

Certified Site



Presented to

ACE/2022/100136.2

ArcelorMittal Méditerranée

SITE NAME AND ADDRESS

ArcelorMittal Méditerranée, Zone Industrielle
Aile 22 village Entreprise Sollac, ,
F-13270 Fos-sur-Mer, FRANCE

ArcelorMittal Méditerranée, av Martyrs Du Maquis,
F48200 Saint-Chély-d'Apcher, France

CLIENT NAME AND ADDRESS

ArcelorMittal Méditerranée, Siège Social, 6 rue André Campra,
93200 Saint-Denis, France

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

ResponsibleSteel Standard version 2.1 ResponsibleSteel
Assurance Manual version 2.2

ISSUE DATE
12 May 2026

EXPIRY DATE
01 May 2028

NEXT SCHEDULED AUDIT
Nov 2026 (TBC)

CERTIFIED SINCE
02 May 2022

CERTIFICATION SCOPE

PRODUCTION OF COKE, SINTER AND INTERNAL
TRANSPORT OF RAW MATERIALS, PRODUCTION OF
PIG IRON AND BY-PRODUCTS, PRODUCTION AND
SERVICING OF SLABS, HOT ROLLED (PICKLED)
COILS AND SHEETS, COLD ROLLED COILS AND
SHEETS INTERMEDIATE AND END PRODUCTS.

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

None

CERTIFICATION BODY

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



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 probatory value.

Julien NIZRI, General Manager

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

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

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



Certified Site



Annex

ACE/2022/100136.2

ArcelorMittal Méditerranée

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Fos-sur-Mer: 1 sinter plant, 1 coke plant, 2 blast furnaces, 2 oxygen converters, 2 continuous casters, 1 in-ladle metallurgy treatment installation (vacuum degassing, chemistry refining, CAS-OB), 1 hot strip mill, finishing lines (1 pickling line, 1 temper mill, 2 shearing lines, 2 slitting lines).

Saint Chély d'Apcher: pickling, batch annealing, cold rolling, degreasing, annealing, coating, slitting.

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

ResponsibleSteel(™), 755 Hunter Street
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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.



Public summary audit report

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

Audit overview

Member name	ArcelorMittal Group
Audited entity name	ArcelorMittal Méditerranée
Number of sites Names & location	2 sites : – ArcelorMittal Méditerranée site of Fos-sur-Mer FR-13776 Fos-sur-Mer Cedex – ArcelorMittal Méditerranée site of Saint-Chély-d'Apcher rue des Martyrs du Maquis FR-48200 Saint Chély d'Apcher
Certification scope	ArcelorMittal Méditerranée operates as a cluster that designs, develops, produces and services flat steel products
Standard version audited against	ResponsibleSteel Standard V2-1 – Certified Site
Audit type and outcome	Re-certification
Certification body	AFNOR Certification, 11, Rue Francis de Pressensé, 93200 Saint Denis, France
Audit dates	Stage 1: 26_27_28/02/2025: 6,5 Days (2 auditors) Stage 2: 14 – 17/04/2025: 10,5 days (2 auditors) Special audit: September 2025
Number of auditors and audit days	Lead auditor: Caroline BRULEBOIS Auditor/s: Delphine BESSOT Stage 1: 6,5 Days

	Stage 2: 10,5 days
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	Surveillance audit Nov 2026 (TBC)

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Introduction

About ResponsibleSteel

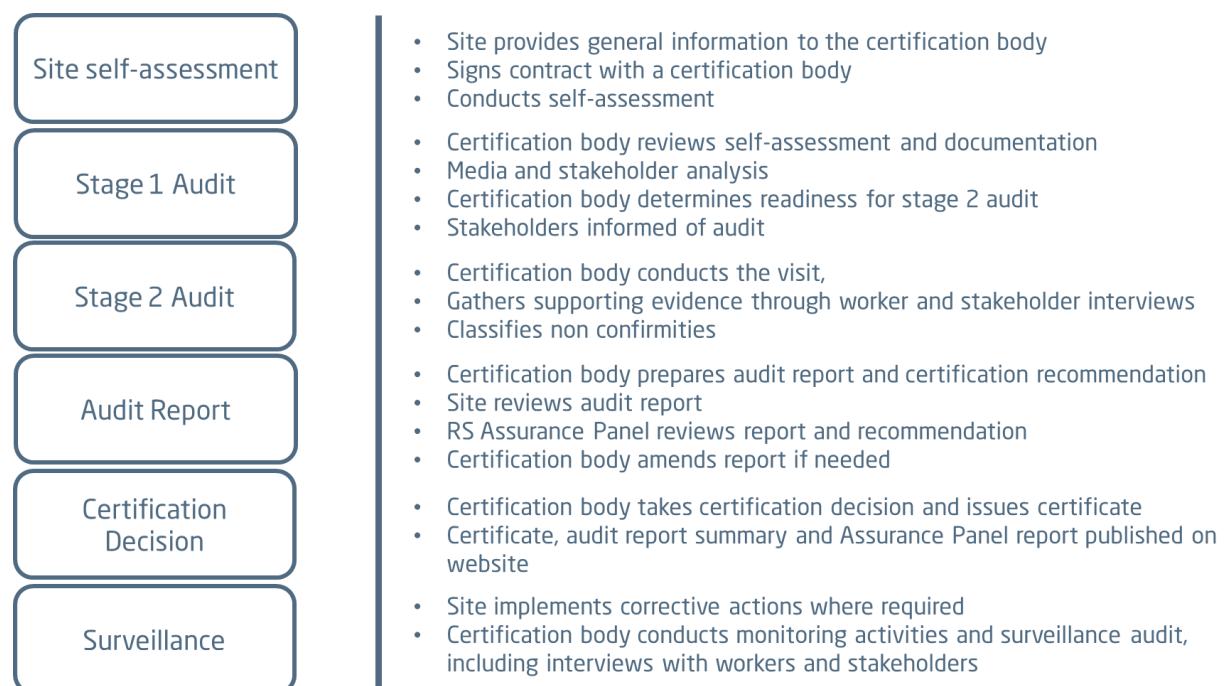
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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	France – Fos-sur-Mer France, Saint-Chély-d'Apcher
Activities and products	ArcelorMittal Fos-sur-Mer This is the main site of the cluster and an integrated steel plant. It covers all phases of steel production and processing. The site comprises: 1 discharging quay/ 1 loading quay, 1 sinter plant, 1 coke plant, 2 blast furnaces, 2 oxygen converters, 2 continuous casters, 1 in-ladle metallurgy treatment installation (vacuum degassing, chemistry refining, CAS-OB), 1 hot strip mill, finishing lines (1 pickling line, 1 temper mill, 2 shearing lines) Products: Black coil, pickled and oiled coil and sheet, slit coils ArcelorMittal Méditerranée site of Saint-Chély-d'Apcher This site carries out different activities, including pickling, batch annealing, cold rolling, degreasing, annealing, coating, and slitting. Products Non oriented electric sheets, electrical energy production (50% of the plant's electrical power supply needs).
Year site opened	Fos-sur-Mer 1973 Saint Chély d'Apcher (1917)
Major extensions and / or refurbishments and year(s) when these occurred	Fos-sur-Mer Coke plant: 150 million euros investment for a complete overhaul of 126 furnaces over the last few years to reduce the diffuse emissions 2022 – automatic safety valve ignition system 2024 – stoppage of battery 3 Sinter plant: 1993 – Sinter strand elongation (400 m2 to 520 m2) 2001: Sinter strand enlargement (520 m2 to 572 m2) 2022: MISTRAL– dedicated system for smoke pollutants reduction 2023: ODAS – innovative dust filtration system, covering a surface area of 20,000 m2

	Blast furnaces: BF1 – 1981–1991–2007 – Relinings 2024 – Next relining (4th) BF2 – 1982–1993–2011 – Relinings Steel shop: 1998 – Continuous caster CC2 revamping / Vertical & Bending machine 2008 – Continuous caster CC1 revamping / Vertical & Bending machine 2024 – Ladle furnace Hot Street Mill: 1982: Walking beam furnace n° 3 1996: Sizing press 2001: New bending actuators finishing mill F1–F4 2006: New coiler n° 4 for heavy coils Saint Chély d'Apcher (1917) As a result of a complete refurbishment in the early 1990s, the plant fully switched to electrical steel production in 1993 and is today part of the world leaders in high-value electrical steels. Over 120 million invested since 2013 for the following extensions/renovations: - A high-tech continuous annealing line to improve the magnetic performance of our steels - An eco-responsible continuous pickling annealing furnace to develop new products and for the automotive industry - Modernisation of the rolling mill to improve product quality - A laser welder on the slitting line to better meet customer requirements
Annual production	Fos-sur-Mer: 2 millions tons of steel in 2024 Saint Chély d'Apcher: 100.000 tons of electrical steel – 150 steel grades
Number of employees and contractors	Fos sur Mer 2500 employees (out of which 9,6% female employees)

	1200 contractors Saint Chely D'Apcher (out of which 8,4% female employees) 200 employees 70 contractors
Carbon reduction target	ArcelorMittal Europe is targeting a 35% reduction in Scope 1 and 2 CO2e by 2030 versus a 2018 baseline, and to reach net-zero by 2050. This is described in the company's sustainability report https://corporate.arcelormittal.com/sustainability/climate
Further environmental and social information	ArcelorMittal France sustainability report can be found here: https://france.arcelormittal.com/engagements/rse-et-vigilance

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 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 Méditerranée Cluster provided a list of external stakeholders to the auditors, based on their areas of influence, their ongoing stakeholder engagement efforts, as well as relevant media articles and other publications. With the information collected during the preparation step 1 and the survey communication from the press provided by AFNOR Certification, the team of auditors defined the more important stakeholder they want to meet and asked the sites to organize the interviews with the stakeholders (as municipal mayors, People administration, inspections, ...) and present in the list communicated by the cluster.

To define the list of interested Parties to contact, the audit team has selected the contacts from the list provided by the cluster and prioritizing them based on media analyzes on themes (air pollution) or on events (for example for the Fos site, environmental incidents, Heath situation, local health, town hall, etc.).

The media analysis, for the Saint Chély site, did not report any dissatisfaction or negative factors, which made it possible not to prioritize contact and with the results communicated with the self-assessment, the choice was more oriented on environmental themes and actors linked to investments on the site. About more than 120 external stakeholders have been informed about the on-going RS certification process in addition to the workers.

It was not useful to complete the list of speakers since this list included the main contacts. 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 Mediterranean Cluster.

Some insights on environmental concerns:

The environmental issues of both sites are tackled at cluster level. However, the issues are more difficult to deal with in Fos, who holds a raw material park, a coke plant and a steel plant, than in St Chély which is a small downstream facility. Furthermore, the issues are quite different for the two plants. Located at ≥ 3 kms from inhabited areas with the winds mainly headed to the sea, Fos focuses on air and water emissions. Being close to the town, Saint Chély deals mainly (and to a smaller extent) with noise concerns.

In Fos area, some part of the population has developed an aggressive approach to industries in general, despite the fact that the industrial sites in the area are accountable for less than 50% of the air emissions. This already started when the area went through a massive transformation in the late 60s, with thousands of workers joining the area, and founding new towns or new areas around pre-existing villages (like Fos's case). Last but not least, this kind of resistance had strongly increased at the beginning of 2000s, when the government has decided the implementation of a new incinerator for wastes coming from Marseille on Fos's territory, against the will of the majority of the population.

These events gave birth to a unique initiative – led by state – the innovative approach of concertation with all the stakeholders, for each particular issue. A big part of the stakeholders is understanding this approach as the efforts to curve down the negative environmental impact brought during the last decades, supporting at the same time the industry as an important source of employment and economical benefits for the surrounding area.

Due to the nature of the plant's activities, Fos is one of the contributors to the pollution of air or water in the area, reason why, under strong pressure of governmental agencies as well as local communities, the environmental issues are strongly tackled with ArcelorMittal group financial support (100 m€ invested since 2012 and 30m€ were engaged for 2020–2021). Improvements over the past 10 years have been very important, cutting atmospheric emissions by half or more, and will continue to be as environmental concern is – with safety – one of the major priorities of the plant's management. Fos missioned the LECES Laboratory to conduct an independent ERS (Sanitary Risks assessment) of Fos Plant in 2018, following the new approval to operate issued by the French legal authorities. The conclusion of this assessment was shared with several stakeholders. Complete report can be provided as evidence.

Conclusion of LECES report from 2018: "Considering the conclusions of the IEM specifying that the environment conditions are compatible with the usages and these results, the site ArcelorMittal Fos-sur-Mer doesn't demonstrate any significative sanitary impact on the surrounding area."

All external stakeholders on the list were informed of the ResponsibleSteel audit 4 weeks prior the stage 2. They have been contacted by Afnor via email in the regionally used languages. AM Med has also organized a communication campaign to inform the stakeholders about the certification process.

The auditors worked closely with the both sites on organizing of virtual or in-person interviews.

For the French administrations (CARSAT DREAL, Town Hall, Deputies, prefects and associations) several reminders were made between the 2 audit stages (by AM Med and by the auditors) to be able to obtain more interviews, but the level of response remained very low.

Requests for interviews or meetings have mostly remained unanswered for all requests made by the company and by the audit team, which contradicts the image communicated by the press and for NC situations (such as formal notices).

The stakeholders did not seize the opportunity to confirm their state of satisfaction with the needs and expectations.

The level of participation of sub-contractors was important (all request for an interview was positive). The stakeholder interviews were conducted by Microsoft Teams or phone or physically. Suppliers were interviewed on the AM Méditerranée Cluster (Fos-sur-Mer and Saint-Chély d'Apcher sites).

Workers are an important internal stakeholder since they are directly affected by the activities of the sites. About 2500 employees and 1200 contractors in 2024-2025 (including full and part-time employees and contractors) work for Fos and 200 employees and 50 contractors for St Chély Site.

All sites apply a system of 5 rotating shifts:

- Morning: 05:00 – 13:00 (Fos) 04:00 – 12:00 (St Chély)
- Afternoon: 13:00 – 21:00 (Fos) 12:00 – 20:00 (St Chély)
- Night: 21:00 – 05:00 (Fos) 20:00 – 04:00 (St Chély)

The auditors interviewed workers of all shifts during the site visit. The auditors preselected workers for interviews 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 additionally to the provided statistics which makes at the total more than 50 persons.

The auditors also held several meetings with the trade unions at Fos-sur-Mer and Saint Chély. The representatives of all present TU have been met.

A part from interviews with process owners as relevant for the 12 Principles of the ResponsibleSteel Standard, several workers and external stakeholders were interviewed, as summarized here:

External stakeholders that were interviewed:

- municipal mayors– Port de Bouc and Saint Chély
- sub-prefect of the district of Istres
- Associations : Delegation Generale du SPPPI PACA

- Suppliers (such as an industrial cleaning, packing, maintenance supplier, and Manpower temporary company (Fos sur Mer)
- Environmental – Natural areas management , ORTEC , ECOMED (Fos sur Mer)
- Environmental Saint Chely d'Apcher Naturalist Association (Saint Chely)
- Professional Association – economy circular (Saint Chely)
- Doctor (Fos sur Mer) ; Psychologist

For the majority of internal or external stakeholder interviews, the objective was to evaluate relations with AM on various current topics (economy, environment, decarbonization and participation in community life).

The overall perception of external stakeholders is rather positive, being for certain municipalities the largest employer (Fos-sur-Mer and St-Chely), contributing to the influence of local economic development.

Overall, the inputs provided by internal and external stakeholders were mixed (positive and negative) in nature. Most of the relevant input from external stakeholders came from government organizations, association, subcontractor and from stakeholders that have a strong relationship with the site (for example the administrations which support the site in the decarbonization plan and the maintenance of employment). The input provided may be impacted by the business relationships with the sites. The interviewed suppliers demonstrated a high level of loyalty to the sites, which makes it difficult to identify potential areas of concern, if these exist.

Although many communications external to the Fos site appear negative (atmospheric emissions, environmental situation, environmental and safety formal notice, financial penalties, state of employees' psychological health), the positive factors that emerged from the interviews demonstrate the site's commitment to improving the factory environment through investment; many stakeholders also recognise the difficulty of being able to rapidly improve situations (safety and environment) concerning industrial processes, as equipment is expensive and few suppliers can make it.

The improvement of the communication on the events and better information on the context and the actions planned to deal with the problems have been acknowledged (e.g. importance of the meeting called CLIE (Commission Locale d'Information et d'Echange – Local Information and Exchange Commission) where most of the stakeholders and neighbours of the site of Fos take part in it).

Verbatim: *"Having direct contact with them makes exchanges easier: 'Calling someone like the CEO is easier"*

The feedback from the majority of interviews with external stakeholders confirms a significant improvement in relations with the community, improvement in the information dedicated to the public.

Verbatim: *"Transparency at the hierarchy level on the St Chely site and recognition at the departmental level of the efforts that were made during the summer shutdowns"*

For the Saint Chély site, all the interviews show a positive opinion (investment policy, state of the site and good integration in the city, integration in the local landscape, maintenance of the hydraulic power plants).

The site of Saint Chély participates a lot in the positive communication of the Mediterranean cluster.

For the staff who have been met, the interviews provided information and confirmation regarding the developments they were able to see within each of the sites.

These developments also included:

- their security (individual protection made available, *"we really have no problem on this point"*,
- social support, psychological assistance, specialist meeting if necessary
- Atmosphere at work, well-being at work in high-level positions which is not felt in the same way in offices

Interviews show that AM Med's image is better than in the past and that the decarbonization project is important for the community, given the various local projects underway in the PACA region.

Past environmental incidents do not help the local image and diminish the positive effects of the numerous investments implemented and demonstrating a good level of compliance.

Many interviews (institutions and workers) recognize the strong involvement of the local CEO management in ensuring the sustainability of the FOS site.

The involvement in the process of repositioning/transferring staff according to situations and configurations was also recognized.

It was possible to observe through interviews at the workstations and by employees a significant improvement in working conditions and lighting, access to workstations.

The topics that could be improved through discussions included:

Some questions from subcontractors and associations are currently present, with the change of CEO in October 2024, they expect the same level of communication that the previous CEO had put in place and more.

Having information in anticipation and not in "reaction » Better visibility of planning process modifications which could generate environmental impacts, which would facilitate responses to requests from local residents, which would improve the communication channel.

Some interviews with workers were able to highlight some practices that could be improved, such as applying the same principles of development and progression for temporary workers as for employees. They are treated equally in terms of safety, but career development and the development of versatility or multi-skills could be more egalitarian.

Likewise, it was noted that there was a need for improvement to update the management training of current managers. Managerial skills. Progress to be made in management: "people" are appointed managers for their technical skills and a necessary step to progress, but there is a lack of aptitude/skills in the missions of a manager.

Points that could be improved for all stakeholders: learn even more about the Responsiblesteel approach compared to the Q3SE approach (the information is available, but the stakeholders have difficulty perceiving the difference because the Q3SE approach is so integrated into their daily lives).

The lack of "recovery" and companionship at the time of retirement remains somewhat worrying, in particular, the loss of knowledge and skills, which generates stress.

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)	5		1		
Criterion 1.2: Leadership and Accountability (5)	5				
Principle 2. Social, Environmental and Governance Management Systems					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 2.1: Management System (5)	4		1		
Criterion 2.2: Responsible Sourcing (5)	4		1		
Criterion 2.3: Legal compliance and signatory obligations (6)	5		1		
Criterion 2.4: Anti-Corruption and Transparency (8)	8				
Criterion 2.5: Competence and awareness (5)	5				
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

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
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)	10	3			
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)	0				8
Criterion 5.5: Safe and healthy workplaces (5)	3		1		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				
Criterion 6.2: Forced or compulsory labour (7)	7				
Criterion 6.3: Non-discrimination (9)	9				
Criterion 6.4: Association & collective bargaining (12)	12				
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)	8				3
Criterion 6.9: Working time (7)	7				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 6.10: Worker well-being (2)	2				
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5				
Criterion 7.2: Security practice (9)	6				3
Criterion 7.3: Conflict-affected and high-risk areas (5)	0				5
Principle 8. Stakeholder Engagement and Communication					
Criterion 8.1: Stakeholder engagement (10)	8	3	2		
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)	0				3
Criterion 9.3: Cultural heritage (6)	1				5
Criterion 9.4: Displacement and Resettlement (9)	0				9
Principle 10. Climate Change and Greenhouse Gas Emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	7		1		
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	4				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
reduction targets and planning (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)	10		1		
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)	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				
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7				
Criterion 12.2 Water balance and emissions (8)	7	1	1		
Criterion 12.3 Water-related adverse impact (6)	6	1			
Criterion 12.4 Managing water issues (8)	8				
Principle 13. Biodiversity					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 13.1: Biodiversity commitment and management (25)	18	1	1		6
Total (370)	297	10	11	0	227

* 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

The exclusion justifications during the step 1 audit and updated in the stage 2 are :

Principe 3 full scope : Responsible Sourcing of Input Materials : N/A as this is a core certification which does not include the option additional requirements

Principle 4 full scope: Decommissioning and Closure : N.A. no retroactivity for decommissioning before certification.

Agreement with RS: N.A. no retroactivity for decommissioning before certification.

5.4.2 – These requirements are not applicable to the organization, as in their area of operation (France), compensation for work-related injury, illness or death is regulated by law .

5.5.3 – This criterion is not applicable, as the organization does not provide on-site housing.

6.8.6 – N/A since the sites do not provide accommodation

6.8.7 – N/A since it is defined by French regulation . The minimum in France is Labour law minimum wages ("SMIC"). AM cluster has higher minimum that are defined by Collective agreement

7.2.2 – No need for extensive measures to ensure security of people because the site is not located in a conflict area. 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 activities are not operating in conflict-affected or high-risk areas according the <https://www.cfr.org/interactive/global-conflict-tracker/?category=us>

9.2.1 & 9.2.2. & 9.2.3. Not applicable since no indigenous peoples have been identified in the area of influence,

See for country site <https://minorityrights.org/country/>

9.3.1. – 9.3.4. No cultural heritage exists in the site's area of influence according the UNESCO

<http://whc.unesco.org/fr/etatsparties/fr>

Any specific cultural heritage site should be identified in the environmental permits.

There is no cultural heritage in the sites' areas of influence, also according to UNESCO classification <http://whc.unesco.org/en/statesparties>

9.4.1 to 9.4.7. displacement or resettlement did not take place and is not planned to take place.

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.

Criterion 10.4 : N/A because the site is getting certified for core requirements

Criterion 10.6 : N/A because the site is getting certified for core requirements

Criterion 10.7.b.iii : N/A

Criterion 10.7.2 & 10.7.3 : As the site only applies for core requirements

12.2.4 : Not applicable because regulatory standards are defined by the authorities and completed in the exploitation permit.

13.1.2 a,c,d : – The sites are not situated in world heritage site ;

<http://whc.unesco.org/fr/list/&order=country#alphaF> ; – no indigenous and community-conserved areas (ICCAs)

– no RAMSAR site ; [https://rsis Ramsar.org/ris-](https://rsis Ramsar.org/ris-search?f%5B0%5D=regionCountry_en_ss%3AEurope&f%5B1%5D=regionCountry_en_ss%3AFrance&page)

[search?f%5B0%5D=regionCountry_en_ss%3AEurope&f%5B1%5D=regionCountry_en_ss%3AFrance&page](https://rsis Ramsar.org/ris-search?f%5B0%5D=regionCountry_en_ss%3AEurope&f%5B1%5D=regionCountry_en_ss%3AFrance&page)

13.1.4 The impact study conducted to obtain the environmental permit covered world heritage sites. No such site was identified in the areas of influence of the Cluster's sites ; also, no indigenous and community-conserved areas (ICCAs) are present. There are no Ramsar sites, no critical habitats identified ; no critical habitats

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 identified during this audit concern:

- Significant investments implemented over 5 years: €372 million invested over 5 years (four lanes completed in September 2024) ; 154 equipment upgrades ; 146 environmental improvements including decarbonization ; 132 maintenance ; 3.2 security ; +€50 million
- Building the new business plan with the TOP 70 / recognition of team cohesion in the face of a difficult economic situation
- Communication to explain the AMMED strategy with extensive market and profitability data (SC)
- The Risk Management tool and management
- With ISO 45001 certification (safety and health management standard), numerous tools are in place to manage the approach aimed at reducing safety risks and hazards (Ouf, Safe Approach, SAFE, training, Safety Alert, evaluation of risks / ...)

- Management of operational plans and implementation of training and exercises
- Structured health governance and action plan in place
- Significant evolution since the previous audit in 2023, to improve the working environment, a clear evolution has been noted in the cleanliness of the premises (Preparation of Loads, Steelworks, etc.): this point deserves to be continued and maintained, but the evolution remains at a good level ;
- Social approach deployed in particular on well-being at work;
- training course for occupational health nurses
- mobility favored in St Chely for 5 to 6 years
- No Discrimination identified during the audit
- Generalization of the Stimulus QVT barometer
- In a sector of activity "industry" and in particular the steel industry, the place of women is difficult, the site makes numerous actions and efforts to integrate women within the site ;
- Structured media analysis
- Implementation of numerous Environmental actions aimed at monitoring improvement initiatives
- Innovation approach: resilience and perseverance in the implementation of the hydrolyzer (St Chely)
- Multidisciplinary water working group to continually seek the best technical solution (St Chely)
- The Biodiversity Management Deployment Plan
- The Environmental and Biodiversity Policy of St Chely is very oriented towards the preservation of natural spaces and not just environmental management.

Areas for improvement

The audit did uncover 2 major non-conformities related to the management of the French law and the management of the treatment of observation identified in the inspection reports. A special audit has been carried out to ensure an effective action plan to correct the major non-conformities. The auditor has decided, after the special audit, to close the non-conformity because the actions deployed with the correction action and corrective action are deployed with robust decisions and management.

The cluster AMMED deployed tools and meeting for the follow the surveillance and management regulation and has evaluated the level of compliance systematically. And for the second action plan, the action plan is similar (tools dedicated (IDHALL) and management with meetings dedicated to each department). The requirements affected were the clauses § 2.3.1 a and § 5.5.1

The main weaknesses of the cluster identified during this mission concern:

- The impacts and developments concerning the new PERFORMANCE business project (cluster) (Competitiveness, operating plan, etc.)

- As the system is built on certification procedures, the segmentation of responsibilities on certain principles still remains too pronounced (Risk Management, Regulatory Verification, health, etc.);
- The understanding of the ResponsibleSteel "label" by internal and external stakeholders could be improved (social responsibility is an argument facilitating understanding and the associated objectives);
- no specific assessment of the RS part in the NC business review published during the audit
- Better integrate security teams (prevention officer and security correspondent) into the SAFE approach
- The management approach to safety, health, environment and biodiversity management systems needs to develop towards preventive management rather than compliance with regulations or ISO or ResponsibleSteel standards (e.g. more in-depth analysis of weak signals before receiving formal notices);
- Managerial skills in middle management to be strengthened in a context of change
- Lack of operational monitoring of regulatory inspections (VGP) carried out by a subcontractor: e.g., visual inspection of a 50-tonne lifting beam... NC issued during the audit
- The mandatory safety training plan for the SC site: 77% completion rate
- Strengthen synergies with the GIP department on health issues
- Risk assessment regarding the continuity of the FOS site's occupational physician's business
- PPE: Finalize the deployment of actions regarding women's PPE / vigilance regarding the use of hearing protection with ventilated masks
- Use of DUERs – management or reduction of risks identified as major
- 3 areas of concerns (HR, Supply chain and SC Fab) on Well-being at Work: action plan not defined
- Better demonstrate the management and consistency of the PIP Engagement Plan, aligned with their needs and expectations
- Strengthen monitoring and information for new PIP contacts on the SR standard
- Materiality Matrix to be separated from the two sites to improve the relevance and management of the engagement plan
- Question – discrepancy between press reviews and feedback from ZIPCOM tools
- Engagement plan or management plan for the FOS site under construction, with objectives to be finalized
- Lack of communication of the CO2 publication to demonstrate the commitment.

The various complaints from local residents, neighbours, and employees over the past few years have been highly publicised and have led the site to make numerous investments to improve air quality and employee working conditions to ensure their

safety and health. An investment of several million euros has been made at the steelworks (an action plan monitored by labor and environmental inspectorates). To date, the actions taken over the past 10 years have been recognised by government representatives. The trials opened to date concern past situations (more than 15 years ago), and since the disputed facts have been addressed, the actions have addressed the problems. AMMED is currently on trial but not accused with a presumption of innocence.

During the audit, the various situations were carefully analyzed, in the presence of the management committee, including the CEO and COO. No unaddressed facts were not notified, and the past situation then appears obsolete and does not call into question the ResponsibleSteel certification approach

Assurance Panel declaration

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

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 12 May 2026.