

Responsible Steel™ Certified Site



Presented to

ACE/2023/107156.1

INDUSTEEL

SITE NAME AND ADDRESS

INDUSTEEL BELGIUM, Rue de Châtelet 266,
6030 MARCHIENNE-AU-PONT, BELGIUM

INDUSTEEL FRANCE, 118 Route des Etaings,
42803 RIVE-DE-GIER Cedex, FRANCE

INDUSTEEL FRANCE, 56 Rue Clemenceau,
71200 LE CREUSOT, FRANCE

CLIENT NAME AND ADDRESS

INDUSTEEL BELGIUM, Rue de Châtelet 266,
6030 MARCHIENNE-AU-PONT, BELGIUM

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

ResponsibleSteel Standard version 2.0
ResponsibleSteel Assurance Manual version 1.0

ISSUE DATE
2023-11-17

EXPIRY DATE
2026-11-16

NEXT SCHEDULED AUDIT
2025-05-17 (TBC)

CERTIFIED SINCE
2023-11-17

CERTIFICATION SCOPE

DESIGN, DEVELOPMENT, PROCESSING, HEAT TREATMENT, NON-DESTRUCTIVE AND DESTRUCTIVE TEST, SALES AND USER SUPPORT FOR PRODUCTS (SLABS, INGOTS, PLATES, COILS, FORMED AND FLAME CUT PLATES) IN CARBON, ALLOYED AND STAINLESS STEELS, CLAD STEELS OR SPECIAL ALLOYS.

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

CERTIFICATION BODY

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



AUTHORIZED CERTIFICATION BODY SIGNATURE

Ce document est signé électroniquement. Il constitue un original électronique à valeur probatoire.
This document is electronically signed. It stands for an electronic original with probatory value.

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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ACE/2023/107156.1

Annex

INDUSTEEL

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Marchienne-au-Pont: Electrical arc furnace, hot rolling mill, heat treatment, surface treatment

Loire: Electrical arc furnace, hot rolling mill, heat treatment, surface treatment

Le Creusot: Electrical arc furnace, hot rolling mill, heat treatment, surface treatment

SUPPORT FUNCTION THAT CONTRIBUTED TO THE AUDIT

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

ArcelorMittal 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 audit report for Cluster AMDS – Industeel. 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	Cluster AMDS -Industeel
Number of sites Names & location	3 Industeel Belgium, Rue de Châtelet 266, 6030 Marchienne-au-Pont Belgium Industeel Creusot, Rue Clemenceau 56, 71200 Le Creusot, France Industeel Loire, Rue du Gier 254, 42800 Chateauneuf, France
Certification scope	<p>Cluster AMDS – Industeel operates as a cluster that is active in design, development, processing, heat treatment, non-destructive and destructive test, sales, and user support for products (slabs, ingots, plates, coils, formed and flame cut plates) in carbon, alloyed and stainless steels, clad steels or special alloys.</p> <p>Industeel Belgium: Upstream activities:</p> <ul style="list-style-type: none"> - Large EAF for carbon and stainless grades with continuous caster able to cast 355mm thick slabs - Highly efficient stainless steel finishing line with 100kt capacity - One of the most powerful medium gauge levellers in Europe, installed in 2012 - Water quenching equipment - Finishing lines enabling production of a wide variety of grades and surface quality - Fully automated test laboratory <p>Industeel Creusot: Upstream activities:</p> <ul style="list-style-type: none"> - Ingot casting enabling focus on specialties ranging from nickel-based alloys and stainless to carbon steel grades - Highest quality and top-of-the-range products - Casting production capability for nuclear

	<ul style="list-style-type: none"> - Globally certified to cater to nuclear market - Capability to cast ingots with weight up to 350 tonnes - Oil quenching and water quenching equipment - One of only two sites in Europe capable of producing clad plates <p>Industeel Loire:</p> <p>Upstream activities:</p> <ul style="list-style-type: none"> - Ingot casting with focus on thick plates - Forging press in-line with rolling mill to produce the thickest and heaviest plates - Water quenching equipment - Oxy-cutting and sawing equipment enabling finishing to exact customer specifications <p>Downstream activities:</p> <ul style="list-style-type: none"> - 12kt press with unique hot-forming capability for 2-piece heads in wide diameter and high thickness - 7m diameter quenching bath for large pieces <p>Supporting functions:</p> <p>The corporate headquarter of ArcelorMittal in Luxembourg was engaged in the audit since policies, strategies, etc. are developed at corporate level for implementation at the sites (Principle 1. Corporate Leadership, Principle 7. Stakeholder Engagement and Communication, Principle 8. Climate Change and Greenhouse Gas Emissions)</p> <p>ArcelorMittal Europe Flat Products & EPO (European Procurement Organisation) in Luxembourg concentrates the flat carbon steel production sites in Europe and provides a number of transversal support functions such as purchasing and the management of suppliers. This business division is also in charge of the communication of results to the public (GHG reduction targets and planning). As such, the EPO contributed to the audit as well (in relation to Criterion 2.2 Responsible Sourcing and Principle 4. Labour Rights, especially where contractors are involved).</p>
Standard version audited against	ResponsibleSteel Standard V2.0
Audit type and outcome	Initial certification audit Initial certification
Certification body	AFNOR Certification, 11, Rue Francis de Pressensé, 93200 Saint Denis, France
Audit Dates	Stage 1: from March 3 rd to March 7 th 2023

	<p>Stage 2: from 01 to 07 June 2023.</p> <p>Special audit: 13 October 2023</p>
Number of auditors and audit days	<p>2 auditors</p> <p>17.5 days (stage 1, stage 2, special audit and reporting)</p>
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	<p>Surveillance Audit: Feb 2025</p>

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Introduction

About ResponsibleSteel

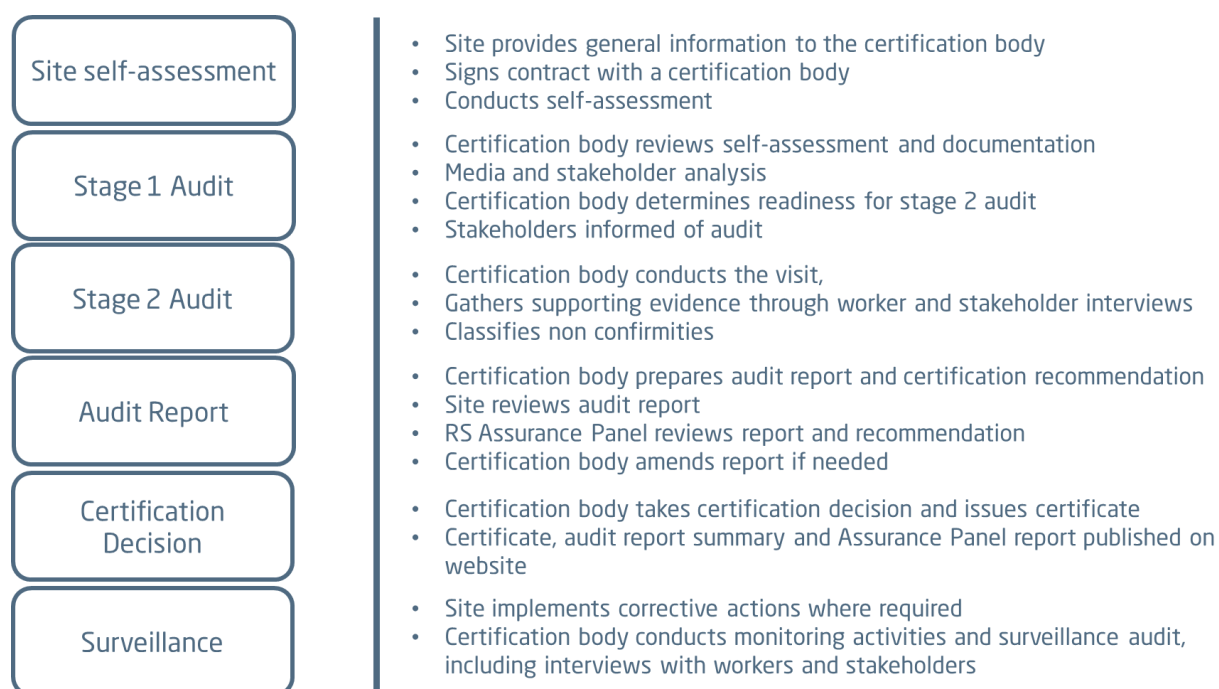
Our mission is to achieve net zero carbon emissions for the steel sector, and to enhance the responsible sourcing, production, use and recycling of steel.

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	Belgium : Marchienne-au-Pont & France : Le Creusot and Chateauneuf
Activities and products	<p>Industeel Belgium:</p> <p>Upstream activities:</p> <ul style="list-style-type: none"> - Large EAF for carbon and stainless grades with continuous caster able to cast 355mm thick slabs - Highly efficient stainless steel finishing line with 100kt capacity - One of the most powerful medium gauge levellers in Europe, installed in 2012 - Water quenching equipment - Finishing lines enabling production of a wide variety of grades and surface quality - Fully automated test laboratory <p>Industeel Creusot:</p> <p>Upstream activities:</p> <ul style="list-style-type: none"> - Ingot casting enabling focus on specialties ranging from nickel-based alloys and stainless to carbon steel grades - Highest quality and top-of-the-range products - Casting production capability for nuclear - Globally certified to cater to nuclear market - Capability to cast ingots with weight up to 350 tonnes - Oil quenching and water quenching equipment - One of only two sites in Europe capable of producing clad plates <p>Industeel Loire:</p> <p>Upstream activities:</p> <ul style="list-style-type: none"> - Ingot casting with focus on thick plates - Forging press in-line with rolling mill to produce the thickest and heaviest plates - Water quenching equipment - Oxy-cutting and sawing equipment enabling finishing to exact customer specifications <p>Downstream activities:</p> <ul style="list-style-type: none"> - 12kt press with unique hot-forming capability for 2-piece heads in wide diameter and high thickness - 7m diameter quenching bath for large pieces
Year site opened	<p>The opening dates are:</p> <p>Industeel Belgium 1863</p> <p>Industeel Creusot 1836</p> <p>Industeel Loire 1865</p>

Major extensions and / or refurbishments and year(s) when these occurred	The key dates are: https://industeel.arcelormittal.com/about-us/our-history
Annual production	Industeel Belgium: 170 kt (2020) Industeel Creusot: 71 kt (2020) Industeel Loire: 24 kt (2020)
Number of employees and contractors	<p>Industeel Belgium: 932 employees 182 external providers and contractors</p> <p>Industeel Creusot – Rue clémenceau 665 employees 203 external providers and contractors</p> <p>Industeel Creusot – Breuil 150 employees 46 external providers and contractors</p> <p>Industeel Loire - Chateauneuf 272 employees 78 external providers and contractors</p> <p>Industeel Loire - Saint Chamond 30 employees 8 external providers and contractors</p>
Carbon reduction target	The target is to reduce our direct CO2 emissions, per unit of production, by 35% by 2030 (compared to 2018).
Further environmental and social information	ArcelorMittal Europe is targeting a 35% reduction in Scope 1 and 2 CO ₂ e 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 The sustainability report is available here

Stakeholder engagement

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

For the purpose of the ResponsibleSteel audit, the sites of the Industeel 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. All the stakeholders have been informed by mail in the local language. As the level of answer was very low, 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. As interview requests are difficult to organise with government departments (Health, environment), Industeel was asked to help remove the barriers to accessing interviewees. Despite this, these people are exercising their right of confidentiality. This was balanced out by a large-scale investigation of regulatory control reports to get a more accurate picture of the situation.

Regarding the areas of influence the following categories of external stakeholders were identified.

- 4 local communities (Charleroi, Châteauneuf, Creusot, Saint-Chamond)
- 2 National and local government authorities and politicians
- 11 Labour unions for blue and white collar for all the sites
- Occupational healthcare stakeholders (2 doctors, 2 prevention advisors)
- 3 Civil society organisations (Les Compagnons Maalox, cycling association, Contrat de Rivière)
- Environmental and labour inspectors - SPF Emploi et Bien-être au travail – Division du Contrôle des Risques Chimiques. DPC: Département de la police et des contrôles, DREAL (no contribution)
- Financial statutory auditors (no contribution)
- 2 Regional industrial partners (neighbouring industrial sites)
- 3 institutional (region, prefect, water agency, etc.)
- Media (no contribution)
- 2 Professional Federations (UIMM)
- 1 Academics and schools
- 4 Suppliers (contractual stakeholders)
- 6 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 above for a list of external stakeholders that were interviewed (except the ones where “no contribution” is mentioned).

Input was provided to the auditors by email to complete the discussion by Teams after the interviews.

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 2566 individuals (including full and part-time employees and contractors) work at Industeel Belgium & France All sites have 3 rotating shifts:

For IB

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

For IC & IL

- ✦ Morning: 04:00 - 12:00
- ✦ Afternoon: 12:00 - 20:00
- ✦ Night: 20:00 - 04:00

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 audited to review the principles, more than 42 workers (12 women), including workers from the Electric blast furnace, Heat treatment, surface treatment, waster waste treatment, packaging, waste storage, hot rolling mill, cutting, boiler, supporting functions, foremen, suppliers, maintenance, line managers, members of top management, plants managers, suppliers, union representatives and purchasing managers, human resources, health & safety, industrial risk, environment. This number includes the interviews of the people included in the audit plan in the various representative workshops mentioned, plus the people interviewed during the visits to the workshops not included in the audit plan.

The workers expressed a dissatisfaction regarding the sanitary conditions (See the NC open).

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 Charleroi site or Loire or Le Creusot.

Also, better communication is expected including also a better understanding of this standard.

The labour or environmental inspectors refused to contribute to interviews. So, the auditors have analysed deeper all compliance report related to the labour or environmental declaration and feedback from them to ensure the right understanding of the situation completed by the worker's representatives.

The workers acknowledge that the site is making efforts in communication to deal with complaints and to reduce Noise and dust emissions.

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					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 1.1: Corporate Values and Commitments (6)	6				
Criterion 1.2: Leadership and Accountability (5)	5	1			
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	5				
Criterion 2.2: Responsible Sourcing (5)	5				
Criterion 2.3: Legal compliance and signatory obligations (6)	6	2			
Criterion 2.4: Anti-Corruption and Transparency (8)	6				2
Criterion 2.5: Competence and awareness (5)	5				
Principle 3. Responsible Sourcing of Input Materials					
Criterion 3.1: Commit to responsible sourcing and incorporate it in key functions and processes (18)	0				18
Criterion 3.2: Know your upstream supply chains (10)	0				10
Criterion 3.3: Understand supplier ESG performance and promote improvement (15)	0				15
Criterion 3.4: Strengthen and account for responsible sourcing (23)	0				23
Criterion 3.5: Report publicly on responsible sourcing (11)	0				11
Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes (15)	0				15
Criterion 3.7: Know your upstream scrap supply chain (8)	0				8
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)	0				12
Criterion 3.9: Strengthen and account for responsible sourcing (1)	0				1

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 3.10: Report publicly on responsible sourcing (16)	0				16
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)	0				14
Principle 5. Occupational Health and Safety					
Criterion 5.1: OH&S policy (6)	6	2			
Criterion 5.2: Health and Safety (OH&S) management system (10)	8	2	2		
Criterion 5.3: Leadership and worker engagement on OH&S (10)	9				
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	4				4
Criterion 5.5: Safe and healthy workplaces (5)	3				1
Criterion 5.6: OH&S performance (2)	1		1		
Criterion 5.7: Emergency preparedness (6)	5	2	1		
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (10)	7				3
Criterion 6.2: Forced or compulsory labour (7)	6				1
Criterion 6.3: Non-discrimination (9)	8	1	2		
Criterion 6.4: Association & collective bargaining (12)	11				1
Criterion 6.5: Disciplinary practices (5)	5	1	1		
Criterion 6.6: Hearing and addressing worker concerns (5)	5				
Criterion 6.7: Communication of terms of employment (5)	5				
Criterion 6.8: Remuneration (11)	7	1			4
Criterion 6.9: Working time (7)	7	1	1		
Criterion 6.10: Worker well-being (2)	1		1		
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 7.2: Security practice (9)	1				8
Criterion 7.3: Conflict-affected and high-risk areas (5)	0				5
Principle 8. Stakeholder Engagement and Communication					
Criterion 8.1: Stakeholder engagement (10)	9	3	1		
Criterion 8.2: Grievances and remediation of adverse impacts (12)	11	1	1		
Criterion 8.3: Communicating to the public (7)	7	1			
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	7		1		
Criterion 9.2: Free, Prior & Informed Consent (3)	0				3
Criterion 9.3: Cultural heritage (6)	0				6
Criterion 9.4: Displacement and Resettlement (9)	0				9
Principle 10. Climate Change and Greenhouse Gas Emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	7				
Criterion 10.2: Corporate Climate-Related Financial Disclosure (2)	2				
Criterion 10.3: Determination of GHG emissions for the purpose of site level GHG emissions reduction targets and planning (4)	4				
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG emissions intensity for the production of crude steel (29)	0				29
Criterion 10.5: Site-level GHG reduction targets and planning (11)	11				
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8)	0				8
Criterion 10.7: GHG emissions disclosure and reporting (8)	4				4
Principle 11. Noise, Emissions, Effluents and Waste					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 11.1: Noise and vibration (7)	4		3		
Criterion 11.2: Emissions to air (8)	7	1	1		
Criterion 11.3: Spills and leakage (9)	8		1		
Criterion 11.4: Waste, by-product and production residue management (11)	10		1		
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7	1			
Criterion 12.2 Water balance and emissions (8)	7	1			1
Criterion 12.3 Water-related adverse impact (6)	4		1		1
Criterion 12.4 Managing water issues (8)	7	1	1		
Principle 13. Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	11		1		13
Total (370)	271	22	19	0	246

* 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.

2.4.4 Belgium and France are not a high-risk country according to the Transparency International Corruption Perceptions Index. No public controversy either, then this requirement is not applicable

2.4.5 ArcelorMittal does not make financial or in-kind contributions to political parties, politicians, civil servants and other politically exposed persons (PEP)

3. N/A because the site is not seeking certification for additional product requirements.

4. No planned closure or decommissioning for this company.

5.4.2 & 5.4.3 In accordance with Belgium and France laws, this is covered by the "Association Assurance Accident" and "social security system" (CNS).

5.5.3 No on-site housing is provided to workers.

6.1.3 Child labour is prohibited by Belgium and France legislation (Art L.343-3 of Labor Code). The risk level is low.

6.2.3 The risk level is low.

6.4.2 Freedom of association and collective bargaining are not restricted in Belgium and France are.

6.8.5 The sites do not provide on-site shops. No collective catering services offered

6.8.6 The sites do not provide accommodation

6.8.7 The living wage is regulated by the French and Belgian governments

7.2.2 The site is not located in a conflict area.

7.3.1 & 7.3.2 The sites are not operating in conflict-affected or high-risk areas according to

<https://www.cfr.org/interactive/global-conflict-tracker/?category=us>

9.2.1 & 9.2.2. & 9.2.3. No indigenous people

9.3.1. - 9.3.5. There is no cultural heritage site

9.4.1 to 9.4.7 No displacement of communities

10.4 / 10.6 / 10.7.2 and 10.7.3 The site is not seeking certification for additional product requirements.

12.2.4 regulatory standards are defined by the authorities and completed in the exploitation permit

12.3.3 Not applicable. This kind of action is monitored by the authorities

13.1.2 No adjacent World Heritage sites, protected areas, indigenous sites, Ramsar site, Key Biodiversity Areas to the sites

13.1.3 No natural habitat has been identified since the sites are in industrial areas

13.1.4 No critical habitat

13.1.5 No World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I-VI

13.1.6 No World Heritage site, Ramsar site or officially protected area

Strengths

The main strengths that the auditors identified are summarized here:

- ✦ Involvement of the RS project team to implement this standard with self-training (2.1)
- ✦ Responsible sourcing management is well implemented with the support of headquarter (2.2)
- ✦ Investment in training and access to development opportunities are high. (2.5)
- ✦ Carrying out "Health Thursdays" in collaboration with the nurse to promote health (5.2.2)
- ✦ Practical reflex cards for emergency situations (5.7)
- ✦ Effort to share risks at machine level with simplified safety sheets (5.2.2)
- ✦ People are motivated to identify near miss and feel safe (5.3)
- ✦ Still a relevant CO2 roadmap in relation with the group commitment (10)
- ✦ Positive feedback from suppliers has been collected during the audit (8.1)
- ✦ Launch of the first CSR report (8.3)
- ✦ Work on gender and disability is particularly noteworthy (6.3)

Maintaining Total Productive Maintenance TPM-based operating procedures to support the daily work (11.3)

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 19 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:

- ✦ Segmentation of health, safety and environmental management systems, procedures and practices, making them difficult to understand and to drive. Encourage the development of cluster procedures (2.1)
- ✦ The acceptance of hazards and risks has to be reinforced regarding the health and safety issues detected during the audit (prevention of OH&S risks, behaviour, working conditions, hygiene, etc.) (5)
- ✦ Action plan management is highly heterogeneous in the risk analysis (5)
- ✦ Wide variation in health, safety and environmental risk analysis practices (5.2)
- ✦ Wide variation in communication practices between sites (5.2)
- ✦ The KPIs aggregated at the cluster dashboard are mainly lagging indicators at cluster level (5.6)
- ✦ The management of emergency situation (planification, scope and action management) needs to be strengthened (5.7)
- ✦ The prevention of non-discrimination is limited solely to the grounds of gender and disability (6.3)
- ✦ The clear public policy related to fatigue management, equal pay for equal work, undignified disciplinary practices
- ✦ The deployment of measures to promote well-being at work are limited (6.10)
- ✦ Coordination between occupational physicians should be encouraged (8.1.3)
- ✦ The structuration of the management of stakeholder's local communities is young and the practices related to it needs to be reinforced including communication and action plan (8.1.2, 8.2.1,9.1.3).
- ✦ The roadmaps are recent, and better structuring is expected including vibration topic, time bonds-to target for air and vibration, emissions, waste. Also, the prevention related to the spills and leakage is expected (11).
- ✦ The future related environment risk and the time-bound related to water needs to be reinforced (12)
- ✦ The implementation of a biodiversity plan related to the diagnosis is limited

Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for Cluster AMDS Industeel, 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 Cluster AMDS Industeel

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 17 November 2023.