

Responsible Steel™ Certified Site



DNV-C575856

Presented to

Outokumpu Business Line Advanced Materials (Business Area Europe)

SITE NAME AND ADDRESS

1. Outokumpu Stainless AB, Avesta Operations, Bergsnäsgatan 11, 774 41 Avesta, Sweden
2. Outokumpu Stainless AB, Degerfors Operations, Bruksparken 2, 693 81 Degerfors, Sweden
3. Outokumpu Stainless AB, Nyby Operations, Nybyvägen 8, SE-644 80 Torshälla, Sweden
4. Outokumpu Nirosta GmbH, Dahlebrück Operations, Volmestr. 69, 58579 Schalksmühle-Dahlebrück, Germany
5. Outokumpu Nirosta GmbH, Dillenburg Operations, Kasseler Straße 100, 35683, Dillenburg, 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, flat, high precision stainless steel products

Any facilities and associated activities that are directly related to steel making or processing, that are on-site or near the site and that have not been included in the certification scope or audit scope

At Outokumpu Stainless AB, Avesta Operations: Suction roll shell blanks (Outokumpu Press Plate and Prefab) is not in scope of this certification)

At Outokumpu Stainless AB, Degerfors Operations: Manufacturing of long products is not in scope of this certification .

CERTIFICATION BODY

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



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 Advanced Materials (Business Area Europe)

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Avesta Operations: Avesta Works (fenced area) – Integrated melt shop, hot and cold rolling, 3 finishing lines, R&D; Avesta Cutting Center and Strömsnäs Pump Station

Degerfors Operations: Fenced area – slab grinding, hot rolling, annealing, cutting to size and pickling of quarto plates

Nyby Operations: Cold-rolling mill (2 Annealing and pickling lines, 1 VKS mill, 2 Cold Rolling Mills, 2 Coil Grinding lines, 1 Plate grinding line, 3 Slitting lines, 2 Cut-to-length lines

Dahlerbrück Operations: 4 Bright annealing lines, 1 Electro-pickling line, 2 Cold rolling mills and a skin pass mill, 1 Tension leveler, Finishing and cutting installations including packaging and logistics, Supporting infrastructure in areas of energy and water neutralization facilities, Hydroelectric installation for own use

Dillenburg Operations: Annealing and Pickling lines for stainless steel, 1 Cold rolling mill and a skin pass mill, Finishing and cutting installations including packaging and logistics, Supporting infrastructure in areas of energy, water, mediums, acid regeneration and water treatment facilities and Regional 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 Advanced Materials (Business Area 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 Advanced Materials (Business Area Europe)
Number of sites Names & location	<u>Individual sites comprising the cluster are:</u> 1. Outokumpu Stainless AB, Avesta Operations Address: Bergsnäsgatan 11, 774 41 Avesta, Sweden Activities and products: Integrated melt shop, hot and cold rolling, R&D Website: Avesta stainless steel plant, Sweden Outokumpu 2. Outokumpu Stainless AB, Degerfors Operations Address: Bruksparken 2, 693 81 Degerfors, Sweden Activities and products: Hot rolling of quarto plates Website: Degerfors Quarto Plate, Sweden Outokumpu 3. Outokumpu Stainless AB, Nyby Operations Address: Nybyvägen 8, SE-644 80 Torshälla, Sweden Activities and products: Manufacturing of stainless steel products including Nickel-based alloys by annealing and pickling, grinding, cold rolling, slitting to width and cutting to length Website: Nyby Stainless steel, Sweden Outokumpu 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations (discontinued)

	Address: Volmestr. 69, 58579 Schalksmühle-Dahlerbrück, Germany Activities and Products: Precision strip production (discontinued) Website: Dahlerbrück stainless steel plant, Germany Outokumpu 5. Outokumpu Nirosta GmbH, Dillenburg Operations Address: Kasseler Straße 100, 35683, Dillenburg, Germany Activities and Products: Cold rolling of flat stainless coils, Precision strip production Website: Dillenburg stainless steel plant, Germany Outokumpu
Certification scope	1. Outokumpu Stainless AB, Avesta Operations The site's facilities and associated activities: • Avesta Works (fenced area): Integrated melt shop, hot and cold rolling, R&D • Avesta Cutting Center (located in less than 3km from Avesta Works area) • Strömsnäs Pump Station (located in less than 3km from Avesta Works area) 2. Outokumpu Stainless AB, Degerfors Operations Degerfors Operations (fenced area): • slab grinding, • hot rolling, annealing, • cutting to size, • pickling of quarto plates. 3. Outokumpu Stainless AB, Nyby Operations Nyby Operations (fenced area), cold rolling mill • 2 Annealing and pickling lines, • 1 VKS mill, • 2 Cold Rolling Mills, • 2 Coil Grinding lines, • 1 Plate grinding line, • 3 Slitting lines, • 2 Cut-to-length lines 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations - Site discontinued and dismantled 5. Outokumpu Nirosta GmbH, Dillenburg Operations Facilities of the site: • Annealing and Pickling lines for stainless steel • Cold rolling mill and a skin pass mill • Finishing and cutting installations including packaging and logistics • Regional training center • 1 Bright annealing line • 1 Cold rolling mill • 1 Tension leveler • Finishing and cutting installations including packaging and logistics

	Supporting infrastructure in areas of energy, water, mediums, acid regeneration and water treatment facilities
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 AB, Avesta Operations Stage 1 audit: 3,5 days offsite (5th – 8th December 2022) Stage 2 audit: 5 days on-site (13th – 17th March 2023) Surveillance Audit: Stage 1 audit: 1 day offsite (15th April 2025) Stage 2 audit: 3 days onsite (20th-22nd May 2025) 2. Outokumpu Stainless AB, Degerfors Operations Stage 1 audit: 1,5 days offsite (1st & 7th December 2022) Stage 2 audit: 2.5 days on-site (17th & 20-21st April 2023) Surveillance Audit: Stage 1 audit: 0,5 day offsite (16th April 2025) Stage 2 audit: 1 day onsite (17th June 2025) 3. Outokumpu Stainless AB, Nyby Operations Stage 1 audit: 1,5 days offsite (12th & 14th December 2022) Stage 2 audit: 2,5 days on-site (17th & 18th – 19th April 2023) Surveillance Audit: Stage 1 audit: 0,5 day offsite (16th April 2025) Stage 2 audit: 1 day onsite (18th June 2025) 4. Outokumpu Nirosta GmbH, Dahlebrück Operations

	Initial Audit: Stage 1 audit: 2 days offsite (16th – 18th January 2023) Stage 2 audit: 2 days onsite (27th – 28th June 2023) Surveillance Audit: Stage 1 audit: 0,5 days offsite (23rd April 2025) Stage 2 audit: 0,25 day offsite (11th June 2025) 5. Outokumpu Nirosta GmbH, Dillenburg Operations Stage 1 audit: 2 days offsite (19th – 20th January 2023) Stage 2 audit: 2 days onsite (29th – 30th June 2023) Surveillance Audit: Stage 1 audit: 1,5 days offsite (22nd – 23rd April 2025) Stage 2 audit: 3,75 days onsite (10th – 13th June 2025)
Number of auditors and audit days	1. Outokumpu Stainless AB, Avesta Operations, and 2. Outokumpu Stainless AB, Degerfors Operations, and 3. Outokumpu Stainless AB, Nyby Operations 1 Lead auditor Auditor/s: N/A 1 Technical expert 1 Translator: DNV Sweden Surveillance audit: 1 Lead auditor: DNV Sweden Auditor: GHG Principle Technical Expert/s: none Translator/s: none 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations, and 5. Outokumpu Nirosta GmbH, Dillenburg Operations Initial Audit: 1 Sr. Lead Auditor Co-Auditor Technical Expert/s: none Translator/s: none Surveillance Audit 1 Sr. Lead Auditor
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 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 be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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

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

Overview of the certification process

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



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

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

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

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

Site information

Country and town	1. Outokumpu Stainless AB, Avesta Operations Address: Bergsnäsgatan 11, 774 41 Avesta, Sweden Activities and products: Integrated melt shop, hot and cold rolling, R&D Website: Avesta stainless steel plant, Sweden Outokumpu
Activities and products	2. Outokumpu Stainless AB, Degerfors Operations Address: Bruksparken 2, 693 81 Degerfors, Sweden Activities and products: Hot rolling of quarto plates Website: Degerfors Quarto Plate, Sweden Outokumpu 3. Outokumpu Stainless AB, Nyby Operations Address: Nybyvägen 8, SE-644 80 Torshälla, Sweden Activities and products: Manufacturing of stainless steel products including Nickel-based alloys by annealing and pickling, grinding, cold rolling, slitting to width and cutting to length Website: Nyby Stainless steel, Sweden Outokumpu 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations (discontinued) Address: Volmestr. 69, 58579 Schalksmühle-Dahlerbrück, Germany Activities and Products: Precision strip production (discontinued) Website: Dahlerbrück stainless steel plant, Germany Outokumpu 5. Outokumpu Nirosta GmbH, Dillenburg Operations Address: Kasseler Straße 100, 35683, Dillenburg, Germany Activities and Products: Cold rolling of flat stainless coils, Precision strip production Website: Dillenburg stainless steel plant, Germany Outokumpu
Year site opened	1. Outokumpu Stainless AB, Avesta Operations In 1924 the first stainless steel melt was produced in Avesta. Duplex stainless steel was invented in Avesta in 1930. That heritage continues today in a facility housing a melt shop, hot rolling mill, cold rolling mill and finishing lines, and its vital Group R&D centre. In 2002 AvestaPolarit became a wholly owned subsidiary of Outokumpu, and in year 2004 AvestaPolarit changed its name to Outokumpu Stainless.
Major extensions and / or refurbishments and year(s) when these occurred	Acid Regeneration Plant was built in 2011 which helps recovery of acid and solvents and reduces nitrate emissions. Central production unit for compressed air was built in years 2018-2023.

	2. Outokumpu Stainless AB, Degerfors Operations Degerfors Mill (Degerfors Järnverk) was founded in 1660 by George Camitz. During a long history of the site, many extensions and refurbishments have been completed. Quarto Plate has gone through several transformations. Degerfors Hot Rolling mill site main investments dated between 2009 and 2013, e.g., New High Bay storage building with automatic plate-packing and dispatch hall and new pre-heating furnace, new batch-furnaces, new quench, new cold plate leveler, cooling beds and process-control systems. 3. Outokumpu Stainless AB, Nyby Operations 1829: First Swedish plate rolling mill founded at Nyby, 1945: Production concentrated on stainless steel, 1955: First Sendzimir mill in Europe, 1981 Melt shop closed at Nyby. Hot rolling concentrated to Avesta, 2001: CR 1500 mm wide Focus on special grades & special products (<10%) 2009: Investments to double special grade capacity, 2012: approximately 70% special grade sales Nyby Operations is fully owned by Outokumpu since 2003. 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations The production site was established in Dahlerbrück 300 years ago with stainless steel production since 1952. Main extensions and refurbishments: • 20-roll 250 mm roll stand, installed in 1953, disassembled in 2018 • 20-roll 650 mm roll stand, installed in 1980 with latest refurbishment in 2012 • 20-roll 480 mm roll stand, installed in 2004 • Skin-pass-mill, installed in 1992 with latest refurbishment in 2008 • Tension leveller, installed in 1992 with latest refurbishment in 2008 • Pickling line, installed in 1956 with latest refurbishment in 2011 • BAL 1-4, installed in 1979-1988, with latest refurbishments in 2015 • BAL 5-10, installed in 1972-2000, disassembled in 2020 • Slitters 1-4, installed 1975-1979, with latest refurbishments in 2018 • Edge roundings 1-2, installed in 1979 with latest refurbishments in 2000. • MEMA Spooler, installed in 1992 with latest refurbishments in 2012 • The site has been closed 31.12.2024. Certain equipment has been transferred to Outokumpu's Dillenburg site. Buildings with related facilities (production facilities, storage facilities, office space, canteen etc.) at the site were built during 1900-1990.
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	5. Outokumpu Nirosta GmbH, Dillenburg Operations Founded as “Stahlwerke Südwestfalen” in 1958: HAPL 1350; Slitting Line 1300-1; Cut to length line 1300, Extension I 1963-1965: Grinding line 1350; Skin Pass Mill 1500; Coil Build up line; HAPL 1550; Sendzimir 1300, Extension II 1969-1971: Sendzimir 1500; Slitting Line 1500; BAL 1550, Extension III 1987-2000: Slitting Line 1300-2; Sundwig Cold Rolling Mill; Slitting Line 1300-3; Tension Leveller; BAL 1350; Cut to length line 1500, Optimization & Roll Grinding Shop 2001-2012: Grinding Machine Capco 1; Grinding Machine Capco 2; Grinding Machine Capco 3, Further Extensions: 2003 Locker Room; 2004 Dispatch Hall; 2012 Skin Pass Mill 1600; 2020 Slitting Line 650; 2020 Packaging Line. 2024-25: Transfer of equipment from the closed site Dahlerbrück to the Outokumpu Dillenburg site
Annual production	1. Outokumpu Stainless AB, Avesta Operations Production (year 2022): Melt shop (crude steel): 380 461 tons, (382 440 tons in 2024) Hot Rolling: 337 743 tons (328 488 tons in 2024) KBR (cold rolling): 157 000 tons (129 532 tons in 2024) 2. Outokumpu Stainless AB, Degerfors Operations Degerfors Operations annual plate-production (year 2022) was 86 000 tons (76 507 tons in 2024) 3. Outokumpu Stainless AB, Nyby Operations The mill has a production capacity of 80 000 tons (when fully manned), production volume for the year 2022 was 53 000 tons (52 251 tons in 2024) 4. Outokumpu Nirosta GmbH, Dahlerbrück Operations The production volume in 2022 was 12 600 tons (site closed in 2024) 5. Outokumpu Nirosta GmbH, Dillenburg Operations Total production in 2022 was 145 000 tons (102 500 tons in 2024)
Number of employees and contractors	1. Outokumpu Stainless AB, Avesta Operations Total employees: 1060 1040 Own Full time employees: 750 738 (men: 570 561 and women 180 177) Own Part-time employees: 25 17 (men: 25 12 and women: 0 5) Contractors: 285 (men: 238 and women: 47) 2. Outokumpu Stainless AB, Degerfors Operations Total employees: 378 376

	Own Full time employees: 349 362 (men: 307 317 and women: 42 45) Own Part-time employees: 4 (men: 4 and women: 0) Contractors: 25 10 (men: 23 10 and women: 2 0) 3. Outokumpu Stainless AB, Nyby Operations Total employees: 314 268 Own Full time employees: 276 243 (men: 242 207 and women: 34 36) Own Part-time employees: 2 0 (men: 2 0 and women: 0) Contractors: 36 25 (men: 26 20 and women: 10 5) 4. Outokumpu Nirosta GmbH, Dahlebrück Operations Total employees: 167 0 Own Full time employees: 155 0 (men: 147 0 and women: 8 0) Own Part-time employees: 3 0 (men: 0 and women: 3 0) Contractors: 9 0 (men: 7 0 and women: 2 0) Site closed 5. Outokumpu Nirosta GmbH, Dillenburg Operations Total employees: 611 587 Own Full time employees: 577 555 (men: 548 521 and women: 29 34) Own Part-time employees: 9 12 (men: 3 2 and women: 6 10) Contractors: 25 20 (men: 21 16 and women: 4 4)
Carbon reduction target	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 reports for the past 5 years can be accessed via this link. • Sustainability performance is presented publicly in Outokumpu 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 have been identified according to the ResponsibleSteel Assurance Manual, and their contact details have been provided to the certification body. In total, 135 external stakeholders' representatives have been identified as relevant to the sites in this cluster as shown in Table 1. Stakeholders were approached by email and/or telephone to solicit their input on the audit in both English and 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.

The number of interviewed external stakeholders and the groups they represent are mapped in Table 1. It was noted that authorities in Scandinavia were not comfortable to join the voluntary and confidential process, based on their legal status.

Table 1. Identified (and interviewed) group of external stakeholders for Avesta, Degerfors, Nyby, Dahlerbrück and Dillenburg sites.

Stakeholder Group	Outokumpu Stainless AB, Avesta Operations	Outokumpu Stainless AB, Degerfors Operations	Outokumpu Stainless AB, Nyby Operations	Outokumpu Nirosta GmbH, Dahlerbrück Operations <i>Site closed</i>	Outokumpu Nirosta GmbH, Dillenburg Operations
Academics	1 (0) 1 (1)	4 (0) 4 (0)	2 (1) 2 (0)	0 0	5 (0) 5 (1)
Civil society organisations (operating at local, regional, national, or global level)	3 (0) 3 (0)	6 (0) 4 (0)	0 2 (0)	1 (0) 0	1 (0) 2 (1)
Labour unions	4 (4) 4 (4)	4 (4) 4 (4)	3 (3) 4 (3)	3 (1) 0	3 (1) 3 (1)
Local communities (including their formal and informal representatives, and indigenous peoples)	1 (1) 1 (0)	4 (2) 2 (1)	1 (1) 1 (0)	11 (0) 0	2 (0) 2 (0)
Marginalised groups	0 0	0 0	0 0	0 0	1 (0) 5 (0)

National or local government authorities	10 (5) 9 (0)	5 (2) 2 (0)	4 (2) 4 (0)	9 (0) 0	10 (0) 10 (0)
Emergency response	0 0	0 0	0 0	2 (0) 0	3 (0) 3 (0)
Industrial and Commercial Neighbours	0 1 (1)	0 0	0 0	1 (0) 0	6 (0) 5 (0)
Media	0 0	1 (0) 1 (0)	1 (0) 0	1 (0) 0	1 (0) 2 (0)
Religious leaders	0 0	1 (0) 1 (0)	1 (0) 1 (0)	0 0	0 0
Politicians	1 (0) 1 (0)	4 (0) 2 (0)	1 (0) 2 (0)	1 (0) 0	3 (0) 6 (0)
Others	1 (0) 1 (0)	1 (0) 7 (0)	2 (0) 0	2 (0) 0	3 (0) 3 (0)
Total	21 (10) 21 (6 interviewed)	30 (8) 27 (5 interviewed)	15 (8) 15 (3 interviewed)	31 (1) 0 interviewed)	38 (1 interviewed) 46 (3 interviewed)

The perception of external stakeholders interviewed about the Scandinavian sites and how they manage sustainability in their activities was mostly positive. Some of the interviewed stakeholders mentioned that communication has improved during the latest years. Though some of the stakeholders would like to have more active cooperation and communication, and cooperation e.g., on environmental protection could be improved with sites and local organizations. On the other hand, Outokumpu sites are the biggest private employers in their areas, and in this role, they have 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. Unions have strong role, and they are part of the monitoring process of company's compliance with legal requirements.

Overall, Outokumpu's Scandinavian sites are 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.

For the smaller sites Dählerbrück and Dillenburg in Germany, stakeholder coverage was somewhat limited, as the feedback from external stakeholders was zero.

Stakeholders being reluctant to contribute to the audit has been noted in other sustainability audits in that country before.

However, the audit team was able to interview union representatives. Their overall feedback was positive, although they are also concerned 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 sites' audit in Sweden, the total number of workers (including full- and part-time as well as contract workers) was for 1060 at Avesta, 314 at Nyby, and 378 at Degerfors. Guided by the ResponsibleSteel Assurance manual, Worker interviews were conducted in 4 groups (1x3, 3x4 persons) and 15 individuals) at Avesta, 3 groups (2x3, 1x4 persons) and 8 individuals) at Nyby, and 3 groups (2x3, 1x4 persons) and 9 individuals at Degerfors. In total 67 workers (48 men and 19 women) were interviewed at sites in Sweden, including production, maintenance, warehouse, other cross-sectional areas.

On the other hand, the number of workers (including full- and part-time as well as contractors) at the time of audit was 155 at Dahlerbrück and 611 at Dillenburg. Guided by the ResponsibleSteel Assurance Manual, and worker interviews were also conducted in 4 groups (3x3, 1x4 persons) and 8 individuals at Dahlerbrück and 4 groups (3x3, 1x4 persons) and 12 individuals at Dillenburg. The auditors selected the groups of people to be interviewed on the basis of an anonymous staffing plan (employee roster). A total of 46 employees were interviewed, including production, maintenance, warehouse, other cross-sectional areas. 39 men and 7 women were interviewed, covering employees and contractor workers.

Many of the workers have long history with the sites, and they have clear views how the development has been. As a concern, however, many of the workers mentioned shortage of resources and high workload for some employees. This causes stress and several risks for workers' wellbeing.

Positive findings of the worker interviews were their commitments to Outokumpu as an employer, and common opinion of good colleagues and good working atmosphere. Internal communication is on a good level and active in many ways, though social aspects could be highlighted and discussed more on these occasions.

Surveillance audit 2025

Avesta, Nyby and Degerfors

Stakeholders were contacted by emails and phone. For Avesta, there were three attempts made to contact each stakeholder between 5–19 May, following up with two reminder emails and phone calls for those who did not respond. All communications, including the survey, were sent from DNV email address. For Degerfors/Nyby, the same approach was used during the period of 2–16 June.

Due to absences on both sides, it was difficult to reach stakeholders, and there were delays in communications from all parties. After several reminders, most stakeholders responded that they did not have time to respond or had no opinion to express. For employees and employee representatives i.e. unions, the opinions expressed are consistent with the interviews from previous audits.

Worker interviews were conducted across 2 groups (of 3-4 persons) and an additional 9 individual interviews at Avesta, 1 group (4 persons) and 6 individuals at Nyby, and 1 group (4 persons) and 7 individuals at Degerfors. In total 37 workers (27 men and 10 women) were interviewed at sites in Sweden, including production, maintenance, warehouse, other cross-sectional areas.

Many of the workers have long history with the sites, and they have clear views regarding the development of the site, especially positive improvements concerning safety and the working environment. Workers feel that safety and the work environment are prioritized more and have improved, as more personnel are available in this area and that safety is discussed every day. During the interviews, it was pointed out that certain work areas need to be addressed (such as dust and noise) and that the response times for corrective actions and improvement measures within the work environment are sometimes too long. There were also opinions that production can, on occasion, take precedence over safety/work environment.

Concerning environmental work, more information is now available concerning overall efforts, with workers indicating that they receive monthly information. Workers feel that they already do what they can to support in this area, however top management need to manage investments more efficiently. There are many local safety representatives appointed by the workers and the collaboration within the company between unions and management works well.

Dillenburg

Stakeholders were contacted by email and some additionally by phone, however there were limited responses from stakeholders expressing interest in or otherwise taking part in the stakeholder consultation. Therefore, only three external stakeholders were interviewed for the Dillenburg site. Feedback from external stakeholders was consistently positive. No concerns were expressed.

At the time of the audit, the number of workers (including full- and part-time workers and contractors) was 587. Guided by the ResponsibleSteel Assurance Manual, worker interviews were also conducted in 3 groups (2x4 & 1x2 persons) and then an additional 7 individual interviews at Dillenburg. The auditor selected the groups of people to be interviewed on the basis of an anonymous staffing plan (employee roster). A total of 17 workers were interviewed, including production, maintenance, warehouse, other cross-sectional areas. 12 men and 5 women were interviewed, covering employees and contractor workers.

Workers mentioned that they are concerned about the difficult economic situation (including the decision for short work and organisational changes and they would like having more direct contact with the site manager.

Summary of audit findings

Conform	Conformity, the requirement is fulfilled.
Opportunity for improvement (OFI)	The respective requirement or criterion has been implemented, but effectiveness or robustness might be increased, or it is a situation that could lead to a future non-conformity if not addressed.

Minor non-conformity (NC)	Isolated, unusual or non-systemic lapse. Or a lapse with limited temporal and organisational impacts. A non-conformity that does not result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. Sites can become certified with minor non-conformities, but they must have addressed them by the time of their next audit.
Major non-conformity (NC)	A non-conformity that, either alone or in combination with further non-conformities, results in or is likely to result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. For example, non-conformities that continue over a long period of time, are systemic, affect a wide range of the site's production or of the site's facilities. Sites with major non-conformities cannot be certified.
Exclusion	The requirement is either not applicable : excluded from the audit since it is not applicable to the sites; or not rated : the requirement is very closely linked to another requirement where a non-conformity (NC) or opportunity for improvement (OFI) has already been raised. Sometimes, when requirements are linked to one and the same subject-matter, it is appropriate to count NCs or OFIs only once to avoid repetition.

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Principle 1. Corporate Leadership (11)					
Criterion 1.1: Corporate Values and Commitments (6)	6 6	0	0	0	0
Criterion 1.2: Leadership and Accountability (5)	4 5	1 0	0	0	0
Principle 2. Social, Environmental and Governance Management Systems (29)					
Criterion 2.1: Management System (5)	3 3	1 1	1 1	0	0
Criterion 2.2: Responsible Sourcing (5)	5 5	0	0	0	0
Criterion 2.3: Legal compliance and signatory obligations (6)	6 6	0	0	0	0
Criterion 2.4: Anti-Corruption and Transparency (8)	4 6	2 0	1 1	0	1 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)	6 7	3 3	1 0	0	0
Criterion 5.3: Leadership and worker engagement on OH&S (9)	9 8	0	0 1	0	0
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	2 2	0	0	0	6 6
Criterion 5.5: Safe and healthy workplaces (5)	3 3	0	1 1	0	1 1
Criterion 5.6: OH&S performance (2)	2 2	0	0	0	0
Criterion 5.7: Emergency preparedness	4 5	1 0	1 1	0	0

and response (6)					
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)	8 7	1 1	0 1	0	0
Criterion 6.4: Association & collective bargaining (12)	11 10	0 1	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)	4 4	0 1	1 0	0	0
Criterion 6.7: Communication of terms of employment (5)	4 5	1 0	0	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 3	2 1	1 1	0	0
Criterion 7.2: Security practice (9)	7 8	1 0	1 1	0	0
Criterion 7.3: Conflict-affected and high-risk areas (5)	0	0	0	0	5 5
Principle 8. Stakeholder Engagement and Communication (29)					
Criterion 8.1: Stakeholder engagement (10)	5 6	3 3	2 1	0	0
Criterion 8.2: Grievances and remediation of adverse impacts (12)	7 8	4 3	1 1	0	0
Criterion 8.3: Communicating to the public (7)	7 7	0	0	0	0
Principle 9. Local Communities (27)					
Criterion 9.1: Commitment to local communities (8)	2 3	0	6 6	0	0
Criterion 9.2: Free, Prior & Informed Consent (3)	0	0	0	0	3 3
Criterion 9.3: Cultural heritage (7)	0	0	4 4	0	3 3
Criterion 9.4: Displacement and Resettlement (9)	0	0	0	0	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 7	1 0	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 11	2 0	1 0	0	0
Criterion 10.7: Site-level GHG or CO2 emissions reporting and disclosure (8)	1 6	0	5 0	0	2 2
Principle 11. Noise, Emissions, Effluents and Waste (35)					
Criterion 11.1: Noise and vibration (7)	5 6	1 0	1 1	0	0
Criterion 11.2: Emissions to air (8)	4 5	1 2	3 1	0	0
Criterion 11.3: Spills and leakage (9)	6 8	0	3 1	0	0
Criterion 11.4: Waste, by-product and production residue management (11)	10 10	0	1 1	0	0
Principle 10. 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)	6 7	0	1 0	0	1 1
Criterion 12.3 Water-related adverse impact (6)	3 6	3 0	0	0	0
Criterion 12.4 Managing water issues (8)	2 5	4 1	2 2	0	0
Principle 13. Biodiversity (25)					
Criterion 13.1: Biodiversity commitment and management (25)	13 13	0	0	0	12 12
Principle 4. Decommissioning and closure (14)					
Criterion 4.1: Decommissioning and closure (14)	0 0	0	0	0	14 5
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (367)	224 261	35 20	48 35	0 0	60 51

* 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	Neither the audited sites nor any other Outokumpu Business Area Europe sites are located in conflict-affected and high-risk areas. However, the same principles and practices on anti-corruption apply to all Outokumpu sites regardless of their location.
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.
5.4.3.a-c 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.
5.4.4.b Support and compensation for work-related injuries or illness	Avesta, Degerfors and Nyby operations (in Sweden): Based on the legislation in Sweden, it is up to the individual to apply the compensation via Försäkringskassan, AFA or the labor unions. It is not a direct duty for Outokumpu to pay for the compensation. Compensation is managed by the social security system and the records on claims and results are respectively kept by the organizations receiving and handling the claims. There is information provided by Outokumpu to Försäkringskassan and other involved parties (HR & payroll services covering all Swedish sites).

# of requirement	Reason for exclusion
	Dahlebrück and Dillenburg 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".
5.4.4.c Support and compensation for work-related injuries or illness	In Sweden , the compensation topics are not dealt with directly by Outokumpu but via insurance practices as defined by legislation. Also in Germany , the compensation topics 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 BGHM.
5.5.3 Safe and healthy workplace	There is no on-site housing at the audited sites.
6.4.2 Provide for alternative means if freedom of association and collective bargaining is restricted by law	In Sweden, National law does not restrict workers' organizations. Also, 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	There is no request from workers for such as the central collective bargaining agreement provides a framework the salary levels. In Germany and Sweden, this is a procedure handled through collective bargaining process, based on the bargaining process between the stakeholders in the labour market.
7.3.1 a-c Conflict-affected and high-risk areas	Audited sites are located in Germany and Sweden which are not CAHRA countries. 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 Group function Ethics & Compliance and implemented via related instructions and procedures for group functions and sites.
7.2.2c-a	There is no need for extensive measures to ensure security of people, property and assets based on location and the circumstances in the local community
7.3.2 Conflict-affected and high-risk areas	As per 7.3.1. a-c sites are located in countries which are not CAHRA countries. Moreover, this criterion is not directly applicable, as sourcing is a central (group) function, not performed at the sites.

# of requirement	Reason for exclusion
9.2 Free, Prior and Informed Consent (FPIC)	There are no indigenous people around the audited sites, based on the geographical location and demographic profile of the local community.
9.4 Displacement and Resettlement	Neither physical nor economic displacement of communities is being considered at the audited sites.
10.3.3	There is no crude steel manufacturing at Nyby, Degerfors and Dillenburg.
10.7.1. 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.
10.7.1. 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-e 13.1: Biodiversity commitment and management	There are no such areas as world heritage sites, protected areas of the IUCN protected area management categories I-VI and conservation areas protected under national or local law, Indigenous and community-conserved areas (ICCAs), RAMSAR sites or key biodiversity areas close to the audited sites.
13.1.4.a-d 13.1: Biodiversity commitment and management	No critical habitats have been identified close to the sites or are covered in the environmental permit application (or current permit)
13.1.5 13.1: Biodiversity commitment and management	No world heritage sites, Ramsar sites or IUCN category I-VI sites have been identified at the audited sites or close to them.
13.1.6	No world heritage sites, Ramsar sites or IUCN category I-VI sites have been identified at the audited sites or close to them

# of requirement	Reason for exclusion
13.1: Biodiversity commitment and management	
Principle 4 Decommissioning and Closure	Applicable only to Dahlerbrück site, which has been closed since 31.12.2024.

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

Avesta: Increased safety focus and improvements by adding more resources in EHS (working environment engineering) resulting in good cooperation with shop floor

Degerfors, Nyby, Avesta:

- There is now a better understanding of ResponsibleSteel scheme and increased degree of maturity in integrating ResponsibleSteel in the Quality Management System
- Collaboration is good and systematic between employees and employer. Workers feel included and get information regularly

Dillenburg:

- On the occasion of transferring machinery from the closed site Dahlerbrück, the site has been refurbished,
- The entity provides vocational training not only for its own apprentices but offers this education also for other companies in the region,
- Vocational training is offered each year (not sporadically as other companies may do),
- The entity has a relationship with the workers representatives, which they described as cooperative.

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 35 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:

2.1.2.a (Management system, Degerfors operations): Various risk types are covered via certified ISO 9001 and ISO 14001 management system practices. In addition, workers' wellbeing and other OH&S related topics are covered via management system that is aligned with ISO 45001. ISO management review twice a year including a wider risk and opportunity aspects. Risk assessments do not cover comprehensively ResponsibleSteel requirements (the site's main social, environmental and governance risks and adverse impacts). It is not fully assessed how to prevent and mitigate these impacts.

Surveillance 2025:

A pilot for a stakeholder review evaluation process is running and will be completed during 2025. This will be a tool for local management concerning systematic control and evaluation of relevant stakeholders. During the audit, Degerfors presented a macro excel which will be used to cover the stakeholder investigation and analysis on a yearly basis yearly. This change is the result of a corrective action for the Degerfors site from the previous audit. The time scheduled for full release of this excel is expected for 2026.

Corrective action in progress, not finished – Minor NC remains open

2.4.6 (Anti-Corruption and Transparency, All sites): Publication of recipients of donations and contributions to organisations is on group level only, not on site level, as required by this criterion

Surveillance audit 2025

Minor NC closed for Avesta, Nyby and Degerfors - Process is in place and is documented. A proposal for a process description with application and decision-making activities has been developed and will be decided on at an overall Group level. The amount of sponsorship per site is public on website.

<https://www.outokumpu.com/en/news/2019/outokumpu-stoder-23-ideella-projekt-i-sverige>

Minor NC remains open for Dillenburg. Repeat finding

2.5.1. (Competence and awareness, Avesta operations): At the site level roles and responsibilities in RS management system (Principles 1., 2., 6., 7., 8.) are not clarified. Many of the manager roles and responsibilities are described in Avesta, and skills matrix available, but the connection to the RS management system is lacking.

Surveillance audit 2025:

System updated, Responsible Steel (doc nr 6330), role description for senior Sustainability engineer added.

Minor NC closed

5.2.2.e. (OH&S Management System, Avesta operations): Material Safety Data Sheets (MSDS) are not known by the workers, and not found from the site system.

Surveillance audit 2025:

Several trainings performed, sampling in production show effectiveness in this area, sampling in training system. Evidence: Training records, competence matrix, interviews. **Minor NC closed**

5.5.1. (Safe and healthy workplace, Avesta, Degerfors and Nyby 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 in 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:

Avesta/Degerfors: Due to interviews this problem is solved with the new local organization (purchasing). Evidence: Interviews with employee, safety representative, workers, maintenance staff. **Minor NC closed**

Nyby: Issue not fully resolved. **Minor NC remains open**

5.7.2. (Emergency preparedness and response, Nyby operations): Though several precautionary procedures, there have been 5 fire incidents recorded during 1.1.-19.4.2023 time period. There is a site target to get less than last year, and it is not now achieved. Systematic analyses are needed and more effective actions to be taken to reach the target and minimize the risk of fire.

Surveillance audit 2025:

Corrective actions are effective. A new site target is set for 2025 to fulfil planned activities in related areas. The fire committee is regularly part of the safety committee. **Minor NC closed**

5.7.3. (Emergency preparedness and response, Nyby operations): Due to interviews with employees and safety representative that not all emergency preparedness and response procedures are regularly tested with workers. For example, chemicals: the company handles large quantities of hazardous chemicals but does not regularly test the emergency plan and evaluate the results. **New Minor NC raised**

6.3.5. (Non-discrimination, Dillenburg): The site's program to promote inclusion, workforce diversity, gender equality and to create a non-discrimination culture among workers is not fully effective, as in an isolated case, sexualized depictions of women were observed in a team room. **New Minor NC raised**

6.5.1 (Disciplinary Practices, all sites): Minor NC: However, 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:

Human Rights Policy updated according to the requirement, Draft 19.5.2025 version includes the sentence according to the Responsible Steel requirement. Will be published during the year 2025, not yet approved.

Minor NC remains open

6.6.2. (Hearing and addressing workers concerns, Avesta 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:

Knowledge of this is spread throughout the organization, including the introductory training. This was verified in the interviews during audit, sampling in production. **Minor NC closed.**

6.8.1.a-c (Remuneration, Outokumpu Nirosta GmbH's sites): The site(s) have not provided a public remuneration policy.

Surveillance audit 2025:

Outokumpu has decided to issue a group policy, rather than each site issuing its own site-specific policy. A group level policy was available as draft only. It is not yet publicly available. **Minor NC remains open.**

6.9.1.a-d (Working time, Outokumpu Nirosta GmbH's sites): The organization/site(s) did not provide a public policy on fatigue management.

Surveillance audit 2025:

Outokumpu has decided to issue a group policy, rather than that each site issuing its own site-specific policy. A group level policy was available as draft only. It is not yet publicly available. **Minor NC remains open.**

7.1.2. (Human rights due diligence, all sites): Human rights due diligence has been conducted on group level. Sites level efforts are "anecdotal". The sites have not demonstrated appropriate involvement/participation in the process to systematically assess potentially affected rights holder group (e.g. gender, disabled persons).

Surveillance audit 2025:

Dillenburg: Work in progress. **Minor NC remains open.**

Avesta: Personal handbook includes processes for this with connection to Outokumpu SDD ESGs, verified by interviews with employee representatives. Outokumpu SDD ESGs Validation, 12.12.2024 slide deck, presentation. Salient human rights impacts in Outokumpu's upstream supply chains. Outokumpu own operations HRIA summary (3.10.2024). **Minor NC closed.**

Nyby: : Included into environmental analysis, personal handbook. **Minor NC closed.**

Degerfors: Degerfors is running as the pilot site for the implementation of improved stakeholder engagement: part of this will improve governance awareness for risk assessment purposes. **Minor NC closed.**

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

Surveillance audit 2025:

Avesta/Nyby/Degerfors/Dillenburg: corrective actions ongoing but not fully completed. **Minor NC remains open.**

8.1.3. (Stakeholder consultation, Outokumpu Nirosta GmbH's sites): A systematic approach for consulting with stakeholders and their representatives on accessible, culturally appropriate and inclusive methods of engaging them has not yet been demonstrated.

Surveillance audit 2025:

Dillenburg: Finding remains unchanged from initial audit. **Minor NC remains open.**

8.1.4.a (Stakeholder engagement plan, Outokumpu Nirosta GmbH's sites): A documented stakeholder engagement plan is not yet in place.

Surveillance audit 2025:

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

8.2.1.b (Grievances and remediation of adverse impacts, Outokumpu Nirosta GmbH's sites): 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:

Test of the external SpeakUp channel did not show an improvement. A new technical platform will be used in the future which will accommodate for this criterion. **Minor NC remains open. Repeat finding.**

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

Surveillance audit 2025:

Certain measures that the site's management have taken or supported were demonstrated during the audit. However, a documented plan to implement its commitment to maintaining or improving the social and economic well-being of local communities was not yet in place. **Minor NC remains open.**

9.1.2.d (Commitment to local communities, Outokumpu Nirosta GmbH's sites): It has not been demonstrated that marginalised groups have been identified and 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:

Dillenburg: The site demonstrated support marginalized groups (e.g. to a local Children's home, Albert Schweitzer Kinderheim). However, a documented plan to implement its commitment to maintaining or improving the social and economic well-being of local communities was not yet in place. **Minor NC remains open.**

9.1.2.e (Commitment to local communities, Outokumpu Nirosta GmbH's sites): As there is no plan to implement the site's commitment to maintaining or improving the social and economic well-being of local communities in place, it has not been made publicly available.

Surveillance Audit 2025:

Dillenburg: Finding remains unchanged from initial audit. **Minor NC remains open.**

9.1.3 (Commitment to local communities, Outokumpu Nirosta GmbH's sites): The site has not demonstrated that a plan to implement the site's commitment to maintaining or improving the social and economic wellbeing of local communities is monitored together with local community and local government representatives.

Surveillance Audit 2025:

Dillenburg: Finding remains unchanged from initial audit. **Minor NC remains open.**

9.3.1.a-c & 9.3.2 (Cultural heritage, Outokumpu Nirosta GmbH's sites): 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:

Dillenburg: Finding remains unchanged from initial audit. **Minor NC remains open.**

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:

Compared to the initial certification, Outokumpu has now incorporated in the annual reports (2024) (1) the transition plan for climate change mitigation including GHG reduction targets aligned with SBTi, decarbonisation levers etc...[see page 75], (2) a breakdown of medium-term intensity reduction (tCO₂/tCS) targets to be achieved have they deployed various technologies until 2030 [see page 80]. These targets are broken down and assigned to specific clusters and their respective sites for implementation. **Minor NC closed**

10.7.1.a-b, f (GHG Reporting, all sites): 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:

a-b: The Group function manages procurement, including selection of suppliers. Avesta enters the volumes of raw materials used each month in the Microsoft Sustainability Manager. As witnessed during the stage 2 audit, these data are tracked in Microsoft Sustainability Management System at the site level and reported together with other Scope 3 emission categories at Group level in the annual report [see page 83].

c: Scope 2 emissions for the business' advanced materials are reported in the Annual report 2024, page 83.

f: The Microsoft Sustainability Manager system is used to track and report GHG emission at sites. The sites' data are consolidated at the Group level and reported in the annual report. Emissions are reported in accordance with relevant GHG Protocol standards and are audited by PwC

g. GHG emission intensity per ton of crude steel for the Advanced Materials Business Line (applicable only to Avesta) is published in the 10.7.1 GHG emissions disclosure available at the Outokumpu's website.

11.1.4. (Noise, Emissions, Effluents and Waste, Dillenburg): Regarding noise, the site has not established more stringent targets than meeting legal limits in order to minimize emissions in line with the requirement of criterion 9.1 of the standard (to prevent and reduce adverse impacts from noise and vibration on communities or the environment)

Surveillance audit 2025:

No action demonstrated, **Minor NC remains open.**

11.2.2. (Emissions to air): Dillenburg site has considerations to change to carbon neutral heating, which would consequently also reduce emissions to air. However, these considerations are focussed on CO₂, other adverse emissions to air are not covered by a plan to continually reduce emissions to air.

Surveillance audit 2025:

No action demonstrated, **Minor NC remains open.**

11.2.3.a-b (Emissions to air): Dillenburg site did not demonstrate a systematic approach to fulfil these requirements (Review the site's methods of operation and maintenance and identify potential opportunities to prevent or reduce point-source, diffuse and fugitive adverse emissions to air and analyse the feasibility of the identified opportunities and provides a clear rationale for why prevention and reduction opportunities are taken or not), as only anecdotal activities were shown during the audit.

Surveillance audit 2025:

Technical department conducts weekly review meetings to discuss the condition of the technical equipment, including potential opportunities to prevent or reduce point-source, diffuse and fugitive adverse emissions to air. **Minor NC closed.**

11.3.1.b (Spills and leakage, Dillenburg operations): The preventive maintenance program aimed at preventing spills and leakage is not fully effective, as the regular inspections of structures, equipment and systems ("Gemba walks") failed to identify a clearly visible oil spill, existing for quite a while (the area of the oil tanks at the coil grinding line).

Surveillance Audit 2025:

Dillenburg: The surveillance audit confirmed that this was an isolated case. Cleaning routines have been reviewed and improved. **Minor NC closed**

11.3.2.b (Spills and leakage, Dillenburg operations): Spills and leakage will be managed according to alarm and hazard prevention plan (AGAP), as the plant is a Seveso III site. The AGAP does not yet contain a section covering impacts from remediation of spills and leakage.

Surveillance Audit 2025

Dillenburg: The site's AGAP has been updated and now includes a specific section on water related topics. As the site is a Seveso III site, major spills and leakages will be handled in co-operation with the authorities, which have issued a dedicated alarm plan. Also, mitigation and remediation of impacts from spills and leakage are covered in fire service plans. **Minor NC closed.**

11.3.2.c (Spills and leakage, Dillenburg operations): The site did not demonstrate that in a procedure it is defined how mitigation and remediation progress is quantified where spill or leakage occurred

Surveillance audit 2025:

Permanent monitoring of groundwater is in place, however, this practice is not yet defined in a documented procedure. **Minor NC remains open.**

11.4.4.b (Waste, by-product and production residue management): At Dählerbrück site, the safety of waste containers was not effectively ensured, as 3 of 5 containers were overdue for inspection.

Surveillance audit 2025

Site closed

12.1.1. (Water-related context, Outokumpu Nirosta GmbH's sites): The sites have an understanding of its area of influence. However, the area of influence has not yet been defined in writing.

Surveillance audit 2025:

The water stewardship plan has been reviewed and updated. The areas of influence have been defined and visualized. **Minor NC closed.**

12.2.2. (Water balance and emissions, Nyby operations): Water balance exists for Nyby but there is no indicator on water efficiency as water availability has not been an issue with permit authority, local community or with any other stakeholder.

Surveillance audit:

Water consumption is reported from 2024 into the MSM system. Yearly water consumption reports are presented in the Environmental report done in several years but now also monitored over years. **Minor NC closed.**

12.4.2.e (Managing water issues, Outokumpu Nirosta GmbH's sites): 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:

No action demonstrated. **Minor NC remains open.**

12.4.3. (Managing water issues, Nyby and Degerfors operations)

Nyby: Though several actions are done, the Water Stewardship approach incl. proactive aspect to the management of water related issues and completing the existing measures on water issues would benefit with this regard. This is under consideration but with no concrete actions or timeline defined yet in Nyby.

Degerfors operations: Formal Water Stewardship plan is available for audited OTK business line (cluster). During the audits time (2023), this was in a draft mode but now (2024) formally approved by the OTK's

Surveillance audit:

Nyby/Degerfors

The sites are still in the process of introducing a dedicated water stewardship plan. **Minor NC remains open**

Opportunities 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) Focus on continual improvement of environmental performance, not on compliance with legal/regulatory limits
 - 5) Create a responsibility matrix showing ResponsibleSteel criteria and respective responsibilities on site level/group level.
 - 6) Develop comprehensive documentation of procedures (guidance) and systematic processes for subcontractor acceptance and their sustainability performance monitoring on sites (Avesta, Nyby and Degerfors)
 - 7) Complete the filling of the columns for the commitments of the list of tier 1 suppliers for all existing suppliers (Degerfors operations)
 - 8) At Nyby operations, site level understanding, identification and management on corruption is not systematically developed
 - 9) It has been identified at Avesta, Degerfors and Nyby operations sites that the sites' management have trainings and monitoring of different risks specified, but risk assessment is not comprehensively implemented to the site activities
 - 10) There are several IT tools (RICO, Wave, MIA, etc.) taken into use, but the site level competence of using these systems needs to be improved (Degerfors operations)
 - 11) The German sites have amended the local OHS policy to accommodate for RS requirements, which is not the case for the group policy
 - 12) 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
 - 13) Consider an optimized approach to achieve a higher willingness of external stakeholders to participate in ResponsibleSteel audits (Dillenburg and Dahlerbrück)
 - 14) Compliance is not organized in such a way that the compliance evaluation itself and the outcome (compliance status) can be more easily demonstrated (Dillenburg and Dahlerbrück).
 - 15) Document all emergency drills to be able to demonstrate that all shifts are covered over a certain period (Dillenburg and Dahlerbrück)
 - 16) Establish a "consistent logbook" for grievances to get a better overview of incidents and trends (Dillenburg and Dahlerbrück)
 - 17) Water balance exists for Nyby but there is no indicator on water efficiency as water availability has not been an issue with permit authority, local community or with any other stakeholder. Site efficiency of water use could be more systematically managed and comprehensive (Nyby operations)
- Avesta site's role in the water protection association (vattenvårdsförening) is not very active, and this could be improved to take account stakeholder views in Outokumpu operations

5.1.1.a (Health and Safety (OH&S) Policy, Outokumpu Group, REPEAT

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

Surveillance Audit 2025:

Finding remains unchanged from initial audit. **OFI remains open.**

5.1.1.c (Health and Safety (OH&S) Policy, Outokumpu Group, 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:

Finding remains unchanged from initial audit. **OFI remains open.**

5.2.1.a (OH&S Management System, Dillenburg, REPEAT)

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.

Surveillance Audit 2025:

The project will implement an OHS management system according to ISO 45001, which is taking more time than initially planned, due to the closure of the Dahlerbrück site and the transfer of equipment. Certification is now targeted for 2026. **Work in Progress. OFI remains open.**

5.2.1.d (OH&S Management System, German sites, REPEAT)

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. Dillenburg site wants to switch to ISO 45001 but this project should be finished earlier than originally intended.

Note: KPMG was contracted to facilitate introducing an ISO 45001 certification by an independent certification body within the next 2 years.

Surveillance Audit 2025:

The project will implement an OHS management system according to ISO 45001, which is taking more time than initially planned, due to the closure of the Dahlerbrück site and the transfer of equipment. Certification is now targeted for 2026. **Work in Progress. OFI remains open**

5.2.2.a (OH&S Management System, Dillenburg, 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 will site ensure that relevant requirements are effectively implemented through various means, especially committee meetings and site inspections. However, through this practice the site is still not

organized in such a way that the compliance evaluation and the related outcome (compliance status) can be more easily demonstrated through other means or methods. **OFI remains open**

6.3.3 (Non-discrimination, Dillenburg, 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.**

6.4.3.a (Association and collective bargainin, Avesta operations): According to worker interviews/union representatives, sometimes no information was given before changes were carried out. Neither collaboration nor influence has been possible for the working representatives. Some cases of poor or late information in MBL-process were demonstrated. **New OFI**

6.6.3. (Hearing and addressing workers concerns, Avesta Operations, NEW OFI)

- a) According to worker interviews/union representatives, there is a lack of a robust, systematic method to handle suggestions from groups or individuals when it comes to improving smaller working environment issues or improvements related to the process.
- b) According to worker interviews/union representatives a system is in place for handling and prioritising tasks (identified risks, needed improvements) but for the issues that have been set to lower priority, little or no progress is observed.
- c) Operators want to participate in improvement projects but do not feel involved, e.g. environmental improvements, technical process development.

7.1.4 (Human rights due diligence, Outokumpu Group, 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:

Conformance for Avesta, Nyby and Degerfors

OFI remains open for Dillenburg: There are plans from the communication and purchasing departments to intensify communication on human rights topics, especially to suppliers, but this is not yet fully implemented.

8.1.3. (Stakeholder consultation, Dillenburg, NEW):

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

Surveillance Audit 2025:

Finding remains unchanged from initial audit.

OFI remains open.

8.1.4.a (Stakeholder engagement, Avesta & Nyby) The stakeholder analysis serves as basis for engaging with different stakeholders.

The engagement is currently administered through several documents and procedures with no holistic plan.

The engagement can take various forms from individual requests from neighbours to organized events aimed at a targeted stakeholder group.

Communication plan is done for different business line activities. Engagement and consultation with stakeholders could be more on a regular basis and more systematic related to relevant issues to the stakeholders.

Surveillance audit 2025:

Avesta/Degerfors: A pilot for a stakeholder review evaluation process is running and will be completed during 2025. This will be a tool for local management concerning systematic control and evaluation of relevant stakeholders. During the audit, Degerfors presented a macro excel which will be used to cover the stakeholder investigation and analysis on a yearly basis. This change is the result of a corrective action for the Degerfors site from the previous audit. Avesta and Nyby have implemented other corrective actions and systems which fulfil this requirement, and therefore the action applied at Degerfors does not need to be implemented at Nyby and Avesta. The time scheduled for full release of this excel is expected for 2026. **OFI**

Remains open

Nyby: Activities are ongoing, but need to be completed as described in 4003, (Områdeskommitten, kommunikationsplan), see pilot Degerfors above **OFI Remains open (NC)**

8.1.4.d (Stakeholder Management, Dillenburg, REPEAT)

Consider an optimized approach to achieve a higher willingness of external stakeholders to participate in Responsible Steel audits.

Note: No external stakeholder was willing to participate in the initial audit.

Surveillance Audit 2025:

Situation has slightly improved but still not much interest in participation.

OFI remains open.

8.2.1.c (Stakeholders engagement: Dillenburg and Dahlerbrück operations): Consider to program the website and documents "barrier-free" according to standard WCAG 2.1 und Barrierefreie-Informationstechnik-Verordnung - BITV 2.0

Surveillance Audit 2025:

Dillenburg: **No action demonstrated, OFI remains open**

8.2.5 (Grievances and remediation of adverse impacts, Dillenburg, REPEAT)

Corporate level human rights due diligence could be shared more actively with the sites/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.

11.2.3.b (Emissions to air, Dillenburg, NEW)

Surveillance Audit 2025:

Consider being more detailed in the documentation regarding the rationale concerning whether or not any prevention and reduction opportunities are taken.

New OFI.

11.2.4.a (Emissions to air, Dillenburg, REPEAT)

The site's target levels are the limit values set by the legal documents (permit, technical rules).

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

Surveillance Audit 2025

Due to the transfer of equipment from Dahlerbrück, the Dillenburg site will fall under EU IED. This will lead to a re-evaluation of limit values, with the site planning to consult the applicable BREF document.

OFI remains open.

12.4.4 (Managing water issues, Dillenburg, REPEAT)

Define the specific type of performance indicators to be monitored, in line with the (draft) water stewardship plan - Dillenburg and Dahlerbrück operations).

Surveillance Audit 2025:

No action demonstrated. **OFI remains open.**

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 Advanced Materials (Business Area Europe), 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 Advanced Materials (Business Area Europe).

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**.