

# ResponsibleSteel™ Certified Site



Presented to

## ARCELORMITTAL CONSTRUCTION France SAS

Certificate code: 30450412 RS22

### ARCELORMITTAL CONSTRUCTION France SAS

Zone Industrielle  
Site 1  
55800 Contrisson  
FRANCE

### ARCELORMITTAL CONSTRUCTION France SAS

Zone Industrielle  
Site 2  
55800 Contrisson  
FRANCE

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

ResponsibleSteel Standard Version 1.1  
ResponsibleSteel Assurance Manual V1.0

### ISSUE DATE

2024-10-04

### EXPIRY DATE

2027-10-03

### NEXT SCHEDULED AUDIT

2025-10-15

### CERTIFIED SINCE

2024-10-04

### CERTIFICATION SCOPE

Production of coated coils: galvanized - lacquered - organic coating

### CERTIFICATION BODY

**DQS CFS GmbH**  
Deutsche Gesellschaft für Nachhaltigkeit  
August-Schanz-Straße 21  
60433 Frankfurt am Main



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

Site 2 : Downstream activities such as profiling and production of sandwich panels

### AUTHORISED CERTIFICATION BODY SIGNATURE

Guido Eggers, Managing Director DQS CFS

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](http://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.



# ResponsibleSteel™ Certified Site



Annex

## ARCELORMITTAL CONSTRUCTION France SAS

ResponsibleSteel Certificate code: xxxxxx

### SITES AND FACILITIES COVERED BY THE CERTIFICATE

ARCELORMITTAL CONSTRUCTION France SAS  
Coil Coating Contrisson Activities  
Zone Industrielle  
Site 1 & Site 2  
55800 Contrisson  
FRANCE

### SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

ARCELORMITTAL  
CONSTRUCTION France SAS  
Coil Coating Contrisson Activities  
Zone Industrielle  
Site 1  
55800 Contrisson  
FRANCE

ResponsibleSteel™, 755 Hunter Street,  
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# Public summary audit report

This is a concise public summary of the audit report for ARCELOR MITTAL CONSTRUCTION FRANCE. The full version of the audit report is in the possession of the member company and the audited sites.

## Audit overview

|   |  |
|---|--|
| <b>Member name</b>                              | ARCELOR MITTAL   |
| <b>Audited entity name</b>                      | ARCELOR MITTAL CONSTRUCTION FRANCE   |
| <b>Number of sites<br/>Names &amp; location</b> | Two sites : <ul style="list-style-type: none"><li>- Contrisson Site 1</li><li>- Contrisson Site 2</li></ul>  |
| <b>Certification scope</b>                      | Production of coated coils: galvanized – lacquered – organic coating   |
| <b>Standard version audited against</b>         | <a href="#">ResponsibleSteel Standard V2-1 – Certified Site</a>  |
| <b>Audit type and outcome</b>                   | Surveillance Audit   |
| <b>Certification body</b>                       | DQS  |
| <b>Audit dates</b>                              | 8-9-10-13-14-15-16-17 October 2025   |
| <b>Number of auditors and audit days</b>        | 1 auditor<br>8 days stage 2 and 4 days for reporting   |
| <b>Lead auditor declaration</b>                 | 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 |

|                                 |   |
|---------------------------------|---|
|                                 | <p>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> |
| <b>Next audit type and date</b> | Surveillance (April 2027)   |

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# Introduction

## About ResponsibleSteel

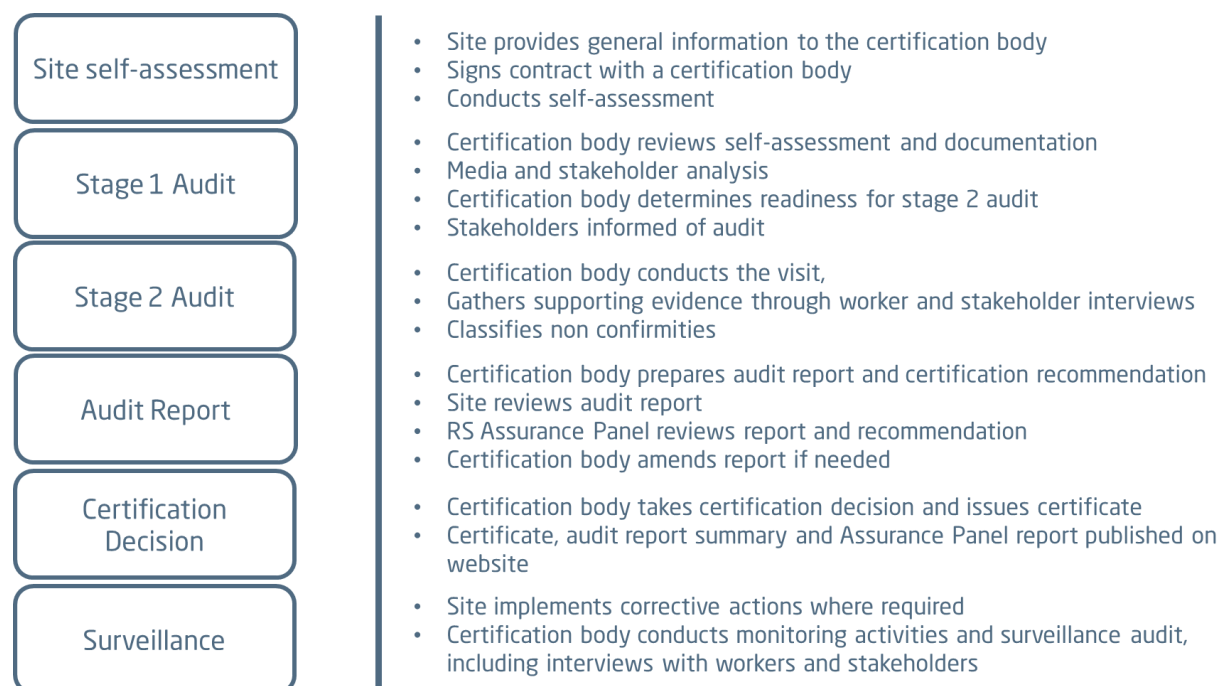
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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

|   |  |
|---|--|
| <b>Country and town</b>   | FRANCE, City of Contrisson   |
| <b>Activities and products</b>  | Production of coated coils: galvanized – lacquered – organic coating   |
| <b>Year site opened</b>   | 1976   |
| <b>Major extensions and / or refurbishments and year(s) when these occurred</b> | <p>In 1995, the Galvameuse company became a subsidiary of HAIRONVILLE SA.</p> <p>In 1996, the revamping of the Novolac pre-lacquering line allowed it to increase its flexibility.</p> <p>In 1999, modernization of the "GALVA2" galvanizing line by adding a second continuous pre-painting line.</p> <p>In 2000, Authorization for bulk paint storage (1st bulk tank)</p> <p>In 2001 ; Installation of a perforation line, and installation of the 2nd bulk paint tank</p> <p>In 2002 ; Decision to install a stripping line.</p> <p>In 2005: Installation of a 4th bulk paint tank et</p> <p>In 2006: Installation of offices, Closure of the site, Modification of hydrogen station, Modification of fire network</p> <p>In 2007: Relocation of the store</p> <p>In 2013: OPTIGAL installation</p> |
| <b>Annual production</b>  | 400 000 tons of incoming and processed raw coils in 2024   |
| <b>Number of employees and contractors</b>                                      | <p>Contrisson Site 1 : 257 (195 men and 62 women)</p> <p>Contrisson Site 2 : 20 (15 men and 5 women)</p>   |
| <b>Carbon reduction target</b>  | Net Zero by 2050 , 25% in 2030 (scope 1 et 2)  |
| <b>Further environmental and social information</b>                             | No waste sent to landfill  |

# 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](#).

By definition, 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 Construction France 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 auditor examined the list and asked the sites to organize the interviews with the stakeholders extracted from the press and present in the list. They requested that the sites identify additional significant stakeholders such as environmental NGOs. The Annex describes the areas of influence and provides the full list of external stakeholders that were identified for the scope.

For the entire ArcelorMittal France perimeter, more than 20 stakeholders were identified.

The main stakeholders identified by ARCELORMITTAL Construction France are :

- Local communities : mainly local residents and neighboring communities
- National government authorities
- Labour unions
- Civil society organizations
- And academics

In 2025, there has been an update to the mapping of Relevant Stakeholders: document '2015-10-02-Main Institutionals and PIP\_CCC-RS'. New stakeholders have been identified : Société Aquaprox & BWT (as part of the project to reduce water consumption & water treatment). All stakeholders were contacted as part of the process : 10 meetings were organized between the certification audit and the surveillance audit.

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 organizing virtual or in-person meetings with those stakeholders that responded to the invite and volunteered to be interviewed. Several requests for an interview were positive. The level of participation of sub-contractors was very important. It was easy to have interviews with such stakeholders , the communication were very transparent.

There was a lack of input from politicians and inspectors. There are not answer at the contacts and email but the different report communicated for understand the need were explicit.

In France, labour and environmental inspectors do not wish to share their reports with third parties even if the company's agreement has been given. Several stakeholder interviews were conducted by Microsoft Teams or phone, but the majority were realized physically. Different suppliers were interviewed on the AM France.

The auditor interviewed workers of all shifts during the audit certification system ISO14001 ISO 50001, ISO 45001 ISO 9001 and during specific site visit. The auditors preselected workers for interviews (according to the sampling rules defined in the ResponsibleSteel Assurance manual) and, together with the sites, confirmed which of those 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 auditors also held a meeting with the different labour unions and/or worker's representative.

Apart from interviews with process owners as relevant for the 13 Principles of the ResponsibleSteel Standard, a number of workers and external stakeholders were interviewed, as summarized here:

Approximately 15 interviews (6 interviews with women) across AMCF :

- 12 people were (Logistic – production : stripping – rolling)
- 1 external supplier (raw material suppliers)
- 3 people form external organization (Authorities / Neighbors / University)

Exchanges with external stakeholders were of a very high standard

Discussions focused on their expectations of ResponsibleSteel and their vision of the company's safety, health and environmental policies.

For most of the interviews, expectations focused more on the decarbonisation process, associated employability and environmental impact.

They appreciated the communication efforts made by AM France and the numerous visits organised to see the developments and challenges of the processes

From an external point of view, it also emerges from several interviews that training and support for young people is a quality, as is staff safety.

The interviewed suppliers demonstrated a high level of loyalty with the sites, which makes it difficult to identify potential areas of concern, if these exist

The approach and management of safety are perceived positively, although standards are imposed and the level of requirements is high, but the results are effective and the subcontractors recognise the benefits of this level of requirements

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 277 individuals (including full and part-time employees and contractors) work at the Contrisson site. The majority of the sites apply a system of 5 teams rotating around the 3 shifts.

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

The overall interviews carried out with the operators, or managers, bring out the same positive note that they feel safe on the site. And that many actions are undertaken to support them in personal development as well as active listening reinforces the feeling of well-being

Training stands out as an asset and a quality

The state of the infrastructure often tarnishes the image of the company and not only at the primary level.

## Summary of audit findings

|  |   |
|--|---|
| <b>Conform</b>                           | Conformity, the requirement is fulfilled.   |
| <b>Opportunity for improvement (OFI)</b> | 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.   |
| <b>Minor non-conformity (NC)</b>         | 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.  |
| <b>Major non-conformity (NC)</b>         | 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. |
| <b>Exclusion</b>                         | The requirement is either <b>not applicable</b> : excluded from the audit since it is not applicable to the sites; or <b>not rated</b> : the requirement is very closely linked to another requirement where a non-conformity (NC) or opportunity for improvement (OFI) has already been raised. Sometimes, when requirements   |

|  |  |
|--|--|
|  | are linked to one and the same subject-matter, it is appropriate to count NCs or OFIs only once to avoid repetition. |
|--|--|

| Principles and criteria (# of requirements)   | Conform | OFI | Minor NC | Major NC | Exclusion |
|---|---------|-----|----------|----------|-----------|
| <b>Principle 1. Corporate Leadership</b>  |         |     |          |          |           |
| Criterion 1.1: Corporate Values and Commitments (6)   | 6       |     |          |          |           |
| Criterion 1.2: Leadership and Accountability (5)  | 3       | 2   |          |          |           |
| <b>Principle 2. Social, Environmental and Governance Management Systems</b>   |         |     |          |          |           |
| Criterion 2.1: Management System (5)  | 2       | 3   |          |          |           |
| Criterion 2.2: Responsible Sourcing (5)   |         | 1   | 4        |          |           |
| Criterion 2.3: Legal compliance and signatory obligations (6)   | 3       | 3   |          |          |           |
| Criterion 2.4: Anti-Corruption and Transparency (8)   | 7       |     |          |          |           |
| Criterion 2.5: Competence and awareness (5)   | 5       |     |          |          |           |
| <b>Principle 3. Responsible Sourcing of Input Materials (NOTE: applicable if site seeks certification to the additional requirements. If not applicable, mark as n/a)</b> |         |     |          |          |           |
| Criterion 3.1: Commit to responsible sourcing (18)  | N/A     |     |          |          | 8         |
| Criterion 3.2: Know your upstream supply chains (10)  | N/A     |     |          |          | 7         |
| Criterion 3.3: Understand supplier ESG performance (15)   | N/A     |     |          |          | 18        |
| Criterion 3.4: Strengthen and account for responsible sourcing (23)   | N/A     |     |          |          | 21        |
| Criterion 3.5: Report publicly on responsible sourcing (11)   | N/A     |     |          |          | 11        |
| Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes. (15)   | N/A     |     |          |          | 15        |
| Criterion 3.7: Know your upstream scrap supply chain (8)  | N/A     |     |          |          | 7         |
| Criterion 3.8: Understand supplier ESG performance and promote improvement (12)   | N/A     |     |          |          | 12        |

| Principles and criteria (# of requirements)                                      | Conform | OFI | Minor NC | Major NC | Exclusion |
|--|---------|-----|----------|----------|-----------|
| Criterion 3.9: Strengthen and account for responsible sourcing (1)               | N/A     |     |          |          | 1         |
| Criterion 3.10: Report publicly on responsible sourcing (16)                     | N/A     |     |          |          | 16        |
| <b>Principle 4. Decommissioning and closure</b>                                  |         |     |          |          |           |
| Criterion 4.1: Decommissioning and closure (14)                                  |         |     |          |          | 14        |
| <b>Principle 5. Occupational Health &amp; Safety</b>                             |         |     |          |          |           |
| Criterion 5.1: OH&S policy (6)   | 6       |     |          |          |           |
| Criterion 5.2: Health and Safety (OH&S) management system (10)                   | 10      |     |          |          |           |
| Criterion 5.3: Leadership and worker engagement on OH&S (9)                      | 9       |     |          |          |           |
| Criterion 5.4: Support and compensation for work-related injuries or illness (8) | 4       |     |          |          | 4         |
| Criterion 5.5: Safe and healthy workplaces (5)                                   | 4       |     |          |          | 1         |
| Criterion 5.6: OH&S performance (2)  | 2       |     |          |          |           |
| Criterion 5.7: Emergency preparedness and response (6)                           | 6       |     |          |          |           |
| <b>Principle 6. Labour Rights 9</b>  |         |     |          |          |           |
| Criterion 6.1: Child and juvenile labour (10)                                    | 9       |     |          |          |           |
| Criterion 6.2: Forced or compulsory labour (7)                                   | 7       |     |          |          |           |
| Criterion 6.3: Non-discrimination (9)  | 9       |     |          |          |           |
| Criterion 6.4: Association & collective bargaining (12)                          | 2       |     |          |          | 1         |
| Criterion 6.5: Disciplinary practices (5)  | 5       |     |          |          |           |
| 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)   | 9       |     |          |          | 2         |
| Criterion 6.9: Working time (7)  | 7       |     |          |          |           |
| Criterion 6.10: Worker well-being (2)  | 2       |     |          |          |           |
| <b>Principle 7. Human Rights</b>   |         |     |          |          |           |
| Criterion 7.1: Human rights due diligence (5)                                    | 4       | 1   |          |          |           |

| Principles and criteria (# of requirements)   | Conform | OFI | Minor NC | Major NC | Exclusion |
|---|---------|-----|----------|----------|-----------|
| Criterion 7.2: Security practice (9)  | N/A     |     |          |          | 9         |
| Criterion 7.3: Conflict-affected and high-risk areas (5)  | N/A     |     |          |          | 5         |
| <b>Principle 8. Stakeholder engagement and communication</b>  |         |     |          |          |           |
| Criterion 8.1: Stakeholder engagement (10)  | 10      |     |          |          |           |
| Criterion 8.2: Grievances and remediation of adverse impacts (12)   | 12      |     |          |          |           |
| Criterion 8.3: Communicating to the public (7)  | 7       |     |          |          |           |
| <b>Principle 9. Local Communities</b>   |         |     |          |          |           |
| 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         |
| <b>Principle 10. Climate Change and GHG emissions</b>   |         |     |          |          |           |
| Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)  | 5       |     | 2        |          |           |
| Criterion 10.2: Corporate Climate-Related Financial Disclosure TCFD (2)   | 2       |     |          |          |           |
| Criterion 10.3: Determination of GHG emissions for the purpose of site level GHG emissions reduction targets and planning (4)   | 2       |     | 1        |          | 1         |
| 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) (NOTE: applicable if site seeks certification to the additional requirements. If not applicable, mark as n/a) | N/A     |     |          |          | 28        |
| Criterion 10.5: Site-level GHG emissions reduction targets and planning (11)  | 2       |     |          |          |           |
| Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8) (NOTE: applicable if site seeks certification to  | N/A     |     |          |          | 6         |

| Principles and criteria (# of requirements)   | Conform        | OFI        | Minor NC        | Major NC        | Exclusion        |
|---|----------------|------------|-----------------|-----------------|------------------|
| the additional requirements. If not applicable, mark as n/a)  |                |            |                 |                 |                  |
| Criterion 10.7: GHG emissions disclosure and reporting (8) (NOTE: 10.7.2 and 10.7.3 only applicable if site seeks certification to the additional requirements) | 4              |            |                 |                 |                  |
| <b>Principle 11. Noise, emissions, effluents and waste</b>  |                |            |                 |                 |                  |
| Criterion 11.1: Noise and vibration (7)   | 7              |            |                 |                 |                  |
| Criterion 11.2: Emissions to air (8)  | 8              |            |                 |                 |                  |
| Criterion 11.3: Spills and leakage (9)  | 9              |            |                 |                 |                  |
| Criterion 11.4: Waste, by-product and production residue management (11)  | 11             |            |                 |                 |                  |
| <b>Principle 12. Water Stewardship</b>  |                |            |                 |                 |                  |
| Criterion 12.1 Water-related context (7)  | 7              |            |                 |                 |                  |
| 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)  | 8              |            |                 |                 |                  |
| <b>Principle 13: Biodiversity</b>   |                |            |                 |                 |                  |
| Criterion 13.1: Biodiversity commitment and management (25)   | 18             | 1          |                 |                 | 5                |
|   | <b>Conform</b> | <b>OFI</b> | <b>Minor NC</b> | <b>Major NC</b> | <b>Exclusion</b> |
| <b>Total (534) * (NOTE: Total number has to be reduced accordingly if site does not seek certification to the additional requirements)</b>                      | <b>259</b>     | <b>10</b>  | <b>7</b>        | <b>0</b>        | <b>156</b>       |

\* 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

Criterion 2.4.4: in the world's classification, the risk "Corruption" in France is classified Low risk

Principle 4: No planned closure or decommissioning for this company.

Criterion 3.1–3.2–3.3–3.4–3.5–3.6–3.7–3.8–3.9–3.10 : ResponsibleSteel Core site certification

Criterion 5.4.2, 5.4.3: The costs and losses associated with an accident at work, illness or death are covered by state health insurance funds or schemes and by insurance companies, not by the site.

Criterion 5.5.3: ArcelorMittal France does not provide on-site housing

Criterion 6.4.2 Compliance with the regulation / Law; Freedom of association and collective bargaining are not restricted by the French legislation

Criterion 6.8.6: the sites do not provide accommodation

Criterion 7.2: Where the sites are located there is no requirement to put in place extensive measures for the safety of people / The sites are protected in accordance with the requirements for controlling access to sites classified as highly dangerous / Hazardous for the environment.

Criterion 7.3: the sites are not operating in conflict-affected or high-risk areas according to Global Conflict Tracker | Council on Foreign Relations (cfr.org)

Criterion 9.2 no indigenous peoples in the site' area of influence

Criterion 9.3 no cultural heritage currently

Criterion 9.4 Displacement or resettlement did not take place and is not planned to take place

Criterion 10.4: The site do not produce crude steel

Criterion 10.5.1 b: no import to the site from outside the site boundary.

Criterion 10.5.1.d & e: not using CO2 offsets.

Criterion 10.6 : The site do not produce crude steel

Criterion 12.2.4: The standards for quality of water and waste water are defined by Permits.

Criterion 13.1.2 a: Sites are not situated in a world heritage site.

Criterion 13.1.2c: No indigenous and community- conserved areas (ICCAs)

Criterion 13.1.2.d: No RAMSAR site.

Criterion 13.1.6: There is no World Heritage site, Ramsar site or officially protected area established in, around or adjacent to the area of AMCF activities in all sites,

Criterion 13.1.11: there has been no controversy egarding biodiversity risks and impacts

## Strengths

The strength of the management of the ResponsibleSteel system is mainly to be integrated into the QSEE management system (Quality, Safety, Environment and Energy)

This QSEE Management system, having been certified for many years and integrated into the management of each entity, has made it possible to integrate the requirements and approach targeted by ResponsibleSteel in a preventive and anticipatory approach.

The significant strengths are

- supervision with leadership
- Needs and expectations of stakeholders in active listening
- management of suppliers in a societal policy (and consistent in the various interviews)
- relations with stakeholders at a good level with the establishment of an institutional representative
- Integrated Safety and Environment management both in terms of indicators and operational applications
  - a good level of regulatory monitoring
  - Site level management of GHG good organization, roadmap with milestone, well-structured and well associated sites
  - Work on the waste strategy to reduce waste generation
  - Resources put in place to improve and manage the Water policy

## Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 11 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:

Criterion 1.2.3. : Set up monitoring on how well the values, policies, and commitments defined by the corporate owner are implemented in practice

Criterion 1.2.5. : Ensure that these evidence is systematically available.

Criterion 2.1.2.a : The main identified risks are related to the fields of environment and health and safety; this analysis should be extended to other ESG topics (supply chain – community relations – ethics and integrity – reporting and transparency ...)

Criterion 2.1.2.b : Better define the major risks in the RS approach than the main management factors of the different systems par les SWOT analysis

Criterion 2.1.2.c : All the indicators by domain are integrated into the process management (safety, health, environment, etc.) the approach aimed at demonstrating the level of RS compliance, as is done for the other standards, would strengthen the management demonstrating compliance

Criterion 2.2.1.b : The questionnaire sent to suppliers does not take into account aspects of social responsibility and sustainable sourcing

Criterion 2.3.1.b : The process for defining regulatory requirements is in place. However, it should be extended to other compliance areas (for example, labor law – business law – commercial law) and responsibilities should be defined.

Criterion 2.3.2 : Regulatory compliance is assessed at regular intervals, particularly for Safety–Environment topics; this practice should be extended to other areas of social responsibility.

Criterion 2.3.3 : The site keeps records to demonstrate compliance with environmental and health and safety regulations, but not with regard to the other topics to which it has committed.

Criterion 7.1.5 : The effectiveness of the site's procedures for preventing and mitigating human rights–related risks and adverse impacts could be more often verified by a competent independent party (at least once a year)

Criterion 13.1.3 : A mitigation hierarchy should be integrated in an instruction and applicable to each project

# Assurance Panel declaration

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

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 04 October 2024.

More information on the audit process and the role of the Assurance Panel can be found in the ResponsibleSteel Assurance Manual.