

Responsible Steel™ Certified Site



DNV-C689723

Presented to

Outokumpu Business Line Stainless Europe (Business Area Europe)

SITE NAME AND ADDRESS

1. Outokumpu Stainless Oy, Tornio Operations, Terästie, 95490, Tornio, Finland
2. Outokumpu Nirosta GmbH, Krefeld Operations, Oberschlesienstraße 16, 47807, Krefeld, Germany

CLIENT NAME AND ADDRESS

Outokumpu Oyj
Salmisaarenranta 11,
00180 Helsinki, Finland

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

ResponsibleSteel Standard Version 1.1, 23 June 2021
ResponsibleSteel Assurance Manual Version 1.0, 29 December 2019

ISSUE DATE

15 March 2024

EXPIRY DATE

14 March 2027

NEXT SCHEDULED AUDIT

May 2025 (TBC)

CERTIFIED SINCE

15 March 2024

CERTIFICATION SCOPE

Design, development, production, marketing and sales of hot- or cold-rolled stainless, acid- and heat-resistant steel products

CERTIFICATION BODY

DNV Business Assurance Services UK
Limited
30 Stamford Street
SE1 9LQ London
United Kingdom



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

Kemi mine and production of FeCr (Business Area Ferrochrome) at the same site in Tornio is outside the certification scope.

AUTHORISED CERTIFICATION BODY SIGNATURE

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

Thomas van Haaren, Global Services Manager

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

Validity of this certificate is subject to continued conformity with the applicable ResponsibleSteel Standard and can be verified at www.responsiblesteel.org

This certificate does not constitute evidence that a particular product supplied by the certificate holder is ResponsibleSteel certified. Products offered, shipped or sold by the certificate holder can only be considered covered by the scope of this certificate when the required ResponsibleSteel claim is clearly stated on sales and delivery documents.



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Annex

Outokumpu Business Line Stainless Europe (Business Area Europe)

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Tornio Operations: 2 stainless steel melt shop lines, 1 hot rolling mill, 1 cold rolling plant, rushing and polishing, slitting and cut-to-length lines

Krefeld Operations: Annealing and Pickling lines for stainless steel, Cold rolling mill with 4 installations and a skin pass mill, Batch annealing facilities, Stainless Steel Powder production, Finishing and cutting installations including packaging and logistics, Supporting infrastructure in areas of energy, water, mediums, acid, regeneration, and water treatment facilities, Research and development as well as a training center.

SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

Outokumpu Oyj, Headquarters
Salmisaarenranta 11,
00189 Helsinki, Finland

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

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PUBLIC SUMMARY AUDIT REPORT

This is a concise public summary of the audit report for Outokumpu Business Line Stainless Europe. The full version of the audit report is in the possession of the member company and the audited sites.

How to read this report

Throughout the report, texts in graphite font represent initial certification information whereas texts in **purple** font represent changes, adjustments and/or results of the surveillance audit that took place in 2025.

Audit overview

Member Name	Outokumpu (referred to as “Outokumpu” or “Group” or “the organisation” hereafter)
Audited entity name	Outokumpu Business Line Stainless Europe (Business Area Europe)
Number of sites Names & location	<u>Individual sites comprising the cluster are:</u> 1. Outokumpu Stainless Oy, Tornio Operations Address: Terästie, 95490, Tornio, Finland Activities and products: Integrated melt shop, hot and cold rolling, R&D Website: Tornio Stainless steel plant, Finland Outokumpu 2. Outokumpu Nirosta GmbH, Krefeld Operations Address: Oberschlesienstraße 16, 47807, Krefeld, Germany Activities and products: Production of cold rolled stainless, acid-resistant, and heat-resistant steels. Website: Krefeld stainless steel plant, Germany Outokumpu
Certification scope	1. Outokumpu Stainless Oy, Tornio Operations Main facilities: • Two stainless steel melt shop lines, • Hot rolling mill, • Cold rolling plant, • Rushing and polishing, • Slitting and cut-to-length lines. NOTE: Kemi mine and production of FeCr (BA Ferrochrome) at the same site in Tornio is outside the certification scope.

	Other facilities and associated activities on-site or near the site that are directly related to steel making and processing: • Water intake - station in Näätsaari (6 km from the site), • Oy Linde Gas AB gas factory on-site, • Tapojärvi Oy slag-refining operations on-site, • Tornion Voima power plant on-site, • Norex Service Finland Oy scrap metal handling operations on-site, • Fortum Battery Oy recycling plant on-site, • Outokumpu Shipping Oy harbour operations on-site, • J&J Alamäki Oy, on-site material transportation, • LNG Manga Oy, on-site natural gas supplier, • Lhoist, lime supplier, • Outokumpu Chrome Oy, on-site raw material and energy supplier. Associated facilities: • Railway to Tornio site- VR Oy, • Röyttä Harbour, • Power transmission lines to Tornio site. 2. Outokumpu Nirosta GmbH, Krefeld Operations Main facilities: • Annealing and Pickling lines for stainless steel, • Cold rolling mill with 4 installations and a skin pass mill, • Batch annealing facilities, • Stainless Steel Powder production, • Finishing and cutting installations including packaging and logistics, • Supporting infrastructure in areas of energy, water, mediums, acid, regeneration, and water treatment facilities, • Research and development as well as a training center.
Standard version audited against	ResponsibleSteel Standard V2-0 - Certified Site
Audit type and outcome	Surveillance audit
Certification body	DNV Business Assurance B.V. on behalf of DNV Business Assurance Services UK Limited

	Zwolsseweg 1 2994 LB Barendrecht Netherlands Contact(s): Pascal Nsanzimana Senior Sustainability Consultant DNV Business Assurance B.V. Pascal.Nsanzimana@dnv.com, M: +31 638 34 910 Or Thomas van Haaren Global Service Manager – Supply Chain Management Services thomas.van.haaren@dnv.com, responsible.steel@dnv.com M: + 330612731523
Audit Dates	1. Outokumpu Stainless Oy, Tornio Operations Stage 1 audit: 2 days on-site (at the Headquarters, Helsinki): 23rd – 24th November 2022 Stage 1 audit: 3,5 days off-site (30th November, 13th December 2022, 20th – 21st February 2023) Stage 2 audit: 5 days on-site (27th – 31st March 2023) Surveillance Audit: Stage 1 audit: 1 day offsite at Headquarters (31st March 2025) Stage 1 audit: 2 days offsite at Tornio (15th – 16th April 2025) Stage 2 audit: 5 days onsite at Tornio site (19th - 23rd May 2025) 2. Outokumpu Nirosta GmbH, Krefeld Operations Stage 1 audit: 3 days (28th November & 19th – 20th December 2022) Stage 2 audit: 5 days on-site (19th – 23rd June 2023) and 1 day off-site (26th June 2023) Surveillance Audit: Stage 1 audit: 2 days (29th – 30th April 2025) Stage 2 audit: 4 days (23rd-26th June 2025)
Number of auditors	1. Outokumpu Stainless Oy, Tornio Operations 1 Lead Auditor Surveillance Audit 1 Lead auditor: DNV Finland 2. Outokumpu Nirosta GmbH, Krefeld Operations

	1 Lead Auditor Surveillance Audit 1 Sr. Lead Auditor: Germany
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	The next audit will be a surveillance audit. It shall take place latest 18 months prior the end of the validity of the initial certificate. Surveillance Audit scheduled for May 2025. The next audit will be a recertification audit. It shall take place ca. 6 months prior the end of the validity of the initial certificate (before March 14, 2027)

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Introduction

About ResponsibleSteel

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

We are a not-for-profit multi-stakeholder organisation founded to bring together business, civil society and downstream users of steel, to provide a global standard and certification initiative for steel. We have built a consensus on what sustainability looks like for steel – including the impacts of mining, steel production, the scrap metal supply chain, greenhouse gas emissions, water use, workers’ rights, communities and biodiversity. We are the first global scheme for responsibly sourced and produced steel.

Our Members include steel makers, mining companies, automotive and construction companies as well as civil society organisations focused on labour rights, biodiversity, climate change and many other important issues.

Overview of the certification process

Certification against the ResponsibleSteel Standard is voluntary and follows the process below:



Sites can apply to be assessed against the ResponsibleSteel Standard on a voluntary basis. Conformity with the Standard is verified by independent certification bodies and auditors. They study documentation provided by the site, review relevant media and scientific publications on the site, visit the site to see operations first-hand, and interview site management, process owners, shopfloor workers and external stakeholders such as authorities, community and civil society representatives. The assessment is summarised in an audit report that is reviewed by an independent Assurance Panel. Only if that Panel is satisfied with the quality of the audit and the resulting report, can a site with a positive certification recommendation be certified. A ResponsibleSteel certificate is valid for three years and certified sites have to pass a surveillance audit after 18 months and subsequent re-certification audits to remain certified. The rules and processes for ensuring compliance with the Standard are laid out in the [Assurance Manual](#) and have been developed in line with the Assurance Code of Good Practice set by the ISEAL Alliance.

ResponsibleSteel provides an Issues Resolution System that any stakeholder may use to log a complaint about any aspect of the ResponsibleSteel programme. The [Issues Resolution System](#) can be accessed via the ResponsibleSteel website.

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

Site information

Site(s) description	<u>Individual sites comprising the cluster are:</u> 3. Outokumpu Stainless Oy, Tornio Operations Address: Terästie, 95490, Tornio, Finland Activities and products: Integrated melt shop, hot and cold rolling, R&D Website: Tornio Stainless steel plant, Finland Outokumpu 4. Outokumpu Nirosta GmbH, Krefeld Operations Address: Oberschlesienstraße 16, 47807, Krefeld, Germany Activities and products: Production of cold rolled stainless, acid-resistant, and heat-resistant steels. Website: Krefeld stainless steel plant, Germany Outokumpu
Year site opened, major extensions and / or refurbishments and year(s) when these occurred	1. Outokumpu Stainless Oy, Tornio Operations 1950's: Chrome ore deposit discovered in Kemi in 1959. 1960's: Kemi Mine and ferrochrome production begins in 1968 with a capacity of 28 000 tpa. 1970's: Stainless steel production starts in 1976 with a capacity of 50 000 tpa. 1980's: Kemi Mine expanded as the second FeCr smelting furnace begins operations in 1985. Hot Rolling Mill starts in 1988. 1990's: Finishing Plant in the Netherlands (not in certification scope) opens in 1993. In 1995 ferrochrome converter begins operations, In 1997: Expansion of Cold Rolling Plant in 1997, capacity now exceeds 400 000 tpa 2000's: In 2004 steel production expansion project finalised, stainless steel production capacity now 1,2 million tpa. Kemi mine (not in certification scope) was completely switched to underground production in 2006. 2010's: The third ferrochrome furnace investment was commissioned in 2013. The entire ferrochrome production capacity is 530 t/a. 2020's: Outokumpu is planning a large investment in a biocoke plant to reduce climate emissions and increase Finland's energy self-sufficiency. There are plans to build a factory in connection with the Tornio factories. 2. Outokumpu Nirosta GmbH, Krefeld Operations The mill is in production since 1950. Central Finishing Shop (start 2000)

	• Annealing & Pickling line 1380 (rebuilt after fire in 2006) • Dry Polishing Line (start 2007) • Shutdown of Melting shop (2013) • Blanking Line for disc production (start 2013) • Batch Annealing (start 2016) • Pickling Line (start 2016) • Bright Annealing Line 1600 (start 2016) • Sale of Northern Industry Park (2021) • Partial rental of Admin building (2022)
Annual production	1. Outokumpu Stainless Oy, Tornio Operations Production (year 2022): Stainless steel slabs (crude steel): 1 315 500 tons, Hot rolled stainless steel: 1 293 240 tons, Cold rolled stainless steel: 841 740 tons. 2. Outokumpu Nirosta GmbH, Krefeld Operations Total production (hot & cold) in 2022: 172,760 kilo tons
Number of employees and contractors	1. Outokumpu Stainless Oy, Tornio Operations Total employees: 2052 • Own Full time employees: 1665 (men: 1415 and women: 250) • Own Part-time employees: 12 (men: 10 and women: 2) • Contractors: 375 (men: 319 and women: 56) 2. Outokumpu Nirosta GmbH, Krefeld Operations Total employees: 1224 • Own Full time employees: 1005 (men: 903 and women: 102) • Own Part-time employees: 34 (men: 2 and women: 32) • Contractors: 185 (men: 157 and women: 28) Total employees: 1.152 (incl. Contractor workers) • Own Full-time employees: 953 (men: 860 and women: 93) • Own Part-time employees: 33 (men: 5 and women: 28) • Interns & Apprentices: 36 (men: 29 and women 7) • Contractors: 130
Supported long-term emissions reduction pathway for the steel industry	Outokumpu ascribes to: • the IEA report “Iron and Steel Technology Roadmap” (2020). (This roadmap doesn’t include stainless steel.) • EUROFER is currently preparing a roadmap for stainless steel in which Outokumpu are participating.

GHG reduction target at corporate level	Outokumpu is committed to the Science Based Targets initiative's 1.5 degree target. Outokumpu's near-term science-based target is to reduce direct and indirect emissions as well as its supply chain emissions (scopes 1, 2 and 3) by 42% per tonne of stainless steel by 2030 from a 2016 base year. The new target marks a further 30% reduction from the 2020 level. The updated targets cover Outokumpu's value chain from raw materials to own production and delivery.
Further environmental and social information	• Outokumpu's Annual Report 2024 is accessible via this link • Sustainability review 2022 is accessible via this link. • Sustainability reports for the past 5 years can be accessed via this link. • Sustainability performance is presented publicly in Outokumpu Sustainability Data Tool

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](#).

ResponsibleSteel distinguishes between external and internal stakeholders. In relation to external stakeholders, the focus is on local communities, civil society organisations, authorities, labour unions, marginalised groups and academics.

A review of the interested parties as identified by the organisation has been conducted by the auditors.

The sites have internal and external stakeholder groups identified with their requirements and expectations of the sites and prioritized according to needs and expectations and the associated risks and opportunities. The process is documented.

Stakeholders' lists and their contact details have been provided to the certification body.

Stakeholders were approached by email and/or telephone to solicit their input on the audit in both English and/or respective local languages. They were also communicated in 4-6 weeks before the actual stage 2 audits took place. Those stakeholders interested have been interviewed.

In total 24 and 64 relevant stakeholder representatives have been identified at Tornio Operations and Krefeld operations sites, respectively. Number of interviewed external stakeholders and the groups they represent are mapped in Table 1.

Table 1. Identified (and interviewed) groups of external stakeholders for Tornio and Krefeld sites.

Stakeholder Group	Number for Tornio Operations site (per December 2022) Per June 2025	Number for Krefeld Operations site (per December 2022) Per June 2025

Academics	3 (2) 3	9 (0) 10 (1)
Civil society organisations (operating at local, regional, national, or global level)	4 (2) 2 (1)	3 (0) 2 (1)
Labour unions	4 (4) 4 (4)	2 (1) 3 (1)
Local communities (including their formal and informal representatives, and indigenous peoples)	2 (0) 2 (0)	3 (0) 6 (0)
Marginalised groups	0 0	4 (0) 4 (0)
National or local government authorities	5 (2) 5 (0)	2 (0) 7 (2)
Emergency response	-	3 (0) 3 (0)
Industrial and Commercial Neighbours	- 3 (3)	29 (2) 28 (1)
Media	1 (1) 0	3 (0) 4 (0)
Others	3 (1) 4 (2)	6 (2) 6 (1)
Politicians	2 (0) 2 (0)	0 3 (0)
Total	24 (12 interviewed) 25 (10 interviewed)	64 (5 interviewed) 76 (7 interviewed)

The perception of external stakeholders interviewed about the Tornio site and how it manages sustainability in its activities was mostly positive. Some of the stakeholders interviewed mentioned that communication has improved during the latest years. Though some of the stakeholders would like to have more active cooperation and communication e.g., on environmental protection, could be improved with sites and local organizations.

Many of the stakeholders, especially in Tornio identify reduction of CO₂ emissions and climate actions, as one of the most important sustainability aspects for the operations of the site. This is one of the main targets for Outokumpu Tornio, according to the stakeholder interviews. Also, more and more transparent, and public information is needed on site level, to see how the progress is proceeding. There are several educational institutions / schools in the area of Tornio site and cooperation is already quite active. Specially on environmental development projects, schools could still provide more resources and new solutions for Tornio site.

Some concerns were discussed with stakeholders of the utilizing employees' knowledge and wide experience of steel making.

On the other hand, Outokumpu's Tornio site is the biggest private employers in its area, and in this role, It has an important impact on the communities around.

One of the biggest challenges highlighted by the stakeholders is to get more employees in the steel industry. The competence of employees will also be a challenge in the future. Stakeholders mentioned that there are ongoing cooperation with local schools and common interest to get more people interested in the industry. Overall, Outokumpu Tornio site is according to the external stakeholder interviews positive towards any cooperation with local or national organizations, and but resources are limited and sometimes it is difficult to

find time for cooperation. Also, cooperation with local SMEs was discussed with some stakeholders, and concerns that how they could be better part of the Outokumpu (sustainable) development.

For the Krefeld site in Germany, stakeholder coverage was somewhat limited, as only few stakeholders signaled their willingness to contribute to the audit. This is often the case in sustainability audits in that country. The overall feedback from those who were interviewed was quite positive. No grievances were reported.

Some were concerned about the future success of the organization due to uncertainties in the transformation process on the path to net carbon zero and they voiced also concern about the availability of sufficient competent personnel in the future.

Workers are an important internal stakeholder group, since they are directly affected by the company. Workers' interviews were conducted according to the ResponsibleSteel manual requirements, in group and individual interviews on the sites.

At the time of the audits, the number of workers (headcount, including full- and part-time workers and contractors) at the sites were 2052 and 1224 at Tornio and Krefeld, respectively.

Guided by the ResponsibleSteel Assurance Manual, worker interviews for Krefeld were conducted with 4 groups (2x3, 1x4, 1x5 persons) and 20 individuals. The auditors selected the group of people to be interviewed on the basis of an anonymous staffing plan (employee roster). A total of 35 employees were interviewed, including production, maintenance, warehouse, and other cross-sectional areas. 30 men and 5 women were interviewed, covering employees and contractor workers. Similarly, interviews for 5 groups (2 x 3, 1 x 4, 2 x 5) of workers and 24 individuals were conducted at Tornio covering full- and part-time employees and contractors from steel melting shop, hot rolling mill, and cold rolling mill. A total of 44 workers were interviewed, 31 men and 13 women. Many of the workers have long history with the sites. As a concern, however, many of the workers at both sites mentioned shortage of resources and high workload for some employees. This causes stress and several risks for workers' wellbeing. In addition, general concern at Tornio was also related to the H&S incident reporting to ensure it encourages workers to report extensively on various kinds of incidents, including the smaller ones. Actions have been taken to improve the procedure already during 2023 and more changes will be implemented for 2024 to ensure comprehensive incident reporting. During the worker interviews, it was clear that interviewed employees are very committed to Outokumpu and general working atmosphere is good.

Surveillance Audit (Stakeholders findings)

Worker interviews for Tornio were conducted with 4 groups (3 groups of 4 workers, 1 group of 3 workers) and 9 individual workers interviews. 18 men and 6 women were interviewed, covering 13 permanent, 5 temporary and 6 contractors. According to the worker interviews, the attitude of workers to Outokumpu as an employer varies a lot. The main concerns of the workers were unclear or undefined or varied processes for safety

management or for continuous development, and also general concern regarding old equipment on the site and operational challenges. Positive aspects were mentioned, e.g. more concrete actions taken towards a safe working environment during the last few years, as well as team spirit in many of the departments.

The interviewed stakeholders mentioned that communication and cooperation has been generally good with Outokumpu Tornio site. The interval for stakeholder meetings with Outokumpu Tornio site varies from daily cooperation to a few times per year, but all interviewed stakeholders felt that communication is working well with the site. Stakeholders seem to have clear contact persons on the site, and communication is effective and usually informal. Some of the stakeholders mentioned that it is important to work closely with common interfaces, where both companies have own interests or own different procedures to work with. Also, the need for continuous cooperation in the future, e.g. environmental and safety aspects, was mentioned in several interviews. Stakeholders felt that, as a big organisation (Outokumpu), some decisions or changes a long time, but at simultaneously many of the stakeholders mentioned the importance of big organisation in the Tornio area and hoped that their cooperation will continue as it is currently working.

At Krefeld, following confidential worker interviews were conducted:

1 group of 8 workers, 2 groups of 4 workers, 7 works council members, 8 individual interviews

The overall feedback from the workers interviewed was positive. However, concerns were raised regarding the future of the site, as the expected closing of a production line (pickling line) had recently been announced.

Workers also mentioned the weak responsiveness of the HR department and poor recognition/lack of praise.

Workers expressed the wish for a proper canteen, as currently, only a snack bar is available (The canteen was closed during Covid pandemic and not re-opened).

General feedback from external stakeholders was also positive. Because a lawsuit was filed regarding the protection of cultural heritage on the site's premises, questions appeared concerning the cooperation in good faith with the community/the authorities.

Summary of Audit Findings

The performance of Outokumpu Stainless Steel Cluster of sites in relation to the Principles and Criteria of the ResponsibleSteel Standard is summarised in the table on the next page. The headings of the table mean the following:

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 (11)					
Criterion 1.1: Corporate Values and Commitments (6)	6 6	0	0	0	0
Criterion 1.2: Leadership and Accountability (5)	2 3	1 1	2 1	0	0
Principle 2. Social, Environmental and Governance Management Systems (29)					
Criterion 2.1: Management System (5)	3 3	2 2	0	0	0
Criterion 2.2: Responsible Sourcing (5)	5 5	0	0	0	0
Criterion 2.3: Legal compliance	6 6	0	0	0	0
and signatory obligations (6)					

Criterion 2.4: Anti-Corruption and Transparency (8)	3 4	2 2	2 1	0	1
Criterion 2.5: Competence and awareness (5)	3 3	1 1	1 1	0	0
Principle 5. Occupational Health and Safety (46)					
Criterion 5.1: OH&S policy (6)	4 4	2 2	0	0	0
Criterion 5.2: Health and Safety (OH&S) management system (10)	4 4	5 5	1 1	0	0
Criterion 5.3: Leadership and worker engagement on OH&S (9)	8 8	0	1 1	0	0
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	1 1	1 1	0	0	6 6
Criterion 5.5: Safe and healthy workplaces (5)	4 5	0	1 0	0	0
Criterion 5.6: OH&S performance (2)	2 2	0	0	0	0
Criterion 3.7: Emergency preparedness and response (6)	4 4	2 2	0	0	0
Principle 6. Labour Rights (72)					
Criterion 6.1: Child and juvenile labour (9)	9 9	0	0	0	0
Criterion 6.2: Forced or compulsory labour (7)	7 7	0	0	0	0
Criterion 6.3: Non-discrimination (9)	7 7	2 2	0	0	0
Criterion 6.4: Association & collective bargaining (12)	11 11	0	0	0	1 1
Criterion 6.5: Disciplinary practices (5)	4 4	0	1 1	0	0
Criterion 6.6: Hearing and addressing worker concerns (5)	2 2	2 2	1 1	0	0
Criterion 6.7: Communication of terms of employment (5)	4 4	0	1 1	0	0
Criterion 6.8: Remuneration (11)	6 6	0	3 3	0	2 2
Criterion 6.9: Working time (7)	3 3	0	4 4	0	0
Criterion 6.10: Worker well-being (2)	2 2	0	0	0	0
Principle 7. Human Rights (19)					
Criterion 7.1: Human rights due diligence (5)	2 4	2 1	1 0	0	0
Criterion 7.2: Security practice (9)	5 6	0	4 3	0	0
Criterion 7.3: Conflict-affected and high-risk areas (5)	0 0	0	0	0	5 5
Principle 8. Stakeholder Engagement and Communication (29)					
Criterion 8.1: Stakeholder engagement (10)	4 5	5 5	1 0	0	0
Criterion 8.2: Grievances and remediation of adverse impacts (12)	8 8	2 2	2 2	0	0
Criterion 8.3: Communicating to the public (7)	5 6	1 1	1 0	0	0
Principle 9. Local Communities (27)					
Criterion 9.1: Commitment to local communities (8)	2 2	0	6 6	0	0
Criterion 9.2: Free, Prior & Informed Consent (3)	0	0	0	3 3	3
Criterion 9.3: Cultural heritage (7)	0	0	4 4	3 3	3

Criterion 9.4: Displacement and Resettlement (9)	0	0	0	9 9	9
Principle 10. Climate Change and Greenhouse Gas Emissions (31)					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	6 6	1 1	0	0	0
Criterion 10.2: Corporate Climate-Related Financial Disclosure (2)	2 2	0	0	0	0
Criterion 10.3: Site-level GHG emissions measurement and intensity calculation (3)	3 3	0	0	0	0
Criterion 10.5: Site-level GHG reduction targets and planning (11)	8 9	2 2	1 0	0	0
Criterion 10.7: Site-level GHG or CO2 emissions reporting and disclosure (8)	1 6	0	5 0	2 2	2
Principle 11. Noise, Emissions, Effluents and Waste (35)					
Criterion 11.1: Noise and vibration (7)	6 6	1 1	0	0	0
Criterion 11.2: Emissions to air (8)	7 8	0	1 0	0	0
Criterion 11.3: Spills and leakage (9)	9 9	0	0	0	0
Criterion 11.4: Waste, by-product and production residue management (11)	9 9	2 2	0	0	0
Principle 12. Water Stewardship (29)					
Criterion 12.1 Water-related context (7)	6 7	0	1 0	0	0
Criterion 12.2 Water balance and emissions (8)	7 7	0	0	0	1 1
Criterion 12.3 Water-related adverse impact (6)	5 5	1 1	0	0	0
Criterion 12.4 Managing water issues (8)	4 4	3 3	1 1	0	0
Principle 13. Biodiversity (25)					
Criterion 13.1: Biodiversity commitment and management (25)	12 12	0	0	0	13 13
Principle 14. Decommissioning and closure (14)					
Criterion 14.1: Decommissioning and closure (14)	0	0	0	0	14 14
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (367)	221 237	40 39	46 31	0 0	60 60

* 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

# of requirement	Reason for exclusion
2.4.4 Anti-Corruption and Transparency	The sites do not operate in countries with a high corruption risk
5.4.2 Support and compensation for work-related injuries or illness	This is not applicable to the audited sites as all employees need to be insured under the statutory health insurance legislation. The incidents are reported to their health insurer as required by the legislation

# of requirement	Reason for exclusion
5.4.3.a-c Support and compensation for work-related injuries or illness	5.4.3 not applicable as 5.4.2 not applicable to Germany and Finland
5.4.4.b & c Support and compensation for work-related injuries or illness	Tornio operations: The compensation topics are not dealt with directly by Outokumpu Tornio but via insurance practices as defined by legislation. Krefeld operations: The claims are not dealt with directly by Outokumpu but through the legal mechanism that is in place for this. Part of the German Social Insurance System. Outokumpu Nirosta is insured through mandatory statutory BGHM “Holz & Metall Berufsgenossenschaft”.
5.5.3 Onsite housing	Krefeld operations: There is no on-site housing in Krefeld or at any other German sites.
6.4.2 Provide for alternative means if freedom of association and collective bargaining is restricted by law	Tornio operations: National law does not restrict workers’ organisations. Krefeld operations: There’s no such law in Germany restricting this. Outokumpu has tariff agreements in place and has a worker’s council at every site.
6.8.7.a-b Remuneration	Tornio operations: No request to introduce a living wage. Wages are according to the local CBAs. Krefeld operations: No request from workers, there is a central collective bargaining agreement which provides a framework for the paid salaries.
7.2.2. a-c Extensive Security Measures	Krefeld operations: There is no need for extensive measures to ensure security of people, property and assets at Krefeld based on location and the circumstances in the local community. The facilities are part of an enclosed industrial park with clearly defined boundaries and safety is protected under standard measures.
7.3.1 a-c Conflict-affected and high-risk areas	Tornio operations: Tornio is located in Finland which is not a CAHRA country.

# of requirement	Reason for exclusion
	Krefeld operations: Krefeld is located in Germany which is not a CAHRA country. Additionally, Outokumpu uses TDi AIRS sustainability index to assess country-based risk. None of the countries in which Business Area Europe sites are located, are classified as CAHRAs. The indirect risks related to CAHRA countries are covered by Outokumpu's Group function Ethics & Compliance and implemented via related instructions and procedures for group functions and sites.
7.3.2 Conflict-affected and high-risk areas	Tornio operations: see above 7.3.1. Krefeld operations: This criterion is not directly applicable, as sourcing is a central (group) function, not performed at the site.
8.2.5 Grievances and remediation of adverse impacts: The site cooperates in legitimate processes for consideration of remediation	All sites related, there have been no such cases.
9.2 Free, Prior and Informed Consent (FPIC)	Tornio operations: There are no indigenous people around the Tornio site. There is ongoing EIA process, and this is part of the assessment. Krefeld operations: This criterion is not applicable, as there are no indigenous people around the Krefeld site.
9.3.3 Cultural heritage	Tornio operations: The Tornio site is not located within or near critical cultural heritage. Krefeld operations: The Krefeld site is not located within or near critical cultural heritage.
9.3.4 Cultural heritage	See 9.2
9.3.5 Cultural heritage	Tornio operations: There are no cultural heritage sites or values around the Tornio site. Krefeld operations: The Krefeld site is not located within or near relevant cultural heritage.
9.4 Displacement and Resettlement	Neither physical nor economic displacement of communities is being considered at the audited sites.

# of requirement	Reason for exclusion
	No displacement or resettlement happened in the previous 10 years prior to applying for ResponsibleSteel certification
10.3.3. Crude Steel	Krefeld: There is no crude steel manufacturing at Krefeld as the site receives the steel coils from other Outokumpu sites for further processing.
10.5.1. d. Site-level GHG or CO2 emissions reporting and disclosure	There is no GHG emissions offsetting at the audited Outokumpu sites. This is described in Outokumpu's emissions reduction targets and related calculations with no amount of CO2 emissions under offsetting actions.
10.5.1. e. Site-level GHG or CO2 emissions reporting and disclosure	No credit emissions are used by the audited Outokumpu sites.
12.2.4. Water balance and emissions	There is EU level and national regulation in place concerning water quality and quantity which is reflected in the environmental permit requirements and taking the local circumstances into account.
13.1.2.a, c-e 13.1: Biodiversity commitment and management	a. There are no World Heritage sites close to the sites, c. There are no such areas site close to Tornio and Krefeld sites, d. There are no Ramsar sites nearby the Tornio and Krefeld sites according to the official list, e. There are no KBAs in or immediately adjacent to the Tornio and Krefeld sites.
13.1.3.a-c 13.1: Biodiversity commitment and management	The sites do not occupy any official natural habitat and neither carry any activities in natural habitats outside of their borders. Natural habitats are covered by the environmental permit application and EIA process and when such are identified, it triggers a further process to find a feasible alternative. For example, some species may make it impossible to proceed with the original plans. Stakeholder interaction is part of the EIA process. As no habitats have been identified, there is no need to manage them.
13.1.4.a, c, d & e 13.1: Biodiversity commitment and management	No critical habitats have been identified close to Tornio and Krefeld sites.
13.1.5 13.1: Biodiversity commitment and management	Tornio operations: In Finland there is also strong control of environmental authorities to secure that no harm is made to protected species or habitats.

# of requirement	Reason for exclusion
	The local EHSQ policy and the group Corporate Responsibility Policy function as a backbone to meet these requirements. Natural habitats are covered by the environmental permit application and EIA process and when such are identified, it triggers a further process to find a feasible alternative. For example, some species may make it impossible to proceed with the original plans. Stakeholder interaction is part of the EIA process. Krefeld Operations: No critical habitats have been identified close to the site or are covered in the environmental permit application (or current permit).
11.1.6 13.1: Biodiversity commitment and management	Tornio and Krefeld: As above 11.1.5
Principle 4 Decommissioning and Closure	There are no plans or announcements to decommission or close the sites or part of them.

Strengths

- The organisation is strongly committed to occupational safety and health,
- Overall satisfaction of workers with their employer was high,
- Also, the environmental management is well established,
- There is close cooperation with union representatives,
- Employee engagement is active on sites, and different channels are well utilised to reach all employees,
- Environmental issues and impacts are actively monitored and analysed,
- Sustainability aspects are regularly part of communication at the sites,
- There are efforts to continuously improve the operations environmental performance and minimise environmental impacts of the site.

Surveillance Audit 2025:

- Krefeld demonstrated an established health management programme (including psycho-social aspects, support for disabled persons and occupational re-integration management after illness).
- Tornio demonstrated systematic approach to manage stakeholder engagement and several development actions are planned to make stakeholder engagement more effective and systematic. Top management commitment to the ResponsibleStandard is high and roles and responsibilities shared more clearly for the senior management.

Areas for Improvement

Non-conformities (all rated as “Minor”)

1.2.1. (Leadership and Accountability, Tornio operations): Several aspects of the ResponsibleSteel standard (e.g., Principle 7 Local communities & Principle 8 Climate change and greenhouse gas emissions), are not clearly assigned for directors. Note: At the time of the audit the site management was changing.

Surveillance Audit 2025:

There is a draft version available of the assigned responsibilities to site directors, but this has not yet been approved by the site management / board of directors, therefore this criteria is **still minor NC**.

2.4.5 and 2.4.6. (Anti-corruption and transparency, Tornio and Krefeld operations): Publication happens on group level only, not on site level as required by criterion 2.4.5 and 2.4.6.

2.4.5 Surveillance audit (HQ):

In Sponsorship and donations instruction, and in the CoC (p.12, publicly available) Outokumpu state that they do not give any donations to political persons. This criterion will be excluded (“Exclusion”) from the next Responsible Steel certification process. **NC is closed.**

2.4.6 Surveillance Audit 2025 (HQ):

There will be an updated document on Outokumpu public webpages, however the documentation is not ready yet, and therefore this criteria is still a Minor NC.

NC remains open. Repeat finding

2.5.1. (Competence and awareness, Tornio operations): There is a need to clarify site level roles (Principles 1., 2., 6., 7., 8.) and responsibilities in ResponsibleSteel (sustainability) management system. Many of the manager roles and responsibilities are described in Tornio, and skills matrix is available. Training is provided and skills are documented. However, this is not the case for all ResponsibleSteel related responsibilities as some of the principles / aspects are not covered in described roles and responsibilities.

Surveillance Audit 2025 (Tornio):

Competency requirements are not established related to ESG management system roles and responsibilities, though plans and draft versions are available. There is no (ongoing) education and training program in place to ensure competency of Responsible Steel requirements and roles. **NC remains open.**

5.2.1.d (OH&S Management System, Krefeld)

The site's OHS management system is aligned with the Safety Management System run by the statutory Occupational Health and Accident Insurance (BGHM).

This system is intended for small enterprises up to 250 employees. Krefeld site wants to switch to ISO 45001 but this project should be finished earlier than originally intended.

Surveillance Audit 2025 (Krefeld):

The project to implement an OHS management system according to ISO 45001 is delayed. It is not yet decided whether to pursue single site or matrix certification. Certification is now targeted for 2026.

Although the site's OHS related efforts are exemplary, the underlying management system is not yet adequately documented. The used safety management system model issued by the statutory Occupational Health and Accident Insurance (BGHM) is intended for smaller enterprises up to 250 employees.

OFI escalated to Minor NC.

5.2.2.f (OH&S Management System, Tornio operations): According to the worker interviews, there is a risk that with existing procedures smaller incidents are not reported as requested. While most of the interviewed workers mentioned that they know cases where smaller incidents are not properly reported; it can be assumed that incident reporting system is not fully effective and functional.

Surveillance Audit 2025 (Tornio):

There are several actions taken to develop safety culture at the site, e.g. preventive safety actions as part of the H&S target setting. Still, during the worker interviews, lack of trust in incident reporting and investigations was mentioned by the majority of interviewed workers. There is still a need to identify and analyse the risks relating to missing incident reporting; and ensure that root cause analyses are done comprehensively to prevent similar incidents re-occurring in the future. **NC remains open.**

5.3.1.c (Leadership and worker engagement on OH&S, Tornio operations): The management of OH&S risks, opportunities and performance is not fully effective, where there are found some non-conformities and several internal views that incident reporting is not fully effective and reliable.

Surveillance Audit 2025 (Tornio):

Safety related performance reviews and investigations were performed on several occasions, but they did not seem to be effective as there are still workers complaining about an unreliable process of investigation / incident reporting. Findings on safety aspects of the previous RS audit are not included in the Safety management review. Also e.g. workers OHS representative has not been invited to all incident investigations despite this being a site level requirement for these meetings. **NC remains open.**

5.5.1. (Safe and healthy workplace, Tornio operations): To get some new spare parts or safety installation/equipment etc. to the mill operations take sometimes long time, and may pose several risks e.g., to health or risk of incidents. Reasoning for slow delivery seems to be ineffective / non-cooperative

purchasing procedures, which cause that workers must organize temporary solutions to the operations, or they are not able to use applicable tools, materials, or equipment.

Surveillance Audit 2025 (Tornio):

According to the worker interviews, there are no longer challenges to getting proper equipment for production when new tools or equipment are needed. The sourcing department has made some organizational changes and procurement decisions are now made on a local level. **NC is closed.**

6.5.1. (Disciplinary Practices, all sites): the phrase “prohibits threats or use of disciplinary practices that undermine workers' dignity” is not expressis verbis stated in a public policy

Surveillance Audit 2025 (HQ):

Human Rights Policy has been updated according to requirements, Draft 19.5.2025 version includes a sentence according to the RS requirement. It will be published during 2025, however it is currently not approved and therefore this criterion is still Minor NC. **NC remains open.**

6.6.2. (Hearing and addressing workers concerns, Tornio operations): Even though SpeakUp mechanism is presented and available in various places and platforms, it is not known by majority of the employees interviewed. Also, contractors / subcontractors on site, do not systematically get the information of the anonymous SpeakUp mechanism.

Surveillance Audit 2025 (Tornio):

According to the worker and contractor interviews, the knowledge and understanding of the SpeakUp mechanism are still not on a good level. This view was particularly prevalent among contractors. Surveillance Audit 2025 (HQ):

During the worker interviews, very few of the contractors knew about the SpeakUp tool. Many of Outokumpu's own workers mentioned SpeakUp as an anonymous communication channel. So, progress is visible but not yet optimal.

Surveillance Audit 2025 (Krefeld):

The majority of interviewed workers were not aware of the Speak-Up channel.
Minor NC.

6.7.2. (Communication of terms of employment, Krefeld operations): the site did not demonstrate that contracts with employment and recruitment agencies explicitly ask for the terms of employment to be communicated to workers at the beginning of the working relationship and when there are changes to the terms using languages, methods and channels that are understood and are easily accessible to workers.

Surveillance Audit 2025 (HQ):

During the HQ interview, it was unclear which sites use employment or recruitment agencies. This will be checked on site level audits. Corrective actions are carried out, e.g. Procedures and training developed to incl. CBA and related requirements for worker-related site information.

Currently there is no use of agency workers. However this might change any moment, therefore there is a need for provisions to be made within contracts with agencies to fulfil the requirements of this criterion. **NC remains open. Repeat finding.**

6.8.1.a-c (Remuneration, Krefeld operations): The site has not provided a public remuneration policy.

Surveillance Audit 2025 (HQ):

Outokumpu 's HR policy is available publicly on external websites, but it is not yet updated and approved according to the RS requirements. The Human Rights policy will be updated during 2025 to meet these requirements.

NC remains open. Repeat finding.

6.9.1.a-d (Working time, Krefeld operations): The organization did not provide a public policy on fatigue management.

Surveillance Audit 2025 (HQ):

Outokumpu has decided to issue a group policy, rather than each site issue its own site-specific policy. A group level policy was available but does not cover the requirement of this criterion. See 6.8.1 a.

NC remains open. Repeat finding.

7.1.2. (Human rights, Tornio and Krefeld operations): Human rights due diligence has been conducted on group level. Site level efforts are "anecdotal". The site should enhance the process to more systematically assess potentially affected rights holder group (e.g. gender, disabled persons). External stakeholders are not comprehensively part of the human rights risk / adverse impact assessments.

Surveillance Audit 2025 (Tornio): Human Rights Impact Assessment completed (2024) on group level, but not yet communicated or shared with the site. No evidence of the process for assessment or regular update of human rights risks and impacts. **NC remains open.**

Surveillance Audit 2025 (Krefeld):

Work in progress. NC remains open. Repeat finding.

7.2.1 (Security practices, Tornio and Krefeld operations): The site was not aware of and did not provide a specific public policy on security arrangements and human rights.

Surveillance Audit 2025:

At neither site, a specific public policy on security arrangements and human rights was still not available at the time of the audit.

NC remains open. Repeat finding

7.2.3.b-d (Procedure for managing security providers, Krefeld operations): A procedure covering the regular training of security personnel and providers on their roles and appropriate behaviour, the deployment of

security personnel and providers and the individuals working for them and the monitoring of security personnel and provider conduct has not been provided.

Surveillance Audit 2025 7.2.3.b &d:

At Krefeld, a regular training of security staff specific to human rights has not been demonstrated. Progress in implementing a procedure covering the monitoring of security personnel and provider conduct has not been demonstrated. **NC remains open. Repeat Finding.**

Surveillance Audit 2025 7.2.3.c (Krefeld operations):

A comprehensive set of documented procedures exists which describe the activities of the security. **NC is closed.**

8.1.4.a (Stakeholder engagement plan, all sites): A documented stakeholder engagement plan is not yet in place.

Surveillance Audit 2025 (Tornio operations):

The Stakeholder Engagement plan (and previous years stakeholder engagement effectiveness) will be reviewed and evaluated in the Stakeholder Engagement management review, which is planned for late 2025 and a draft agenda already available. **This criterion is assessed as OFI**, as the management review is planned but has not taken place at time of audit.

Surveillance Audit 2025 (Krefeld operations):

A documented stakeholder engagement plan ("Stakeholder Analysis, Opportunities & Risk Evaluation") has been established. The plan is reviewed and updated annually. **NC closed.**

8.2.1.b (Grievances and remediation of adverse impacts, Krefeld operations): The information required in criterion is given in the global SpeakUp channel but only after entering the system to submit a concern, not before. This is too late as the user has already entered data without knowing how this data will be used. This constitutes a violation of data privacy rules.

Surveillance Audit 2025 (Krefeld operations):

A new technical platform will be used in the future which will accommodate this criterion.

NC remains open. Repeat finding.

8.2.2. (Awareness of Grievance Mechanism, Krefeld operations): All worker interviews confirmed that blue collar workers (own and contractor) are unaware of the speak-up channel, even if asked for the availability of such option.

Surveillance Audit 2025 (HQ):

Multiple actions have been performed to increase awareness of the SpeakUP channel. However, these are still ongoing processes.

Surveillance Audit 2025 (Krefeld operations, REPEAT):

The majority of interviewed workers were not aware of the Speak-Up channel

Minor NC (Repeat finding for Krefeld).

8.3.3.a (Communicating to the public, Tornio and Krefeld operations): Information on the material sustainability topics for Outokumpu is presented in the Annual report, covering environment, OH&S, compliance, community engagement, risks and financials, among others. Also, other publications, such as the quarterly reports, are published at their website. The key KPIs can also be studied via the online Sustainability Data Tool. The entity did not demonstrate that, on site level, it regularly makes information on material topics available to the public.

Surveillance Audit 2025(Tornio operations):

Tornio site-specific stakeholder information (material topics) has been added to the relevant web pages (www.outokumpu.com/sustainability/commitments/responsiblesteel).

Surveillance Audit 2025 (Krefeld operations):

The site provides “information for the public” as required by EU Seveso II regulation. ESG information is publicly available on Outokumpu’s corporate website. Further site-specific information is available on the Krefeld sub website.

NC is closed for Tornio and Krefeld operations

9.1.2.a-c (Commitment to local communities, Krefeld operations): Although cooperation takes place with the local authorities and decision-makers, the site has not demonstrated that it has developed a plan to implement its commitment to maintaining or improving the social and economic well-being of local communities in consultation with local community and local government representatives.. Provided examples of individual measures that the site's management has taken or supported are “anecdotal”.

Surveillance Audit 2025:

Work in progress. NC remains open. Repeat finding.

9.1.2.d (Commitment to local communities, Krefeld operations): It has not been demonstrated that all relevant marginalised groups have been systematically considered (Marginalized communities are those excluded from mainstream social, economic, educational, and/or cultural life. Examples of marginalized populations include, but are not limited to, groups excluded due to race, gender identity, sexual orientation, age, physical ability, language, and/or immigration status).

Surveillance Audit 2025:

Work in progress. NC remains open. Repeat finding.

9.1.2.e (Commitment to local communities, Tornio and Krefeld operations): Plan for community support/wellbeing is not publicly available.

Surveillance Audit 2025:

Work in progress. NC remains open. Repeat finding.

9.1.3. (Commitment to local communities, Tornio and Krefeld operations): the sites have not demonstrated that the plans are monitored together with local community and local government representatives.

Surveillance Audit 2025:

Work in progress. NC remains open. Repeat finding.

9.3.1.a-c & 9.3.2 (Cultural heritage, Krefeld operations): A documented procedure for identifying and dealing with cultural heritage sites and values in the entity's area of influence shall be place, which has not been demonstrated.

Surveillance Audit 2025:

The local authority has declared some buildings and infrastructure as officially protected heritage. The site does not accept this decision and has filed a lawsuit against it. It was not demonstrated that the site tried to solve this conflict "in a collaborative effort".

Work in progress. NC remains open. Repeat finding.

10.5.5. (Site-level GHG reduction targets and planning, all sites): The Outokumpu 2022 Annual Sustainability Report and data tool have been made publicly available. However, the report and the data tool are not yet specific to the sites or defined portfolio of sites (business line).

Surveillance Audit 2025:

The required information has not been made publicly available on site or business line level.

NC remains open. Repeat finding.

10.7.1.a-c, f (GHG Reporting, all sites and g for Tornio operations only): The Outokumpu 2022 annual sustainability report and data tool have been made publicly available. The annual reporting on climate-related topics takes place at group level. However, the report and the data tool are not yet specific to the sites or defined portfolio of sites (business line).

Surveillance Audit 2025 (10.7.1.a-c, f):

The required information has not been made publicly available on site or business line level.

NC remains open. Repeat finding.

Surveillance Audit 2025 (10.7.1.g, Tornio operations):

GHG emission intensity per tonne of crude steel for the Stainless Europe Business Line (applicable only to Tornio) is published in the 10.7.1 GHG emissions disclosure available on Outokumpu's websites.

NC is closed.

11.2.4.a (Emissions to air, Krefeld operations): The site has not established more stringent targets in order to minimize emissions in line with the requirement of criterion 9.2 of the standard (to prevent and reduce emissions to air that have adverse impacts on communities or the environment).

Surveillance Audit (Krefeld operations):

The site has demonstrated that it already achieves best practice in relevant emissions, as defined in the European FMP “Best Practice Reference Document”. **NC is closed.**

12.1.1. (Water-related context, Krefeld operations): The site has an understanding of its area of influence. However, the area of influence has not yet been defined in writing.

Surveillance Audit 2025 (Krefeld operations):

The site has collected information on its water related area of influence, such as a map of groundwater levels. The site does not discharge into rivers, instead all water is discharged into the public sewage system.

NC closed.

12.4.2.e (Managing water issues, Tornio and Krefeld operations): The sites report that the monitoring program is available to the public as it has been transmitted to the authority as a public document.

However, as relevant stakeholders might not be aware of the availability of the document at the authority, they would not be able to retrieve such document.

Surveillance Audit 2025:

No Progress reported.

NC remains open. Repeat finding.

Areas for improvement

- 1) Further develop the stakeholder management,
- 2) Further develop the social facet, especially the understanding of human rights issues,
- 3) Align the Occupational Health & Safety Management System with ISO 45001,
- 4) Strengthen the contractor management,
- 5) The provisions to monitor and achieve compliance with all applicable requirements of the ResponsibleSteel Standard do not yet use KPIs developed for all the criteria of ResponsibleSteel standard.
- 6) Develop comprehensive documentation of procedures (guidance) and systematic processes for subcontractor acceptance and their sustainability performance monitoring on sites,
- 7) Complete the filling of the columns for the commitments of the list of tier 1 suppliers for all existing suppliers (Tornio operations),
- 8) It has been identified at Tornio operations site that the site’s management has trainings and monitoring of different risks specified, but risk assessment is not comprehensively implemented to the site activities,
- 9) A comprehensive situational analysis to identify and evaluate the fundamental strengths, weakness, opportunities, and threats with regard to OHS was not available at the time of the audit,

10) TUKES authorities and Pohjola insurance reports of the site visits include several findings, but systematic / documented evidence of the corrective actions done by the site is partly missing (Tornio operations),

11) There is also separate First Aid group (Ensiapu ryhmä), which has not been active since external occupational health care provider has changed (since 2020). Previously the group was organized by the assigned medical personnel (doctor and nurses) but similar group has not started since the health care provider changed (Tornio operations),

12) Investigation could be more effective to ensure effectiveness of corrective actions when discrimination occurs (Tornio operations),

13) Consider an optimized approach to achieve a higher willingness of external stakeholders to participate in ResponsibleSteel audits (Krefeld operations),

14) A “noise minimization plan” to explore further opportunities to avoid noise and to protect the workers was missing. Currently no further project other than the “Noise traffic lights” is being pursued (Krefeld operations),

15) Consider establishing more stringent targets in order to minimize emissions by using BATNEEC approach (Best Available Technique Not Entailing Excessive Cost) (Krefeld operations),

16) There is no frequent interaction on water topics with other commercial water users, though Tornio could find new solutions or cooperation possibilities with them, with more active interaction.

Surveillance Audit 2025:

The entity has made some progress regarding the non-conformities and opportunities for improvement which were raised during the initial audit but many findings are still open.

Tornio:

- Continue to proceed development actions related to the ResponsibleStandard to be able to close non-conformities during the next audit.
- Carefully assess environmental aspects and document site level actions taken to minimise significant environmental impacts (e.g. related on water stewardship and biodiversity) of your operations.
- Utilise internal company procedures on measuring and managing H&S incidents, and cooperate with stakeholders when developing these site level procedures.

Krefeld:

- Consider an increased check of contractors at the gate to better protect the site against theft.
- Be alert in cases of vandalism and theft. It can be an indicator for worker dissatisfaction.
- Carefully re-assess plan to use AI in HR. Using AI instead of humans could increase workers’ discontent with the service of the HR dept.

2.1.2.b (Management System, REPEAT) The provisions to monitor and achieve compliance with applicable requirements of the ResponsibleSteel Standard do not yet always use KPIs developed for the criteria of ResponsibleSteel standard.

Surveillance Audit 2025:

Some KPIs have been developed and are monitored.

However, not all RS requirements are covered yet and not all KPIs are used to manage the processes.

OFI remains open.

3.1.1.a (Health and Safety (OH&S) Policy, REPEAT)

The German sites have amended the group OHS policy to accommodate for RS requirements, which is not yet the case for the group policy.

Surveillance Audit 2025:

Situation remains unchanged from initial audit.

OFI remains open.

3.1.1.c (Health and Safety (OH&S) Policy, REPEAT)

The works council and H&S committee were involved in the issue of the latest version of the local H&S policy. However, as it is desirable to have only one OHS policy on group level, it will be necessary that in future the workers (or their representatives, respectively) are consulted when changes are made to the OHS policy (which is a requirement of ISO 45001 as well (clause 5.4)).

Surveillance Audit 2025:

Situation remains unchanged from initial audit.

OFI remains open.

3.2.2.a (OH&S Management System, REPEAT)

Compliance is not organized in such a way that the compliance evaluation itself and the outcome (compliance status) can be more easily demonstrated.

Surveillance Audit 2025:

The site ensures that relevant requirements are effectively implemented through various means, such as committee meetings and site inspections. However, this practice is still not organized in such a way that the compliance evaluation itself and the outcome (compliance status) could be easily demonstrated.

OFI remains open.

4.3.3 (Non-discrimination, REPEAT)

Establish a "consistent logbook" for grievances to get a better overview of incidents and trends.

Surveillance Audit 2025:

A log is maintained for the “speak-up” channel.

Other incidents received via other channels are recorded in the personnel files but there is no “log” which would provide an overview of incidents or allegations of discrimination. The site notes that data protection requirements might restrict the possibilities for recording cases.

OFI remains open.

5.1.4 (Human rights due diligence, REPEAT)

Consider a more active internal and external communication on human rights related topics to relevant stakeholders (especially suppliers and local communities).

Surveillance Audit 2025:

There are plans from the communication and purchasing departments to intensify communications on human rights topics, especially to suppliers, but this is not fully implemented yet.

OFI remains open.

6.1.3. (Stakeholder consultation, NEW):

Systematic stakeholder engagement has been demonstrated, however, the entity might consider further developing the engagement with marginalised groups.

Surveillance Audit 2025:

Systematic stakeholder engagement has been demonstrated, however, the entity might consider further developing engagement with marginalised groups.

New OFI.

6.2.1.c (Grievances and remediation of adverse impacts, REPAET):

Consider programming the website and documents “barrier-free” according to standard WCAG 2.1 und Barrierefreie-Informationstechnik-Verordnung - BITV 2.0

Surveillance Audit:

No progress demonstrated.

OFI remains open.

6.2.5 (Grievances and remediation of adverse impacts, REPEAT)

Corporate level human rights due diligence could be shared more actively with the sites and business lines, so they understand their involvement in these issues.

Surveillance Audit 2025:

There are plans to involve the sites more, but this project is still ongoing.

Work in progress. OFI remains open.

11.1.3.a (Noise and vibration, Krefeld, REPEAT):

The site has not yet established a “noise minimization plan” to explore further opportunities to avoid noise and to protect the workers.

Surveillance Audit 2025

The site reported that there were no noise related grievances by neighbours. Legal threshold limits were met. Still, a documented noise minimization plan was not available.

OFI remains open.

12.1.1 (Water-related context, Krefeld)

Consider collecting the documents related to the site’s area of influence in way which makes it easier to ensure access to them (without so much searching effort).

New OFI

Assurance Panel Declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for Outokumpu Business Line Stainless Europe (Business Area Europe) sites, 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 Outokumpu Business Line Stainless Europe (Business Area Europe) sites.

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 15 March 2024.