

Responsible Steel™ Certified Site



ACE/2021/92654.1

Presented to

ArcelorMittal Belgium NV

SITE NAME AND ADDRESS

Site of Gent: John Kennedylaan 51, BE-9042 Gent
Site of Geel: Lammerdries 10, BE-2440 Geel
Site of Genk: Kanaaloever 3, BE-3600 Genk
Sites of Liège:
Rue Forges 64, BE-4570 Marchin
Chaussée de Ramioul 52, BE-4400 Flémalle
Rue Gustave Baivy SN, BE- 4101 Jemeppe
Rue Sompré SN, BE-4400 Flémalle

CLIENT NAME AND ADDRESS

ArcelorMittal Belgium NV
John Kennedylaan 51, BE-9042 Gent

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

19 July 2021

EXPIRY DATE

18 July 2024

NEXT SCHEDULED AUDIT

December 2022 (TBC)

CERTIFIED SINCE

19 July 2021

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 not been included in the certification scope or audit scope

ArcelorMittal Tailored Blanks Gent

AUTHORISED CERTIFICATION BODY SIGNATURE

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.



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Annex

ArcelorMittal Belgium NV

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Gent: raw materials yards, coking plant, 2 sinter plants, 2 blast furnaces, steel shop, hot strip mill, cold rolling mill, finishing lines (cold rolled annealing, metallic coated galvanizing lines, organic coating line), power plant (industrial partner), harbour (industrial partners) for raw material delivery and shipping of finished products, and Steelanol (production of bio-ethanol, under construction).

Genk: Electro galvanizing line

Geel: Organic coating line

Flémalle: 2 organic coating lines and Hot dip galvanizing line

Jemeppe: Cold rolled annealing line and JVDline (Jet Vapor Deposition)

Marchin: Electro galvanizing line

SUPPORT FUNCTIONS 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

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PUBLIC SUMMARY AUDIT REPORT

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

Audit overview

Member Name	ArcelorMittal
Audited entity name	ArcelorMittal Belgium
Number of sites Names & location	<ul style="list-style-type: none">• Integrated steel plant and cluster headquarter: John Kennedylaan 51, 9042 Gent, Belgium• Electro galvanizing line: Kanaaloever 3, 3600 Genk, Belgium• Organic coating line: Lammerdries 10, 2440 Geel, Belgium• 2 organic coating lines: Chaussée de Ramioul 52, 4400 Flémalle, Belgium• Hot dip galvanizing line (Eurogal): Rue Sompré SN, 4400 Flémalle, Belgium• Cold rolled annealing line and Jet-Vapour-deposition line: Rue Gustave Baivy SN, 4101 Jemeppe, Belgium• Electro galvanizing line: Rue Forges 64, 4570 Marchin, Belgium https://belgium.arcelormittal.com/en/
Certification scope	<p>Production of pig iron and by-products, production of coke, sinter and internal transport of raw materials, intermediates and end products.</p> <p>Design, development, production and servicing of flat steel products:</p> <ul style="list-style-type: none">• Gent: hot rolled coils, cold rolled full hard coils, cold rolled annealed coils, metallic coated products, organic coated products, by-products (e.g., blast furnace slag), gas for electricity.• Genk: electro galvanized products• Geel and Flémalle: organic coated products• Flémalle (Eurogal): metallic coated products• Jemeppe: cold rolled annealed and metallic coated products

	<ul style="list-style-type: none"> Marchin: electro galvanized products
Standard version audited against	ResponsibleSteel Standard V1-1
Audit type and outcome	Surveillance audit & Special audit Certified
Certification body	AFNOR Certification
Audit Dates	Stage 1: 5,5 days Stage 2: 28 Nov- 1 st Dec 2022 Special audit 15/05/2023
Number of auditors and audit days	Lead auditor: Pascal Thomas Auditor: Caroline Brulebois Auditor: Stéphane JAGU
Lead auditor declaration	<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. 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	Re-certification audit April 2024

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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>Belgium, Gent</p> <p>Belgium, Geel</p> <p>Belgium, Genk</p> <p>Belgium, Flémalle</p> <p>Belgium, Jemeppe</p> <p>Belgium, Marchin</p>
Activities and products	<p>Gent (cluster HQ, integrated steel plant)</p> <p><u>Activities:</u> raw materials yards, coking plant, 2 sinter plants, 2 blast furnaces, steel shop, hot strip mill, cold rolling mill, finishing lines (cold rolled annealing, metallic coated galvanizing lines, organic coating line), power plant (industrial partner), harbour (industrial partners) for raw material delivery and shipping of finished products, and Steelanol (production of bio-ethanol, under construction).</p> <p><u>Products:</u> hot rolled coils, cold rolled full hard coils, cold rolled annealed coils, metallic coated products, organic coated products, by-products (e.g., blast furnace slag), gas for electricity.</p> <p>Genk</p> <p><u>Activities:</u> Electro galvanizing line. <u>Products:</u> Electro galvanized products.</p> <p>Geel</p> <p><u>Activities:</u> Organic coating line. <u>Products:</u> Organic coated products.</p> <p>Ivoz Ramet</p> <p><u>Activities:</u> 2 organic coating lines. <u>Products:</u> Organic coated products.</p> <p>Flémalle (Eurogal)</p> <p><u>Activities:</u> Hot dip galvanizing line. <u>Products:</u> Metallic coated products.</p> <p>Jemeppe</p> <p><u>Activities:</u> Cold rolled annealing line and JVD line (Jet-Vapour-deposition).</p> <p><u>Products:</u> Cold rolled annealed and metallic coated products.</p> <p>Marchin</p> <p><u>Activities:</u> Electro galvanizing line. <u>Products:</u> Electro galvanized products.</p>

Year site opened	1966									
Major extensions and / or refurbishments and year(s) when these occurred	<div>Site of Gent:</div> <div>1966: Hot strip mill, cold rolling mill</div> <div>1967 and 1968: Two blast furnaces</div> <div>1972: Coking plant</div> <div>1981: Continous cold rolling mill</div> <div>1998: Hot dip galvanizing line 1</div> <div>2000: Hot dip galvanizing lines 2 and 3</div> <div>2002: Organic coating line</div> <div>2019: Start of Steelanol construction (production of bio-ethanol)</div> <div>2020: All Weather Terminal</div> <div>Site of Genk:</div> <div>1993: Electro galvanizing line</div> <div>Site of Geel:</div> <div>1991: Organic coating line</div> <div>Sites of Liège:</div> <div>1975: Organic coating line (LP2)</div> <div>1985: Continous cold rolled annealing line</div> <div>1989: Organic coating line (combiline)</div> <div>1991: Electro galvanizing line</div> <div>1997: Hot dip galvanizing line</div> <div>2019: Jet-Vapor-Deposition line</div>									
Annual production	<div>Site Gent: crude steel production 4.927 kt</div> <div>Site Genk: 326 kt</div> <div>Site Geel: 126 kt</div> <div>Site Ramet Organic coating lines: 367 kt</div> <div>Site Ramet Hot dip galvanizing line: 472 kt</div> <div>Site Kessales Cold rolling production: 364 kt</div> <div>Site Kessales JVD production: 168 kt</div> <div>Site Marchin: 59 kt</div>									
Number of employees and contractors	<div>Direct employees</div> <table><tr><th>Direct employees</th><th>Female</th><th>Male</th></tr><tr><td>AM FCE BELGIUM - GENT</td><td>185</td><td>3973</td></tr><tr><td>AM FCE BELGIUM - GENK</td><td>5</td><td>122</td></tr></table>	Direct employees	Female	Male	AM FCE BELGIUM - GENT	185	3973	AM FCE BELGIUM - GENK	5	122
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	<div> <div>AM FCE BELGIUM - GEEL</div> <div>1</div> <div>56</div> </div> <div> <div>AM RAMET - IVOZ RAMEZ</div> <div>6</div> <div>135</div> </div> <div> <div>AMEUROGAL-IVOZ RAMEZ</div> <div>5</div> <div>215</div> </div> <div> <div>AM KESSALES - JEMEPPE</div> <div>2</div> <div>158</div> </div> <div> <div>AM MARCHIN - MARCHIN</div> <div>1</div> <div>27</div> </div> <div> <div> Contactors </div> <div> <div>AM FCE BELGIUM - GENT</div> <div>1227</div> </div> <div> <div>AM FCE BELGIUM - GENK</div> <div>16</div> </div> <div> <div>AM FCE BELGIUM - GEEL</div> <div>13</div> </div> <div> <div>AM RAMET - IVOZ RAMEZ</div> <div>34</div> </div> <div> <div>AM EUROGAL - IVOZ RAMEZ</div> <div>54</div> </div> <div> <div>AM KESSALES - JEMEPPE</div> <div>59</div> </div> <div> <div>AM MARCHIN - MARCHIN</div> <div>14</div> </div> </div>
Carbon reduction target	<p>ArcelorMittal ascribes to a long-term emissions reduction pathway as described in the company's Climate Action Report 2, available here: https://corporate-media.arcelormittal.com/media/ob3lpdom/car_2.pdf. The company is committed to having its targets validated by the Science Based Targets Initiative (SBTi).</p> <p>ArcelorMittal Europe is targeting a 35% reduction in Scope 1 and 2 CO₂e by 2030 versus a 2018 baseline, and to reach net-zero by 2050. This is described in the company's Climate Action Report 2, available here: https://corporate-media.arcelormittal.com/media/ob3lpdom/car_2.pdf</p>
Further environmental and social information	10 enjeux - Rapport de responsabilité sociétale ArcelorMittal

Stakeholder engagement

Stakeholder engagement is an integral part of a ResponsibleSteel audit and ensures a rich and balanced collection of information and evidence. The auditors followed the methodology indicated in the [Guidance on Stakeholder Engagement](#) developed by ResponsibleSteel as well as the [Introduction to ResponsibleSteel for stakeholders](#).

For the purpose of the ResponsibleSteel audit, the sites of the ArcelorMittal Belgium 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. The Annex describes the areas of influence and provides the full list of external stakeholders that were identified for the scope.

As the audit was conducted in a surveillance audit configuration, the stakeholder review was reduced in view of the audit time.

Stakeholders:

The following stakeholder groups and their representatives were identified as relevant in the areas of influence:

- 6 local communities (Gent, Genk, Geel, Marchin, Ivoz Ramet, Jemeppe)
- National and local government authorities and politicians
- Labor unions
- Occupational healthcare stakeholders (doctors, prevention advisors)
- Civil society organisations
- Environmental and labour inspectors
- Insurance companies (because they are involved in risk management and potentially cover damages)
- Financial statutory auditors (ensure the detection of finance and corruption risks)
- Regional industrial partners (harbours, public transportation companies, neighbouring industrial sites)
- Media
- Federations
- Academics and schools
- Customers (contractual stakeholders)
- Suppliers (contractual stakeholders)
- Employees (contractual 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 organising virtual or in-person meetings with those stakeholders that responded to the invite and volunteered to be interviewed. The stakeholders selected are representatives of the different categories. All the stakeholders identified in the audit plan accepted to be interviewed, see below for a list of external stakeholders that were interviewed.

No input was provided to the auditors by email.

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 6309 individuals (including full and part-time employees and contractors) work at AM Belgium. All sites have 3 rotating 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 functions slots for interviews and, together with the sites, confirmed which workers 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 workers included in the interviews made it possible to cover different categories of gender, hierarchical level, arduousness and diversity in order to have a representative picture.

Unions were fully part of the interviews.

Additionally, to the process owners, more than 27 workers (17 men, 10 women), including workers from the blast furnace, rolling mill, Steelanol, Hot Strip Mill, Electrolytic galvanizing line, Hot dip galvanizing line, supporting functions, foremen, suppliers, line managers, members of senior leadership team, suppliers, union representatives and purchasing managers, human resources, health & safety, industrial risk, environment and sustainability team.

External stakeholders that were interviewed:

- ✦ 2 suppliers (such as IT, cleaning) at cluster level
- ✦ 2 Neighbours representatives in Gent
- ✦ 1 Environmental Inspector for Liège sites
- ✦ 2 persons from Milieu Charter Oost-Vlaanderen (an initiative of the Flemish Government for companies with an interest in Corporate Social Responsibility) all Dutch sites
- ✦ 1 Doctor at Gent but in coordination with the other doctors
- ✦ 1 School/University of Gent For liège sites

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. Overall, the input provided by internal and external stakeholders was mainly positive in nature. The needs and expectations did not show any new sensitivities that were not known by the company and that were shared during the audit of the owners of the principles. With regards to stakeholder's management, higher expectations were requested from the neighbourhood, especially with regards to the noise issues and dust related to Gent site mainly. Improvements are also expected in the area of the environment, particularly at the Ghent site.

They acknowledge that the site is making efforts in communication to deal with complaints and to reduce dust emissions. Furthermore, a better understanding of this standard is expected.

Also, relevant input from external stakeholders came from governmental bodies (environment inspectors) to confirm the area of concern, suppliers from stakeholders that have a strong relationship with the site (for

example, the suppliers, temporary agency, city). Their provided input may be impacted by the business relationships they have with the sites. The internal stakeholders like workers, unions and the doctor provided important input as well. They recognised the site's commitment to occupational health and safety, the environment, social issues and social protection

The evolution in the interlocutors (change of interlocutor) has reduced the history of exchanges and expectations. This was compensated by more investigation of the analysis reports

Relevant input from internal and external stakeholders has been captured in the requirements table below to substantiate the auditors' 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.

* 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 process owners in implementing the ResponsibleSteel Standard helped succeed in putting many practices in place in a short period of time (2.1)
- The fact that the Cluster implemented a full COVID-19 protocol to monitor the situation with relevant stakeholders during the COVID-19 crisis is proof of the strong focus on management systems
- The global risk management is well structured (2.1.2a) and relevant
- The management of conflict minerals is well under control (Key Performance Indicators, self-assessment, etc.) (2.2)
- Compliance trainings are well monitored to secure skills development (good score, almost 100%) (2.5)
- The approach to monitoring competence trainings and follow-up via a software (2.5) is above the regulatory level
- The effective management of issues arising from periodic inspections for the mandatory occupational health and safety (OHS) regulatory controls has to be highlighted (3.5)
- Mechanical and maintenance workshop (FER) sector areas show very clean shop floors (3.5)
- The access to machines is controlled via a badge system linked to information about the required qualifications. This good practice ensures that only workers with appropriate skills get access to the machines (3.5.2)
- Visual safety data sheet next to chemical products contributes to a better understanding of the employees (3.5)
- The reputation survey conducted by the Group to identify the main interests of stakeholders is good practice and relevant at Cluster level (6.1.2)
- The collation of practices to communicate with stakeholders is important (6.1.4)
- Community grievances in relation to dust issues have been well managed, all the way to the feedback provided to the affected stakeholder (6.2.6)
- The Cluster-level management of greenhouse gas emissions (GHG) is well structured with a roadmap with milestones and associated sites to reach the commitment of 30% reduction of GHG emissions by 2030 (8)
- Off-setting measures are produced and carried out by the Gent site itself thanks to the development of renewable energy (8.5.1d)

- A study about noise and vibration, dust reduction, management of historic pollution, volume in landfill off-site and water stewardship showed good results, as confirmed by the environmental inspector who was interviewed (9)

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

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
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	1			
Criterion 4.7: Communication of terms of employment (5)	5				
Criterion 4.8: Remuneration (11)	8				3
Criterion 4.9: Working time (7)	7				
Criterion 4.10: Worker well-being (2)	2	1			
Principle 5. Human Rights					
Criterion 5.1: Human rights due diligence (5)	5				
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)	10	3			
Criterion 6.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 6.3: Communicating to the public (7)	6	2	1		
Principle 7. Local Communities					
Criterion 7.1: Commitment to local communities (8)	8	2			
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	1			

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 8.2: Corporate Climate-Related Financial Disclosure (2)	2				
Criterion 8.3: Site-level GHG emissions measurement and intensity calculation (3)	3				
Criterion 8.4: Site-level GHG reduction targets and planning (11)	11				
Criterion 8.5: Site-level GHG or CO2 emissions reporting and disclosure (8)	7				1
Principle 9. Noise, Emissions, Effluents and Waste					
Criterion 9.1: Noise and vibration (7)	3		4*		
Criterion 9.2: Emissions to air (8)	5	1	3*		
Criterion 9.3: Spills and leakage (9)	8		1		
Criterion 9.4: Waste, by-product and production residue management (11)	9		2*		
Principle 10. Water Stewardship					
Criterion 10.1 Water-related context (7)	7	1			
Criterion 10.2 Water balance and emissions (8)	7				1
Criterion 10.3 Water-related adverse impact (6)	4		1*		1
Criterion 10.4 Managing water issues (8)	6		1		
Principle 11. Biodiversity					
Criterion 11.1: Biodiversity commitment and management (25)	17		2*		6
Principle 12. Decommissioning and closure					
Criterion 12.1: Decommissioning and closure (13)	0				13
Total (370)	296	28	14		54

*A common NC affect the principle P9.2 and P11.2 and an another one the criteria 9.1.3a,9.2.3a, 9.4.2, 10.3.1

that's why the total is 14 NC min

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

The main strengths that the auditors identified are summarized here:

- ✦ The implementation of a complete questionnaire to evaluate the CSR performance of suppliers (2.2.1c)
- ✦ An ongoing coaching on the Dupont de Nemours approach to reinforce the safety culture (3.2.1)
- ✦ HAZOP Studies and responsibilities has been reinforced to better prevent hazardous situations (3.7)
- ✦ A clean shop floor and visual management practices for safety (3.5)
- ✦ Various mechanisms to support workers in difficult situations (4.10)
- ✦ A structured study launched to better manage the stakeholders (6.1)
- ✦ The construction of the Steelanol plant will contribute to multiples positives impacts and it is part of an ambition CO2 roadmap (8)
- ✦ Cluster level management of GHG demonstrates a good organization supported by a roadmap (milestones, structured and sites contributions) (8)
- ✦ A clear waste strategy to identify co-products (9.4.1)
- ✦ The monitoring and the management approach of water consumption shows results (10.2.2)

Areas for improvement

The audit did uncover one major weakness related to the environmental analysis mainly used to drive the monitoring of regulation but not as a preventive tool to go beyond the regulations. A special audit has been carried out to ensure an effective action plan to correct that major non-conformity. **The auditor has decided, after the special audit, to maintain it as a minor non-conformity because the roadmap is still in progress to ensure it will be done. The requirements affected were 9.1.3a, 9.2.3a, 9.4.2 and 10.3.1 a,b,d**

Many of the identified non-conformities are linked to understanding of the requirements and the miss of demonstration of the effectiveness expected in the ResponsibleSteel Standard. The Standard is a challenging tool which requires to go beyond the regulation and the border of the site.

The minor non-conformities are summarised below and will have to be fully addressed by ArcelorMittal by the time of the surveillance audit against the ResponsibleSteel Standard. Also, improvements are proposed to the site to strengthen their practices.

- ✦ The interfaces/interactions between Corporate and Cluster could to be reinforced (dynamics, action plan) (1) as the environmental policy was not available in Dutch and the Diversity and inclusion policy not in French
- ✦ Monitoring compliance with legal obligations is complex due to segmented and non-consolidated information to manage this compliance commitment (2.3.1)

- ✦ The psychosocial risk is not integrated in the health and safety risk assessment. Also, the data is split in different organizations and/or responsibilities which makes difficult to drive the health at cluster level (3.2.2b)
- ✦ Actions to control/eliminate hazards risks are incomplete to cover critical safety situations (3.2.2c)
- ✦ Maintenance in good working order still shows weaknesses, particularly in the control of operations at the hot rolling mill and blast furnaces (3.5.1)
- ✦ Communication to the public has weaknesses, particularly with regard to the 2020-2021 CSR report, which contains different data than the internal steering data, and the scope of the data used is unclear (site or cluster level?) (6.3.3)
- ✦ The current policy only indicates generic commitments without clearly stating those relating to noise and vibration, air emissions and biodiversity (9.1.1, 9.2.1, 11.1.1).
- ✦ The vibration studies are limited to the Flanders's sites. The 3 Liège sites has not performed such studies (9.1.2)
- ✦ Based on the analyses, the level of objectives is not clearly documented for noise and vibration (9.1.4) and for air emissions (9.2.4).
- ✦ Regular inspection of equipment shows weaknesses with the presence of chemicals without retention or simplified safety data sheets (9.3.1)
- ✦ Targets for reducing the amount of waste going to landfill are not clearly documented (9.4.1c)
- ✦ Time-bound targets are not clearly documented for improving water intakes and discharges (10.4.2)
- ✦ Assessment against biodiversity risk is still ongoing (11.1.7)

Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the findings of the special audit ArcelorMittal Belgium reg the major NC identified and closed during the special audit. Subsequently, the Assurance Panel members had online exchanges to discuss individual findings and to align their views on the audit report. We support the certification recommendation for ArcelorMittal Belgium.

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 22 June 2023.

More information on the [Assurance Panel](#) can be found on the ResponsibleSteel website. The audit process is described in the [ResponsibleSteel Assurance Manual](#).