

Responsible Steel™ Certified Site



DNV-2023-275783.B

Presented to

ARCELORMITTAL BRASIL S.A.

SITE NAME AND ADDRESS

ArcelorMittal Vega
BR 280 Km11 - Morro Grande
São Francisco do Sul – SC
89240-000
Brazil

CLIENT NAME AND ADDRESS

ArcelorMittal Brasil – Headquarter
Av. Carandaí, 1115 - 16º Andar
Funcionários, Belo Horizonte – MG - 30130-915
Brazil

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

10 March 2023

EXPIRY DATE

9 March 2026

NEXT SCHEDULED AUDIT

April 2024 (TBC)

CERTIFIED SINCE

10 March 2023

CERTIFICATION SCOPE

Design and Manufacturing of Pickled, Cold Rolled and Galvanized steel coils

CERTIFICATION BODY

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



AUTHORISED CERTIFICATION BODY SIGNATURE

A handwritten signature in blue ink, appearing to read 'Juliana Scalón'.

Juliana Scalón, Regional Manager LATAM

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

None

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

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

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



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Annex

ARCELORMITTAL BRASIL S.A.

SITES AND FACILITIES COVERED BY THE CERTIFICATE

ArcelorMittal Vega
BR 280 Km11 - Morro Grande
São Francisco do Sul – SC
89240-000
Brazil

SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

ArcelorMittal Brasil – Headquarter
Av. Carandaí, 1115
16º Andar
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Public summary audit report

This is a concise public summary of the audit report for ArcelorMittal Brazil SA, Vega site. The full version of the audit report is in the possession of the member company and the audited sites.

Audit overview

Member name	ArcelorMittal Brazil SA
Audited entity name	ArcelorMittal Brazil SA, Vega site
Number of sites Names & location	<p>ArcelorMittal Vega is in São Francisco do Sul (SC), 45 km from Joinville, with road access via BR-280. Strategically located in the North Region of Santa Catarina, it is close to the main industrial, automotive, and metal-mechanical centers of the state. The port structure of São Francisco do Sul allows the use of an innovative system of maritime cabotage transport, integrating ArcelorMittal Vega by sea with the ArcelorMittal Tubarão unit, in Espírito Santo - Brazil.</p> <p>The unit occupies an area of 120 thousand m2, part of a plot of 2.2 million m2, which also houses the Private Natural Heritage Reserve (RPPN) with 760 thousand m2, inaugurated in 2002 with the aim of preserving the biological diversity of the region.</p>
Certification scope	<p>Design and Manufacturing of Pickled, Cold Rolled and Galvanized steel coils</p> <p>HOT STEEL LAMINATED COILS: From the stripping of hot rolled coils. They are produced in the pickling line when it is not coupled with the cold strip laminator. The material can be supplied with or without oil.</p> <p>COLD LAMINATED COILS: The cold rolled material is obtained by the box annealing process from the Full-Hard coil, promoting the recovery and recrystallization of the product. After this heat treatment, the material passes through the hardening laminator to adjust the shape, mechanical property, and surface quality. The</p>

	<p>material can be supplied with or without oil, as required by the customer "COATED GALVANIZED COILS:</p> <p>EXTRAGAL (GI): Steel plates with pure zinc coating. Coating weights between 40 and 235 g/m² per face (5.6 to 33 µm). Not exposed (GI-X): The only coated product that can be produced in the two Galvanization lines (1 and 2). Benefits: high resistance to corrosion. The crystalline structure is not visible to the naked eye. The high quality of the surface leads to a finished paint appearance, meeting the most stringent requirements in the industry automotive for exposed body parts.</p> <p>GALLVALLIA (GA): Coating weights between 40 and 75 g/m² per face (5.6 to 10.5 µm).</p> <p>GALVALUME (GL): Coated product produced in the Galvanization line 2. Steel sheets with 55% aluminum, 43.5% zinc and 1.5% silicon coating. Coating weights between (34 to 100g/m²) per face (10 to 26 µm).</p> <p>ALUSI® (AS): Coated product produced in the Galvanization line 2. Obtained by the hot-dip process of the plate in a bath composed of 90% aluminum and 10% silicon. Coating weights between 34 to 100 g / m² per face (12 to 33 µm).</p> <p>USIBOR ®: Aluminium-silicon coated boron steel. Coating thickness: 34 to 100 g / m²) per face (12 to 33 µm).</p>
Standard version audited against	ResponsibleSteel Standard V2-0 – Certified Site
Audit type and outcome	Surveillance Audit
Certification body	DNV BUSINESS ASSURANCE AVALIAÇÕES E CERTIFICAÇÕES BRASIL LTDA
Audit dates	<p>Stage 1: July 29, 2024 to July 30, 2024</p> <p>Stage 2: August 12, 2024 to August 14, 2024</p>
Number of auditors and audit days	<p>Stage 1: 3 days</p> <p>Stage 2: 6 days</p>

	Remote audit preparation and reporting: 3 days Lead auditor: Leandro Augusto Selles Auditor: Luciano Rodrigues Teixeira Auditor: Mebur Bardini
Lead auditor declaration	<p>The findings in this report are based on an objective evaluation of evidence, derived from documents, first-hand observations at the sites and interviews with site staff, workers and stakeholders, as conducted during stage 1 and stage 2 audit activities. The audit team members were deemed to have no conflicts of interest with the sites. The audit team members were professional, ethical, objective and truthful in their conduct of audit activities. The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p> <p>It should be noted that audits are snapshots that rely on sampling. Sampling of interview partners, of documentation and records, of observed operations and activities. The auditors can therefore not exclude the possibility that there are non-conformities in addition to the ones identified during the audit activities.</p>
Next audit type and date	Recertification Audit, March 2026

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Introduction

About ResponsibleSteel

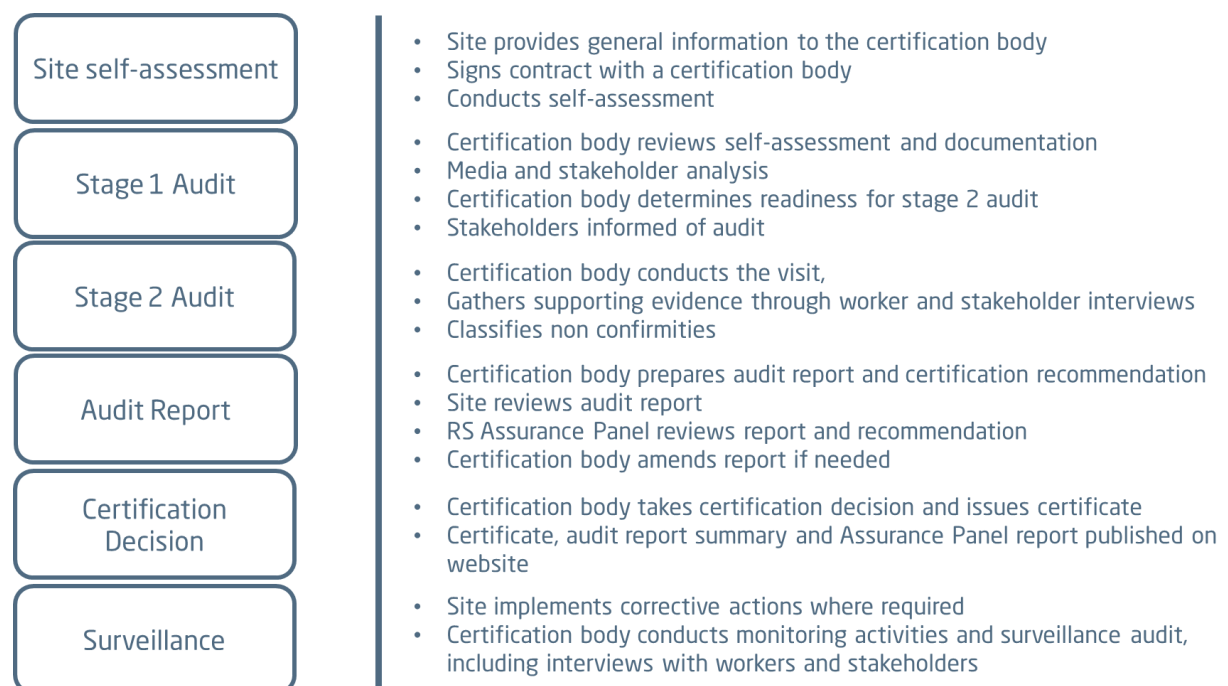
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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

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

Overview of the certification process

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



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

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

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

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

Site information

Country and town	ArcelorMittal Brazil SA, Vega site BR-280, Km 11, São Francisco do Sul – SC
Activities and products	<p>Products:</p> <p>HOT STEEL LAMINATED COILS: From the stripping of hot rolled coils. They are produced in the pickling line when it is not coupled with the cold strip laminator. The material can be supplied with or without oil.</p> <p>COLD LAMINATED COILS: The cold rolled material is obtained by the box annealing process from the Full-Hard coil, promoting the recovery and recrystallization of the product. After this heat treatment, the material passes through the hardening laminator to adjust the shape, mechanical property, and surface quality. The material can be supplied with or without oil, as required by the customer "COATED GALVANIZED COILS:</p> <p>EXTRAGAL (GI): Steel plates with pure zinc coating. Coating weights between 40 and 235 g/m² per face (5.6 to 33 µm). Not exposed (GI-X): The only coated product that can be produced in the two Galvanization lines (1 and 2). Benefits: high resistance to corrosion. The crystalline structure is not visible to the naked eye. The high quality of the surface leads to a finished paint appearance, meeting the most stringent requirements in the industry automotive for exposed body parts.</p> <p>GALVALLIA (GA): Coating weights between 40 and 75 g/m² per face (5.6 to 10.5 µm).</p> <p>GALVALUME (GL): Coated product produced in the Galvanization line 2. Steel sheets with 55% aluminum, 43.5% zinc and 1.5% silicon coating. Coating weights between (34 to 100g/m²) per face (10 to 26 µm).</p> <p>ALUSI® (AS): Coated product produced in the Galvanization line 2. Obtained by the hot-dip process of the plate in a bath composed of 90% aluminum and 10% silicon. Coating weights between 34 to 100 g / m² per face (12 to 33 µm).</p>

	<p>USIBOR ®: Aluminium–silicon coated boron steel. Coating thickness: 34 to 100 g / m²) per face (12 to 33 µm).</p> <p>Support and management processes of the site:</p> <p>Facilities</p> <p>Health and safety (including medical service)</p> <p>Environmental</p> <p>Maintenance</p> <p>Administrative activities</p> <p>Human Resources</p> <p>Community relationship</p> <p>Website ArcelorMittal – https://www.arcelormittal.com.br/</p>
Year site opened	Vega unit began operations in 2003.
Major extensions and / or refurbishments and year(s) when these occurred	<p>Currently, it has already conducted two major expansions and is preparing for a third investment.</p> <p>In 2010, the Galvanization 2 line was inaugurated, with an investment of US\$ 76 million.</p> <p>In 2015, it invested US\$32 million in line adjustments to diversify the product portfolio and increase capacity.</p> <p>In 2021, work resumed on the largest expansion project in its history, the CMC Project (Cold Mill Complex), an investment of US\$ 350 million for the production of a new continuous galvanizing and annealing line. The Cold Mill Complex system will allow the combined processing of cold-rolled and coated steels and increase the product portfolio for the market. The completion of the work is scheduled for the third quarter of 2023.</p> <p>In 2024, completion of the Expansion Project (CMC), with the start of operation of the third galvanizing and continuous annealing line (Combi line system) scheduled for the 1st half of 2024. The system ensures greater optimization in the pickling and cold rolling lines, allowing the production line to act and adapt according to market demands. The production volume will increase by 0.6 million tons of steel per year.</p>
Annual production	Total Production = 2 million tonnes steel per year
Number of employees and contractors	<p>760 (Direct workers) Male: 621 / Female: 129</p> <p>1923 (Workers of service providers and subcontractors) Male: 1713 / Female: 211</p> <p>Total: 2673</p>

Carbon reduction target	ArcelorMittal has committed to reduce CO2 specific scope 1 and 2 emissions by 10% by 2030, with a further ambition to be carbon-neutral by 2050, in line with the Paris Agreement, baseline 2018.
Further environmental and social information	https://brasil.arcelormittal.com/sala-imprensa/publicacoes-relatorios/brasil/sustainability-report-2021 https://brasil.arcelormittal.com/en/sustainability

Stakeholder engagement

Stakeholder engagement is an integral part of a ResponsibleSteel audit and ensures a rich and balanced collection of information and evidence. The auditors followed the methodology outlined in the Guidance on Stakeholder Engagement provided by ResponsibleSteel as well as the Introduction to ResponsibleSteel for stakeholders.

The interested parties were identified by the site and declared in the document Audit-planning-and-preparation-templates-version-2.0.

The completed list of stakeholders was submitted to ResponsibleSteel beforehand after phase 1.

After identifying the interested parties, the audit team selected them for visits and interviews, which were carried out without any interference from ArcelorMittal representatives. The interviews were conducted in the local language without the need for a specialised translation team.

Stakeholders were selected independently by the audit team, but information about details of each of them or public information was not shared by the DNV certification body.

Interviews with stakeholders (2022)

Group: Government / Public Power

A member of the government (Secretary Public) was interviewed at city hall office, and he was informed that ArcelorMittal has several positive actions in the city of São Francisco do Sul, for sports, education, technical training, support for children and adolescents, combating cancer, women's prize, firefighter project, children with disabilities, autism, and the secretary still understands that the company could improve the training of social workers and campaigns to collect food. ArcelorMittal's engagement was considered a positive impact.

Group: Fire and Rescue Service in the city of São Francisco do Sul (Volunteer)

Organization formed by 26 Public Employees and 102 Volunteer members, with the objective of bringing comfort and the necessary care to victims of pre-hospital accidents, mitigating and preventing possible sequelae; sensitize the public through lectures and meetings on accident prevention, first aid, firefighter training and the training of Child Firefighters, recognizing that ArcelorMittal works in partnership and support with the

provision of support materials in training and sponsorship to improve the rooms of class. ArcelorMittal's engagement is considered a positive impact.

Group: Social Assistance Service

Provision of service that serves people with disabilities, the elderly, children and adolescents, people included in the Single Registry (Vulnerable), beneficiaries of the social program "Programa Bolsa Família", "Auxílio Brasil" and the program "Benefit of Continued Provision".

During the visit, the Social Secretary reported the importance of the company's support and investment actions in the children's and adolescents' investment fund (annually),

(Public Fund that aims to finance projects that work to guarantee the promotion, protection, defence of the rights of children and adolescents), the company periodically conducts support visits and volunteer projects. ArcelorMittal engagement is considered a positive impact.

Group: Government / Public Power

Interviewed technician from the Instituto do Meio Ambiente (Environment Institute) at the institute's headquarters, which is the environmental agency of the Santa Catarina State Government. It operates with an administrative headquarters, located in Florianópolis, and 16 Regional Managements distributed throughout the State. Created in 2017, replacing Fatma (Environment Foundation), which operated for 42 years, IMA's main mission is to ensure the preservation of the state's natural resources. In the city of São Francisco do Sul, it has an administrative headquarters, and the local action is to manage the Acaraí State Park, which was conceived with the support of ArcelorMittal as an environmental compensatory measure for the installation of the enterprise. Among the actions promoted by the institute with the support of ArcelorMittal are monitored visits and the availability of a structure for academic studies by universities in the region.

The Environment Institute manages the State Conservation Units – seven of them belong to the park category, which is more flexible as to the uses of the area and where access to the public is regulated, but allowed, and three belong to the Reserve category, where environmental management is very restricted, and access is allowed only to researchers.

Verified that the entity and the institute act in a positive way towards issues related to environmental awareness and preservation.

Group: Social project

Association of Parents and Friends of the Disabled – Social Entity that is a reference service in the care of people with intellectual and/or multiple disabilities and/or autism in the areas of Health, Social Welfare and Education, free of charge, the interview process took place in person with the visit of Auditors and ArcelorMittal responsible from the Communication Area. During the interview with the President of the Entity, it was possible to verify ArcelorMittal's engagement with the entity, through social investment in social projects. ArcelorMittal's engagement is considered a positive impact.

Group: Union

Sindicato dos Metalúrgicos de Araquari e São Francisco do Sul (SINTRAMASF).

Interview conducted remotely by the Microsoft Teams platform due to the union being in another municipality. The Joinville mechanical industry professional association was created, which was recognized with its union letter in 1973 and started to be called Joinville mechanical industry patronal union. The focus of the entity has always been the

growth and strengthening of the metal mechanical industries in the region, which was reinforced with the acquisition in 2015 of its new headquarters. the entity's new headquarters was inaugurated in December 2015, thus increasing the quality of the union's services, and providing more benefits to its member companies. During the interview with the union representative, the actions promoted by the entity and the good level of relationship with ArcelorMittal were verified, and a close and positive relationship with the company was reported. It was verified, according to the representative's reports, that the company, whenever necessary, makes available an adequate structure so that the union can access the company's website for a relationship with the workers.

Interviews with stakeholders (2024)

The following topics were discussed with all the stakeholders during the interviews:

- Level of relationship with the company;
- Regularity of technical visits made by ArcelorMittal to identify their needs;
- Channels available for contact with specialized ArcelorMittal teams;
- Stakeholders' knowledge of how they can communicate with ArcelorMittal and how they can be supported in each of its projects;
- How they are communicated about new ArcelorMittal engagement programs and projects and how these stakeholders within their area of activity can benefit from the company's initiatives;
- How stakeholders can make complaints and denunciations, if necessary;
- Invitation and participation of the stakeholder in events held by ArcelorMittal;
- How stakeholders who receive support from ArcelorMittal report and comply with the company's compliance program;

Stakeholder – President of the Araquari Union – Confirmed good conduct, openness, respect, good coexistence, and respect for freedom of association.

The union's president highlighted the benefits achieved since 2014, when the union began its operations.

Agreements with stationery stores, medical clinics, vehicle dispatchers, driving schools to acquire driving licenses, eyeglass stores, a recreational guild in the city of Joinville, food vouchers and paternity pay were some of the benefits obtained by the union for its members.

The union did not identify any complaints against ArcelorMittal.

The union president only suggested that ArcelorMittal could maintain a local agenda with the union to enable union leaders to set up a mobile base on previously agreed dates to facilitate communication with workers, given that due to working hours and shifts it is not always possible to make contact with all workers.

No problems were identified.

Stakeholder – Local government authorities

During the audit, we visited the Associação empresarial de São Francisco do Sul whose aim since its foundation in 1915 has been to integrate and boost business in São Francisco do Sul, promoting an innovative business environment.

According to the president of the association, ArcelorMittal is considered a sponsoring partner and uses the Association's facilities to promote training courses for the local community. The Director of the Vega site is a volunteer and is keen to share his experience to help promote the local community.

No problems were identified.

Stakeholder – Marginalised groups

"Rede Feminina de Combate ao Câncer de São Francisco do Sul" – Entity that promotes the fight against Cancer in São Francisco do Sul, which is maintained with the support of the community and partnerships with public and private companies, would like to express its sincere gratitude for this partnership with the Federal Revenue Service of São Francisco do Sul, recognizing the importance of maintaining the resources allocated by ArcelorMittal for the maintenance of systems, structure and supplies, thus ensuring greater quality of care, a positive impact achieved with the unit's own resources.

No problems were identified.

Stakeholder – Marginalised groups

Kairós Therapeutic Community – The services provided by the Shelter Entities, also called Therapeutic Communities, are intended for people with disorders resulting from the abuse or dependence on psychoactive substances and who need to be removed, for a prolonged period of time, from the environment in which the dependence on psychoactive substances, such as alcohol and other drugs, began, developed or was established, with the aim of achieving abstinence. Shelter Entities are private, non-profit institutions that provide extra-hospital care and are characterized by voluntary adherence and permanence, residential, temporary regime, practices of activities of educational value, offering therapeutic projects based on coexistence among peers, conducive to the formation of bonds and the development of the human person, with an intersectoral and interdisciplinary character, aimed at serving people in situations of social vulnerability, aiming at risk reduction and social reintegration. Thus, they are institutions legally constituted under the terms of art. 26-A of Law No. 11,343 of 2006, based on the fundamental values for social and personal life, as set forth in items VI and VII of article 5 of the Federal Constitution. The Entity currently serves 150 community members per year and has recognized the importance of maintaining the financial resources allocated by ArcelorMittal for the maintenance of the site's infrastructure and payment of part of the payroll of the Entity's employees.

No problems were identified.

Observation: All stakeholders and ArcelorMittal communicate through appropriate channels. See details of the forms of communication described in Principles 7, 8 and 9.

Interviews with stakeholder – Direct employees and service providers

Number of employees and contractors 760 (Direct workers) Male: 621 / Female: 129

1923 (Workers of service providers and subcontractors) Male: 1713 / Female: 211

Total: 2673

Interviews with stakeholder – Direct employees and service providers

Twenty (20) employees and contractors were interviewed, distributed as follows:

15 employees hired directly by ArcelorMittal who work full time.

5 service provider employees hired by ArcelorMittal. Employees from the following companies were interviewed:

Top Service = 1 employee (female)

Sankyo = 2 employees (1 male and 1 female)

Global = 1 employee (male)

CRC = 1 employee (male)

The selection and sampling for conducting interviews with direct employees was defined taking into consideration only the employees who were present at the company according to the shifts and times that they would be at the company.

A list of employees was made available, and the auditor randomly selected the employees to be interviewed.

For the interviews with service providers, the selection was determined by visiting the providers' operational facilities and, on site, a list of employees who were on site and selected for the interview was requested.

Sampling for the interviews was done as determined by the Responsible Steel Manual 3.2 Certification audit stage 2 (Section 3.2.3.5 – Table 3)

Conform requirement 3.2.3.5. Personnel and worker interviews of the ResponsibleSteel Assurance Manual (Page 51 – Table 4)

Number of workers: 2026 – 2675 (For initial Certification)

Workers to be interviewed individually and in groups: 40

For surveillance audit Vega 2024: Workers to be interviewed individually and in groups: 20

For ArcelorMittal employees, managements, supervisors, administrative, and operational level employees were interviewed.

For service provider employees administrative and operational level employees were selected

In general, the interviews were conducted as planned and organized with the support of the ArcelorMittal team, which directed the interviewees to the private place made available to the audit team.

ArcelorMittal's managers and supervisors were interviewed individually and privately

The interviews assessed general knowledge of policies, programs, and procedures on the following topics:

- Compliance, health and safety, and environment.
- Work environment and relationship with managers and coworkers.

- Freedom to enter and leave the company after working hours.
- Working conditions and confirmation of the existence of labor contracts.
- Working hours and payment of salaries and benefits.
- Verification if there are internal campaigns focused on health and quality of life.
- Freedom to join unions and associations.
- Career development plan.
- Knowledge about emergency response procedures and evacuation drills.
- Knowledge of available channels for registering complaints.

Positive comments

- Payment of wages and benefits
- Quality of food
- Transportation
- Availability of health and safety equipment
- Relationship with managers
- Ease of communication and possibility of registering suggestions for improvement

No complaints made by workers

With managers, in addition to the requirements evaluated above, knowledge about the organization's strategic objectives on the environment, diversity and inclusion, and social engagement projects was evaluated.

In general, the interviews had very favorable evaluations and the audit team identified a high level of employee satisfaction with the management model and resources made available by ArcelorMittal, with this positive perception being extended to service providers. No complaints or critical situations were identified and reported to the audit team.

Summary of audit findings

Conform	Conformity, the requirement is fulfilled.
Opportunity for improvement (OFI)	The respective requirement or criterion has been implemented, but effectiveness or robustness might be increased, or it is a situation that could lead to a future non-conformity if not addressed.
Minor non-conformity (NC)	Isolated, unusual or non-systemic lapse. Or a lapse with limited temporal and organisational impacts. A non-conformity that does not result in a fundamental failure to achieve the objective of the relevant requirement or related criterion. Sites can become certified with minor non-

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

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Principle 1. Corporate Leadership					
Criterion 1.1: Corporate Values and Commitments (5)	5	0	0	0	0
Criterion 1.2: Leadership and Accountability (6)	6	0	0	0	0
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	5	0	0	0	0
Criterion 2.2: Responsible Sourcing (5)	5	0	0	0	0
Criterion 2.3: Legal compliance and signatory obligations (6)	6	0	0	0	0
Criterion 2.4: Anti-Corruption and Transparency (8)	7	1	0	0	0
Criterion 2.5: Competence and awareness (5)	5	0	0	0	0
Principle 3. Responsible Sourcing of Input Materials					
Criterion 3.1: Commit to responsible sourcing (18)	NA	NA	NA	NA	NA
Criterion 3.2: Know your upstream supply chains (10)	NA	NA	NA	NA	NA
Criterion 3.3: Understand supplier ESG performance (15)	NA	NA	NA	NA	NA

Principles and criteria (# of requirements)	Conform	OFl	Minor NC	Major NC	Exclusion
Criterion 3.4: Strengthen and account for responsible sourcing (23)	NA	NA	NA	NA	NA
Criterion 3.5: Report publicly on responsible sourcing (11)	NA	NA	NA	NA	NA
Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes. (15)	NA	NA	NA	NA	NA
Criterion 3.7: Know your upstream scrap supply chain (8)	NA	NA	NA	NA	NA
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)	NA	NA	NA	NA	NA
Criterion 3.9: Strengthen and account for responsible sourcing (1)	NA	NA	NA	NA	NA
Criterion 3.10: Report publicly on responsible sourcing (16)	NA	NA	NA	NA	NA
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)	0	0	0	0	14
Principle 5. Occupational Health & Safety					
Criterion 5.1: OH&S policy (7)	7	0	0	0	0
Criterion 5.2: Health and Safety (OH&S) management system (11)	10	1	0	0	0
Criterion 5.3: Leadership and worker engagement on OH&S (9)	9	0	0	0	0
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	8	0	0	0	0
Criterion 5.5: Safe and healthy workplaces (5)	4	0	0	0	1
Criterion 5.6: OH&S performance (2)	1	1	0	0	0
Criterion 5.7: Emergency preparedness and response (6)	6	0	0	0	0
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (9)	9	0	0	0	0
Criterion 6.2: Forced or compulsory labour (7)	7	0	0	0	0
Criterion 6.3: Non-discrimination (9)	9	0	0	0	0
Criterion 6.4: Association & collective bargaining (12)	5	1	0	0	6

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 6.5: Disciplinary practices (5)	5	0	0	0	0
Criterion 6.6: Hearing and addressing worker concerns (5)	4	1	0	0	0
Criterion 6.7: Communication of terms of employment (5)	5	0	0	0	0
Criterion 6.8: Remuneration (11)	10	0	0	0	1
Criterion 6.9: Working time (7)	7	0	0	0	0
Criterion 6.10: Worker well-being (2)	2	0	0	0	0
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5	0	0	0	0
Criterion 7.2: Security practice (9)	5	1	0	0	3
Criterion 7.3: Conflict-affected and high-risk areas (5)	0	0	0	0	5
Principle 8. Stakeholder engagement and communication					
Criterion 8.1: Stakeholder engagement (10)	10	0	0	0	0
Criterion 8.2: Grievances and remediation of adverse impacts (12)	12	0	0	0	0
Criterion 8.3: Communicating to the public (7)	7	0	0	0	0
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	8	0	0	0	0
Criterion 9.2: Free, Prior & Informed Consent (3)	0	0	0	0	3
Criterion 9.3: Cultural heritage (7)	0	0	0	0	7
Criterion 9.4: Displacement and Resettlement (9)	0	0	0	0	9
Principle 10. Climate Change and GHG emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	7	0	0	0	0
Criterion 10.2: Corporate Climate-Related Financial Disclosure TCFD (2)	2	0	0	0	0
Criterion 10.3: Determination of GHG emissions for the purpose of site level GHG emissions reduction targets and planning (4)	3	0	0	0	1
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG	NA	NA	NA	NA	NA

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
emissions intensity for the production of crude steel (29)					
Criterion 10.5: Site-level GHG emissions reduction targets and planning (11)	11	0	0	0	0
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8)	NA	NA	NA	NA	NA
Criterion 10.7: GHG emissions disclosure and reporting (8)	4	0	0	0	4
Principle 11. Noise, emissions, effluents and waste					
Criterion 11.1: Noise and vibration (7)	6	1	0	0	0
Criterion 11.2: Emissions to air (8)	8	0	0	0	0
Criterion 11.3: Spills and leakage (9)	9	0	0	0	0
Criterion 11.4: Waste, by-product and production residue management (11)	11	0	0	0	0
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7	0	0	0	0
Criterion 12.2 Water balance and emissions (8)	8	0	0	0	0
Criterion 12.3 Water-related adverse impact (6)	4	0	0	0	2
Criterion 12.4 Managing water issues (8)	8	0	0	0	0
Principle 13: Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	15	1	0	0	9
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (370)	297	8	0	0	65

* 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

Principle 3. Responsible Sourcing of Input Materials – ArcelorMittal defined the non-application of the requirement in this audit (Initial Certification).

Principle 4. Decommissioning and closure – Principle 04 does not apply since they have not announced a site closure or decommissioning.

Principle 5.5.3 – Site does not have accommodation.

Principle 6.4.2 – Not applicable for ArcelorMittal as national legislation does not restrict workers' organisations and does not obstruct alternative legal means for workers to freely associate.

Principle 6.4.5 – ArcelorMittal does not hire through recruitment agencies.

Principle 6.8.6 – ArcelorMittal does not provide accommodation.

Requirement 7.2.2 – Does not apply because the site is not located in a conflict area, is not subject to terrorist attacks, or has assets that are under constant threat from marginalised groups.

Principle 7.3.1 a-e – The company does not work in risky or high-risk areas.

Principle 7.3.2 a-b – Requirement considered Not Applicable, because the site is not located in a terrorist risk, because it is not located in permanent risk and does not have permanent risks due to the action of marginal groups. This requirement refers to installations in conflict areas.

Principle 7.3.2 – Does not apply, since it is forbidden to trade on sites listed in the blocked list provided by the group.

Principle 9.2 – Does not apply, as there are no Indigenous peoples in the vicinity of the site.

Principle 9.3 – Does not apply, as the area of influence of the site is not in a World Heritage area.

Principle 9.4 – Does not apply, as there is no need for physical or economic displacement of the communities. There are no plans for expansion and, if there is, the site has extensive non-industrialised areas of its own.

Principle 10.3.4 – As a processing plant, ArcelorMittal Vega does not produce crude steel.

Principle 10.4 – Does not apply as the unit is undergoing audits to certify the site and not the product.

Principle 10.6 – Does not apply as the unit is undergoing audits for site certification and not product certification.

Principle 10.7.2 – Does not apply as the site is undergoing audits for site certification and not product certification.

Principle 10.7.3 – Does not apply as the site is undergoing audits for site certification and not product certification.

Principle 12.3.2 ArcelorMittal has demonstrated that there is no commercial user within the Site's area of influence.

Principle 12.3.3 ArcelorMittal has demonstrated that there is no commercial user within the Site's area of influence.

Principle 13.1.2 a – Does not apply as the site is not part of World Heritage Sites, IUCN Protected Area Management Categories or areas protected by local legislation, Indigenous and community protected areas, Ramsar Sites, Key Biodiversity Areas (KBAs).

Principle 13.1.2 c – The site is not found in Indigenous Zones and Community Conserved Areas (ICCAs).

Principle 13.1.2 d – The site is not found on Ramsar sites.

Principle 13.1.2 e – The site does not have Key Biodiversity Areas (KBA). Only permanent preservation areas that are preserved according to the relevant legislation.

Principle 13.1.5 – Not applicable because the ADA of the plant is not considered a world heritage site and we are not within the items of the protected areas of categories I to VI of the IUCN.

Principle 13.1.6 – The site is not in a World Heritage or Ramsar area, nor is it in IUCN categories I through VI protected areas.

Principle 13.1.7a – The site is not found on Ramsar sites.

Principle 13.1.7 c – Does not apply, as the site is not located in Key Biodiversity Areas (KBAs).

Strengths

Principle 1. Corporate Leadership – Principle well attended, demonstrating a high commitment to Sustainability and compliance with the Responsible Steel Principles

Positive Point – ArcelorMittal Pyramid of Safe and Sustainable Production, which starts at the base with People, which sustains Respect, which sustains Trust, which sustains Transparency, which sustains Integration, which sustains Motivation and which sustains Innovation.

Principle 2. Social, Environmental and Governance Management Systems – Principle well attended with certifications in ISO9001, ISO14001 and ISO45001 demonstrating a very mature Integrated Management System, in addition to demonstrating well-structured Governance Policies to demonstrate an excellent ethical conduct in the diverse topics covered by Responsible Steel.

Positive Point – Supplier Approval Process focusing on training Anti-Corruption Systems

Positive Point – Establishment of master plans for environmental, social and governance issues.

Principle 5. Occupational Health and Safety – Principle well attended with ISO45001 certification demonstrating strong preventive actions to keep employees and third parties working in a safe and healthy manner.

Positive Point – Occupational Health and Safety Culture well disseminated among employees and third parties.

Positive Point – Total Health Program with a focus on workers' well-being

Principle 6. Labor Rights – Principle well attended with a well-developed Integrated Management System and well-structured Governance Policies to demonstrate

excellent ethical conduct in the various labour rights issues addressed by Responsible Steel.

Principle 7. Human Rights – Principle that is well attended with a mature Integrated Management System and well-structured Governance Policies to demonstrate excellent ethical conduct in the various human rights issues addressed by Responsible Steel.

Principle 8. Stakeholder Engagement and Communication – Principle well attended with a mature Integrated Management System and well-structured Governance Policies to demonstrate excellent ethical conduct in the activities conducted by ArcelorMittal in the engagement of Stakeholders.

Positive Point – Implementation of Participatory Social Diagnosis.

Principle 9. Local Communities – A principle that is well attended with a well-established Integrated Management System, which allowed the identification of the seriousness and ethics of the relationship between ArcelorMittal and the Local Communities.

Positive Point – Technical Sustainability and Junior Technical Sustainability programs to support the training of young people from the community

Positive Point – Local Communities are engaged. ARCELORMITTAL's initiative-taking involvement with the Local Communities to understand the needs and expectations as well as the provision of the necessary resources to serve these Local Communities

Principle 10. Climate Change and Greenhouse Gas Emissions – Principle well attended with a mature Integrated Management System and presentation of strategic data to demonstrate the commitment to the Paris Agreement agenda.

Positive Point – target to reduce its CO₂ emissions by 10% by 2030 and to become carbon neutral by 2050.

Principle 11. Noise, Emissions, Effluents and Waste – Principle well attended with ISO14001 certification demonstrating a very mature Integrated Management System and the use of high-tech equipment.

Positive Point – Blue Seal Company Award and recognition of Ervino Beach (where the unit's outfall is located) as a Blue Flag beach. <https://bandeiraazul.org.br/temporada-2023-2024/>

Principle 12. Water Stewardship – Principle well attended with certification in ISO14001 demonstrating a very mature Integrated Management System and the use of high-tech equipment.

Positive Point – Maintenance of a water reservoir to mitigate impacts related to the availability of water resources.

Principle 13. Biodiversity – Principle well accompanied through a monitoring program and Biodiversity Management Plan, contributing to the excellent conservation of Biodiversity.

Positive Point – Internal programs to preserve the RPPN (Private Natural Heritage Reserve)

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and no 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:

Principle 2.4.6 – ArcelorMittal could better identify in the sustainability report the way in which financial resources are managed, including a link that is more easily accessible to interested parties, since the information on financial management is available on the Foundation's website, but access to it is not integrated with ArcelorMittal's website.

Principle 5.2.2.d – The opportunity for improvement was identified in the implementation of the "Values Program", which includes the commission for the prevention of accidents and harassment in the workplace, and the inclusion of activities related to support for encouraged social projects.

Principle: 5.6.1 – The opportunity to improve the management of the number of records made by workers was identified, demonstrating unsafe situations and which were declared as "Right of Refusal".

Principle 6.4.6 – Identified an opportunity for improvement in terms of keeping proper records of meetings and other events when the local union is on the company's facilities.

Principle 6.6.1 b – Identified an opportunity for improvement in terms of including members of the Internal Accident Prevention Committee in the process of investigating complaints when they are related to potential harassment situations.

Principle 7.2.3 – Identified an opportunity for improvement in terms of defining an electronic system for selecting people who will be subject to inspections by the Property Security team when they enter or leave the premises.

Principle 11.1.4 – Identified an opportunity for improvement in terms of setting objectives and targets for reducing noise and vibrations, because even if the goal is to have results below the limits set by the environmental authority, it is important to demonstrate how committed the company is to reduce its environmental impacts.

Principle 13.1.2.b – Identified the opportunity to improve the implementation of a butterfly garden in the permanent preservation area and visit by community members and students.