance audit after 18 months and subsequent re-certification audits to remain certified. The rules and processes for ensuring compliance with the Standard are laid out in the [Assurance Manual](#) and have been developed in line with the Assurance Code of Good Practice set by the ISEAL Alliance.

ResponsibleSteel provides an Issues Resolution System that any stakeholder may use to log a complaint about any aspect of the ResponsibleSteel programme. The [Issues Resolution System](#) can be accessed via the ResponsibleSteel website.

More information on ResponsibleSteel can be found on <https://www.responsiblesteel.org/>.

## Site information

<b>Country and town</b>	France, Fos-sur-Mer France, Saint-Chély d'Apcher
<b>Activities and products</b>	<p>The individual sites comprise the following facilities and products.</p> <p><b>Fos-sur-Mer:</b> This is the main site of the cluster and an integrated steel plant. It covers all phases of steel production and processing.</p> <p>The site comprises of: 1 discharging quay/ 1 loading quay, 1 sinter plant, 1 coke plant, 2 blast furnaces, 2 oxygen converters, 2 continuous casters, 1 in-ladle metallurgy treatment installation (vacuum degassing, chemistry refining, CAS-OB), 1 hot strip mill, finishing lines (1 pickling line, 1 temper mill, 2 shearing lines, 2 slitting lines).</p> <p>Products: black coil, pickled and oiled coil and sheet, cut to length sheet, slit coils</p> <p><b>Saint Chély d'Apcher:</b> This site carries out different activities, including pickling, batch annealing, cold rolling, degreasing, annealing, coating, and slitting.</p> <p>Products: non oriented electric sheets, electrical energy production (50% of the plant's electrical power supply needs).</p>
<b>Year site opened</b>	Fos-sur-Mer : 1973 Saint Chély d'Apcher : 1917
<b>Major extensions and / or refurbishments and year(s) when these occurred</b>	<p><b>Fos-sur-Mer</b></p> <p><i>Coke plant:</i></p> <p>2006 - Building of battery 3 (18 ovens)</p> <p><i>Sinter plant:</i></p> <p>1993 - Sinter strand elongation (400 m2 to 520 m2)</p> <p>2001 : Sinter strand enlargement (520 m2 to 572 m2)</p> <p><i>Blast furnaces:</i></p> <p>BF1 - 1981-1991-2007 - Relinings 2024 - Next relining (4th)</p> <p>BF2 - 1982-1993-2011 - Relinings</p> <p><i>Steel shop:</i></p> <p>1998 - Continuous caster CC2 revamping / Vertical &amp; Bending machine</p> <p>2008 - Continuous caster CC1 revamping / Vertical &amp; Bending machine</p> <p><i>Hot Street Mill:</i></p> <p>1982 : Walking beam furnace n° 3</p> <p>1996 : Sizing press</p>



	<p>2001 : New bending actuators finishing mill F1-F4</p> <p>2006 : New coiler n° 4 for heavy coils</p> <p><b>Saint Chély d'Apcher</b></p> <p>As result of complete refurbishment in early 1990s, the plant has fully switched to the electrical steel production in 1993, being part today of the world leaders for high-value electrical steels.</p> <p>Over 120 millions invested since 2013 for following extensions / renovations:</p> <ul style="list-style-type: none"> <li>• A high-tech continuous annealing line to improve the magnetic performance of our steels</li> <li>• An eco-responsible continuous pickling annealing furnace to develop new products and for automotive industry</li> <li>• Modernization of the rolling mill to improve product quality</li> <li>• A laser welder on the slitting line to better meet customer requirements</li> </ul>
<b>Annual production</b>	<p><b>Fos-sur-Mer:</b> 4 millions tons of steel</p> <p><b>Saint Chély d'Apcher:</b> 100.000 tons of electrical steel</p>
<b>Number of employees and contractors</b>	<p>2700 employees</p> <p>1550 contractors</p>
<b>Carbon reduction target</b>	<p>35% reduction in GHG emissions by 2030</p>
<b>Further environmental and social information</b>	<p>ArcelorMittal France sustainability report can be found here:</p> <p><a href="https://france.arcelormittal.com/~media/Files/A/Arcelormittal-In-France-V2/ARCELORMITTAL%20RSE%20France%202020.pdf">https://france.arcelormittal.com/~media/Files/A/Arcelormittal-In-France-V2/ARCELORMITTAL%20RSE%20France%202020.pdf</a></p>

## Stakeholder engagement

A stakeholder is a person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity of a site. Stakeholder engagement forms an important part of ResponsibleSteel audits. Stakeholders are a key source of information for the auditors and can help provide an objective view of the site. The identification of relevant stakeholders depends on the specific context and situation of a site. For the purpose of the ResponsibleSteel audit, the sites of the ArcelorMittal Méditerranée Cluster provided a list of external stakeholders to the auditors, based on their areas of influence, their ongoing stakeholder engagement efforts, as well as relevant media articles and other publications. The auditors examined the list and asked the sites to organize the interviews with the stakeholders extracted from the press provided by AFNOR Certification (as France Nature et Environnement) and present in the list. The selection of interviews considered the results of this media

analysis. To define the list of interested parties to contact, the audit team selected the contacts from the list provided by the cluster and prioritized them based on media analyses on themes (for example, air pollution) or on events (for example for the Fos site, environmental incidents, local health authorities, town hall representative, etc.). The media analysis, for the Saint Chély site, did not report any dissatisfaction or negative factors, which made it possible not to prioritize contact and with the results communicated with the self-assessment, the choice was more oriented on environmental themes and actors linked to investments on the site. About more than 120 external stakeholders have been informed about the on-going RS certification process.

The auditors requested that the sites identify additional significant stakeholders such as environmental NGOs. The Annex describes the areas of influence and provides the full list of external stakeholders that were identified for the Mediterranean Cluster.

Some insights on environmental concerns:

The environmental issues of both sites are tackled at cluster level. However, the issues are more difficult to deal with in Fos, who holds a raw material park, a coke plant and a steel plant, than in St Chély which is a small downstream facility. Furthermore, the issues are quite different for the two plants. Located at  $\geq 3$  kms from inhabited areas with the winds mainly headed to the sea, Fos focuses on air and water emissions. Being close to the town, Saint Chély deals mainly (and to a smaller extent) with noise concerns.

In Fos area, some part of the population has developed an aggressive approach to industries in general, despite the fact that the industrial sites in the area are accountable for less than 50% of the air emissions. This already started when the area went through a massive transformation in the late 60s, with thousands of workers joining the area, and founding new towns or new areas around pre-existing villages (like Fos' case). Last but not least, this kind of resistance had strongly increased at the beginning of 2000s, when the government decided to establish a new incinerator for wastes coming from Marseille in Fos, against the will of the majority of the population.

These events gave birth to a unique initiative - led by state - the innovative approach of concertation with all the stakeholders, for each particular issue. A big part of the stakeholders considers this approach as the efforts to curve down the negative environmental impact brought during the last decades, supporting at the same time the industry as an important source of employment and economical benefits for the surrounding area.

Due to the nature of the plant's activities, Fos is one of the contributors to the pollution of air or water in the area, that is why, under strong pressure of governmental agencies as well as local communities, the environmental issues are strongly tackled by the site with ArcelorMittal group financial support (100 m€ invested since 2012 and 30m€ were engaged for 2020-2021). Improvements over the past 10

years have been very important, cutting atmospheric emissions by half or more, and will continue to be, as environmental concern is - with safety - one of the major priorities of the plant's management. Fos commissioned the LECES Laboratory to conduct an independent ERS (Sanitary Risks Assessment) of Fos Plant in 2018, following the new approval to operate issued by the French legal authorities. The conclusion of this assessment was shared with several stakeholders. A complete report could be provided for review.

Conclusion of LECES report from 2018: "Considering the conclusions of the IEM specifying that the environment conditions are compatible with the usages and these results, the site ArcelorMittal Fos-sur-Mer doesn't demonstrate any significant sanitary impact on the surrounding areas."

All external stakeholders on the list were informed of the ResponsibleSteel audit 4 weeks prior the stage 2 of the audit. They have been contacted by AFNOR via email in the regionally used languages. AM Méditerranée has also organized a communication campaign to inform the stakeholders about the certification process.

The auditors worked closely with the two sites on organizing virtual or in-person interviews.

For the French administrations (CARSAT DREAL, city council, Deputies, and associations), a reminder was sent (on 21/10/2021, 3 weeks before the audit on-site) by the auditors to be able to obtain more interviews, but the level of response remained very low.

Requests for interviews or meetings have mostly remained unanswered for all requests made by the company and by the audit team, which contradicts to the image communicated by the press and for non compliance situations (such as formal notices). The stakeholders did not seize the opportunity to confirm their state of satisfaction with the needs and expectations.

The level of participation of sub-contractors was important (all requests for an interview received positive response). There was a lack of input from financial auditors, politicians and Inspectors of French administrations (Safety and Environment). The stakeholder interviews were conducted by Microsoft Teams or phone or in-person meetings. Suppliers were interviewed on the AM Méditerranée Cluster (Fos-sur-Mer and Saint-Chély d'Apcher sites).

Workers are important internal stakeholders since they are directly affected by the activities of the sites. In 2020, there were about 3691 FTE (including full and part-time employees and contractors) worked at the various sites of the Mediterranean cluster, most of them in Fos-sur-Mer. All sites apply a system of 5 rotating shifts:

- Morning: 05:00 - 13:00 (Fos); 04:00 - 12:00 (St Chély)
- Afternoon: 13:00 - 21:00 (Fos); 12:00 - 20:00 (St Chély)
- Night: 21:00 - 05:00 (Fos); 20:00 - 04:00 (St Chély)

The auditors interviewed workers of all shifts during the site visit. The auditors pre-selected workers for interviews and, together with the sites, confirmed who of those to interview. Selecting workers for interviews needs the help of the sites to make sure that production lines can continue to operate during

the interviews and to avoid safety risks for the remaining workers. Additionally, during the shop floor visit, some employees were interviewed directly at their workstations.

The auditors also held several meetings with the trade unions at Fos-sur-Mer and Saint Chély. The audit team has met representatives of all present trade unions.

Apart from interviews with process owners as relevant for the 12 Principles of the ResponsibleSteel Standard, workers and external stakeholders were interviewed, as summarized here:

	ndividuel		Groups			TOTAL	Comments
FOS	25	2x2	3x3	1x4	1x5	45	with 9 Stakeholders (integrated subcontractor , Association environment, safety manpower, medical ... )
St Chely	4		2x3			10	with 4 Stakeholders (integrated subcontractor , Association environment, financial partners )

External stakeholders that were interviewed:

- A member of the city council - Istres (Fos sur Mer)
- Suppliers (such as an industrial cleaning, packing, maintenance supplier, and Manpower interim company (Fos sur Mer)
- Environmental NGO - Natural areas management (Fos sur Mer)
- Environmental NGO (Fos sur Mer & Saint Chely)
- Medical social specialist (Social, psychologist, ergonomics) well-being initiatives (Fos sur Mer)
- Professional Association - economy circular (Saint Chely)
- Professional association - Environnement Industrie (Fos sur Mer & Saint Chely)
- Doctor (Fos sur Mer)

Overall, the inputs provided by internal and external stakeholders were mixed (positive and negative) in nature. Most of the relevant inputs from external stakeholders came from governmental organizations, associations, subcontractors and from stakeholders that have a strong relationship with the site (for example the administrations which support the site in the decarbonization plan and the maintenance of employment). The inputs provided may be impacted by the business relationships with the sites. The interviewed suppliers demonstrated a high level of loyalty with the sites, which makes it difficult to identify potential areas of concern, if these exist.

Although many communications external to the Fos site appear negative (atmospheric emissions, environmental situation, environmental and safety formal notice, financial penalties, state of employees' psychological health). The positive factors that emerged from the interviews demonstrate the site's commitment to improving the factory environment through investment; many stakeholders

also recognise the difficulty of being able to rapidly improve the situations (safety and environment) with regard to industrial processes, as equipment is expensive and few suppliers can make it.

The improvement of the communication on the events and better information on the context and the actions planned to deal with the problems have been acknowledged (e.g. importance of the meeting called CLIE (Commission Locale d'Information et d'Echange - Local Information and Exchange Commission) where most of the stakeholders and neighbors of the site of Fos take part in it).

For the Saint Chély site, all the interviews show a positive opinion (investment policy, state of the site and good integration in the city, integration in the local landscape, maintenance of the hydraulic power plants).

The site of Saint Chély participates a lot in the positive communication of the Mediterranean cluster.

## Summary of Audit Findings

<b>Conform</b>	Conformity, the requirement is fulfilled.
<b>Opportunity for Improvement (OFI)</b>	The respective requirement or criterion has been implemented, but effectiveness or robustness might be increased, or it is a situation that could lead to a future non-conformity if not addressed.
<b>Minor non-conformity (NC)</b>	Isolated, unusual or non-systemic lapse. Or a lapse with limited temporal and organisational impacts. A non-conformity that does not result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. Sites can become certified with minor non-conformities, but they must have addressed them by the time of their next audit.
<b>Major non-conformity (NC)</b>	A non-conformity that, either alone or in combination with further non-conformities, results in or is likely to result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. For example, non-conformities that continue over a long period of time, are systemic, affect a wide range of the site's production or of the site's facilities. Sites with major non-conformities cannot be certified.
<b>Exclusion</b>	The requirement is either <b>not applicable</b> : excluded from the audit since it is not applicable to the sites; or <b>not rated</b> : the requirement is very closely linked to another requirement where a non-conformity (NC) or opportunity for improvement (OFI) has already been raised. Sometimes, when requirements are linked to one and the same subject-matter, it is appropriate to count NCs or OFIs only once to avoid repetition.

Principles and criteria (# of requirements)	Conform	OFl	Minor NC	Major NC	#Exclusions
<b>Principle 1. Corporate Leadership</b>					
Criterion 1.1: Corporate Values and Commitments (6)	4	4	2		
Criterion 1.2: Leadership and Accountability (5)	4	1	1		
<b>Principle 2. Social, Environmental and Governance Management Systems</b>					
Criterion 2.1: Management System (6)	6	3			
Criterion 2.2: Responsible Sourcing (6)	5	4	1		
Criterion 2.3: Legal compliance and signatory obligations (6)	5	2	1		
Criterion 2.4: Anti-Corruption and Transparency (8)	7				1
Criterion 2.5: Competence and awareness (5)	4	2	1		
<b>Principle 3. Occupational Health and Safety</b>					
Criterion 3.1: OH&S policy (6)	6				
Criterion 3.2: Health and Safety (OH&S) management system (10)	9	4	1		
Criterion 3.3: Leadership and worker engagement on OH&S (10)	9	1	1		
Criterion 3.4: Support and compensation for work-related injuries or illness (8)	5				3
Criterion 3.5: Safe and healthy workplaces (5)	3		1		1
Criterion 3.6: OH&S performance (2)	2	1			
Criterion 3.7: Emergency preparedness (6)	6	1			
<b>Principle 4. Labour Rights</b>					
Criterion 4.1: Child and juvenile labour (9)	8	1			1
Criterion 4.2: Forced or compulsory labour (7)	7				
Criterion 4.3: Non-discrimination (9)	8	1	1		
Criterion 4.4: Association & collective bargaining (12)	11				1
Criterion 4.5: Disciplinary practices (5)	5				
Criterion 4.6: Hearing and addressing worker concerns (5)	5				
Criterion 4.7: Communication of terms of employment (5)	5				

Principles and criteria (# of requirements)	Conform	OFl	Minor NC	Major NC	#Exclusions
Criterion 4.8: Remuneration (11)	8				3
Criterion 4.9: Working time (7)	7				
Criterion 4.10: Worker well-being (2)	2	1			
<b>Principle 5. Human Rights</b>					
Criterion 5.1: Human rights due diligence (5)	5	2			
Criterion 5.2: Security practice (9)	8				1
Criterion 5.3: Conflict-affected and high-risk areas (5)	0				5
<b>Principle 6. Stakeholder Engagement and Communication</b>					
Criterion 6.1: Stakeholder engagement (10)	9	11	1		
Criterion 6.2: Grievances and remediation of adverse impacts (12)	12	4			
Criterion 6.3: Communicating to the public (7)	7	3			
<b>Principle 7. Local Communities</b>					
Criterion 7.1: Commitment to local communities (8)	8	1			
Criterion 7.2: Free, Prior & Informed Consent (3)	0				3
Criterion 7.3: Cultural heritage (7)	1				6
Criterion 7.4: Displacement and Resettlement (9)	0				9
<b>Principle 8. Climate Change and Greenhouse Gas Emissions</b>					
Criterion 8.1: Corporate commitment to achieve the goals of the Paris Agreement (8)	8	2			
Criterion 8.2: Corporate Climate-Related Financial Disclosure (2)	2				
Criterion 8.3: Site-level GHG emissions measurement and intensity calculation (3)	3	1			
Criterion 8.4: Site-level GHG reduction targets and planning (11)	10	1	1		
Criterion 8.5: Site-level GHG or CO2 emissions reporting and disclosure (8)	7	1			1
<b>Principle 9. Noise, Emissions, Effluents and Waste</b>					
Criterion 9.1: Noise and vibration (7)	5	1	2		
Criterion 9.2: Emissions to air (8)	8	2			

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 9.3: Spills and leakage (9)	9	4			
Criterion 9.4: Waste, by-product and production residue management (11)	11	1			
<b>Principle 10. Water Stewardship</b>					
Criterion 10.1 Water-related context (7)	7	2			
Criterion 10.2 Water balance and emissions (8)	7				1
Criterion 10.3 Water-related adverse impact (6)	6				
Criterion 10.4 Managing water issues (8)	7	3			1
<b>Principle 11. Biodiversity</b>					
Criterion 11.1: Biodiversity commitment and management (25)	21	1			4
<b>Principle 12. Decommissioning and closure</b>					
Criterion 12.1: Decommissioning and closure (13)	0				13
<b>Total (370)</b>	<b>302</b>	<b>66</b>	<b>14</b>	<b>0</b>	<b>54</b>

\* Note that the Total in the table does not correspond to the sum of Conform, OFI, Minor NC, Major NC and Exclusion due to the way that requirements and conformity classifications are counted.

## Strengths

Since ArcelorMittal has a lot of experience with management systems, good practices have been developed to implement the ResponsibleSteel Standard. The main strengths that the auditors identified are summarized here:

- The commitment of top management to implement the ResponsibleSteel standard has contributed to the implementation of many good practices in a short time (P1.1)
- Strengthening of the positioning of environmental themes in the site's CAP 25 strategy (CAP25 is the name of the cluster's Master Plan for 2020-2025) (P1.1)
- Project management with the prioritization of existing risk analyses (P2.1)
- RS makes it possible to consolidate the approach of listening to interested parties for other standards (P6)
- Demonstrated involvement in the territory (Institutional relations manager, frequent meetings, transparent communication, etc.) (P6)
- ResponsibleSteel is an accelerator for better structuring in the systematic approach through the different principles and the process management system (integration of ResponsibleSteel into existing processes) (P2.1)



- Social approach deployed in the management system and the creation of a social management system for the cluster (P4)
- The intranet site is available to all employees (P4.6)
- Fair practices in negotiation / Contract relations with subcontractors have been demonstrated (P2.2)
- Significant improvement in external communication have been implemented ("L'Acier & vous" biannual magazine, Meeting CLIE (Commission Locale d'information et d'Echange. It's a Local Commission for Information and Exchange, organized with other industrial companies present in the area) (P6)
- Creation of an efficient website (<https://france.arcelormittal.com/developpement-durable/responsiblesteel>) with a French scope and covering the 2 French clusters (P.6.3).
- Numerous Safety tools to improve health and safety: Take Care, Occupational Accident (AT) Analysis, training, Safety Alert.... (P3)
- Mechanical and maintenance workshop sector areas are safe and clean (P3.5)
- Managing health and the COVID crisis to ensure a safe workplace (P3)
- High contribution to better integrate people with disabilities and efforts to increase the number of women in teams (P3 - 4)
- The new "Director of Institutional Relations" full-time function was created in 2019, strengthening relations with the various institution (Government agencies, NGOs, cities' town halls, port authorities) (P6.1)
- The collection of practices for communicating with stakeholders is important (P6.1.4)
- The management of greenhouse gas (GHG) emissions at cluster level is structured according to a roadmap (decarbonization plan) with milestones and covering the 2 sites to achieve the commitment of a 35% reduction in GHG emissions by 2030 (P8)
- The level of compliance with regulation about dust reduction, volume in landfill off-site and water stewardship showed good results (P9)
- Preservation of protected natural areas and biodiversity actions on the 2 sites (P11)

## Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 14 minor non-conformities against requirements of the ResponsibleSteel Standard were raised. The sites are required to effectively address the non-conformities before the surveillance audit. The non-conformity findings are related to: Criterion 1.1: Corporate Values and Commitments, Criterion 1.2: Leadership and Accountability, Criterion 2.2: Responsible Sourcing, Criterion 2.3: Legal compliance and signatory obligations, Criterion 2.5: Competence and awareness, Criterion 3.2: Health and

Safety (OH&S) management system, Criterion 3.3: Leadership and worker engagement on OH&S, Criterion 3.5: Safe and healthy workplaces, Criterion 4.3: Non-discrimination, Criterion 6.1: Stakeholder engagement, Criterion 8.4: Site-level GHG reduction targets and planning, Criterion 9.1: Noise and vibration.

The audit did not uncover any major weaknesses, which is underlined by the fact that only a number of minor non-conformities were raised by the auditors. Many of the identified non-conformities (NCs) are mainly linked to the short time that was taken to implement the requirements of the ResponsibleSteel Standard. Many NCs are related to the areas that are not covered in more established standards in the fields of environment ISO 14001 energy ISO 50001 and Health and Safety (ISO 45001 (formerly OHSAS 18001)). Also, the complexity of a global organization like ArcelorMittal contributes to the identified weaknesses. The ResponsibleSteel Standard brings a lot of new concepts and a new vision of corporate responsibility, so the internal knowledge and understanding needs to be reinforced to fully embrace the new requirements.

# Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for ArcelorMittal Méditerranée, including the auditors' findings for each individual requirement of the ResponsibleSteel Standard. Subsequently, the Assurance Panel members met online to discuss individual findings and to align their views on the audit report. We sought clarification and asked for reconsideration of conformity classifications where the auditors' conclusions were not sufficiently substantiated. Following review of the changes that were made by the auditors, we support the certification recommendation for ArcelorMittal Méditerranée.

The Assurance Panel's conclusions on the final audit report are as follows:

- The audit report contains sufficient detail to support an informed certification decision
- The supporting evidence and rationales given in the audit report support the auditors' conformity classifications
- The certification recommendation based on the audit report is conclusive

This statement has been approved by the three members of the Assurance Panel who reviewed the audit report on 07 April 2022.

More information on the audit process and the role of the Assurance Panel can be found in the [ResponsibleSteel Assurance Manual](#).