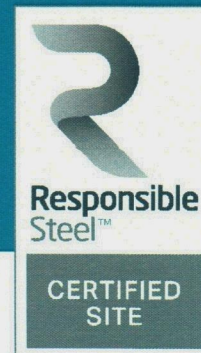


Responsible Steel™ Certified Site



SRI-1883-15

Presented to

ArcelorMittal Dofasco G.P.

SITE NAME AND ADDRESS

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

CLIENT NAME AND ADDRESS

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

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

ResponsibleSteel Version 1.1

ISSUE DATE

January 11, 2024

EXPIRY DATE

January 10, 2027

NEXT SCHEDULED AUDIT

June 11, 2025

CERTIFIED SINCE

January 11, 2024

CERTIFICATION SCOPE

The manufacture of coke, iron, steel slabs, hot rolled sheet, cold rolled sheet, electrolytic tin plate and electrolytic chromium coated plate, zinc and aluminum coated products, and tubular steel products. Production of by-products and internal transport of raw materials, in-process and finished products.

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 Windsor is a related facility (division of ArcelorMittal Dofasco)

CERTIFICATION BODY

SRI Quality System Registrar
A PRI Company
161 Thorn Hill Road,
Warrendale, Pennsylvania, 16046
USA



A PRI Company

AUTHORISED CERTIFICATION BODY SIGNATURE

A handwritten signature in black ink.

Edward L. Maschmeier, Vice President, Certification

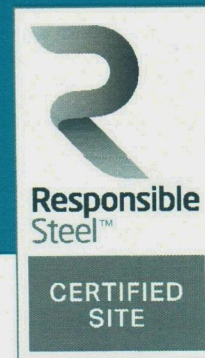
ResponsibleSteel™, 755 Hunter Street,
Newcastle West NSW 2303, Australia

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.



Responsible Steel™ Certified Site



SRI-1883-15

Annex

ArcelorMittal Dofasco G.P.

SITES AND FACILITIES COVERED BY THE CERTIFICATE

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

2 coke plants, 3 blast furnaces and a Desulph station; 1 KOBM (basic oxygen) furnace; 1 EAF; 2 continuous casters; 1 hot rolling mill; 2 continuous pickling and cold rolling mills; 1 pickling line; 4 galvanizing lines; 1 tower anneal furnace; 1 batch anneal furnace; 2 temper mills; 1 electrolytic tinning line; 2 slitters; 2 tube mills and several administrative buildings.

SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

ArcelorMittal Headquarter
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.



PUBLIC SUMMARY AUDIT REPORT

This is a concise public summary of the audit report for ArcelorMittal Dofasco. 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 Dofasco
Number of sites Names & location	1 ArcelorMittal Dofasco G.P. 1330 Burlington St, Hamilton, Ontario, Canada, L8N 3J5 Integrated Steel Mill https://dofasco.arcelormittal.com/
Certification scope	The manufacture of coke, iron, steel slabs, hot rolled sheet, cold rolled sheet, electrolytic tin plate and electrolytic chromium coated plate, hot dip galvanized, galvanneal and Galvalume coated products, and tubular steel products. Production of by-products and internal transport of raw materials, in-process and end products.
Standard version audited against	ResponsibleSteel Standard V1-1
Audit type and outcome	Initial certification audit Initial certification
Certification body	SRI Quality System Registrar 300 Northpointe Circle, Suite 304 Seven Fields, PA 16046
Audit Dates	Stage 1: 7/27-28/2022 8.5 days Stage 2: 2/28-3/2/2023 14.0 days
Number of auditors and audit days	3 auditors 22.5 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 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

	<p>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	Surveillance- December 2024

Contents

Introduction.....	5
Site information	7
Stakeholder engagement	7
Summary of Audit Findings.....	9
Assurance Panel Declaration	16

Introduction

About ResponsibleSteel

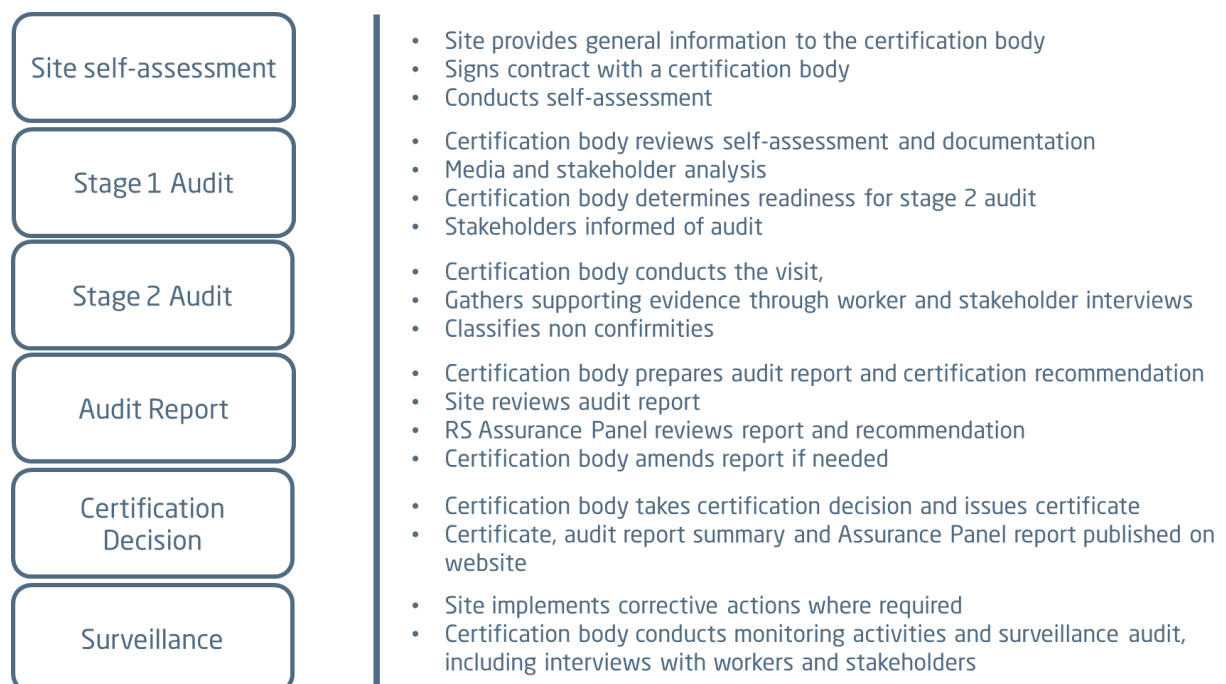
Our mission is to achieve net zero carbon emissions for the steel sector, and to enhance the responsible sourcing, production, use and recycling of steel.

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	Canada, Hamilton, ON
Activities and products	The manufacture of coke, iron, steel slabs, hot rolled sheet, cold rolled sheet, electrolytic tin plate and electrolytic chromium coated plate, hot dip galvanized, galvalume and Galvalume coated products, and tubular steel products. Production of by-products and internal transport of raw materials, in-process and end products.
Year site opened	1912
Major extensions and / or refurbishments and year(s) when these occurred	The site was opened in 1912. The original company (Dofasco) was purchased by ArcelorMittal in 2006, to become ArcelorMittal Dofasco.
Annual production	ArcelorMittal Dofasco produces more than 100 different grades and approximately 4.5 million tons of steel each year
Number of employees and contractors	4727 employees (4169 male and 558 female) 500 contractors (demographics not available)
Carbon reduction target	<i>"As the world's leading steel company, we are committed to leading our industry's efforts to decarbonise, and to be part of the solution to the world reaching net-zero by 2050"</i> <i>"We have recently set a Group target of reducing our CO2e emissions intensity by 25% by 2030 (2018 baseline), and in our European operations, by 35% by 2030. These targets are deliberately the most ambitious of any steelmaker, reflecting our intent to drive meaningful decarbonisation progress this decade."</i>
Further environmental and social information	https://dofasco.arcelormittal.com/ https://dofasco.arcelormittal.com/sustainability https://northamerica.arcelormittal.com/sustainability/reporting/sustainability-report-2021

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 outlined in the [Guidance on](#)

[Stakeholder Engagement](#) provided by ResponsibleSteel as well as the [Introduction to ResponsibleSteel for stakeholders](#).

ArcelorMittal Dofasco provided a comprehensive list of stakeholders, including conservation groups, industry associations, community members, academia, government representatives, and others. SRI reached out to the full list of thirty-one stakeholders via email in English to request to schedule an interview. There was a total of fifteen participants. The Stakeholders have had various contact with AMD through community events, meetings, and other interactions throughout the years. Hamilton, Canada is a very diverse area of all economic levels as well as a diverse culture of people and businesses. Those that participated were of their own free will and reached out to SRI after the letters were sent out via email, stating they would like the opportunity to participate in the stakeholder portion of the audit for AMD, for Responsible Steel. There were no negative comments or concerns. Responses were all very positive. The participants stated that AMD is very approachable and that they are making efforts to ensure the environment and community are included in decisions that can impact their quality of life in the surrounding community and beyond. AMD supports various charities within the community as well as the education system. Participants spoke highly of the AMD volunteer program the employees participate in within the community.

AMD has 4727 non-unionized employees (4169 male and 558 female) and 500 contractors (demographics not available). The full-time employees are split between two shifts. Manufacturing employees have several different shifts and alternating schedules where they can flex time. Not all areas are able to flex their time due to the nature of the work. Shifts are 6:00 am to 6:00 pm and 6:00 pm to 6:00 am with a maximum of 48 hours worked per week. Utilizing a clear set of criteria to ensure a blend of functions, departments, contractors, SRI worked with AMD to identify a random selection of employees for interviews. SRI conducted 49 interviews during the audit, according to the schedule provided by Responsible Steel for a balance of individual and small group sessions as detailed in the following table.

Category	Individual Interview	Group Interview
Leader (direct)	3	
Staff (direct)	9	
Manufacturing Operations (direct)	9	12
Maintenance (direct)	6	5
Contractor	2	3
Total	29	20

Employee interviews focused on topics such as training, pay and paid time off, flex time and understanding of the Responsible Steel standard and its impact on their jobs. Contractors described a collaborative environment working with AMD employees. Employees were asked about training, overall knowledge of the Responsible Steel standard, and satisfaction with pay and paid time off (PTO). Employees said that they feel well prepared with their training and are satisfied with their pay and time off, especially since they have

flexibility in how they take time off within their work areas. Employees also said everyone is made to feel welcome and they feel they have a voice, and it is heard within the workplace environment.

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	Exclusion
Principle 1. Corporate Leadership					
Criterion 1.1: Corporate Values and Commitments (6)	6				
Criterion 1.2: Leadership and Accountability (5)	5				
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (6)	2	4			

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 2.2: Responsible Sourcing (6)	6				
Criterion 2.3: Legal compliance and signatory obligations (6)	6				
Criterion 2.4: Anti-Corruption and Transparency (8)	5				3
Criterion 2.5: Competence and awareness (5)	5				
Principle 3. Occupational Health and Safety					
Criterion 3.1: OH&S policy (6)	5	1			
Criterion 3.2: Health and Safety (OH&S) management system (10)	10				
Criterion 3.3: Leadership and worker engagement on OH&S (10)	9	1			
Criterion 3.4: Support and compensation for work-related injuries or illness (8)	1				7
Criterion 3.5: Safe and healthy workplaces (5)	4				1
Criterion 3.6: OH&S performance (2)	2				
Criterion 3.7: Emergency preparedness and response (6)	6				
Principle 4. Labour Rights					
Criterion 4.1: Child and juvenile labour (9)	7				2
Criterion 4.2: Forced or compulsory labour (7)	7				
Criterion 4.3: Non-discrimination (9)	9				
Criterion 4.4: Association & collective bargaining (12)	8				4
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)	4				1
Criterion 4.8: Remuneration (11)	8				3
Criterion 4.9: Working time (7)	7				
Criterion 4.10: Worker well-being (2)	2				
Principle 5. Human Rights					
Criterion 5.1: Human rights due diligence (5)	4		1		
Criterion 5.2: Security practice (9)	6				3

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 5.3: Conflict-affected and high-risk areas (5)					5
Principle 6. Stakeholder Engagement and Communication					
Criterion 6.1: Stakeholder engagement (10)	10				
Criterion 6.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 6.3: Communicating to the public (7)	7				
Principle 7. Local Communities					
Criterion 7.1: Commitment to local communities (8)	8				
Criterion 7.2: Free, Prior & Informed Consent (3)		3			
Criterion 7.3: Cultural heritage (7)	4				3
Criterion 7.4: Displacement and Resettlement (9)					9
Principle 8. Climate Change and Greenhouse Gas Emissions					
Criterion 8.1: Corporate commitment to achieve the goals of the Paris Agreement (8)	8				
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)	10				1
Criterion 8.5: Site-level GHG or CO2 emissions reporting and disclosure (8)	5				3
Principle 9. Noise, Emissions, Effluents and Waste					
Criterion 9.1: Noise and vibration (7)	6		1		
Criterion 9.2: Emissions to air (8)	6		2		
Criterion 9.3: Spills and leakage (9)	9				
Criterion 9.4: Waste, by-product and production residue management (11)	11				
Principle 10. Water Stewardship					
Criterion 10.1 Water-related context (7)	7				
Criterion 10.2 Water balance and emissions (8)	6		2		

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 10.3 Water-related adverse impact (6)	6				
Criterion 10.4 Managing water issues (8)	3		6		
Principle 11. Biodiversity					
Criterion 11.1: Biodiversity commitment and management (25)	19	3			3
Principle 12. Decommissioning and closure					
Criterion 12.1: Decommissioning and closure (13)					13
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (370)*	286	12	12	0	6

* 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.

Exclusions

Criteria	Reason
2.4.2	AMD does not accept cash transactions.
2.4.4	Canada has a corruption perception index score of 74 therefore the site is not in a high corruption risk country.
2.4.5	Site does not provide financial contributions to government persons as such is prohibited by Federal and Provincial elections legislation.
3.4.2	Canada has a government scheme for both work related and personal healthcare which includes all points listed in 3.4.3.
3.5.3	Employee housing is not provided.
4.1.5 (a., b.)	Employees must be at least 18 years old to be hired. Apprentice program is offered to college students, and documentation must be provided to demonstrate age over 18. AMD does not run an on-site worker program for high school.
4.4.2	No such law exists in Canada.
4.4.4	Collective Bargaining Agreements are not in place.
4.4.5.b	No collective bargaining agreements are applicable to site workers
4.4.6	There is not a formal Workers' Representative.
4.7.1.c	The site is not a unionized workplace and therefore there are no applicable collective agreements
4.8.5	AMD does not have a company store. They do offer cafeteria services but workers can also leave the site and have several local options to purchase nearby.
4.8.6	The site does not provide on-site accommodations.

4.8.7 a.-b.	The site does not have workers' representatives and has not been requested to provide a living wage.
5.2.2 a-b	The site is not in a conflict affected area.
5.2.2.c	As the site is not in a conflict area, no arrangements are currently undertaken that engage local communities on site security practices.
5.3.1	Site does not operate in a conflict-affected or high-risk area.
5.3.2	Site does not operate in a conflict-affected or high-risk area.
7.3.3	There are no cultural heritage sites within AMD area of influence.
7.3.4	There are no cultural heritage sites within AMD area of influence.
7.3.5	There are no cultural heritage sites within AMD area of influence.
7.4.1.a.-c.	Physical and economic displacement of communities is not being considered.
7.4.2	Physical and economic displacement of communities is not being considered.
7.4.3	Physical and economic displacement of communities is not being considered.
7.4.4	Physical and economic displacement of communities is not being considered.
7.4.5	Physical and economic displacement of communities is not being considered.
7.4.6	Physical and economic displacement of communities is not being considered.
7.4.7	Physical and economic displacement of communities is not being considered.
8.4.2	In 2021, 72% of Ontario's Generation Capacity was built on zero-emission sources, while 91.2% of Ontario's Actual Energy Output was generated from zero-emission sources. The low GHG emissions from AMD imported electricity do not reach a level of significance for setting a target.
8.5.1.b	The site does not import heat and/or steam.
8.5.1.d	The site does not have arrangements for offsets at this time.
8.5.1.e	The site does not have credit emissions at this time.
11.1.5	There are no World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I-VI located on the organization's site.
11.1.6	There are no World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I-VI located on the organization's site.
11.1.11	
12.1	<p>Principle 12 is not applicable for this initial certification audit.</p> <p>This Principle is only applicable to sites where full or partial decommissioning or closure is announced while a site is certified. Compliance would allow such a site to maintain certification while the site is still operational.</p>

Strengths

The organization has done an excellent job in utilization of existing management systems and programs established for areas of Environmental Health and Safety, Water Conservation, and biodiversity, and adding additional measures and strategic plans to support the mission and intent of Responsible Steel. These proven programs establish structure and engagement at all levels of operations in taking actions to achieve established objectives. Key strengths include:

- Extensive evidence of not only leadership, but all employee, commitment to sustainability with several mature management systems and best practices in place
- Principle 3 – Safety – evidence of mature, comprehensive program; wellness, mental health, and medical facilities are best in class
- Principle 8 – GHG emissions / Decarb project – significant commitment to GHG reduction

Community Liaison Committee – company actively engages with its local community, both proactively and in response to any complaints or concerns

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 12 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:

Opportunities for improvement were identified in the following areas:

- Principle 2 – individual components are in place; integrated management system is beginning to form leading to sustainable, long-term impact;
- Principle 3 - Workers are involved in the execution of key OH&S related decisions; however, a finding of the Bradley Curve Safety Culture Assessment found an opportunity for improvement in including workers in the initiation of OH&S related decisions.
- Principle 5 & 6 – Utilize formal materiality assessment to enhance these Principles.
- Principle 7 – Add member(s) of local Indigenous Communities to CLC to enhance engagement and respectful relationship building.
- Principle 9 – While meeting compliance related to noise, vibration, and air quality impacts, now need to go above (or below depending on the perspective) compliance requirements; execution of action plans along with integration into major capital project is key.
- Principle 10 - While meeting water quality compliance well, now need to go above (or below depending on the perspective) compliance requirements; execution of action plans along with integration into major capital project is key.

Principle 11 - Currently not an issue, but a formal Plan which describes a plan should the site attempt to expand into additional areas which might contain natural habitat is needed.

Assurance Panel Declaration

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

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 04 January 2024.