Responsible Steel™ Certified Site

Presented to

ACE/2021/92654.2

ARCELORMITTAL BELGIUM NV

SITE NAME AND ADDRESS

Site of Gent: John Kennedylaan 51, BE-9042 Gent
Site of Geel: Lammerdries 10, BE-2440 Geel
Site of Genk: Kanaaloever 3, BE-3600 Genk
Sites of Liège:
Rue Forges 64, BE-4570 Marchin
Chaussée de Ramioul 52, BE-4400 Flémalle
Rue Gustave Baivy SN, BE- 4101 Jemeppe
Rue Sompré SN, BE-4400 Flémalle

CLIENT NAME AND ADDRESS

ArcelorMittal Belgium NV
John Kennedylaan 51, BE-9042 Gent BELGIUM

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

ResponsibleSteel Standard version 2.0 ResponsibleSteel Assurance Manual version 1.0

ISSUE DATE
2024-07-19

EXPIRY DATE
2027-07-18

NEXT SCHEDULED AUDIT
2026-02-09 (TBC)

CERTIFIED SINCE
2021-07-19

CERTIFICATION SCOPE

Design, development, production and servicing of slabs, hot rolled (pickled) coils and sheets, cold rolled coils and sheets, coated (metallic and organic) coils and sheets. Production of pig iron and by-products, production of coke, sinter and internal transport of raw materials, intermediates and end products.

CERTIFICATION BODY

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

Any facilities and associated activities that are directly related to steel making or processing, that are on-site or near the site and that have been included in the certification scope or audit scope

None

AUTHORIZED CERTIFICATION BODY SIGNATURE

Ce document est signé électroniquement. Il constitue un original électronique à valeur probatoire.
This document is electronically signed. It stands for an electronic original with probationary value.

Julien NIZRI, General Manager

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

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

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

Responsible Steel™ Certified Site

Annex

ACE/2021/92654.2

ARCELORMITTAL BELGIUM NV

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Gent: raw materials yards, coking plant, 2 sinter plants, 2 blast furnaces, steel shop, hot strip mill, cold rolling mill, finishing lines (cold rolled annealing, metallic coated galvanizing lines, organic coating line), power plant (industrial partner), harbour (industrial partners) for raw material delivery and shipping of finished products, and Steelanol (production of bio-ethanol, under construction).

Genk: Electro galvanizing lineGeel: Organic coating line

Flémalle: 2 organic coating lines and Hot dip galvanizing line

Jemeppe Kessales: Cold rolled annealing line and JVD line (Jet Vapor Deposition)

Marchin: Electro galvanizing line

SUPPORT FUNCTION THAT CONTRIBUTED TO THE AUDIT

ArcelorMittal Headquarter, 24-26, Boulevard d'Avranches, Luxembourg City, Luxembourg

ArcelorMittal Europe – Flat Products & EPO (European Procurement Organisation), 24-26, Boulevard d'Avranches, Luxembourg City, Luxembourg

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Public summary audit report

This is a concise public summary of the audit report for ArcelorMittal Belgium. The full version of the audit report is in the possession of the member company and the audited sites.

Audit overview

Member name	ArcelorMittal
Audited entity name	ArcelorMittal Belgium
Number of sites **Names & location**	7 Sites • Integrated steel plant and cluster headquarter: John Kennedylaan 51, 9042 Gent, Belgium • Electro galvanizing line: Kanaaloever 3, 3600 Genk, Belgium • Organic coating line: Lammerdries 10, 2440 Geel, Belgium • 2 organic coating lines: Chaussée de Ramioul 52, 4400 Flémalle, Belgium • Hot dip galvanizing line (Eurogal): Rue Sompré SN, 4400 Flémalle, Belgium • Cold rolled annealing line and Jet-Vapour-deposition line: Rue Gustave Baivy SN, 4101 Jemeppe, Belgium • Electro galvanizing line: Rue Forges 64, 4570 Marchin, Belgium https://belgium.arcelormittal.com/en/
Certification scope	Production of pig iron and by-products, production of coke, sinter and internal transport of raw materials, intermediates and end products. Design, development, production and servicing of flat steel products: • Gent: hot rolled coils, cold rolled full hard coils, cold rolled annealed coils, metallic coated products, organic coated products, by-products (e.g., blast furnace slag), gas for electricity. • Genk: electro galvanized products

	• Geel and Flémalle: organic coated products • Flémalle (Eurogal): metallic coated products • Jemeppe: cold rolled annealed and metallic coated products Marchin: electro galvanized products
Standard version audited against	ResponsibleSteel Standard Version 2.1.1 – Certified Site
Audit type and outcome	Surveillance
Certification body	AFNOR Certification 11, Rue Francis de Pressensé, 93200 Saint Denis, France
Audit dates	Certified Site: Stage 1: 3 MD offsite and 1 MD onsite – 22 October 2025 Stage 2: 6,5 MD onsite – 01-05/12/2025
Number of auditors and audit days	1 Lead auditor 2 Team Auditors
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	Re-certification audit June 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:

Site self-assessment	• Site provides general information to the certification body • Signs contract with a certification body • Conducts self-assessment
Stage 1 Audit	• Certification body reviews self-assessment and documentation • Media and stakeholder analysis • Certification body determines readiness for stage 2 audit • Stakeholders informed of audit
Stage 2 Audit	• Certification body conducts the visit, • Gathers supporting evidence through worker and stakeholder interviews • Classifies non confirmities
Audit Report	• Certification body prepares audit report and certification recommendation • Site reviews audit report • RS Assurance Panel reviews report and recommendation • Certification body amends report if needed
Certification Decision	• Certification body takes certification decision and issues certificate • Certificate, audit report summary and Assurance Panel report published on website
Surveillance	• Site implements corrective actions where required • Certification body conducts monitoring activities and surveillance audit, including interviews with workers and stakeholders

Sites can apply to be assessed against the ResponsibleSteel Standard on a voluntary basis. Conformity with the Standard is verified by independent certification bodies and auditors. They study documentation provided by the site, review relevant media and scientific publications on the site, visit the site to see operations first-hand, and interview site management, process owners, shopfloor workers and external stakeholders such as authorities, community and civil society representatives. The assessment is summarised in an audit report that is reviewed by an independent Assurance Panel. Only if that Panel is satisfied with the quality of the audit and the resulting report, can a site with a positive certification recommendation be certified. A ResponsibleSteel certificate is valid for three years and certified sites have to pass a surveillance audit after 18 months and subsequent 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	• Integrated steel plant and cluster headquarter: John Kennedylaan 51, 9042 Gent, Belgium • Electro galvanizing line: Kanaaloever 3, 3600 Genk, Belgium • Organic coating line: Lammerdries 10, 2440 Geel, Belgium • 2 organic coating lines: Chaussée de Ramioul 52, 4400 Flémalle, Belgium • Hot dip galvanizing line (Eurogal): Rue Sompré SN, 4400 Flémalle, Belgium • Cold rolled annealing line and Jet-Vapour-deposition line: Rue Gustave Baivy SN, 4101 Jemeppe, Belgium • Electro galvanizing line: Rue Forges 64, 4570 Marchin, Belgium
Activities and products	Production of pig iron and by-products, production of coke, sinter and internal transport of raw materials, intermediates and end products. Design, development, production and servicing of flat steel products: Gent: hot rolled coils, cold rolled full hard coils, cold rolled annealed coils, metallic coated products, organic coated products, by-products (e.g., blast furnace slag), gas for electricity. Genk: electro galvanized products Geel and Flémalle: organic coated products Flémalle (Eurogal): metallic coated products Jemeppe: cold rolled annealed and metallic coated products Marchin: electro galvanized products
Year site opened **Major extensions and / or refurbishments and year(s) when these occurred**	Site of Gent: 1966: Hot strip mill, cold rolling mill 1967 and 1968: Two blast furnaces, relining BF B in 2021 1972: Coking plant 1981: Continous cold rolling mill 1998: Hot dip galvanizing line 1 2000: Hot dip galvanizing lines 2 and 3 2002: Organic coating line 2019: Start of Steelanol construction 2019: start of construction of a waste wood processing plat Torero, commissioning in 2023

	2020: All Weather Terminal 2021: announcement of the DRI/EAF project 2024: Steelanol (production of bio-ethanol) 2024: Torero (torrefaction of bio-mass for bio-coal production) 2025: acquisition of Galva 5 hot-dip galvanising line in Flémalle (expected to be put into operation in 2026) Site of Genk: 1993: Electro galvanizing line Site of Geel: 1991: Organic coating line Sites of Liège: 1975: Organic coating line (LP2) in Ramet 1985: Continous cold rolled annealing line, revamp and extension to Q&P in 2016 in Kessales 1989: Organic coating line (combiline) in Ramet 1991: Electro galvanizing line in Marchin 1997: Hot dip galvanizing line Eurogal in Ramet 2019: Jet-Vapor-Deposition line in Kessales
Annual production	For each site: metric tonnes of produced crude steel or, for a processing site, metric tonnes of processed steel (Production 2024): Site Gent: crude steel production 4.655 kt Site Genk: 280 kt Site Geel: 138 kt Site Ramet Organic coating lines: 273 kt Site Ramet Hot dip galvanizing line: 477 kt Site Kessales Cold rolling production: 386 kt Site Kessales JVD production: 213 kt Site Marchin: 75 kt
Number of employees and contractors	Direct employees (FTE's) 31/10/2025 (FTE) Female Male Total AM BELGIUM – GENT 480 4.483 4.963 AM BELGIUM – GENK 6 126 132 AM BELGIUM – GEEL 1 55 56

	AM BELGIUM – IVOZ RAMET & Liège) 29 373 402 AM BELGIUM KESSALES – JEMEPPE 6 205 211 AM BELGIUM – MARCHIN 1 36 37 Contractors: 2024 (on average per year) AM BELGIUM – GENT 2.264 AM FCE BELGIUM – GENK 5 AM FCE BELGIUM – GEEL 9 AM RAMET – IVOZ RAMET 73 AM KESSALES – JEMEPPE 108 AM MARCHIN – MARCHIN 29
Carbon reduction target	ArcelorMittal ascribes to a long-term emissions reduction pathway as described in the company's Climate Action Report 2, available here: https://corporate-media.arcelormittal.com/media/ob3lpdom/car_2.pdf. The company is committed to having its targets science-based ArcelorMittal Europe is targeting a 35% reduction in Scope 1 and 2 CO_2 by 2030 versus a 2018 baseline, and to reach net-zero by 2050. This is described in the company's Climate Action Report 2, available here: https://corporate-media.arcelormittal.com/media/ob3lpdom/car_2.pdf
Further environmental and social information	2022-2023: Corporate Responsibility Report 2022-2023 - ArcelorMittal in België

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.

A stakeholder is a person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity of a site. Stakeholder engagement forms an important part of ResponsibleSteel audits. Stakeholders are a key source of information for the auditors and can help provide an objective view of the site. The identification of relevant stakeholders depends on the specific context and situation of a site.

For the purpose of the ResponsibleSteel audit, the sites of the ArcelorMittal Belgium provided a list of external stakeholders to the auditors (documented in stage 1), based on their areas of influence, their ongoing stakeholder engagement efforts, as well as relevant media articles and other publications. The auditors examined the list and asked the sites to organize the interviews with the stakeholders extracted from the press and present in the list. The Annex describes the areas of influence and provides the full list of external stakeholders that were identified for the scope.

Part of the audit has been done before and during the audit to adapt the audit to the stakeholder's availabilities.

Stakeholders:

The following stakeholder groups and their representatives were identified as relevant in the areas of influence:

- 6 local communities (Gent, Genk, Geel, Marchin, Ivoz Ramet, Jemeppe)
- National and local government authorities and politicians
- Labour unions
- Occupational healthcare stakeholders (doctors, prevention advisors, person of trust)
- Civil society organisations
- Environmental and labour inspectors
- Insurance companies (because they are involved in risk management and potentially cover damages)
- Financial statutory auditors (ensure the detection of finance and corruption risks)
- Regional industrial partners (harbours, public transportation companies, neighbouring industrial sites)
- Media
- Federations
- Academics and schools
- Customers (contractual stakeholders)
- Suppliers (contractual stakeholders)
- Employees (contractual stakeholders)

All external stakeholders on the list were informed of the ResponsibleSteel audit 4 weeks in advance of the site visit. They were informed by email, in the regionally used languages. The auditors worked closely with the sites in organising virtual or in-person meetings with those stakeholders that responded to the invite and volunteered to be interviewed. The stakeholders selected are representatives of the different categories. All the stakeholders identified in the audit plan accepted to be interviewed, see below for a list of external stakeholders that were interviewed.

Reports or actions in progress were provided to the auditors by email.

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 7500 individuals (including full and part–time employees and contractors) work at AM Belgium. All sites have 3 rotating shifts:

- Morning: 06:00 – 14:00
- Afternoon: 14:00 – 22:00
- Night: 22:00 – 06:00

The auditors interviewed workers of all shifts during the site visit. The auditors preselected functions slots for interviews and, together with the sites, confirmed which workers to interview. Selecting workers for interviews needs the help of the sites to make sure that production lines can continue to operate during the interviews and to avoid safety risks for the remaining workers. Additionally, during the shop floor visit, some employees were interviewed directly at their workstations. The workers included in the interviews made it possible to cover different categories of gender, hierarchical level, arduousness, temporaries, and diversity to have a representative picture.

Unions were fully part of the interviews.

Additionally, to the process owners, more than 29 workers interviews (20 men, 9 women), including workers from the blast furnace, rolling mill, Steelanol, Hot Strip Mill, hot and cold rolling mill, Electrolytic galvanizing line, Hot dip galvanizing line, coating line, supporting functions, foremen, suppliers, line managers, members of senior leadership team, suppliers, union representatives and purchasing managers, human resources, health & safety, industrial risk, environment and sustainability team.

External stakeholders that were interviewed:

- 1 Neighbours representative in Gent (Milieumoment Wachtebeek)
- 2 Environmental Inspectors for Flanders and Liège sites
- 1 person from Gentsmilieufront
- 1 Doctor at Gent but in coordination with the other doctors
- 1 major of neighbouring municipality (Evergem)

The objective of the interviews carried out was to collect through open questions the questions, irritants, positive or negative perceptions, needs and expectations, the level of satisfaction of the answers given to their questions, the dynamics of the company with regard to the various items of ResponsibleSteel, to collect the corporate image. Overall, the input provided by internal and external stakeholders was mainly positive in nature. The needs and expectations did not show any new sensitivities that were not known by the company and that were shared during the audit of the owners of the principles. With regards to stakeholder's management, higher expectations were requested from the neighbourhood, especially with regards to the noise issues and dust related to Gent site mainly. Improvements are also expected in the area of the environment, particularly at the Ghent site.

They acknowledge that the site is making efforts in communication to deal with complaints and to reduce dust emissions.

Also, relevant input from external stakeholders came from governmental bodies (environment inspectors) to confirm the area of concern.

Suppliers from stakeholders with a strong relationship with the site (for example, the suppliers, temporary agency, city). Their provided input may be impacted by the business relationships they have with the sites.

The internal stakeholders like workers, unions and the doctor provided important input as well. They recognised the site's commitment to occupational health and safety, the environment, social issues and social protection

Relevant input from internal and external stakeholders has been captured in the requirements table below to substantiate the auditors' findings.

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	#Exclusions
Principle 1. Corporate Leadership					
Criterion 1.1: Corporate Values and Commitments (6)	6				
Criterion 1.2: Leadership and Accountability (5)	4		1		
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	5				
Criterion 2.2: Responsible Sourcing (5)	5				
Criterion 2.3: Legal compliance and signatory obligations (6)	6	1			
Criterion 2.4: Anti-Corruption and Transparency (8)	8				
Criterion 2.5: Competence and awareness (5)	5	3			
Principle 3. Responsible Sourcing of Input Materials					
Criterion 3.1: Commit to responsible sourcing and incorporate it in key functions and processes (18)	0				18
Criterion 3.2: Know your upstream supply chains (10)	0				10
Criterion 3.3: Understand supplier ESG performance and promote improvement (15)	0				15
Criterion 3.4: Strengthen and account for responsible sourcing (23)	0				23
Criterion 3.5: Report publicly on responsible sourcing (11)	0				11

Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes (15)	0				15
Criterion 3.7: Know your upstream scrap supply chain (8)	0				8
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)	0				12
Criterion 3.9: Strengthen and account for responsible sourcing (1)	0				1
Criterion 3.10: Report publicly on responsible sourcing (16)	0				16
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)	0				14
Principle 5. Occupational Health and Safety					
Criterion 5.1: OH&S policy (6)	6				
Criterion 5.2: Health and Safety (OH&S) management system (10)	9	4	1		
Criterion 5.3: Leadership and worker engagement on OH&S (9)	9	1			
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	8				
Criterion 5.5: Safe and healthy workplaces (5)	4	2	1		
Criterion 5.6: OH&S performance (2)	2				
Criterion 5.7: Emergency preparedness (6)	6	1			
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (10)	10	1			

Criterion 6.2: Forced or compulsory labour (7)	7				
Criterion 6.3: Non-discrimination (9)	8	1	1		
Criterion 6.4: Association & collective bargaining (12)	12				
Criterion 6.5: Disciplinary practices (5)	4		1		
Criterion 6.6: Hearing and addressing worker concerns (5)	5				
Criterion 6.7: Communication of terms of employment (5)	5				
Criterion 6.8: Remuneration (11)	11				
Criterion 6.9: Working time (7)	7	1			
Criterion 6.10: Worker well-being (2)	2	2			
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5				
Criterion 7.2: Security practice (9)	9				
Criterion 7.3: Conflict-affected and high-risk areas (5)	5				
Principle 8. Stakeholder Engagement and Communication					
Criterion 8.1: Stakeholder engagement (10)	10	4			
Criterion 8.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 8.3: Communicating to the public (7)	7				
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	8				

Criterion 9.2: Free, Prior & Informed Consent (3)	3				
Criterion 9.3: Cultural heritage (6)	6				
Criterion 9.4: Displacement and Resettlement (9)	9				
Principle 10. Climate Change and Greenhouse Gas Emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	7				
Criterion 10.2: Corporate Climate-Related Financial Disclosure (2)	2				
Criterion 10.3: Determination of GHG emissions for the purpose of site level GHG emissions reduction targets and planning (4)	4				
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG emissions intensity for the production of crude steel (29)	0				29
Criterion 10.5: Site-level GHG reduction targets and planning (11)	11				
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8)	0				8
Criterion 10.7: GHG emissions disclosure and reporting (8)	4				4
Principle 11. Noise, Emissions, Effluents and Waste					
Criterion 11.1: Noise and vibration (7)	6	1	1		
Criterion 11.2: Emissions to air (8)	7	1	1		
Criterion 11.3: Spills and leakage (9)	8	2	1		

Criterion 11.4: Waste, by-product and production residue management (11)	11	2			
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7	1			
Criterion 12.2 Water balance and emissions (8)	8				
Criterion 12.3 Water-related adverse impact (6)	6				
Criterion 12.4 Managing water issues (8)	7	1	1		
Principle 13. Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	24	3	1		
Total (370)	340	32	10	0	184

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

Exclusions

2.4.4 – Belgium is not high risk country according to the Transparency International Corruption Perceptions Index. No public controversy either, then this requirement is not applicable
2.4.5 The company does not make financial or in-kind contributions to political parties, politicians, civil servants and other politically exposed persons (PEP)
Principle 3 full scope: N.A. N/A as this is a core certification which does not include the option additional requirements.
Principle 4 full scope: N.A. no retroactivity for decommissioning before certification.
5.4.2 – In accordance with the Belgian law, illness or death is provided through the Occupational Accident Insurance and social security system.
5.4.3 – In accordance with Belgian law, illness or death is provided through the Occupational Accident Insurance and social security system.

5.5.3 – There is no on–site housing.
6.1.3 – The company does not use or tolerate child labour for the workers employed directly by the site and also by the contractors according to Belgian regulations. Also, the risks of engaging children is law and mitigated (see 6.1.1 and 6.1.2)
6.4.2 – Freedom of association and collective bargaining are not restricted in Belgium; National regulations do not restrict workers' organisation in Belgium
6.8.5 – Not applicable since the sites do not provide on–site shops. Only collective catering services are offered at very attractive prices (below market prices) and with a financial contribution from the company
6.8.6 – Not applicable since the sites do not provide accommodation.
6.8.7 – Not applicable since it is defined by Belgian regulation
7.2.2 – Not applicable since there is no need for extensive measures to ensure security of people because the site is not located in a conflict area.
7.3.1. & 7.3.2 – The sites are not operating in conflict–affected or high–risk areas according to global conflict traquer– crf.org
9.2.1 & 9.2.2. & 9.2.3. Not applicable since no indigenous peoples have been identified in the area of influence, as per minorirghts.org
9.3.1. – 9.3.5. Not applicable as no critical cultural heritage exist in the sites' areas of influence according the UNESCO and local governmental criterias
9.4.1 to 9.4.7. Not applicable since no displacement and resettlement is being considered or has taken place in the last 10 years. Physical displacement has not occurred. Economic displacement as a result of land acquisition or restrictions on land use has not occurred.
10.4. Not applicable as the site only apply for core requirements
10.6. Not applicable as the site only apply for core requirements
10.7.1 b) iii. Not applicable as the site only apply for core requirements
10.7.2–3 – Not applicable as the site only apply for core requirements
13.1.2 No adjacent World Heritage sites, protected areas, indigenous sites, Ramsar site, Key Biodiversity Areas to the sites
13.1.3 No natural habitat has been identified since the sites are in industrial areas
13.1.4 No critical habitat

13.1.5 No World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I–VI
13.1.6 No World Heritage site, Ramsar site or officially protected area

Strengths

The main strengths that the auditors identified are summarized here:

- Safety dashboard and soon a PowerBI dashboard for the management of the cluster are good practices to manage the ESG KPIs (2.1)
- In the case of unusual tasks (without a procedure): identification of hazards and assessment of risks formalized and carried out by a working group (crossed view) is a good practice (5.2.2)
- Knowledge of the Emergency Kit by the personnel encountered (storage location and use in the event of a spill, including treatment of soiled absorbents) can be highlighted (5.2.2)
- Good knowledge of safety risks at the workstation (entrapment/crushing/handling equipment/manual handling/noise pollution/heat/scald... etc.) (5.2.2)
- Good communication of events experienced on other sites, which contributes to their awareness (5.2.2)
- Positive action of the person of trust and Prevention Officer in relation to psychosocial risks (5.2)
- Good support for employees following an accident at work: listening to their needs and covering all costs, including transport (ambulance and/or taxi) – Every effort is made to encourage their return to work: adapting their workstation, lightening their workload, returning to work part-time, etc. (5.4.1)
- Analysis of relevant workplace accidents and implementation of measures to prevent their recurrence (5.4.1)
- We would highlight the following good practices: Personal Protective Equipment (PPE) respect, 6S areas seen in different places, Colson of different colors for tracking slings, dedicated PPE related to the risks, badging system to limit access areas (5.5.1)
- Investment made to improve safety (ex: welding machine, thermographic cameras, VOC, etc. (5.5.1)
- Extensive range of training courses (2.5)
- Ability to evolve recognized by employees (2.5)
- Communication and dialogue with stakeholders, ensuring that their needs and expectations are considered (8.1)

- Positive feedback related to actions implemented which includes also good communication (8.1). They see the difference and transparency effort made by the site.
- Improvement made and with the level of maturity in certain sites related to the surrounding (11).
- Staff informed of the site's environmental approach (11)

Areas for improvement

The majority of non-conformities are linked to the implementation of actions requiring a longer period of time. In addition, the other types of non-conformity are linked to operational implementation deviations that are classically found in this type of industry. The Standard is a challenging tool which requires to go beyond the regulation and the border of the site.

The minor non-conformities are summarised below and will have to be fully addressed by ArcelorMittal by the time of the surveillance audit against the ResponsibleSteel Standard. Also, improvements are proposed to the site to strengthen their practices.

Procedures for dealing with policy deviations are not clearly formalized as it is limited to the policy implementation (1.2.3)

Actions to control/eliminate hazards and risks are incomplete in covering critical safety situations (5.2.2c)

Maintenance in good working order still shows weaknesses, particularly in the control of operations at (5.5.1)

The human resources risk identification procedure is incomplete because the mechanisms for reviewing, rating, and monitoring the risks are not defined (6.3.2a, 6.3.3a, 6.5.2)

The data analysis to demonstrate equal pay is incomplete and limited to the job's profile definition (6.3.6)

The ongoing monitoring program for vibration is not fully implemented as vibration studies are *in progress for Liège's sites. (11.1.2)

The levels of objectives for the analysis are not clearly documented as only 1 KPI has been identified related to noise in a short period (Peak) which is not fully representative of the whole situation and reports generated regarding noise and vibration (11.2)

The regular inspection of equipment is not fully demonstrated regarding the missing retention or retention full for chemical products, and waste identification (11.3.1 a-b)

The actions related to the water stewardship plan are not available to the public (12.4)

The assessment according to the biodiversity risks work is still in progress for Liege, Genk, Geel (13.1.7)

Assurance Panel declaration

In line with the ResponsibleSteel Assurance Manual, three members of the Assurance Panel reviewed the full audit report for ArcelorMittal Belgium, 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 ArcelorMittal Belgium.

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 08 August 2024.

More information on the Assurance Panel can be found on the ResponsibleSteel website. The audit process is described in the ResponsibleSteel Assurance Manual.