

Responsible Steel™ Certified Site



Presented to

ACE/2022/100137

ArcelorMittal France

SITE NAME AND ADDRESS

Dunkerque: Rue du Comte Jean Grande-Synthe,
F59381 DUNKERQUE CEDEX 1
Mardyck : 1, route de Spycker, F59760 GRANDE
SYNTHÉ
Desvres : 2, rue Bidet, F62240 DESVRES
Montataire : Route de Saint-Leu, F60160
MONTATAIRE
Florange : 17 avenue des Tilleuls FR-57191
FLORANGE CEDEX
Mouzon : 7, Rue Albert Ollivet FR-08210 MOUZON
Basse Indre : Route des Sables, RD 107 Rond-Point
des Forges, FR-44610 INDRE

CLIENT NAME AND ADDRESS

ArcelorMittal France cluster North: Rue du Comte Jean Grande-
Synthe BP 2508 FR-59381 DUNKERQUE CEDEX 1

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

12 May 2022

EXPIRY DATE

11 May 2025

NEXT SCHEDULE AUDIT

November 2023 (TBC)

CERTIFIED SINCE

12 May 2022

CERTIFICATION SCOPE

DESIGN, DEVELOPMENT, PRODUCTION AND SERVICING OF
SLABS, HOT ROLLED (PICKLED) COILS AND SHEETS, COLD
ROLLED COILS AND SHEETS, COATED (METALLIC AND ORGANIC)
COILS AND SHEETS. PRODUCTION OF PIG IRON AND BY-
PRODUCTS, PRODUCTION OF COKE, SINTER AND INTERNAL
TRANSPORT OF RAW MATERIALS, INTERMEDIATES 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

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.

CERTIF-2119 01-2022



Responsible Steel™ Certified Site



Annex

ACE/2022/100137

ArcelorMittal France Cluster North

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Dunkerque is an integrated steel plant: raw materials yards, 1 Unloading dock, 1 loading dock, 2 sinter plants, 1 coke plant, 3 blast furnaces, 1 steel shop (3 Converters with 3 vacuum treatments, 3 Continuous Casting Machines), 1 hot strip mill

Mardyck : 1 Coupling line (pickling & cold rolling), 2 Galvanizing lines, 1 pickling, 1 Slitting line.

Desvres : 1 galvanizing line, 1 Slitting line

Montataire : 3 Galvanizing line, 1 organic coating line

Florange: 1 hot strip mill, 1 Coupling line (pickling & cold rolling), 2 Galvanizing line, 1 continuous annealing line and base line, 1 Pickling Line, 1 Rolling mill 5 Cages, 1 Tinning Line,

Mouzon : 2 Galvanizing line, 1 Slitting line, 1 cutting line

Basse Indre: degreasing line, continuous annealing and base line, 1 skin pass line, 2 Tinning Line, 1 cutting line.

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

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.

CERT-F-2119 05-2022



PUBLIC SUMMARY AUDIT REPORT

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

Audit overview

Member Name	ArcelorMittal Group
Audited entity name	ArcelorMittal France Cluster North
Number of sites Names & location	7 sites : <ul style="list-style-type: none">• ArcelorMittal France cluster North (Dunkerque) : Rue du Comte Jean Grande-Synthe BP 2508 FR-59381 DUNKERQUE CEDEX 1• Mardyck : 1, route de Spycker BP 129 FR-59760 GRANDE SYNTHÉ• Desvres : 2, rue Bidet BP 65FR-62240 DESVRES• Montataire : Route de Saint-Leu BP 109 FR-60160 MONTATAIRE• Florange : 17 avenue des Tilleuls FR-57191 FLORANGE CEDEX• Mouzon : 7, Rue Albert Ollivet FR-08210 MOUZON• Basse Indre : Route des Sables RD 107 Rond-Point des Forges BP 5FR-44610 INDRE
Certification scope	ArcelorMittal France Cluster North operates as a cluster that designs, develops, produces and services flat steel products.
Standard version audited against	ResponsibleSteel Standard V1-1
Audit type and outcome	Initial certification audit Initial certification
Certification body	AFNOR Certification
Audit Dates	Stage 1: 9 - 10 November 2021 on site Stage 2: 13-17 December 2021 on site
Number of auditors and audit days	3 auditors 27 days (stage 1, stage 2 and reporting)
Lead auditor declaration	The findings in this report are based on an objective evaluation of evidence, derived from documents, first-hand

	<p>observations at the sites and interviews with site staff, workers and stakeholders, as conducted during stage 1 and stage 2 audit activities. The audit team members were deemed to have no conflicts of interest with the sites. The audit team members were professional, ethical, objective and truthful in their conduct of audit activities. The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p> <p>It should be noted that audits are snapshots that rely on sampling. Sampling of interview partners, 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.</p>
Next audit type and date	<p>Surveillance audit</p> <p>September - October 2023 (tbc)</p>

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Introduction

About ResponsibleSteel

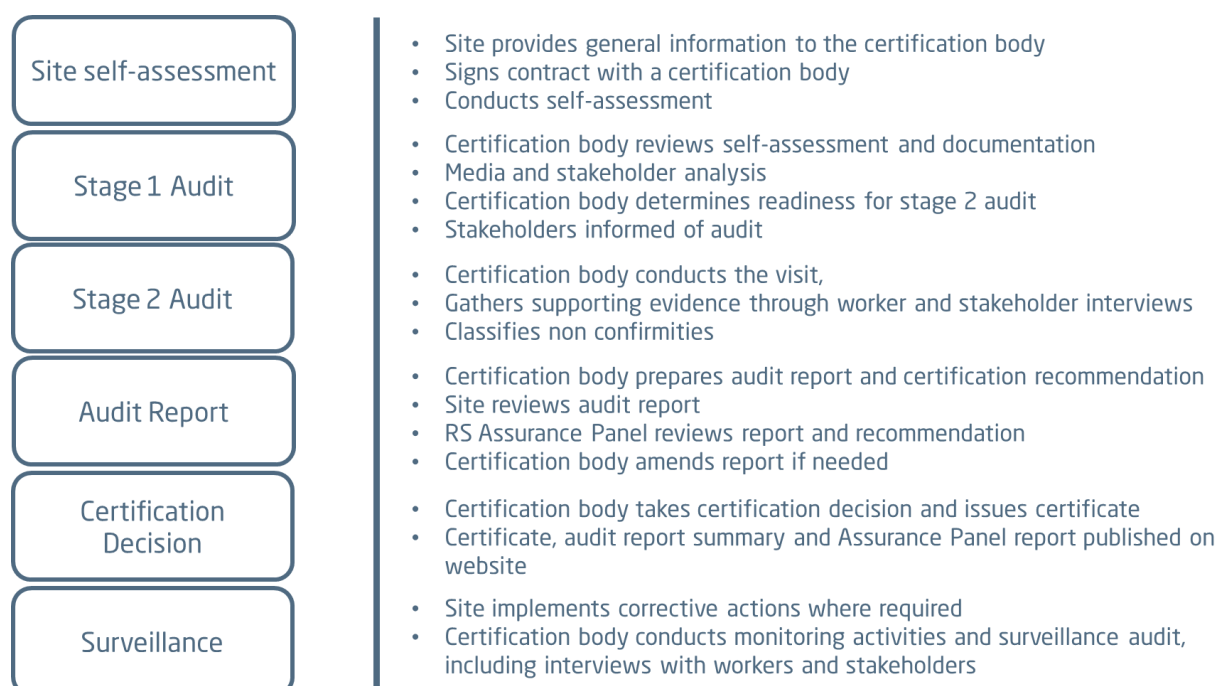
Our mission is to achieve net zero carbon emissions for the steel sector, and to enhance the responsible sourcing, production, use and recycling of steel.

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

Country and town	<p>France, Dunkerque</p> <p>France, Mardyck</p> <p>France, Desvres</p> <p>France, Montataire</p> <p>France, Florange</p> <p>France, Mouzon</p> <p>France, Basse Indre</p>
Activities and products	<p>Dunkerque 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 unloading dock / 1 loading dock, 2 sinter plants, 1 coke plant, 3 blast furnaces, 1 steel shop (3 Converters with 3 vacuum treatments, 3 Continuous Casting Machines), 1 hot strip mill.</p> <p>Products: hot rolled coils full hard coils, by-products (e.g., blast furnace slag), gas for electricity.</p> <p>Mardyck is a finishing site with: 1 coupling line (pickling & cold rolling), 2 galvanizing lines, 1 pickling, 1 slitting line.</p> <p>Products: galvanised products for the automotive and industrial market, by-products (iron oxide).</p> <p>Desvres is a finishing site with: 1 galvanizing line, 1 slitting line</p> <p>Products: galvanised products on hot rolled coils for the automotive and industrial markets, by-products (iron sulphate).</p> <p>Montataire is a finishing site with: 3 galvanizing lines, 1 organic coating line</p> <p>Products: galvanised products for the automotive and industrial market, organic coated products.</p> <p>Florange is a finishing site with: 1 hot strip mill, 1 coupling line (pickling & cold rolling), 2 galvanizing lines, 1 continuous annealing line, 1 pickling line, 1 rolling mill 5 cages, 1 tinning line,</p> <p>Products: galvanised products for the automotive and industrial market, varnish & enamelled steel, steel for packaging (DWI & Tinplate).</p> <p>Mouzon is a finishing site with: 2 galvanizing lines, 1 slitting line, 1 cutting line</p>

	<p>Products: aluminium-based coated products for the automotive and industrial markets.</p> <p>Basse Indre is a finishing site with: degreasing line, continuous annealing and base line, 2 tinning lines, 1 cutting line.</p> <p>Products: coated products for food packaging.</p>
Year site opened	<ul style="list-style-type: none"> • Dunkirk : 1962 • Basse Indre : 1823 • Desvres : 1958 • Florange : 1948 • Mardyck : 1973 • Montataire : 1840 • Mouzon : 1888
Major extensions and / or refurbishments and year(s) when these occurred	<p>Dunkirk</p> <ul style="list-style-type: none"> - 1962: Plant creation (blast furnaces: 1 and 2; steel plant 1 and HSM) - 1967: Blast Furnace 3 - 1972: Steel plant 2 - 1984: Steel plant: RHOB - 1995-97: HSM new walking beam furnaces - 2001: Blast Furnace 4 revamping - 2002: HSM finishing mill automation revamping - 2006: BF3 revamping Steel plant: CC23 revamping - 2007: Sinter plant n°2 cooler dedusting Sinter plant n°3 width enlargement - 2008: CC22 revamping Sinter plant Cooler dedusting - 2010: Steel plant: new RHOB (vacuum degassing) and CC21 revamping Roughing mill stand <p>Basse Indre</p> <ul style="list-style-type: none"> - 1823: foundation of Basse-Indre forges - 1892: beginning of tin plate production, for this reason, Basse-Indre works has a long and outstanding tradition in manufacture of steel packaging - 1952: first cold rolled strips on reversible mills - 1961: first electrolytic tin plated strips

- 1972: commissioning of the 5 stand tandem cold mills
- 1981: first ECCS strips
- 1987: commissioning of the continuous annealing line
- 2001: high speed cooling on continuous annealing line
- 2004: coil packing line

Florange

- 1948: creation of Florange site
- 1955: for the first time, annual production of hot rolling mill in excess of 1,000,000 tons
- 1960: creation of the Packaging site
- 1979: continuous casting was brought into service - for the first time in Europe, entire steel production process of a great plant is in continuous casting
- 1983: the electrogalvanising line is brought into service and produces continuous Zinc plated steel sheets
- 1986: the pickling is coupled to cold rolling mill, accelerating the production process and increasing the productivity
- 1990: revamping of mills, tinning lines and continuous annealing line
- 2004: upgrade of the whole tinplate process for wide D&I tinplate
- 2018: Closure of electrogalvanized line
- 2020: Launch of production of the new galva2 line (conversion of electrogalvanizing line)

Mardyck

- 1973: creation of the site
- 1998: start of Galvanising line 1 for automobile
- 2005: start of Galvanising line 2 for automobile and industry

Montataire

- 1840: Foundation of "Forges et Fonderies de Montataire" S.A.
 - 1948: Merge with the company Denain Anzin. The name changes into Usinor
 - 1950: Start of the first continuous cold rolling mill
 - 1957: Foundation of the Galvanor branch for coated products.
- Start of line 1 (galvanisation line)

	<ul style="list-style-type: none"> - 1976: Start of line 2 (painting line) - 1988: Galvanor mergers with Ziegler (branch of Sacilor). Usinor-Aciers becomes Sollac - 1994: Start of the sandwich plate line <p>Mouzon</p> <ul style="list-style-type: none"> - 1888: creation of Mouzon site by A. Ollivet - 1955: Hot dip galvanising on line 1 - 1963: Aluminised on line 2 - 1995: Lines 1&2: Galfan & Alusi - Line 1: Alupur - 1997: Aluminised stainless steel - 2000: Usibor 1500 P - 2005: Embossed aluminised steel <p>Desvres</p> <ul style="list-style-type: none"> - 1958: creation of the site
Annual production	7 million metric tons of crude steel per year
Number of employees and contractors	<ul style="list-style-type: none"> - 6650 employees - 2450 contractors
Carbon reduction target	35% reduction in GHG emissions by 2030 and carbon neutral by 2050.
Further environmental and social information	<p>More information can be found in the Responsibility Report here:</p> <p>https://france.arcelormittal.com/developpement-durable.aspx</p>

Stakeholder engagement

By definition, 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 France Cluster North provided a list of external stakeholders to the auditors (documented in stage 1), 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 and present

in the list. They 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 scope.

For the entire ArcelorMittal France perimeter, 237 stakeholders were identified.

The distribution per site is

- Dunkerque and Mardyck : 76 stakeholders
- Desvres : 17 stakeholders
- Montataire: 18 stakeholders
- Basse Indre : 32 stakeholders
- Florange : 48 stakeholders
- Mouzon: 15 stakeholders
- Common to all sites: 29 stakeholders

All external stakeholders on the list were informed of the ResponsibleSteel audit 4 weeks in advance of the site visit. They were informed by email, in the regionally used languages. The auditors worked closely with the sites in organizing virtual or in-person meetings with those stakeholders that responded to the invite and volunteered to be interviewed. Several requests for an interview were positive (media, association, representative of a local residents' collective in Dunkirk). The level of participation of sub-contractors was important. There was a lack of input from financial auditors, politicians and inspectors. In France, labour and environmental inspectors do not wish to share their reports with third parties even if the company's agreement has been given. Several stakeholder interviews were conducted by Microsoft Teams or phone, but the majority were realized physically. Different suppliers were interviewed on the AM France Cluster North (7 sites).

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 7000 individuals (including full and part-time employees and contractors) work at the various sites of the AM France cluster North, most of them in Dunkerque. The majority of the sites apply a system of 5 teams rotating around the 3 shifts.

- Morning: 06:00 - 14:00
- Afternoon: 14:00 - 22:00
- Night: 22:00 - 06:00

The auditors interviewed workers of all shifts during the site visit. The auditors preselected workers for interviews (according to the sampling rules defined in the ResponsibleSteel Assurance Manual) and, together with the sites, confirmed which 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 a meeting with the different labour unions (on a few sites but ensuring the complete representation of these interested parties).

Apart from interviews with process owners as relevant for the 12 Principles of the ResponsibleSteel Standard, a number of workers and external stakeholders were interviewed, as summarized here: Approximately 155 interviews (40 interviews with women with 2 groups composed exclusively of women) across AMF Cluster North and the satellite sites were conducted in groups or individually, including workers from the sinter plant, ladle furnace steel shop, blast furnace, also maintenance functions, foremen, laboratory staff, line managers, members of the performance monitoring team, union representatives at the satellite sites, but also the workers of subcontractors (in environment, safety, maintenance work).

The table below shows the sampling carried out according to the number of people at the site.

	Number of interviews				TOTAL	Comments
	Individuals	Groups				
Dunkirk	20	2x3	1x4	2x5	40	5 external stakeholders
Desvres	6	3x3			15	2 external stakeholders
Mouzon	6	3x3			15	2 external stakeholders
Montataire	6	3x3			15	2 external stakeholders
Florange	20	2x3	1x4	1x5	35	5 external stakeholders
Mardyck	10	2x3	1x4		20	4 external stakeholders
Basse Indre	8	2x3	1x4		18	3 external stakeholders

External stakeholders that were interviewed:

- Several suppliers (such as an industrial cleaning company, waste management, energy and a packaging and logistics supplier, water treatment supplier, ...) for the sites of Dunkirk, Mardyck, Desvres, Montataire, Basse-Indre, Florange and Mouzon
- After several reminders and invitations to local residents to take part in ResponsibleSteel interviews to assess their expectations, it was not possible to meet any residents directly, but some of the employees we met were the voice of the residents (and these circumstances are typical for all sites). However, the meeting notes with the stakeholders were analysed during the audit and in particular the meeting notes with all the legal bodies (in environment with the "DREAL" or for safety with the "work inspection" as well as the "CARSAT"). The reports with the local communities were also analyzed (in particular the reports following the public meetings with the residents) as well as with the local representatives (sub-prefecture, mayors). The expectations are taken into account and shared. The audit team have also consulted the feedback of the interested parties in the public press (for example through the newspaper "Vivre à Fort Mardyck" and the feedback of the mayor on the Greenstep project).
- Whatever the reports consulted to assess the relations of the interested parties on their expectations and needs, none of the facts on the various sites were negative and many interested parties testified to the approach of the various sites to solving certain problems but above all the progress significance of the environmental situation and the company's significant contribution or community support

- External companies working for the different ArcelorMittal sites: Dunkirk, Mardyck , Florange and Mouzon
- Instance administrative (administrative authority) for the Management Ecology Biodiversity (Basse Indre) for the site of Basse Indre
- Environmental NGO (bird protection) for the site of Mardyck
- Media for the site of Desvres
- Temporary employment agencies for Dunkirk, Mardyck, Desvres, Montataire, Basse-Indre, Florange and Mouzon
- Members well-being initiatives (health support, ergonomist) for Dunkirk, Mardyck , Florange
- Professional Association –circular economy for Dunkirk, Mardyck
- Professional association - Environment industry for Dunkirk, Mardyck , Montataire, Florange
- Doctor for Dunkirk, Mardyck , Florange
- Psychologists, social workers, ... for the sites of Dunkirk, Mardyck, Florange

Overall, feedback provided by internal and external stakeholders was positive in nature and no significant issues were raised.

The objective of the interviews carried out was to collect through open questions the questions, irritants, positive or negative perceptions, needs and expectations, the level of satisfaction of the answers given to their questions, the dynamics of the company with regard to the various items of ResponsibleSteel, to collect the corporate image.

To achieve this and facilitate exchanges with the various interested parties, the interview process consisted of getting the interviewees to talk about how the site was perceived in the past, the present and how they saw it in the future.

The answers were very constructive and made it possible to see the progress or the evolution of the needs of each interviewee; This questioning approach aims to facilitate discussions but also to see the progress already made.

The method applies to both individual and group interviews because each person met can complete the suggestions of the other;

Questioning with more targeted or reformulated questions makes it possible to validate the information.

The themes addressed during the interviews were to gather their needs and expectations, to identify and discuss with them the key themes of the reference system in order to confirm ArcelorMittal's statements.

In general, for all the interviews, the feedback from the interviews was positive concerning the different approaches and investments that the group had already put in place on the environment, health and safety, human resources and the changes already made on dust for Dunkirk. The expectation for improvement is more on having a better visibility on the state of progress on the planned actions even if the subjects were shared.

Their provided input 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. The internal stakeholders like workers, labour unions and on-site doctors provided important input as well. Relevant input from internal and external stakeholders has been captured in the requirements table below to substantiate the findings.

Summary of Audit Findings

Conform	Conformity, the requirement is fulfilled.
Opportunity for Improvement (OFI)	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.
Minor non-conformity (NC)	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.
Major non-conformity (NC)	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.
Exclusion	The requirement is either not applicable : excluded from the audit since it is not applicable to the sites; or not rated : 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	OFI	Minor NC	Major NC	#Exclusions
Principle 1. Corporate Leadership					
Criterion 1.1: Corporate Values and Commitments (6)	6	2			
Criterion 1.2: Leadership and Accountability (5)	5				
Principle 2. Social, Environmental and Governance Management Systems					

Criterion 2.1: Management System (6)	6	2			
Criterion 2.2: Responsible Sourcing (6)	6	3			
Criterion 2.3: Legal compliance and signatory obligations (6)	6				
Criterion 2.4: Anti-Corruption and Transparency (8)	7	1			1
Criterion 2.5: Competence and awareness (5)	5	2			
Principle 3. Occupational Health and Safety					
Criterion 3.1: OH&S policy (6)	6	3			
Criterion 3.2: Health and Safety (OH&S) management system (10)	10	4	1		
Criterion 3.3: Leadership and worker engagement on OH&S (10)	10	2			
Criterion 3.4: Support and compensation for work-related injuries or illness (8)	6				2
Criterion 3.5: Safe and healthy workplaces (5)	3	7	1		1
Criterion 3.6: OH&S performance (2)	2	1			
Criterion 3.7: Emergency preparedness (6)	6				
Principle 4. Labour Rights					
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)	7	9	1		
Criterion 4.4: Association & collective bargaining (12)	11	1			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	1			
Criterion 4.8: Remuneration (11)	8				3
Criterion 4.9: Working time (7)	7	2			
Criterion 4.10: Worker well-being (2)	2	3			
Principle 5. Human Rights					
Criterion 5.1: Human rights due diligence (5)	5	1			
Criterion 5.2: Security practice (9)	8				1
Criterion 5.3: Conflict-affected and high-risk areas (5)	0				5
Principle 6. Stakeholder Engagement and Communication					

Criterion 6.1: Stakeholder engagement (10)	9	2	1		
Criterion 6.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 6.3: Communicating to the public (7)	7	1			
Principle 7. Local Communities					
Criterion 7.1: Commitment to local communities (8)	8				
Criterion 7.2: Free, Prior & Informed Consent (3)	0				3
Criterion 7.3: Cultural heritage (7)	0				7
Criterion 7.4: Displacement and Resettlement (9)	0				9
Principle 8. Climate Change and Greenhouse Gas Emissions					
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		2		
Criterion 8.5: Site-level GHG or CO2 emissions reporting and disclosure (8)	7	1			1
Principle 9. Noise, Emissions, Effluents and Waste					
Criterion 9.1: Noise and vibration (7)	6	3	1		
Criterion 9.2: Emissions to air (8)	8	4			
Criterion 9.3: Spills and leakage (9)	9	1			
Criterion 9.4: Waste, by-product and production residue management (11)	11				
Principle 10. Water Stewardship					
Criterion 10.1 Water-related context (7)	7	2			
Criterion 10.2 Water balance and emissions (8)	6		1		1
Criterion 10.3 Water-related adverse impact (6)	5	1			1
Criterion 10.4 Managing water issues (8)	7				1
Principle 11. Biodiversity					
Criterion 11.1: Biodiversity commitment and management (25)	18	2	1		6
Principle 12. Decommissioning and closure					

Criterion 12.1: Decommissioning and closure (13)	0				13
Total (370)	305	65	9	0	57

* 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 summarised here:

- The commitment of the pilots (Top management responsible for the deployment and analysis of the various principles related to ResponsibleSteel) of all the principles in the implementation of the ResponsibleSteel standard has contributed to the implementation of many practices in a short time (P1.1)
- Contribution and structuring of the Integrated Management System approach leading to the demonstration of the foundations of the ResponsibleSteel approach: Strengthening of the positioning of environmental and safety, code of conduct, biodiversity and "decarbonation plan" themes in the site's policy strategy (P1.1)
- ResponsibleSteel makes it possible to consolidate the approach of listening to interested parties (P6)
- Demonstrated involvement and participation in the territory (Institutional relations manager, frequent meetings, transparent communication, etc.) (P6)
- Social approach (social process) deployed in the management system (P4)
- Fair practices in negotiation / Contract relations with subcontractors have been demonstrated (P2.2)
- Creation of a website for the French scope and covering the 2 French clusters (AM Méditerranée and AMF Cluster North) (P.6.3).
- Deployment of numerous tools and Safety Culture: Take Care, Safety meeting, Stop, 5 minutes before acting (P3)
- Health, Wellbeing and COVID crisis management to ensure a safe workplace (P3)
- Actions carried out to promote the recruitment of women: intervention in schools, high schools, engineering schools, etc. An OPQCM (the "Office Professionnel of Qualification of Management Consultants" (OPQCM) is one of the qualification committees) offered to people undergoing professional reorientation (P3)
- Good support for the competence of the employees (P4)
- Openness to dialogue: well perceived in the interviews (P4)

- The establishment of a “Director of Institutional Relations” function was created in 2019, strengthening relations with the various institutions (local government, prefectures, environmental agencies, banks, associations, Member of Parliaments,) (P6.1)
- The collection of practices for communicating with stakeholders is important (P6.1.4)
- Good support for external companies (through company villages called “PARSEC”, or “CEI”) (P6-7)
- Decarbonation plan: The management of greenhouse gas (GHG) emissions at cluster level is structured according to a roadmap (decarbonisation plan) with milestones to achieve the commitment of a 35% reduction in GHG emissions by 2030 (P8)
- Management and preservation of natural areas and biodiversity actions on the Mardyck site (P11)

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 9 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 3.2: Health and Safety (OH&S) management system, 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, Criterion 10.2 Water balance and emissions, Criterion 11.1: Biodiversity commitment and management

The audit did not uncover any major weaknesses, which is underlined by the fact that only a relatively low number of minor non-conformities were raised by the auditors. Many of the identified non-conformities are mainly linked to the short time that was taken to implement the requirements of the ResponsibleSteel Standard. Many NCs are notified by the fact that the management system of the ResponsibleSteel standard is recent and the management of several criteria does not have sufficient anteriority to plan preventive actions.

Also, the complexity of a global organisation 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.

The weaknesses are considered to be minor non-conformities because the auditors found that the risk associated with them is not major.

Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for ArcelorMittal France Cluster North, 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 France Cluster North.

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 10 May 2022.

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