Responsible Steel™
Certified Site

Presented to

ArcelorMittal Dofasco G.P.

SRI-1883-15

SITE NAME AND ADDRESS

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

CLIENT NAME AND ADDRESS

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

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

ResponsibleSteel Version 1.1

ISSUE DATE	EXPIRY DATE	NEXT SCHEDULED AUDIT	CERTIFIED SINCE
January 11, 2024	January 10, 2027	June 11, 2025	January 11, 2024

CERTIFICATION SCOPE

The manufacture of coke, iron, steel slabs, hot rolled sheet, cold rolled sheet, electrolytic tin plate and electrolytic chromium coated plate, zinc and aluminum coated products, and tubular steel products. Production of by-products and internal transport of raw materials, in-process and finished products.

CERTIFICATION BODY

SRI Quality System Registrar
A PRI Company
161 Thorn Hill Road,
Warrendale, Pennsylvania, 16046
USA

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

ArcelorMittal Windsor is a related facility (division of ArcelorMittal Dofasco)

AUTHORISED CERTIFICATION BODY SIGNATURE

Edward L. Maschmeier, Vice President, Certification

ResponsibleSteelTM, 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

Responsible Steel™ CERTIFIED SITE

Annex

SRI-1883-15

ArcelorMittal Dofasco G.P.

SITES AND FACILITIES COVERED BY THE CERTIFICATE

ArcelorMittal Dofasco G.P.
1330 Burlington Street East
Hamilton, Ontario, L8N 3J5
Canada

2 coke plants, 3 blast furnaces and a Desulph station; 1 KOBM (basic oxygen) furnace; 1 EAF; 2 continuous casters; 1 hot rolling mill; 2 continuous pickling and cold rolling mills; 1 pickling line; 4 galvanizing lines; 1 tower anneal furnace; 1 batch anneal furnace; 2 temper mills; 1 electrolytic tinning line; 2 slitters; 2 tube mills and several administrative buildings.

SUPPORT FUNCTIONS THAT CONTRIBUTED TO THE AUDIT

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

Public summary audit report

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

Audit overview

Member name	Arcelor Mittal
Audited entity name	ArcelorMittal Dofasco G.P.
Number of sites **Names & location**	1 ArcelorMittal Dofasco G.P. Hamilton, ON, Canada
Certification scope	The manufacture of coke, iron, steel slabs, hot rolled sheet, cold rolled sheet, electrolytic tin plate and electrolytic chromium coated plate, hot dip galvanized, galvanneal and Galvalume coated products, and tubular steel products. Production of by-products and internal transport of raw materials, in-process and end products.
Standard version audited against	ResponsibleSteel Standard V2-0 - Certified Site
Audit type and outcome	Surveillance
Certification body	SRI Quality System Registrar
Audit dates	Stage 1: 2/25/2025 – 3.0 days Stage 2: 2/26-2/28- 7.5 days
Number of auditors and audit days	3 auditors Stage 1: 2/25/2025 – 3.0 days Stage 2: 2/26-2/28- 7.5 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	Re-certification audit July 2026

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Introduction

About ResponsibleSteel

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

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

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

Overview of the certification process

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

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	Canada, Hamilton
Activities and products	AMD produces more than 100 grades and approximately 4.5 million tons of steel each year. Coal, iron ore, limestone and scrap are purchased. Coke and iron are produced on-site. Steelmaking is by both basic oxygen and EAF methods and continuously cast slabs are produced. Additional, externally produced slabs are typically sourced from other ArcelorMittal sources equating to 26% of the total production in 2024. Hot rolling, pickling, cold rolling, galvanizing, annealing, tempering, electrolytic tinning, slitting and tube production are performed on-site. Some coil processing activities (slitting, blanking, embossing, painting/laminating, rewind, storage, inspection, cleaning, pickling, shearing, tension levelling, repair and packaging) are outsourced and located off-site.
Year site opened	1912
Major extensions and / or refurbishments and year(s) when these occurred	The original company (Dofasco) was purchased by ArcelorMittal in 2006, to become ArcelorMittal Dofasco.
Annual production	4.5 million metric tons of steel per year
Number of employees and contractors	4,727 employees (4169 male and 558 female) 500 contractors
Carbon reduction target	Group target of reducing our CO2e emissions intensity by 25% by 2030 (2018 baseline), and in our European operations, by 35% by 2030.
Further environmental and social information	https://dofasco.arcelormittal.com/ https://dofasco.arcelormittal.com/sustainability https://dofasco.arcelormittal.com/media/jmyoc5es/2023-arcelormittal-dofasco-community-update-web.pdf

Stakeholder engagement

ArcelorMittal Dofasco provided a comprehensive list of stakeholders, including conservation groups, industry associations, community members, academia, government representatives, and others. SRI reached out to the full list of thirty-one stakeholders via email in English to request to schedule an interview. There was a total of fifteen participants. The Stakeholders have had various contact with AMD through community events, meetings, and other interactions throughout the years. Hamilton, Canada is a very diverse area of all economic levels as well as a diverse culture of people and businesses. Those that participated were of their own free will and reached out to SRI after the letters were sent out via email, stating they would like the opportunity to participate in the stakeholder portion of the audit for AMD, for Responsible Steel.

The stakeholder assessment, based on input from 15 organizations including NGOs, municipal representatives, and academic institutions, found that ArcelorMittal Dofasco has established formal channels for community engagement and concern reporting, such as the Community Liaison Committee (CLC). Stakeholders acknowledged efforts in community contributions, fair labor practices, and environmental commitments. Programs like “Team Orange,” STEM outreach, and union recognition received praise, and no major violations of labor rights were reported. Communication efforts were seen as active, particularly for formal partners, and many stakeholders appreciated the company’s visible role as a community contributor.

Stakeholders noted few concerns but requested greater transparency and more regular updates related to decarbonization efforts. There is a tendency for communications to feel overly polished. Overall, while stakeholders recognize the company’s progress and engagement infrastructure, they called for more balanced and transparent communication and outreach.

AMD has 4727 non-unionized employees (4169 male and 558 female) and 500 contractors (demographics not available). The full-time employees are split between two shifts. Manufacturing employees have several different shifts and alternating schedules where they can flex time. Not all areas are able to flex their time due to the nature of the work. Shifts are 6:00 am to 6:00 pm and 6:00 pm to 6:00 am with a maximum of 48 hours worked per week. Utilizing a clear set of criteria to ensure a blend of functions, departments, contractors, SRI worked with AMD to identify a random selection of employees for interviews. SRI conducted 23 interviews during the audit, according to the schedule provided by Responsible Steel for a balance of individual and small group sessions as detailed in the following table.

Category	Individual Interview	Group Interview
Leader (direct)	2	2
Staff (direct)	5	3

Manufacturing Operations (direct)	1	3
Maintenance (direct)	3	1
Contractor	2	1
Total	13	10

Summary of audit findings

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

Principles and criteria (# of requirements)	**Conform**	**OFI**	**Minor NC**	**Major NC**	**Exclusion**
Principle 1. Corporate Leadership					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 1.1: Corporate Values and Commitments (6)	6				
Criterion 1.2: Leadership and Accountability (5)	5				
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	2	3			
Criterion 2.2: Responsible Sourcing (5)	6				
Criterion 2.3: Legal compliance and signatory obligations (6)	6				
Criterion 2.4: Anti-Corruption and Transparency (8)	5				3
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 (19)					19
Criterion 3.2: Know your upstream supply chains (18)					18
Criterion 3.3: Understand supplier ESG performance and promote improvement (15)					15
Criterion 3.4: Strengthen and account for responsible sourcing (20)					20
Criterion 3.5: Report publicly on responsible sourcing (10)					10
Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes (15)					15
Criterion 3.7: Know your upstream scrap supply chain (8)					8
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)					12
Criterion 3.9: Strengthen and account for responsible sourcing (1)					1
Criterion 3.10: Report publicly on responsible sourcing (16)					16
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)					14
Principle 5. Occupational Health and Safety					
Criterion 5.1: OH&S policy (6)	6				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 5.2: Health and Safety (OH&S) management system (10)	10				
Criterion 5.3: Leadership and worker engagement on OH&S (10)	10				
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	1				7
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				
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (9)	7				2
Criterion 6.2: Forced or compulsory labour (7)	7				
Criterion 6.3: Non-discrimination (9)	9				
Criterion 6.4: Association & collective bargaining (12)	8				4
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)	4				1
Criterion 6.8: Remuneration (11)	8				3
Criterion 6.9: Working time (7)	7				
Criterion 6.10: Worker well-being (2)	2				
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	4		1		
Criterion 7.2: Security practice (9)	6				3
Criterion 7.3: Conflict-affected and high-risk areas (5)					5
Principle 8. Stakeholder Engagement and Communication					
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				
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	8				
Criterion 9.2: Free, Prior & Informed Consent (3)		3			

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 9.3: Cultural heritage (7)	4				3
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 (8)	8				
Criterion 10.2: Corporate Climate-Related Financial Disclosure (2)	2				
Criterion 10.3: Site-level GHG emissions measurement and intensity calculation (3)	3				
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG emissions intensity for the production of crude steel. (11)	10				1
Criterion 10.5: Site-level GHG reduction targets and planning (8)	5				3
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (7)					7
Criterion 10.7: GHG emissions disclosure and reporting (8)					8
Principle 11. Noise, Emissions, Effluents and Waste					
Criterion 11.1: Noise and vibration (7)	6		1		
Criterion 11.2: Emissions to air (8)	6		2		
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)	6		2		
Criterion 12.3 Water-related adverse impact (6)	6				
Criterion 12.4 Managing water issues (8)	3		6		
Principle 13. Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	22				3

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (517)*	**291**	**6**	**12**	**0**	**208**

* 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

Criteria	Reason
2.4.2	AMD does not accept cash transactions.
2.4.4	Canada has a corruption perception index score of 74 therefore the site is not in a high corruption risk country.
2.4.5	Site does not provide financial contributions to government persons as such is prohibited by Federal and Provincial elections legislation.
3	The site is not pursuing product certification.
4	This Principle is only applicable to sites where full or partial decommissioning or closure is announced while a site is certified. Compliance would allow such a site to maintain certification while the site is still operational.
5.4.2	Canada has a government scheme for both work related and personal healthcare which includes all points listed in 3.4.3.
5.5.3	Employee housing is not provided.
6.1.5 (a., b.)	Employees must be at least 18 years old to be hired. Apprentice program is offered to college students, and documentation must be provided to demonstrate age over 18. AMD does not run an on-site worker program for high school.
6.4.2	No such law exists in Canada.
6.4.4	Collective Bargaining Agreements are not in place.
6.4.5.b	No collective bargaining agreements are applicable to site workers
6.4.6	There is not a formal Workers' Representative.
6.7.1.c	The site is not a unionized workplace and therefore there are no applicable collective agreements
6.8.5	AMD does not have a company store. They do offer cafeteria services but workers can also leave the site and have several local options to purchase nearby.

6.8.6	The site does not provide on-site accommodations.
6.8.7 a.-b.	The site does not have workers' representatives and has not been requested to provide a living wage.
7.2.2 a-b	The site is not in a conflict affected area.
7.2.2.c	As the site is not in a conflict area, no arrangements are currently undertaken that engage local communities on site security practices.
7.3.1	Site does not operate in a conflict-affected or high-risk area.
7.3.2	Site does not operate in a conflict-affected or high-risk area.
9.3.3	There are no cultural heritage sites within AMD area of influence.
9.3.4	There are no cultural heritage sites within AMD area of influence.
9.3.5	There are no cultural heritage sites within AMD area of influence.
9.4.1.a.-c.	Physical and economic displacement of communities is not being considered.
9.4.2	Physical and economic displacement of communities is not being considered.
9.4.3	Physical and economic displacement of communities is not being considered.
9.4.4	Physical and economic displacement of communities is not being considered.
9.4.5	Physical and economic displacement of communities is not being considered.
9.4.6	Physical and economic displacement of communities is not being considered.
9.4.7	Physical and economic displacement of communities is not being considered.
10.4.2	In 2021, 72% of Ontario's Generation Capacity was built on zero-emission sources, while 91.2% of Ontario's Actual Energy Output was generated from zero-emission sources. The low GHG emissions from AMD imported electricity do not reach a level of significance for setting a target.
10.5.1.b	The site does not import heat and/or steam.
10.5.1.d	The site does not have arrangements for offsets at this time.
10.5.1.e	The site does not have credit emissions at this time.
13.1.5	There are no World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I-VI located on the organization's site.
13.1.6	There are no World Heritage Sites, Ramsar sites or protected areas of the IUCN categories I-VI located on the organization's site.
13.1.11	The site has not been subject to controversy and there are no World Heritage sites, protected and conserved areas, indigenous and community-conserved areas, Ramsar sites or Key Biodiversity Areas within the site.

Strengths

The organization has done an excellent job in utilization of existing management systems and programs established for areas of Environmental Health and Safety, Water Conservation, and biodiversity, and adding additional measures and strategic plans to support the mission and intent of Responsible Steel. These proven programs establish structure and engagement at all levels of operations in taking actions to achieve established objectives. Key strengths and improvements observed during the surveillance audit include:

- Principles 1 and 2 – Extensive evidence of not only leadership, but all employee, commitment to sustainability with several mature management systems and best practices in place
- Principle 5 – Safety – evidence of mature, comprehensive program; wellness, mental health, and medical facilities are best in class
- Principle 8 – Addition of Indigenous Communities engagement plan
- Principle 10 – GHG emissions / Decarb project – continued significant commitment to GHG reduction
- Principles 11 and 12 – Strong evidence of action plan implementation to address certification audit corrective actions

Community Liaison Committee – company actively engages with its local community, both proactively and in response to any complaints or concerns

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 12 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:

On-going opportunities for improvement exist for continued integration and implementation of Responsible Steel requirements throughout operation while dealing with geopolitical business uncertainty. Additionally, areas for improvement were identified in the following areas:

- Principle 2 – integrated management system is beginning to form leading to sustainable, long-term impact. Continue to advance responsible sourcing moving towards Principle 3 product certification.
- Principle 4 – Continued efforts to proactively plan for expected decommissioning.
- Principle 5- include workers in the initiation of OH&S related decisions.
- Principle 9- A workplan has been developed, but a formal engagement process does not yet exist.

Principle 13- develop a formal Plan which addresses 13.1.3 a), b), and c) should the site attempt to expand into additional areas which might contain natural habitat.