

Responsible Steel™ Certified Site



Presented to

ACE/2021/92887.2

ARCELORMITTAL BELVAL & DIFFERDANGE S.A.

SITE NAME AND ADDRESS

ArcelorMittal Belval, Boulevard Charles de Gaulle
4008 Esch-sur-Alzette, Luxembourg

ArcelorMittal Differdange, Rue Emile Mark
4503 Differdange, Luxembourg

ArcelorMittal Rodange, 2, rue de l'industrie 4823
Rodange, Luxembourg

CLIENT NAME AND ADDRESS

ARCELORMITTAL BELVAL & DIFFERDANGE S.A
Boulevard Charles de Gaulle
4008 ESCH SUR ALZETTE, LUXEMBOURG

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

ResponsibleSteel Standard version 2.1

ResponsibleSteel Assurance Manual version 1.0

ISSUE DATE
19 July 2024

EXPIRY DATE
18 July 2027

CERTIFICATION SCOPE

Development and manufacture of steel semi and finished products (beams, sheet piles, merchant bars, rails, special section, as well as completed structural elements)

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

NEXT SCHEDULED AUDIT
January 2026 (TBC)

CERTIFIED SINCE
19 July 2021

CERTIFICATION BODY

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



AUTHORIZED CERTIFICATION BODY SIGNATURE

SignatureFournisseur

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.



Responsible Steel™ Certified Site



Annex

ACE/2021/92887.2

ARCELORMITTAL BELVAL & DIFFERDANGE S.A.

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Belval: 1 electric arc furnace, 1 continuous caster steel shop, 2 rolling mills

Differdange: 1 electric arc furnace, 1 continuous caster steel shop, 1 rolling mill

Rodange: 1 rolling mill

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
Newcastle West NSW 2303, Australia

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Public summary audit report

This is a concise public summary of the audit report for ArcelorMittal Belval & Differdange S.A. (AMBD). The full version of the audit report is in the possession of the member company and the audited sites.

Audit overview

Member name	ArcelorMittal
Audited entity name	ArcelorMittal Belval & Differdange S.A. (AMBD)
Number of sites Names & location	Belval, Boulevard Charles de Gaulle L-4008 ESCH-SUR-ALZETTE (cluster HQ) site comprises: 1 electric arc furnace, 1 continuous caster steel shop, 2 rolling mills. Products: long products such as steelpiles, angles, beams Differdange, Rue Emile Mark – L-4503 DIFFERDANGE 1 electric arc furnace, 1 continuous caster steel shop, 1 rolling mill. Product: beam Rodange, 2, rue de l'Industrie – L-4823 RODANGE 1 rolling mill. Products: rails, special profiles and merchant bars. https://luxembourg.arcelormittal.com/
Certification scope	Development and manufacture of steel semi and finished products (beams, sheet piles, merchant bars, rails, special sections, as well as completed structural elements). The individual sites comprise the following facilities and products. Belval: This is the main site of the cluster. The site comprises: 1 electric arc furnace, 1 continuous caster steel shop, 2 rolling mills. Products: long products such as steel piles, angles, beams Differdange: 1 electric arc furnace, 1 continuous caster steel shop, 1 rolling mill. Product: beam

	Rodange: 1 rolling mill. Products: rails, special profiles and merchant bars. Aerial photos of the sites have been added in an annex to the report and the different products
Standard version audited against	ResponsibleSteel Standard V2-1.1 – Certified Site
Audit type and outcome	Surveillance audit
Certification body	AFNOR Certification, 11, Rue Francis de Pressensé, 93200 Saint Denis, France
Audit dates	Stage 1: 3,5 days – 14-17 October 2025 Stage 2: 24 –26 November 2025 and 20-21 January 2026
Number of auditors and audit days	2 auditors Stage 1: 3,5 days Stage 2: 5 days Off-site: 2,5 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 February 2027

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Introduction

About ResponsibleSteel

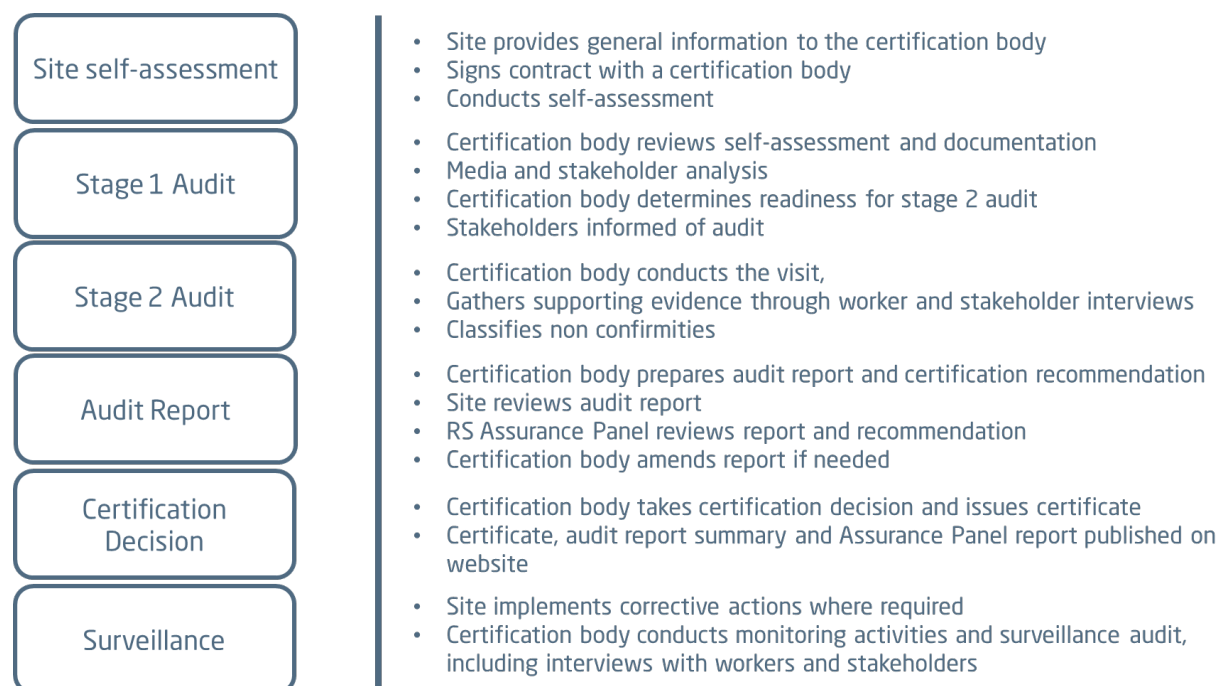
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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

Country and town	Belval, Boulevard Charles de Gaulle L-4008 ESCH-SUR-ALZETTE (cluster HQ) site comprises: 1 electric arc furnace, 1 continuous caster steel shop, 2 rolling mills.
Activities and products	Products: long products such as steelpiles, angles, beams Differdange, Rue Emile Mark – L-4503 DIFFERDANGE 1 electric arc furnace, 1 continuous caster steel shop, 1 rolling mill. Product: beam Rodange, 2, rue de l'Industrie – L-4823 RODANGE 1 rolling mill. Products: rails, special profiles and merchant bars. https://luxembourg.arcelormittal.com/
Year site opened	Beginning of the 20th century
Major extensions and / or refurbishments and year(s) when these occurred	No major change
Annual production	2025 : Crude Steel Belval =701077 t Crude Steel Differdange = 1 121 298 t Site Belval – TMB = 666 887 t Site Belval – TR2 = 454 965 t Site Differdange – GREY = 558 600 t Site Rodange –Train A = 112 128 t
Number of employees and contractors	Employees & contractors Belval: Employees = 887 (35 women) – Contractors = 46 Differdange: Employees = 713 (29 women)- Contractors = 39 Rodange: Employees = 194 (35 women)- Contractors = 13
Carbon reduction target	ArcelorMittal Europe is targeting a 10% reduction in Scope 1 and 2 CO2e by 2030 versus a 2018 baseline, and to reach net-zero by 2050.

	This is described in available here: Climate Sustainability ArcelorMittal
Further environmental and social information	https://luxembourg.arcelormittal.com/en/responsibilities/sustainable-development-reports

Stakeholder engagement

Stakeholder engagement is an integral part of a ResponsibleSteel audit to achieve 'Certified Site' status and ensures a rich and balanced collection of information and evidence. The auditors followed the methodology outlined in the [Guidance on Stakeholder Engagement](#) provided by ResponsibleSteel as well as the [Introduction to ResponsibleSteel for stakeholders](#).

For the purpose of the ResponsibleSteel audit, the sites of the AMBD provided a list of external stakeholders to the auditors (documented in stage 1), based on their areas of influence, their ongoing stakeholder engagement efforts, as well as relevant media articles and other publications.

The auditors examined the list and asked the sites to organize the interviews with the stakeholders extracted from the press and present in the list to ensure the involvement of key stakeholders related to the key topics identified during stage 1. As interview requests are difficult to organise with government departments (Health, Environment), AMBD was asked to help remove the barriers to accessing interviewees. On top of that, a larger-scale investigation of regulatory control reports has been done to get a more accurate picture of the situation.

Regarding the areas of influence, the following categories of external stakeholders were involved in the audit to cover all the categories of stakeholders:

- 1 client
- 1 local community (Belval and Elch)
- 2 National government authorities and politicians
- 2 Labour unions for blue and white collar for all the sites
- 1 trade union secretary
- Occupational healthcare stakeholders (1 doctor, 1 nurse)
- 1 Civil society organisations (Fondation Hëllef fir d'Natur)
- 1 Environmental administration (Ministry of environment)

- Financial statutory auditors (no contribution)
- Media (no contribution)
- 2 Suppliers (such as logistics, handling, maintenance)

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. As the level of answer was very low due to the stakeholders already involved in the stakeholders' analysis managed by an external company.

The auditors worked closely with the sites in organising virtual or in-person meetings with those stakeholders who responded to the invite and volunteered to be interviewed. The stakeholders selected are representatives of the different categories. All the stakeholders identified in the audit plan agreed to be interviewed; see above for a list of external stakeholders that were interviewed (except the ones where "no contribution" is mentioned).

- Input was provided to the auditors by email to complete the discussion by Teams after the interviews.

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites. About 1890 individuals (including full and part-time employees, newcomers, temporary workers, men and women, contractors, white/blue collars and exempts) work at the various sites of the Luxembourg cluster, most of them in Belval. Only Belval and Differdange have 3 rotating shifts. Rodange has only morning and afternoon shifts:

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

The auditors interviewed workers of all shifts during the site visit. The auditors preselected 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 to ensure a representative sample.

The auditors also held a meeting with the labour union.

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

In addition to the process owners, 30 workers (including 5 womens) across the 3 sites, including workers from the electric furnace, rolling mill, also maintenance, supporting

functions, foremen, line managers, members of the performance monitoring team, union representatives and purchasing managers (based at EPO in Luxembourg), sustainability team, communication team, (based at the headquarters in Luxembourg). During the shop floor visit, more than 26 additional workers were interviewed.

A clear focus has been made related to the effectiveness of the practices in place and to ensure that the action plan is relevant enough regarding the previous NCs.

All the NGO, sub-contractors have received positive feedback. In the previous audit, expectations remain high for the inhabitants of the municipality of Differdange, which has a population that has not known the history of the town, and which has higher environmental expectations than the former factory employees. Regarding that topic, a clear improvement related to the dust has been confirmed since the slag storage change. Also, they appreciate better communication and transparency related to the topics that are material to them.

The expectations of the environmental authorities remain high and above the traditional regulatory standards. Indeed, as soon as the company improves its performance, the thresholds are revised well beyond the traditional regulations.

At the human resources level, clarification has been improved related to the personal interviews and the criteria to improve the salary. The evolution possibilities are as high as the training capacities. In terms of safety at work, a satisfaction level is shared by the workers. The expectation is to consider more modern human resources practices and more visual management. The sanitarities' maintainability is a real concern, even though they recognise that incivility affects the good working of the showers. The exempt and white-collar employees have expressed that they need to clarify the priorities, as all seem to be a priority 1.

For information, upstream work was improved to carry out interviews with workers from different categories (white-collar workers, blue-collar workers, women's groups, mixed groups, new arrivals, subcontractors, temporaries, etc.) in order to have a significant panel.

Summary of audit findings

Conform	Conformity, the requirement is fulfilled.
Opportunity for improvement (OFI)	The respective requirement or criterion has been implemented, but effectiveness or robustness might be

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

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Principle 1. Corporate Leadership					
Criterion 1.1: Corporate Values and Commitments (6)	6	2			
Criterion 1.2: Leadership and Accountability (5)	4	1	1		
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	4	2			
Criterion 2.2: Responsible Sourcing (5)	5	2	1		
Criterion 2.3: Legal compliance and signatory obligations (6)	6				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 2.4: Anti-Corruption and Transparency (8)	8				2
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
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

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Principle 5. Occupational Health and Safety					
Criterion 5.1: OH&S policy (6)	6				
Criterion 5.2: Health and Safety (OH&S) management system (10)	9	1	2		
Criterion 5.3: Leadership and worker engagement on OH&S (9)	8	1			
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	6				2
Criterion 5.5: Safe and healthy workplaces (5)	3	1	1		1
Criterion 5.6: OH&S performance (2)	2				
Criterion 5.7: Emergency preparedness (6)	5				
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (10)	8				1
Criterion 6.2: Forced or compulsory labour (7)	6				
Criterion 6.3: Non-discrimination (9)	8	2			1
Criterion 6.4: Association & collective bargaining (12)	11				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)	8				3
Criterion 6.9: Working time (7)	7	1			
Criterion 6.10: Worker well-being (2)	2				
Principle 7. Human Rights					

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 7.1: Human rights due diligence (5)	5				
Criterion 7.2: Security practice (9)	8				1
Criterion 7.3: Conflict-affected and high-risk areas (5)	0				5
Principle 8. Stakeholder Engagement and Communication					
Criterion 8.1: Stakeholder engagement (10)	10	2			
Criterion 8.2: Grievances and remediation of adverse impacts (12)	12				
Criterion 8.3: Communicating to the public (7)	7	1			
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	8	1			
Criterion 9.2: Free, Prior & Informed Consent (3)	0				3
Criterion 9.3: Cultural heritage (6)	-1				7
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)	6		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 reduction targets and planning (4)	4				

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG emissions intensity for the production of crude steel (29)	0				29
Criterion 10.5: Site-level GHG reduction targets and planning (11)	11		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)	3				4
Principle 11. Noise, Emissions, Effluents and Waste					
Criterion 11.1: Noise and vibration (7)	5	1	1		
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)	10	1			
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	6		1		
Criterion 12.2 Water balance and emissions (8)	7				1
Criterion 12.3 Water-related adverse impact (6)	6				
Criterion 12.4 Managing water issues (8)	7				
Principle 13. Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	20				5

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions
Total (370)	295	19	9	0	224
Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	#Exclusions

* 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

2.4.4 Luxembourg is not a high-risk country according to the Transparency International Corruption Perceptions Index. No public controversy either, then this requirement is not applicable

2.4.5 ArcelorMittal does not make financial or in-kind contributions to political parties, politicians, civil servants and other politically exposed persons (PEP)

Principle 3 / core certification which does not include the option additional requirements

Principle 4 / not applicable because we have not announced any closure of the site or shutdown.

5.4.2 + 5.4.3 / In accordance with Luxembourg law, this is covered by the "Association Assurance Accident" and social security system (CNS).

5.5.3 / There is no on-site housing.

6.1.3 / Child labor is prohibited by the Lux legislation (Art L.343-3 of Labor Code)

6.4.2 / Freedom of association and collective bargaining are not restricted in Luxembourg.

6.8.4 a / The General Conditions (all contracts) refer to applicable legislation as well as ArcelorMittal codes (Code of Conduct, Human Rights). The contract with employment and recruitment agencies clearly integrates these clauses and Luxembourg legislation.

6.8.4 b / Draft payroll calculation made by HRSSC for interims is transmitted to recruitment agencies each month. The rules applied are the same as for AM employees. Interim workers may request support from HRSSC or staff delegation if required

6.8.5 / Not applicable since the sites do not provide on-site shops. Only collective catering services are offered.

6.8.6 / Not applicable since the sites do not provide accommodation.

6.8.7 a / Not applicable since the living wage is defined by Luxembourg regulation

6.8.7 b / Not applicable since it is defined by Luxembourg regulation, and it is already paid by the company

7.2.2 / Not applicable since there is no need for extensive measures to ensure the security of people because the site is not located in a conflict area.

7.2.3 e / No cases reported

7.3 / Not applicable since the sites are not operating in conflict-affected or high-risk areas

9.2 / Not applicable since no indigenous peoples have been identified in the area of influence

9.3 / There is no cultural heritage in the sites' areas of influence

9.4 / Not applicable since no displacement and resettlement are being considered or have taken place in the last 10 years.

10.4 / the site is getting certified for core requirements."

10.6 / the site is getting certified for core requirements."

10.7 b iii / the site is getting certified for core requirements."

10.7.2 and 10.7.3 / the site is getting certified 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 to 13.1.6 / no adjacent World Heritage sites, protected areas, indigenous sites, Ramsar sites, Key Biodiversity Areas to the sites are identified.

13.1.1.1 / No sites are subject to controversy.

Strengths

The main strengths that the auditors identified are summarised here:

- Luxembourg Sustainable Development Policy (April 2025) is structured around five commitments. (P1.2)
- Facilitation and coordination of a Sustainable Development Committee at Luxembourg level (P1.2)
- Involvement of subcontractors in projects aimed at improving working conditions and environmental performance (P2.2.3)
- Development of a social regulatory monitoring procedure (P2.3.1)
- Improvement of the management and follow-up of annual performance reviews (excluding blue-collar workers) through digitalisation. (P2.5.2)
- Deployment of IT tools for monitoring the Occupational Health and Safety Management System (OHSMS) currently underway through SAP EHS. (P5.2)
- Roll-out of a training programme for all employees and on-site contractors covering the 10 Life-Saving Rules. (P5.3)
- Improvement of changing rooms and shower facilities. (P5.5)
- Training programmes such as "Managing Mental Health" and "Rescue at Height". (P5.3)
- Continuous progress in safety leadership across the organisation. (P5.2)
- Management of emergency response plans (POI) and implementation of training and emergency drills.(P5.7)

- Significant deployment of training initiatives and provision of e-learning modules for employees.(P6.9)
- Opportunities for internal mobility between entities and departments are available, supported by a formalised framework and development programmes recognised by employees. (P6.8)
- Actions have been implemented to promote well-being at work and improve the overall working environment. (p6.10)
- Stakeholder champions have been appointed for each stakeholder category to facilitate communication, collect concerns and coordinate engagement actions (P8.1)
- A new group-level grievance management procedure has been implemented and integrated into the corporate reporting system.(P8.2)
- Neighbourhood complaints are taken into account through dedicated follow-up actions, including site visits to residents' homes, technical analyses and meetings with concerned stakeholders when necessary. (P8.2)
- Exchange of best practices with other energy-intensive industries in collaboration with the Ministry, aimed at improving energy efficiency and supporting the low-carbon transition (P10.2)
- Progressive installation of hydrogen burners on furnaces as part of the site's decarbonisation strategy. (P10.4)
- Atmospheric emissions: improvement of diffuse emissions following the installation of a new capture system at the Differdange site. (P11.3)
- Hydraulic pits: effective monitoring and management of these installations are in place. (P11.2)
- A biodiversity assessment has been carried out across the three sites by the consultancy BIOTOPE, including the development of a proposed biodiversity action plan. (P13.1)
- A global biodiversity action plan has been developed for all sites, including measures aimed at enhancing biodiversity (e.g. creation of meadows, installation of nesting boxes), improving land management practices and monitoring biodiversity evolution over time. (P13.2)
- Development of a biodiversity roadmap to structure and guide biodiversity initiatives across the sites.(P13.2)
- Awareness-raising and communication actions have been implemented in 2024–2025, both internally and externally (newsletter, information boards, social media, quarterly meetings with stakeholders) (P13.3)

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 9 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. Many of the identified non-conformities are linked to an understanding of the delay in implementing the expected actions to demonstrate the effectiveness expected in the ResponsibleSteel Standard. The Standard is a challenging tool which requires to go beyond the regulation and the border of the site.

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

- Procedures for dealing with policy deviations are not clearly formalised. (P1.2)
- Monitoring of supplier compliance with procurement conditions or the Responsible Sourcing policy is insufficiently documented and lacks clear evidence. (P2.2.3)
- The preventive measures in place for isolated work situations are not adequately effective. (P5.2.2b)
- There is a lack of structured oversight, analysis, and action planning regarding workers' health data and psychosocial risk assessments. (P5.2.2.c)
- There is insufficient evidence to demonstrate that all facilities, particularly lifting and electrical installations, are systematically brought into compliance following periodic regulatory inspections or incidents. (P5.5.1)
- The management of CO2 communication is not fully demonstrated (P10.5.5)
- Many projects in Europe have been put on hold, and there is an unclear report on the climate action status, which may impact the strategy and capability to achieve the goals of the Paris Agreement (P10.1.5)
- The vibration parameter has not been fully considered in the environmental context (P11.1.1)
- The analysis of the potential future uses of water in the area of influence is not achieved (P12.1.3)