

Responsible Steel™ Certified Site



DNV-C563271

Presented to

ARCELORMITTAL Poland S.A.

SITE NAME AND ADDRESS

ArcelorMittal Poland Unit in Dąbrowa Górnicza, Al. J. Piłsudskiego 92; 41-308 Dąbrowa Górnicza, POLAND
ArcelorMittal Poland Unit in Kraków,
ul. Tadeusza Sendzimira 1; 31-752 Kraków, POLAND
ArcelorMittal Poland Unit in Zdzeszowice,
ul. Powstańców Śląskich 1; 47-330 Zdzeszowice,
POLAND **ArcelorMittal Poland Unit in Świętochłowice,**
ul. Metalowców 5; 41-600 Świętochłowice, POLAND
ArcelorMittal Poland Unit in Sosnowiec,
ul. Niwecka 1; 41-200 Sosnowiec, POLAND
ArcelorMittal Poland Unit in Chorzów,
ul. Metalowców 13; 41-500 Chorzów, POLAND

ISSUE DATE

25 August 2025

EXPIRY DATE

24 August 2028

CERTIFICATION SCOPE

Sinter Plant, Blast Furnaces, Lime Plant, Steel Plant,
Continuous Casters, Rolling Mills, Coke Plants, Hot Rolling
Mill, Cold Rolling Mills, Hot Dip Galvanizing, Organic
Coating, Wire Rod Mill

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

None

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.

CLIENT NAME AND ADDRESS

ArcelorMittal Poland S.A.
Al. J. Piłsudskiego 92; 41-308 Dąbrowa Górnicza
POLAND

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

ResponsibleSteel Standard Version 2.1
ResponsibleSteel Assurance Manual Version 2.2

NEXT SCHEDULED AUDIT

August 2026 (TBC)

CERTIFIED SINCE

25 August 2022

CERTIFICATION BODY

DNV
Vivo Building
30 Stamford St
South Bank
London SE1 9LQ
United Kingdom



AUTHORISED CERTIFICATION BODY SIGNATURE

A handwritten signature in black ink, appearing to read 'Th. van Haaren'.

Thomas van Haaren, Global Services Manager



Responsible Steel™ Certified Site



Annex

ARCELORMITTAL Poland S.A.

DNV-C563271

SITES AND FACILITIES COVERED BY THE CERTIFICATE

ArcelorMittal Poland Unit in Dąbrowa Górnicza: Sinter Plant, Blast Furnaces, Lime Plant, Steel Plant, Continuous Casters, Rolling Mills,

ArcelorMittal Poland Unit in Kraków: Coke Plant, Hot Rolling Mill, Cold Rolling Mill, Hot Dip Galvanizing, Organic Coating,

ArcelorMittal Poland Unit in Zdziechowice: Coke Plant,

ArcelorMittal Poland Unit in Świętochłowice: Hot Dip Galvanizing, Organic Coating,

ArcelorMittal Poland Unit in Sosnowiec: Cold Rolling Mill, Wire Rod Mill,

ArcelorMittal Poland Unit in Chorzów: Rolling Mill.

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,
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Public summary audit report

This is a concise public summary of the audit report for ARCELORMITTAL Poland S.A. The full version of the audit report is in the possession of the member company and the audited sites.

Audit overview

Member name	ARCELORMITTAL Poland S.A.
Audited entity name	ARCELORMITTAL Poland S.A.
Number of sites Names & location	6 ArcelorMittal Poland Unit in Dąbrowa Górnicza, Al. J. Piłsudskiego 92; 41-308 Dąbrowa Górnicza, POLAND ArcelorMittal Poland Unit in Kraków, ul. Tadeusza Sendzimira 1; 31-752 Kraków, POLAND ArcelorMittal Poland Unit in Zdzeszowice, ul. Powstańców Śląskich 1; 47-330 Zdzeszowice, POLAND ArcelorMittal Poland Unit in Świętochłowice, ul. Metalowców 5; 41-600 Świętochłowice, POLAND ArcelorMittal Poland Unit in Sosnowiec, ul. Niwecka 1; 41-200 Sosnowiec, POLAND ArcelorMittal Poland Unit in Chorzów, ul. Metalowców 13; 41-500 Chorzów, POLAND
Certification scope	Sinter Plant, Blast Furnaces, Lime Plant, Steel Plant, Continuous Casters, Rolling Mills, Coke Plants, Hot Rolling Mill, Cold Rolling Mills, Hot Dip Galvanizing, Organic Coating, Wire Rod Mill
Standard version audited against	ResponsibleSteel Standard Version 2.1
Audit type and outcome	Re-certification audit
Certification body	DNV
Audit dates	Certified Site: ArcelorMittal Poland Unit in Dąbrowa Górnicza HQ Stage 1: 16.12.2024 + 2 man-days stakeholders engagement in the time between Stage 1 and Stage 2

	<p>Certified Site: ArcelorMittal Poland Unit in Dąbrowa Górnicza + HQ</p> <p>Stage 2: 30–31.01.2025 + 14.02.2025</p> <p>Certified Site: ArcelorMittal Poland Unit in Zdzeszowice</p> <p>Stage 2: 10.02.2025</p> <p>Certified Site: ArcelorMittal Poland Unit in Kraków</p> <p>Stage 2: 11.02.2025</p> <p>Certified Site: ArcelorMittal Poland Unit in Świętochłowice</p> <p>Stage 2: 12.02.2025</p> <p>Certified Site: ArcelorMittal Poland Unit in Chorzów</p> <p>Stage 2: 12.02.2025</p> <p>Certified Site: ArcelorMittal Poland Unit in Sosnowiec</p> <p>Stage 2: 13.02.2025</p>
Number of auditors and audit days	<p>2 auditors</p> <p>17 man–days</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	Surveillance, August 2026

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Introduction

About ResponsibleSteel

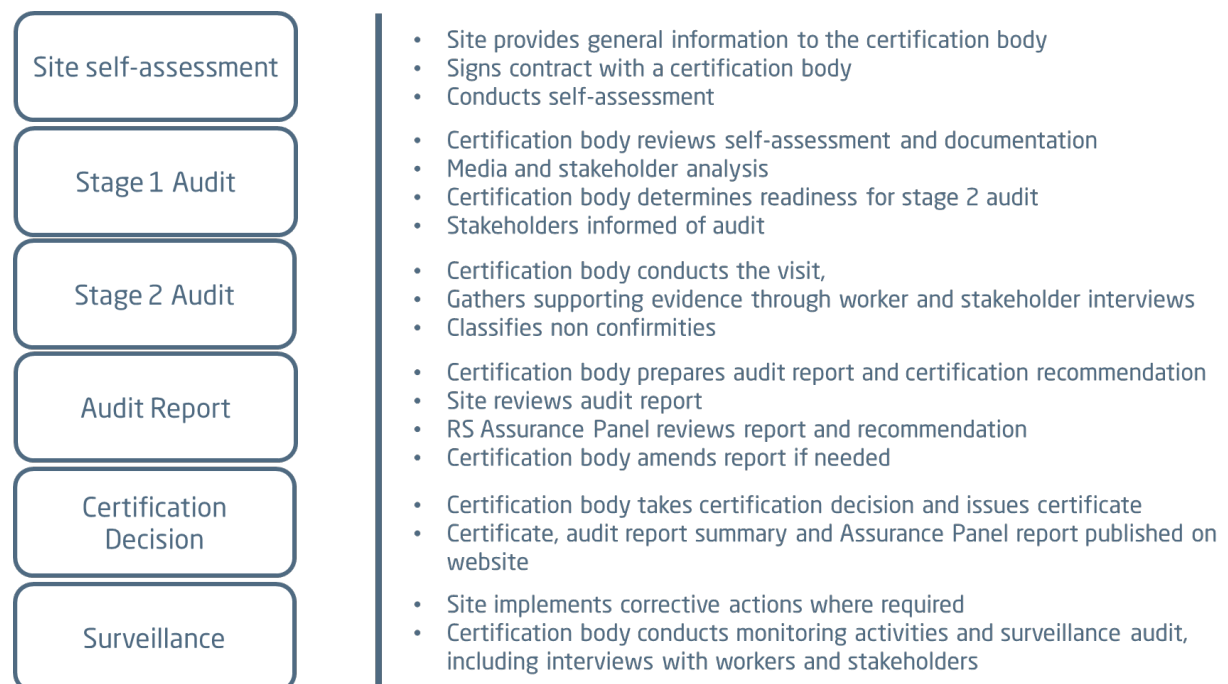
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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

To become a 'Certified Site', the process below must be followed:



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 outlined in the [Assurance Manual](#) and have been developed using the Assurance Code of Good Practice set by the ISEAL Alliance as a reference.

It should be noted that engagement of external stakeholders is not required for the additional responsible sourcing and GHG requirements. A site visit is only necessary for the additional requirements if the site's GHG data has not been independently verified before the ResponsibleSteel audit or if the site and their certification body agree that a site visit would be useful.

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>Poland</p> <p>Górnica [HQ]</p> <p>Kraków</p> <p>Zdzieszowice</p> <p>Świętochłowice</p> <p>Sosnowiec</p> <p>Chorzów</p>
Activities and products	<p>ArcelorMittal Poland Unit in Dąbrowa Górnicza: sinter plant, blast furnaces, lime plant, steel plant: Basic Oxygen Furnaces, Continuous Casters, Rolling Mills, Power & Utilities</p> <p>ArcelorMittal Poland Unit in Kraków: Hot Rolling Mill, Cold Rolling Mill, Hot Dip Galvanizing, Organic Coating, Power & Utilities</p> <p>ArcelorMittal Poland Unit in Zdzieszowice: Coke plant, wastewater treatment plant, Heat & power plant</p> <p>ArcelorMittal Poland Unit in Świętochłowice: Hot Dip Galvanizing, Organic Coating</p> <p>ArcelorMittal Poland Unit in Sosnowiec: Cold rolling mill, Wire rod mill, Heat & power plant</p> <p>ArcelorMittal Poland Unit in Chorzów: Rolling mill, Power & Utilities</p>
Year site opened	<p>ArcelorMittal Poland Unit in Dąbrowa Górnicza: 1976</p> <p>ArcelorMittal Poland Unit in Kraków: 1954</p> <p>ArcelorMittal Poland Unit in Zdzieszowice: 1932</p> <p>ArcelorMittal Poland Unit in Świętochłowice: 1828</p> <p>ArcelorMittal Poland Unit in Sosnowiec: 1902</p> <p>ArcelorMittal Poland Unit in Chorzów: 1802</p>
Major extensions and / or refurbishments and year(s) when these occurred	<p>ArcelorMittal Poland Unit in Dąbrowa Górnicza, established in 1976, has seen extensive modernization over the years. Major upgrades include the relining of blast furnace #2 and installation of a new slab casting line in 2006, followed by advanced steelmaking technologies like twin ladle furnaces and desulphurisation stations. The site became one of the few global producers of 120-meter-long rails in 2014. Recent developments include a waste heat recovery system with E.ON (2023–2025), modernization of lime plant furnaces, and the introduction of head-hardened rail production in 2024.</p> <p>ArcelorMittal Poland Unit in Kraków, founded in 1954, has evolved into a hub for advanced steel processing. Key milestones</p>

	<p>include the launch of a hot strip mill in 2007 and a biological wastewater treatment plant in 2013. After the shutdown of primary operations in 2020, the site pivoted to coated products with a new combi line. It is currently developing hydrogen furnaces and a hydrogen production plant with Linde Gaz Polska, alongside a new Optigal coating line (2024–2026).</p> <p>ArcelorMittal Poland Unit in Zdzeszowice, dating back to 1932, is a major coke production center. It underwent significant upgrades in the early 2000s with new coke oven batteries and modernization of by-product installations. The site retired older batteries in 2018 and is now revamping its combined heat and power plant, including flue gas systems and boiler renovations (2023–2025).</p> <p>ArcelorMittal Poland Unit in Świętochłowice, established in 1828, specializes in coated steel products. It added a second organic coating line in 2006 and revamped its galvanising line in 2013. Recent efforts focus on environmental improvements, including a new regenerative thermal afterburner planned for 2024–2025.</p> <p>ArcelorMittal Poland Unit in Sosnowiec, operational since 1902, has focused on wire rod and strip mill modernization. Key upgrades include a billet distributor in 2015 and improvements to its combined heat and power plant, which was carved out in 2022. The site continues to enhance its cold strip mill and wire rod capabilities.</p> <p>ArcelorMittal Poland Unit in Chorzów, the oldest among them, founded in 1802, has modernized its rolling operations with a high-pressure descender (2010) and upgraded rolling stands (2015). It also added a marking machine and control unit, and took over a neighboring energy department in 2021 to streamline operations.</p>
Annual production	<p>Steel – 3 787 190 tonnes (2024)</p> <p>Coke – 3 045 730 tonnes (2024)</p>
Number of employees and contractors	<p>Total ArcelorMittal Poland: 7719</p> <p>ArcelorMittal Poland Unit in Dąbrowa Górnicza HQ: 82</p> <p>ArcelorMittal Poland Unit in Dąbrowa Górnicza: 3577 (including 100 contractors – men)</p> <p>ArcelorMittal Poland Unit in Kraków: 1776 (including 50 contractors – men)</p> <p>ArcelorMittal Poland Unit in Zdzeszowice: 1329 (including 50 contractors – men)</p> <p>ArcelorMittal Poland Unit in Świętochłowice: 353 (including 20 contractors – men)</p>

	<p>ArcelorMittal Poland Unit in Sosnowiec: 314 (including 15 contractors – men)</p> <p>ArcelorMittal Poland Unit in Chorzów: 288 (including 19 contractors – men)</p>
Carbon reduction target	Decreasing GHG emissions and achieving target of 35% emissions reduction for 2030
Further environmental and social information	https://poland.arcelormittal.com/zrownowazony-rozwoj/raporty-i-polityki/raporty

Stakeholder engagement

ArcelorMittal Poland has identified the relevant stakeholders and their representatives in their areas of influence across its six operational locations. A total of 131 stakeholders were identified and informed in advance of the recertification audit process. Stakeholders were contacted by email and provided with a structured questionnaire to gather feedback on key aspects of AMP's operations. In addition, 11 stakeholders were selected for direct interviews, which were conducted via telephone, videoconference, or face-to-face meetings. The initial number of stakeholders contacted was higher, but some declined to participate in the audit process.

External stakeholders' perceptions of the sites and their management practices were generally positive. Engagement and collaboration with the sites appear to be based on mutual respect and transparency. Stakeholders particularly valued AMP's support for local initiatives, cultural partnerships, and responsiveness to community concerns. Specific examples include the provision of water and heating services by the Zdzeszowice Coke Plant, the community advisory panel in Kraków, and the collaboration with the Metallurgy Museum in Chorzów. Stakeholders also highlighted AMP's participation in job fairs, educational partnerships, and environmental initiatives such as urban reforestation and biodiversity workshops. The stakeholder identification and complaint handling processes were considered effective.

No local community stakeholders have been identified as being at risk of being adversely affected by the sites. This conclusion is supported by stakeholder interviews, employee interviews, site visit observations, consultation of public authority platforms, and review of local press releases.

Employees constitute a key internal stakeholder group, as they are directly impacted by the company's operations. In addition to staff who participated in the audit, a total of 27 individual interviews and 7 group interviews were conducted across all six AMP locations. Group interviews included 2–6 participants and were organized by shared characteristics such as foremen, women, young employees, and long-serving staff. Approximately 100 informal interviews were also conducted during site visits. Interviewees included women, foreign workers, trade union representatives, social labor inspectors, and employees from both office and production roles, as well as middle management and specialists. Interviews

were conducted in accordance with the sampling grid of the ResponsibleSteel™ Assurance Manual.

The interviews confirmed that AMP effectively engages workers on health and safety issues and provides the necessary training to ensure safe working conditions. Labour rights are respected, with commitments to equality and non-discrimination. Employees expressed satisfaction with workplace safety, flexible working arrangements, management accessibility, and the efficiency of administrative processes such as payroll. Trade union representatives confirmed constructive dialogue with management and compliance with collective bargaining agreements. Some areas for improvement were noted, including benefits for agency workers, career advancement opportunities for women, and sanitary conditions in certain facilities.

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.
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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 (5)	5				
Criterion 2.2: Responsible Sourcing (5)	5				
Criterion 2.3: Legal compliance and signatory obligations (6)	6				
Criterion 2.4: Anti-Corruption and Transparency (8)	8				
Criterion 2.5: Competence and awareness (5)	5				
Principle 3. Responsible Sourcing of Input Materials					
Criterion 3.1: Commit to responsible sourcing (18)					18
Criterion 3.2: Know your upstream supply chains (10)					10
Criterion 3.3: Understand supplier ESG performance (15)					15
Criterion 3.4: Strengthen and account for responsible sourcing (23)					23
Criterion 3.5: Report publicly on responsible sourcing (11)					11
Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes. (15)					15
Criterion 3.7: Know your upstream scrap supply chain (8)					8
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)					12

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 3.9: Strengthen and account for responsible sourcing (1)					1
Criterion 3.10: Report publicly on responsible sourcing (16)					16
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)	14				
Principle 5. Occupational Health & Safety					
Criterion 5.1: OH&S policy (6)	6				
Criterion 5.2: Health and Safety (OH&S) management system (10)	10				
Criterion 5.3: Leadership and worker engagement on OH&S (9)	9				
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	6				2
Criterion 5.5: Safe and healthy workplaces (5)	2	2			1
Criterion 5.6: OH&S performance (2)	2				
Criterion 5.7: Emergency preparedness and response (6)	5	1			
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (10)	10				
Criterion 6.2: Forced or compulsory labour (7)	7				
Criterion 6.3: Non-discrimination (9)	9				
Criterion 6.4: Association & collective bargaining (12)	7				5
Criterion 6.5: Disciplinary practices (5)	4				1
Criterion 6.6: Hearing and addressing worker concerns (5)	5				
Criterion 6.7: Communication of terms of employment (5)	3	1			1
Criterion 6.8: Remuneration (11)	7				4
Criterion 6.9: Working time (7)	7				
Criterion 6.10: Worker well-being (2)	2				
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 7.2: Security practice (9)	9				
Criterion 7.3: Conflict-affected and high-risk areas (5)					5
Principle 8. Stakeholder engagement and communication					
Criterion 8.1: Stakeholder engagement (10)	10				
Criterion 8.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 8.3: Communicating to the public (7)	7				
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	8				
Criterion 9.2: Free, Prior & Informed Consent (3)					3
Criterion 9.3: Cultural heritage (6)	5				1
Criterion 9.4: Displacement and Resettlement (9)					9
Principle 10. Climate Change and GHG emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	7				
Criterion 10.2: Corporate Climate-Related Financial Disclosure TCFD (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)					29
Criterion 10.5: Site-level GHG emissions reduction targets and planning (11)	11				
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8)					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	Exclusion
Criterion 11.1: Noise and vibration (7)	7				
Criterion 11.2: Emissions to air (8)	8				
Criterion 11.3: Spills and leakage (9)	8	1			
Criterion 11.4: Waste, by-product and production residue management (11)	11				
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7				
Criterion 12.2 Water balance and emissions (8)	8				
Criterion 12.3 Water-related adverse impact (6)	6				
Criterion 12.4 Managing water issues (8)	8				
Principle 13: Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	11	1			12
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (534)	315	6	0	0	213

* 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

The following requirements have been deemed not applicable, with supporting rationale:

- Principle 3 – Excluded from the scope of certification.
- 5.4.2, 5.4.3 – Poland has mandatory legal regulations covering these requirements.
- 5.5.3 – The site does not provide housing on its premises.
- 6.4.2 – Polish law ensures no restrictions on employee organization.
- 6.4.5, 6.7.2 – No employees performing work for ArcelorMittal Poland (AMP) are employed by external entities (i.e., no interim employees).
- 6.5.4 – No employees performing work for ArcelorMittal Poland (AMP) are employed by external entities (i.e., no interim employees).
- 6.8.4 – The site does not engage external providers of employees.
- 6.8.5 – No on-site shops operate at the facility.
- 6.8.6 – The site does not provide accommodation to employees.
- 6.9.2 – No external providers of employees are engaged by the site.
- 7.3.1 – The site does not operate in a conflict-affected or high-risk area.

- 7.3.2 – Poland is not classified as a conflict-affected or high-risk area.
- 9.2, 9.3.4, 9.4 – No indigenous people, resettlements, or displacements are associated with the site.
- 10.4, 10.6, 10.7.2, 10.7.3 – Excluded from the scope of certification.
- 13.1.2 – No Indigenous and Community-Conserved Areas (ICCAs), Ramsar sites, or Key Biodiversity Areas (KBAs) are within the site's area of influence.
- 13.1.3 – The site does not engage in activities that significantly convert or degrade natural habitats.
- 13.1.4 – No critical habitats have been identified within the site's impact area.
- 13.1.5 – No recorded events of downgrading, downsizing, or degazettement associated with the site's operations.
- 13.1.6 – No World Heritage sites, Ramsar sites, or officially protected areas exist in or adjacent to the site's area of operations.
- 13.1.11 – The site has not been subject to controversies related to environmental or social concerns.

Strengths

Applicable strengths have been identified. The main strengths identified by the auditors are summarised below:

1. A comprehensive corporate governance structure is in place, supported by global policies, codes of conduct, and detailed procedures focused on sustainability and corporate social responsibility. Top management demonstrates strong commitment, consistently reflected across all six AMP locations.
2. AMP maintains a distinctive high management culture, with alignment and consistency in leadership practices across all sites.
3. The organisation demonstrates an exceptional safety culture, with thorough risk assessments conducted in collaboration with employees and a high level of awareness regarding accident prevention and health risks.
4. The Compliance Officer plays a key role in the effective functioning of AMP's social management systems, demonstrating professionalism, strategic oversight, and leadership in compliance matters.
5. A structured compliance framework is in place, including regular risk-based monitoring, timely updates to regulatory documentation, and tailored training programmes for all employee levels.
6. Compliance training and awareness-raising sessions are consistently implemented across the organisation, reinforcing a strong culture of responsible business conduct.

7. AMP has developed a well-defined corporate strategy for decarbonisation, aligned with the CAR2 five-lever approach and supported by policy conditions to ensure a realistic transition to low-carbon steel production.
8. The company is aligned with corporate-wide climate targets, including net-zero by 2050 and a 35% CO₂ reduction in Europe by 2030, positioning AMP as a leader in the steel industry's climate transition.
9. A sophisticated Diversity, Equity, and Inclusion (DEI) framework is in place, supported by formal policies such as the Code of Business Conduct, Human Rights Policy, Social Policy, and Diversity and Social Inclusion Policy.
10. The DEI programme includes targeted initiatives, structured training, and employee engagement activities, fostering a workplace culture of respect, inclusion, and equal opportunity.
11. AMP demonstrates proactive stakeholder engagement, particularly with local communities, social support organisations, and educational and cultural institutions, creating shared value and strengthening its social license to operate.
12. Effective mechanisms for internal social dialogue are in place, with strong cooperation between management and the sixteen trade union organisations operating within AMP.
13. Employee engagement is treated as a strategic priority, contributing to organisational success and sustainability beyond compliance.
14. Biodiversity management plans have been successfully implemented, reflecting AMP's commitment to environmental stewardship and responsible resource use.
15. The company balances industrial operations with ecological considerations, positioning itself as a leader in sustainable steel production.
16. The Director of the Office for Progress and the Plenipotentiary of the Board for Integrated Management Systems have demonstrated outstanding leadership and coordination in implementing ResponsibleSteel™ requirements.
17. A systematic approach was adopted for audit preparation, including coordination of subject-matter experts and transparent organisation of objective evidence.
18. The proactive attitude and collaboration of key functions significantly contributed to AMP's strong audit performance and alignment with the ResponsibleSteel™ Standard.

Areas for improvement

During the audit, several areas were identified that do not constitute non-conformities but would benefit from attention and improvement by the organisation. These observations are intended to support continuous improvement and risk mitigation across AMP's operations.

Safety and Infrastructure

- Chorzów Site: The current system for identifying vehicles entering the shared area of the former Royal Steelworks presents a safety risk. It is recommended that, in coordination with site-sharing companies, a more precise vehicle identification and information-sharing system be developed.
- Sosnowiec Site: Sanitary cabins in the Wire Rolling Department lack appropriate locks in both women's and men's facilities, raising privacy and safety concerns. Additionally, based on driver interviews, it is recommended to clearly mark hygiene, sanitary, and dining areas on the plant map to improve orientation and comfort for visiting drivers.
- Kraków Site – Hot Rolling Mill: The storage area for empty oil drums requires proper marking. Furthermore, manual oil pumping operations currently conducted over a drainless drainage channel should be performed using a sump tray to prevent potential leaks and environmental contamination.

Human Resource Management

The current procedure for fixed-term contracts should be reviewed to allow for case-by-case assessments, particularly for roles requiring specialised expertise or where employee retention is critical. A more flexible approach to permanent contracts would better support AMP's strategic workforce planning and retention goals.

Environmental Management

Sosnowiec Site: The storage method for containers with hazardous substances should be improved. Specifically, partially filled containers should be stored with the valve positioned on the visible side to facilitate identification and reduce leakage risk.

Biodiversity Management

Implementation of the 2023–2024 Biodiversity Management Plans has faced delays, including postponed seeding of trees and nectariferous plants. Additionally, bird nesting boxes have not been cleaned, which may prevent reoccupation and negatively impact biodiversity indicators in future years.

Internal and External Communication During Organisational Transitions

The audit identified a need for stronger internal and external communication during major organisational changes, such as downsizing or closure of production areas. At the

Kraków and Chorzów sites, a lack of timely and transparent communication has negatively affected employee morale and trust.

Externally, limited or fragmented information can lead to the spread of misleading narratives, potentially damaging AMP's reputation and hindering talent attraction.

It is recommended that AMP develop a more structured and proactive communication strategy during transitions. This should include transparent messaging, open forums, and regular internal updates to support employee engagement and build public trust in AMP's transformation efforts.

ResponsibleSteel Secretariat

Conclusion

In situations where there is no formal review by the Assurance Panel, the ResponsibleSteel Secretariat undertakes a thorough review of the full audit report to ensure that the certification body has adhered to the processes and guidelines outlined in the ResponsibleSteel Assurance Manual. The ResponsibleSteel Secretariat has reviewed the full audit report for ArcelorMittal Poland and confirms that the Certification Body followed the process outlined in the Assurance Manual.

Although the ResponsibleSteel Secretariat does not directly conduct or oversee the audit itself, they play an important role in reviewing the audit report to ensure that the Certification Body has followed the correct procedures. As part of this process, the ResponsibleSteel Secretariat may request additional information or clarification from the Certification Body if aspects of the report need further explanation or assessment. However, since the ResponsibleSteel Secretariat is not directly involved in the audit, they do not have full access to all the data collected during the audit, such as details from facility visits, process observations, or interviews with workers and stakeholders.

It is important to note that this review by the ResponsibleSteel Secretariat should not be construed as an endorsement of the audit outcomes or findings.

The public summary of the audit report is a condensed version of the full report and is intended to provide stakeholders with a high-level overview of the audit outcomes. While this summary highlights key findings, it does not include the full range of evidence or supporting details from the audit, which are not made public. Therefore, the summary should be understood as a broad overview rather than a comprehensive account of the full audit process.

3 June 2025