# 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

### **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

NEXT SCHEDULED AUDIT 2025-05-17 (TBC)

**CERTIFIED SINCE** 2023-11-17

### **CERTIFICATION BODY**

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



### **AUTHORIZED CERTIFICATION BODY SIGNATURE**

A rier

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 probationary value

Julien NIZRI, General Manager

ResponsibleSteel(TM), 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



Annex

ACE/2023/107156.1

# **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(TM), 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 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	AMDS - Industeel				
Audited entity name	AMDS - Industeel				
Number of sites Names & location	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	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.				
	Supporting functions:				
	The corporate headquarters 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).				
	ArcelorMittal Europe Flat Products & EPO (European Procurement Organisation) in Luxembourg concentrates the flat carbon steel production sites in Europe and provides 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).
Standard version audited against	ResponsibleSteel Standard V2-1 Certified Site
Audit type and outcome	Surveillance audit
	No additional responsible sourcing and GHG requirements audit
Certification body	AFNOR Certification, 11, Rue Francis de Pressensé, 93200 Saint Denis, France
Audit dates	Pre-audit: not applicable
	Stage 1: from February 28th to March 3rd 2025 (2,5 days)
	Stage 2: from 08 to 11 April 2025. (7 days)
Number of auditors and audit	Lead auditor: Pascal Thomas
days	Auditor/s: Lucie Mignard
	Technical expert/s:
	Translator/s:
	Pre-audit: not applicable
	Stage 1: 2,5 days
	Stage 2: 7 days
	Reporting: 4 days
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 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.
	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.
Next audit type and date	Recertification audit

	September 2026

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## Introduction

### **About ResponsibleSteel**

Our mission is to be a driving force in the socially and environmentally responsible production of netzero 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:

Site self-assessment

Stage 1 Audit

Stage 2 Audit

Audit Report

Certification
Decision

Surveillance

- Site provides general information to the certification body
- Signs contract with a certification body
- Conducts self-assessment
- Certification body reviews self-assessment and documentation
- Media and stakeholder analysis
- Certification body determines readiness for stage 2 audit
- · Stakeholders informed of audit
- · Certification body conducts the visit,
- Gathers supporting evidence through worker and stakeholder interviews
- Classifies non confirmities
- Certification body prepares audit report and certification recommendation
- Site reviews audit report
- RS Assurance Panel reviews report and recommendation
- · Certification body amends report if needed
- Certification body takes certification decision and issues certificate
- Certificate, audit report summary and Assurance Panel report published on website
- Site implements corrective actions where required
- Certification body conducts monitoring activities and surveillance audit, including interviews with workers and stakeholders

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 recertification 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 <u>Issues Resolution System</u> can be accessed via the ResponsibleSteel website.

More information on ResponsibleSteel can be found on <a href="https://www.responsiblesteel.org/">https://www.responsiblesteel.org/</a>.

# Site information

Country and town	Belgium, Marchienne-au-Pont				
	France, Le Creusot				
	France, Chateauneuf				
Activities and products	Electrical arc furnace, hot rolling mill, heat treatment, surface treatment				
	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.				
Year site opened	opening dates:				
	Industeel Belgium 1863				
	Industeel Creusot 1836				
	Industeel Loire 1865				
Major extensions and / or refurbishments and year(s) when these occurred	Not applicable				
Annual production	Industeel Belgium: 170kT (2024)				
	Industeel Creusot: 80kT (2024)				
	Industeel Loire: 27kT (2024)				
Number of employees	Industeel Belgium:				
and contractors	928 employees (53 females)				
	221 external providers and contractors				
	Industeel Creusot – Rue clémenceau				
	769 employees (90 females)				
	300 external providers and contractors				
	Industeel Loire - Chateauneuf				
	288 employees (40 females)				
	45 external providers and contractors				
	Gender diversity:				

	9,8% of Industeel employees are women. Gender diversity is higher in France (13,2% of women) than in Belgium (5,7%).  See page 15 of Sustainability report for more info.
Carbon reduction target	The target is to reduce direct CO2 emissions, per unit of production, by 35% by 2030 (compared to 2018).
Further environmental and social information	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 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. The level of the answer was quite proactive. To complete the representativity, the auditors examined the list and asked the sites to organize additional 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 involved as selected by the auditors.

- 2 National and local government authorities
- 4 Labour unions for blue and white collar for all the sites
- Occupational healthcare stakeholders (2 doctors)
- 3 Civil society organisations
- Environmental and labour inspectors (except DREAL, no contribution)
- 3 institutional (region, prefect, water agency No contribution)
- Media (no contribution)
- 2 Professional Federations
- 4 Suppliers (contractual stakeholders)
- 7 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 who 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 agreed 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 2551 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 function 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, persons of trust were fully part of the interviews.

Additionally, to the process owners audited to review the principles, more than 26 workers were interviewed (4 women - 1 temporaries from contractors and 2 from the sites – 7 white collars, 16 blue collars), including workers from the Electric blast furnace, Heat treatment, surface treatment, hot rolling mill, cutting, boiler, supporting functions, finishing shop, suppliers, maintenance, line managers, members of top management, plants managers, suppliers, union representatives and purchasing managers, human resources, health & safety, industrial risk, environment and sustainability. This number (26) 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 and unions still expressed dissatisfaction regarding the sanitary conditions (See the NC open), and they are aware of the economic context, which impacts their activities and the capacity

of the plan to invest. Issues such as managing the end of shift workers' careers and psychosocial risks are still matters shared with management.

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 about the various items of ResponsibleSteel, to collect the corporate image. Overall, the input provided by internal and external stakeholders was mainly positive in nature. All the efforts made about safety is recognized by all the stakeholders. 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. The external stakeholders, as inspectors, have confirmed a good level of cooperation and transparency.

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

The workers acknowledge that the site is making efforts in communication to deal with complaints and to reduce Noise and dust emissions. It is confirmed with the reduction in the claims affecting the sites.

# 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 <b>not applicable</b> : excluded from the audit since it is not applicable to the sites; or <b>not rated</b> : the requirement is very closely linked to another requirement where a non-conformity (NC) or opportunity for improvement (OFI) has already been raised. Sometimes, when requirements are linked to one and the same

subject-matter, it is appropriate to count NCs or OFIs only once to avoid repetition.

Principles and criteria							
(# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusions		
Principle 1. Corporate Leadership							
Criterion 1.1: Corporate Values and	5		1				
Commitments (6)	J		_				
Criterion 1.2: Leadership and Accountability	5	1					
(5)		-					
Principle 2. Social, Environmental and Gove	rnance Manag	ement Sy	stems				
Criterion 2.1: Management System (5)	5	1					
Criterion 2.2: Responsible Sourcing (5)	5						
Criterion 2.3: Legal compliance and	6	2					
signatory obligations (6)	U	2					
Criterion 2.4: Anti-Corruption and	7				1		
Transparency (8)	,				-		
Criterion 2.5: Competence and awareness	5						
(5)	J						
Principle 3. Responsible Sourcing of Input M	laterials						
Criterion 3.1: Commit to responsible							
sourcing and incorporate it in key functions	0				18		
and processes (18)							
Criterion 3.2: Know your upstream supply	0				10		
chains (10)	Ŭ				10		
Criterion 3.3: Understand supplier ESG							
performance and promote improvement	0				15		
(15)							
Criterion 3.4: Strengthen and account for	0				23		
responsible sourcing (23)	J				23		
Criterion 3.5: Report publicly on	C				11		
responsible sourcing (11)	0				11		
				ı			

Principles and criteria	C	OFI	Ndin - n NG	Nasie v NG	Footballers		
(# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusions		
Criterion 3.6: Commit to responsible							
sourcing and incorporate it in key functions	0				15		
and processes (15)							
Criterion 3.7: Know your upstream scrap	0				8		
supply chain (8)	U				0		
Criterion 3.8: Understand supplier ESG							
performance and promote improvement	0				12		
(12)							
Criterion 3.9: Strengthen and account for	0				1		
responsible sourcing (1)	Ü				-		
Criterion 3.10: Report publicly on	0				16		
responsible sourcing (16)	U				10		
Principle 4. Decommissioning and closure							
Criterion 4.1: Decommissioning and closure	0				14		
(14)	Ü				14		
Principle 5. Occupational Health and Safety							
Criterion 5.1: OH&S policy (6)	6	2					
Criterion 5.2: Health and Safety (OH&S)	8	2	1				
management system (10)	Ü	-	-				
Criterion 5.3: Leadership and worker	9	1					
engagement on OH&S (9)		-					
Criterion 5.4: Support and compensation	4				4		
for work-related injuries or illness (8)	7				7		
Criterion 5.5: Safe and healthy workplaces	3	1	1		1		
(5)	3	1	1		1		
Criterion 5.6: OH&S performance (2)	1		1				
Criterion 5.7: Emergency preparedness (6)	6	0					
Principle 6. Labour Rights							
Criterion 6.1: Child and juvenile labour (10)	7				3		
Criterion 6.2: Forced or compulsory labour			1				
(7)	6		1				
Criterion 6.3: Non-discrimination (9)	7		2				
Criterion 6.4: Association & collective	11				1		
bargaining (12)	11				1		

Principles and criteria					
(# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusions
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	5				
employment (5)	5				
Criterion 6.8: Remuneration (11)	6	0			5
Criterion 6.9: Working time (7)	6		1		
Criterion 6.10: Worker well-being (2)	2	1			
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence	5				
(5)	3				
Criterion 7.2: Security practice (9)	6				3
Criterion 7.3: Conflict-affected and high-risk	0				5
areas (5)	· ·				3
Principle 8. Stakeholder Engagement and Co	mmunication				
Criterion 8.1: Stakeholder engagement (10)	9	0	1		
Criterion 8.2: Grievances and remediation	12	1			
of adverse impacts (12)	12	1			
Criterion 8.3: Communicating to the public	7				
(7)	,				
Principle 9. Local Communities					
Criterion 9.1: Commitment to local	7		1		
communities (8)					
Criterion 9.2: Free, Prior & Informed	0				3
Consent (3)					-
Criterion 9.3: Cultural heritage (6)	0				6
Criterion 9.4: Displacement and	0				9
Resettlement (9)					
Principle 10. Climate Change and Greenhous	se Gas Emissio	ns			
Criterion 10.1: Corporate commitment to					
achieve the goals of the Paris Agreement	7		1		
(7)					
Criterion 10.2: Corporate Climate-Related	2				
Financial Disclosure (2)					

Principles and criteria	Conform	OFI	Minor NC	Major NC	Exclusions	
(# of requirements)	Conform	OFI	IVIIIOT NC	Major NC	EXCIUSIONS	
Criterion 10.3: Determination of GHG						
emissions for the purpose of site level GHG	4					
emissions reduction targets and planning	4					
(4)						
Criterion 10.4: Determination of site level						
GHG emissions for the purpose of reporting	0				29	
the GHG emissions intensity for the	0				29	
production of crude steel (29)						
Criterion 10.5: Site-level GHG reduction	11					
targets and planning (11)	11					
Criterion 10.6: Requirements to market or						
sell products as ResponsibleSteel certified	0				8	
(8)						
Criterion 10.7: GHG emissions disclosure					2	
and reporting (8)	6				2	
Principle 11. Noise, Emissions, Effluents and	Waste		1			
Criterion 11.1: Noise and vibration (7)	5		2			
Criterion 11.2: Emissions to air (8)	7	2	1			
Criterion 11.3: Spills and leakage (9)	8		1			
Criterion 11.4: Waste, by-product and	40					
production residue management (11)	10		1			
Principle 12. Water Stewardship						
Criterion 12.1 Water-related context (7)	7					
Criterion 12.2 Water balance and emissions	_					
(8)	7				1	
Criterion 12.3 Water-related adverse	_				4	
impact (6)	5				1	
Criterion 12.4 Managing water issues (8)	7		1			
Principle 13. Biodiversity						
Criterion 13.1: Biodiversity commitment	9		1		15	
and management (25)	9		1		13	
Total (370)	274	15	19	0	241	

\* Note that the Total in the table does not correspond to the sum of Confom, OFI, Minor NC, Major NC and Exclusion due to the way that requirements and conformity classifications are counted.

### **Exclusions**

- 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.
- 6.4.2 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:

- 2. Creation of a sustainable team at the cluster level, consisting of 3 people, to better support the RS implementation
- 5. Appointment of a safety coordinator and sentries to support the operational teams
- 5.1 Creating a new space for communication and breaks
- 5.3 Signs displaying the rules for using overhead cranes
- 5.3 Fire protection training for the quenching line is delivered, taking into account the operational risks at the station.
- 5.5.2 Women's locker room facilities are spacious and clean
- 8.3 Launch of the new CSR report
- 10 The current target is aligned with the CO2 roadmap and has reached 11% of reduction. No drift regarding the roadmap
- 11.3 Work has been carried out on the preventive maintenance plans, listing interventions and reasons of intervention.

### 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 next audit. The non-conformity findings are related to:

At corporate level the policy for inclusion and diversity is no more available (1)

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)

Not full implementation of Health, leading and lagging indicators (5)

The risk analysis methodology is heterogeneous, which makes it complicated to have a global picture (5)

The methodology to assess the prevention of non-discrimination needs to be more formalized to ensure a sufficient level of assessment (6.3). This is also the same comment for child labour, undignified disciplinary practices or forced labour assessment methodology.

The data analysis to ensure equal pay for equal work has to be reinforced (6.3).

The monitoring of fatigue management has to be organised to ensure that the rules are respected (6.9).

The structuration of the management of stakeholders' local communities is young, and the practices related to it need 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 Climate Action Report has not been updated since 2021 (10)

The time-bound related to water needs to be reinforced (12)

The implementation of a biodiversity plan related to the diagnosis is limited (13)