

Responsible Steel™ Certified Site



Presented to

ArcelorMittal Bremen GmbH

GUT-N-24-24069

SITE NAME AND ADDRESS

Site of Bremen:
Carl-Benz-Straße 30
28237 Bremen
Germany

Site of Bottrop:
Prosperstraße 350
46238 Bottrop
Germany

CLIENT NAME AND ADDRESS

ArcelorMittal Bremen GmbH
Carl-Benz-Straße 30, 28237 Bremen, Germany

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

ResponsibleSteel Standard version 2.0
ResponsibleSteel Assurance Manual version 2.1

ISSUE DATE

19 July 2024

EXPIRY DATE

18 July 2027

NEXT SCHEDULED AUDIT

September 2025 (TBC)

CERTIFIED SINCE

19 July 2021

CERTIFICATION SCOPE

Pig iron production and steelmaking (BOF), industrialisation, manufacture and hire production of: slabs, rolled steel in coils, hot rolled, pickled, cold rolled, galvanised and by products; coke production and by 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 not been included in the certification scope or audit scope

ArcelorMittal Tailored Blanks Bremen

CERTIFICATION BODY

GUT Zertifizierungsgesellschaft für Managementsysteme mbH
Umweltgutachter
Eichenstraße 3b
12435 Berlin
Germany



AUTHORISED CERTIFICATION BODY SIGNATURE

Prof. Dr.-Ing. Jan Uwe Lieback
Director

Andreas Lemke
Head of Certification Office

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

ArcelorMittal Bremen GmbH

GUT-N-24-24069

SITES AND FACILITIES COVERED BY THE CERTIFICATE

Bremen:

Raw materials yards

Sinter plant

2 blast furnaces

Steel shop

Hot strip mill

Cold rolling mill

Finishing lines (cold roll annealing, metallic coated
galvanizing lines)

Bottrop:

Coking plant

SUPPORT FUNCTIONS 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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delivery documents.



Public summary audit report

This is a concise public summary of the audit report for ArcelorMittal Bremen GmbH. 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 Bremen GmbH
Number of sites Names & location	<ul style="list-style-type: none">• Bremen (cluster HQ, integrated steel plant). Carl-Benz-Str. 30, 28237 Bremen, Germany• Bottrop. Prosperstr. 350, 46238 Bottrop, Germany
Certification scope	Pig iron production and steelmaking (BOF), industrialisation, manufacture and hire production of: slabs, rolled steel in coils, hot rolled, pickled, cold rolled, galvanised and by products; coke production and by products.
Standard version audited against	ResponsibleSteel Standard V2.1.1 – Certified Site
Audit type and outcome	Certified Site: Surveillance Audit
Certification body	GUT Zertifizierungsgesellschaft für Managementsysteme mbH Eichenstraße 3b D – 12435 Berlin AFNOR groupe 
Audit dates	Stage 1: 14.–15.10.2025 (2 days remote) Stage 2: 24.–25.11.2025 + 2.–3.12.2025 + 17.12.2025 (6,5 days on-site)
Number of auditors and audit days	1 Lead auditor 1 Co-auditor 14,5 days (pre-audit, stage 1, stage 2 and reporting)

Lead auditor declaration	<p>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.</p> <p>It should be noted that audits are snapshots that rely on sampling. Sampling of interview partners, of documentation and records, of observed operations and activities. The auditors can therefore not exclude the possibility that there are non-conformities in addition to the ones identified during the audit activities.</p>
Next audit type and date	<p>Re-certification audit</p> <p>Q1 2027</p>

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Introduction

About ResponsibleSteel

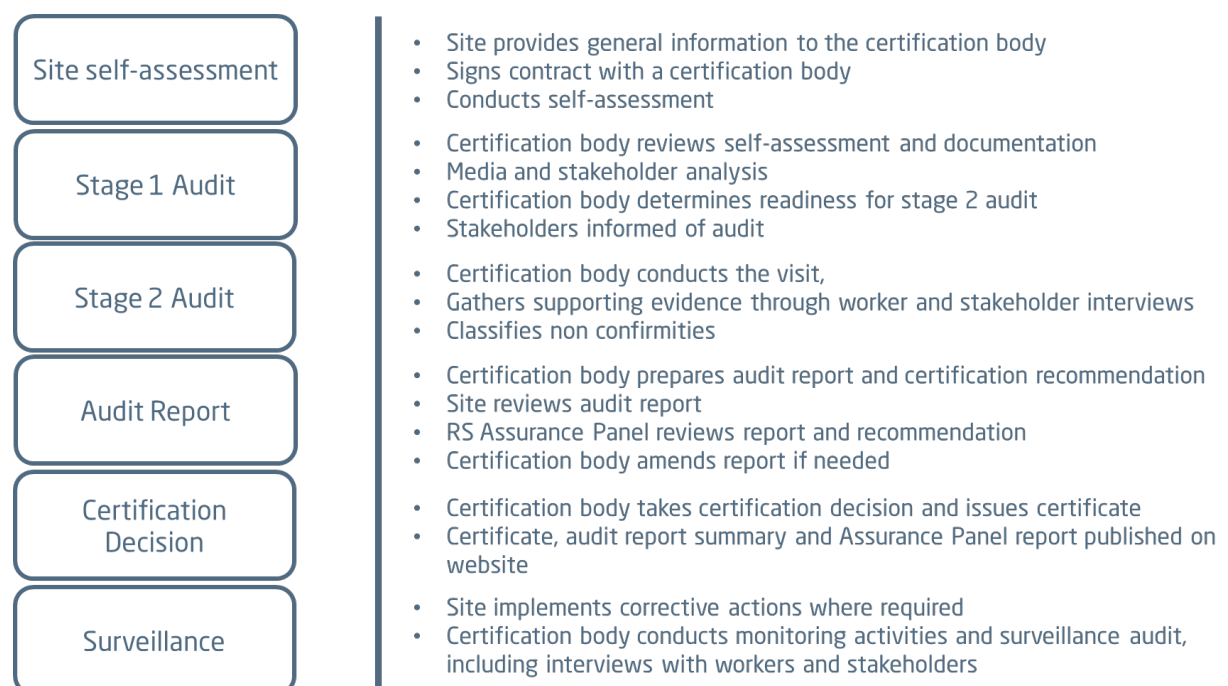
Our mission is to be a driving force in the socially and environmentally responsible production of net-zero steel, globally.

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	Bremen (cluster HQ, integrated steel plant). Carl-Benz-Str. 30, 28237 Bremen, Germany Bottrop. Prosperstr. 350, 46238 Bottrop, Germany
Activities and products	The activities conducted in each location are: <ul style="list-style-type: none"> • Bremen (cluster HQ, integrated steel plant). Carl-Benz-Str. 30, 28237 Bremen, Germany • Activities: raw materials yards, sinter plant, 2 blast furnaces, steel shop, hot strip mill, cold rolling mill, finishing lines (cold roll annealing, metallic coated galvanizing lines) power plant. • Finished products: hot rolled coils, cold rolled full hard coils, cold rolled annealed coils, metallic coated products, by-products (e.g. blast furnace slag), gas for electricity. • Bottrop. Prosperstr. 350, 46238 Bottrop, Germany • Activities: Coking Plant. • Products: Coke, by-products (e.g., ammonium sulphate, benzene, tar), gas for electricity.
Year site opened	Integrated Steel Mill: 1957
Major extensions and / or refurbishments and year(s) when these occurred	Coking Plant: 1928. Site of ArcelorMittal Bremen GmbH: 2011 See https://bremen.arcelormittal.com/Ueber-uns/Geschichte/
Annual production	Bottrop Coking plant: Capacity 2 million tons of coke / year Bremen Blast furnace plant: Capacity up to 3.6 million tons of pig iron / year Steel mill Capacity of up to 3.7 million t of steel / year Hot rolling mill Capacity 4.5 million t / year Cold rolling mill Capacity approx. 2 million t / year

	Hot-dip galvanizing Bregal 1 Capacity approx. 550,000 t / year Hot-dip galvanizing Bregal 2 Capacity approx. 550,000 t / year
Number of employees and contractors	Employees: 2.743 male 276 female Apprentices: 139 male 10 female 1 diverse Contractor in average 727 until August 2025, exact data split by sex is not available, estimated share of females less than 5%
Carbon reduction target	GHG reduction target at corporate level: Reduction of 35% percent on European level and 25% on a global level; Carbon neutrality on corporate level 2050
Further environmental and social information	https://www.youtube.com/watch?v=IOXmKfkR7-w (On the way to green steel) https://germany.arcelormittal.com/nachhaltigkeit/ (Sustainability AMGermany) https://bremen.arcelormittal.com/icc/arcelor-bremende/broker.jsp?uMen=fc250e90-7dbc-6d41-5cba-3a317d7b2f25 (ArcelorMittal Bremen Homepage)

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](#).

ResponsibleSteel distinguishes between external and internal stakeholders. In relation to external stakeholders, the focus is on local communities, civil society organisations, authorities, labour unions, marginalised groups and academics.

A review of the interested parties as identified by the organisation has been conducted by the auditors.

On entity level, internal and external stakeholder groups stakeholders were identified (11 groups with altogether 206 stakeholders). Identification also includes their requirements and expectations of the site; they have been identified in a moderated process in recent years and prioritised according to their power and the difficulty for implementing the expectations and associated risks and opportunities. This initial analysis is revised annually in preparation for the management review by a defined group of people and confirmed by the management. The planned activities of a year are listed in the stakeholder management plan and also settled or reassessed annually.

For Responsible Steel the list of these stakeholders and their contact details have been provided to the certification body (per May 2024). They represent the following groups according to the standard and some additional:

Stakeholder Group	Number (per September 2025)
Academics	6
Civil society organisations (operating at local, regional, national or global level)	9
Labour unions	1
Local communities (including their formal and informal representatives, and indigenous peoples)	5
Marginalised groups	5
National or local government authorities	27
Politicians (on local level)	13
Training providers and certifiers	6
Organizations in the field of sport, culture and humanitarian organizations	2
NGO	1
Others (internal stakeholder, public media, partner companies, clients and suppliers)	130

Ca. 4 weeks in advance of the surveillance 2 audit, stakeholders had been informed of the audit by E-mail in local language. As response, five external stakeholders agreed to confidential interviews (Organizations in the field of local government authorities, a NGO, contractor service providers and others (port operator, train operator). Interviews were carried out in the stakeholder's working environment or by telephone. Overall, the

feedback was very positive and confirmed the audit-team's impression that the entity is quite an active organization with a comprehensive stakeholder engagement.

The procedure for the stakeholder interviews was always similar. First, the audit-team asked whether the interviewee was familiar with the Responsible Steel Standard, explained the main features of the standard if necessary and explained the reasons for the interview situation. The confidentiality of the conversation was assured, consent to the interview was obtained again and a calm environment was ensured. The participants were asked specific questions about their day-to-day work or their points of contact with the organization. The content of the interviews varied accordingly.

In the case of service providers, for example, questions were asked about the specific activities to be carried out, whether sufficient time was set aside for this, what the pay was like (amount), how this was done (handling overtime, withholding parts) or whether sufficient personal protective clothing was available and whether this was or could be used properly. The interview situation was different for NGO or authority representatives. Here, the auditor first asked about the issues that the interviewee had with the organization and what experiences had been made here, for example with regard to meeting deadlines, commitment beyond the actually prescribed content or willingness to talk on the part of the organization.

The feedback from the stakeholder interviews is varied, but the majority is very positive about the company's communication, contracts are adhered to and processes are transparent. In some cases, there was talk of cooperation having improved significantly in recent years. Accordingly, the impression was conveyed that the organization has significantly increased its commitment to the environment, nature conservation and public perception in recent years.

Workers are an important internal stakeholder group since they are directly affected by the activities of the sites.

The following tables give an overview of employee numbers:

Site of Bremen

	Men	Women	Together
Employees of ArcelorMittal Bremen	2373	263	2743
Contractor workers	NA*	NA*	727
TOTAL	NA*	NA*	3470

The work is organized in different shift patterns: one shift work, two shift work, three shift work and 12/24.

* Data is not recorded

Site Of Bottrop:

	Men	Women	Together
Employees of ArcelorMittal Bremen	370	13	383
Contractor workers	0	0	0
TOTAL	370	13	383

The work is organized in different shift patterns: one shift work, two shift work, three shift work and 12/24.

Worker interviews were conducted with 3 groups á 4 persons, 2 groups á 2 persons and 8 individuals.

The auditors selected the groups of people to be interviewed on the basis of an anonymous staffing plan (employee roster). A total of 24 workers were interviewed, focussed on blue collar workers (directly hired and contractor workers. The audit team interviewed production workers, apprentices/trainees, women, workers with a disability, migrants and security, amongst others. 19 men and 5 women were interviewed. Their feedback was generally positive and they confirmed that their labour rights are respected.

The grievance mechanism was known to most of them.

In individual cases, the high workload was criticised. The working atmosphere amongst the employees was mainly praised (with exception in individual cases).

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					
Criterion 1.1: Corporate Values and Commitments (6)	6	0	0	0	0
Criterion 1.2: Leadership and Accountability (5)	5	0	0	0	0
Principle 2. Social, Environmental and Governance Management Systems					
Criterion 2.1: Management System (5)	5	0	0	0	0
Criterion 2.2: Responsible Sourcing (5)	5	0	0	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 2.3: Legal compliance and signatory obligations (6)	6	0	0	0	0
Criterion 2.4: Anti-Corruption and Transparency (8)	6	0	0	0	2
Criterion 2.5: Competence and awareness (5)	5	0	0	0	0
Principle 3. Responsible Sourcing of Input Materials -NA-					
Criterion 3.1: Commit to responsible sourcing (18)	0	0	0	0	18
Criterion 3.2: Know your upstream supply chains (10)	0	0	0	0	10
Criterion 3.3: Understand supplier ESG performance (15)	0	0	0	0	15
Criterion 3.4: Strengthen and account for responsible sourcing (23)	0	0	0	0	23
Criterion 3.5: Report publicly on responsible sourcing (11)	0	0	0	0	11
Criterion 3.6: Commit to responsible sourcing and incorporate it in key functions and processes. (15)	0	0	0	0	15
5Criterion 3.7: Know your upstream scrap supply chain (8)	0	0	0	0	8
Criterion 3.8: Understand supplier ESG performance and promote improvement (12)	0	0	0	0	12
Criterion 3.9: Strengthen and account for responsible sourcing (1)	0	0	0	0	1
Criterion 3.10: Report publicly on responsible sourcing (16)	0	0	0	0	16
Principle 4. Decommissioning and closure					
Criterion 4.1: Decommissioning and closure (14)	0	0	0	0	14
Principle 5. Occupational Health & Safety					
Criterion 5.1: OH&S policy (6)	6	0	0	0	0
Criterion 5.2: Health and Safety (OH&S) management system (10)	10	0	0	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Criterion 5.3: Leadership and worker engagement on OH&S (9)	9	0	0	0	0
Criterion 5.4: Support and compensation for work-related injuries or illness (8)	2	0	0	0	6
Criterion 5.5: Safe and healthy workplaces (5)	3	1	0	0	1
Criterion 5.6: OH&S performance (2)	2	0	0	0	0
Criterion 5.7: Emergency preparedness and response (6)	6	0	0	0	0
Principle 6. Labour Rights					
Criterion 6.1: Child and juvenile labour (9)	6	0	0	0	3
Criterion 6.2: Forced or compulsory labour (7)	4	0	0	0	3
Criterion 6.3: Non-discrimination (9)	9	0	0	0	0
Criterion 6.4: Association & collective bargaining (12)	11	0	0	0	1
Criterion 6.5: Disciplinary practices (5)	3	0	0	0	2
Criterion 6.6: Hearing and addressing worker concerns (5)	5	0	0	0	0
Criterion 6.7: Communication of terms of employment (5)	5	0	0	0	0
Criterion 6.8: Remuneration (11)	8	0	0	0	3
Criterion 6.9: Working time (7)	7	0	0	0	0
Criterion 6.10: Worker well-being (2)	2	0	0	0	0
Principle 7. Human Rights					
Criterion 7.1: Human rights due diligence (5)	5	0	0	0	0
Criterion 7.2: Security practice (9)	6	0	0	0	3
Criterion 7.3: Conflict-affected and high-risk areas (5)	0	0	0	0	5
Principle 8. Stakeholder engagement and communication					
Criterion 8.1: Stakeholder engagement (10)	10	0	0	0	0
Criterion 8.2: Grievances and remediation of adverse impacts (12)	12	0	0	0	0
Criterion 8.3: Communicating to the public (7)	7	0	0	0	0

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Principle 9. Local Communities					
Criterion 9.1: Commitment to local communities (8)	6	1	0	0	0
Criterion 9.2: Free, Prior & Informed Consent (3)	0	0	0	0	3
Criterion 9.3: Cultural heritage (6)	4	1	0	0	1
Criterion 9.4: Displacement and Resettlement (9)	0	0	0	0	9
Principle 10. Climate Change and GHG emissions					
Criterion 10.1: Corporate commitment to achieve the goals of the Paris Agreement (7)	6	0	1	0	0
Criterion 10.2: Corporate Climate-Related Financial Disclosure TCFD (2)	2	0	0	0	0
Criterion 10.3: Determination of GHG emissions for the purpose of site level GHG emissions reduction targets and planning (4)	4	0	0	0	0
Criterion 10.4: Determination of site level GHG emissions for the purpose of reporting the GHG emissions intensity for the production of crude steel (29) (NOTE: applicable if site seeks certification to the additional requirements. If not applicable, mark as n/a)	0	0	0	0	29
Criterion 10.5: Site-level GHG emissions reduction targets and planning (11)	9	0	1	0	1
Criterion 10.6: Requirements to market or sell products as ResponsibleSteel certified (8) (NOTE: applicable if site seeks certification to the additional requirements. If not applicable, mark as n/a)	0	0	0	0	8
Criterion 10.7: GHG emissions disclosure and reporting (8) (NOTE: 10.7.2 and 10.7.3 only applicable if site seeks certification to the additional requirements)	0	0	0	0	8

Principles and criteria (# of requirements)	Conform	OFI	Minor NC	Major NC	Exclusion
Principle 11. Noise, emissions, effluents and waste					
Criterion 11.1: Noise and vibration (7)	7	0	0	0	0
Criterion 11.2: Emissions to air (8)	8	0	0	0	0
Criterion 11.3: Spills and leakage (9)	9	0	0	0	0
Criterion 11.4: Waste, by-product and production residue management (11)	10	0	0	0	1
Principle 12. Water Stewardship					
Criterion 12.1 Water-related context (7)	7	0	0	0	0
Criterion 12.2 Water balance and emissions (8)	7	0	0	0	1
Criterion 12.3 Water-related adverse impact (6)	6	0	0	0	0
Criterion 12.4 Managing water issues (8)	8	0	0	0	0
Principle 13: Biodiversity					
Criterion 13.1: Biodiversity commitment and management (25)	17	0	0	0	8
	Conform	OFI	Minor NC	Major NC	Exclusion
Total (533) *	286	3	2	0	241

* 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	According to Transparency International's Corruption Perception Index 2019, Germany, the country in which the organization operates, ranks 9th out of 180 countries and received a score of 80 out of 100 possible (the best country was scored 87). Therefore, this criterion is currently not applicable to the organization.
3	not applicable for site certification
4	not applicable for site certification
5.4.2	This requirement is not applicable to the organization as in their area of operation (Germany), compensation for work-related injury, illness or death is regulated by law.
5.4.3	This criterion is not applicable as the organization is operating in Germany, which is a country in which compensation for work-related injury, illness or death is provided through a government scheme, collective bargaining agreement or mandatory benefits by law.
5.5.3	This criterion is not applicable, as the organization does not provide on-site housing.

6.1.3	This criterion is not applicable. Human Rights Due Dilligence has shown that there is no risk for child labour at the site. Should there be a change is the risk situation the site would take action accordingly.
6.2.3	This criterion is not applicable to the organisation, as the human rights due diligence did not identify any risk related to forced or compulsory labour at the site
6.4.2	This criterion is not applicable, as the national law does not restrict workers' organizations. Collective bargaining is done on the level of employers' association.
6.5.3	This criterion is not applicable to the organisation, as the human rights due diligence did not identify any risk that the site causes or tolerates undignified disciplinary practices; the site has effective procedures to address these risks.
6.8.6	This criterion is not applicable, as the organization does neither directly nor indirectly provide accommodation.
6.8.7	This criterion is not applicable, as the worker's representation has not requested to introduce a living wage for its workers. Note: The lowest hourly paid wage for employees of the organization is well above the legal minimum wage.
7.2.2	This criterion is currently not applicable to the organization, as the two sites are not located in areas where there is a need for extensive measures to ensure the security of people, property and assets. Note: Security is not equipped with firearms.
7.3	This criterion is currently not applicable to the organization, as it does not operate in a conflict-affected or high-risk area. Also, sourcing of key raw materials is done by the central "European Purchasing Organization" of ArcelorMittal Europe, not by the audited sites.
9.2	This criterion has been excluded, as indigenous peoples are not living in the area of influence of the entity.
9.4	This criterion has been excluded, as resettlements and displacements did not happen and are not planned to happen.
10.4	not applicable for site certification
10.5.2	This criterion is not relevant, as GHG emissions associated with the use of imported electricity are not significant (they represent less than 10% of the site's total (direct and indirect) GHG emissions).
10.6	not applicable for site certification
10.7.2	not applicable for site certification
10.7.3	not applicable for site certification
12.2.4	There are applicable standards, targets regarding WRR (water framework directive), regional law defines measurements: Abwasserverordnung etc. Therefore, this requirement is not applicable, as regulatory standards are defined by the authorities and completed in the operating permits.

Strengths

- Outstanding safety performance (LTIR 0.5) compared to the competition and other metalworking companies in Germany
- Safe coaching for managers and "We take care" safety culture coaching
- Learning Week for workers and managers (format and topics)
- Social transformation concept (Strategic workforce planning, Employee participation & co-determination in the transformation projects, Developing collective agreements to secure employment and skilled workers)
- Nature conservation concept 2030 in collaboration with the environmental non-governmental organisation "BUND" (Bund für Umwelt und Naturschutz Deutschland e.V.)
- LIDAR (Light imaging, detection and ranging) remote measurements for fugitive emissions
- Significant reduction of Benzo(a)pyrene and dust emissions in Bottr
- Redesign of the memorial for WW2 forced labourers
- Active management of safety culture:
- Involvement of partner companies in 'Take Care', Safe Coaching", active occupational health management
- Comprehensive, systematic and insightful analysis of accident causes
- Site improvement process 'Steel has a future', which is important to instil confidence in these times of crisis (e.g. Bottrop: New canteen building)
- Further development of social skills and performance (Employee App, Sharepoint page, onboarding event)
- Active social management with many roles and contact points: Social management, plant security, works council, HR, human rights officer, social counselling, BEM, SBV, and more.

- Conflict with peoples initiative (Bürgerinitiative) in Bottrop finally resolved.

Areas for improvement

During the audit, a few areas were identified that require the attention of the sites and 2 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:

Minor Non-Conformities:

10.1.a Requirement: The site's corporate owner ascribes publicly to a credible, long-term emissions reduction pathway for the steel industry as a whole that is compatible with the "achievement of the goals of the Paris Agreement, and which includes Explicit projections of long-term steel consumption.

Finding: The management of effective review of the CO2 strategy is not fully demonstrated.

Many projects in Europe including the audited entity 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.

10.5.5 Requirement: The medium-term targets for the site or defined portfolio of sites, as specified under Requirements 10.5.1 and 10.5.2 and progress towards achieving these targets are reported publicly and on a regular basis.

Finding: The site is encompassed under the corporate target and that progress is reported in the CO2 performance table in AM's 2024 Annual report (p. 41) and in the sustainability performance tables in the 2024 Sustainability report (p37).

However, these reports provide actual data only, no targets and no action plan to achieve them. The Climate Action Report published at the Group level (which contains targets and actions) has not been updated since 2021.

Opportunity for Improvement:

5.5.2 a) Requirement: The site ensures that workers are provided with a safe and healthy working environment, which includes but is not limited to Clean and hygienic workplaces, including factory, offices, sanitation areas, food storage and meals break areas with seating;

Finding: Clean and hygienic workplaces, including factory, offices, sanitation areas, food storage and meals break areas with seating;

Consider speeding-up the maintenance of sanitary rooms to improve long lasting deficits (Sanitary facilities for lorry drivers, condition of toilets for women in Bottrop).

9.1.3 Requirement: Together with local community and local government representatives, implementation of the plan is monitored and the plan is adjusted where needed to ensure it supports the social and economic well-being of the local communities affected by the site's operations.

Finding: The organization is in close contact with local initiatives and representatives to discuss the wellbeing plan and its implementation.

Consider formalizing the participation of these stakeholders (e.g. for example, via defined update cycles and internal reporting as well as fixed communication deadlines).

9.3.2 Requirement: The site respects and safeguard cultural heritage within its area of influence. The procedure is implemented in a collaborative effort by the site and affected communities.

Finding: Consider documenting the activities related to cultural heritage, in order to be able to demonstrate implementation of the procedure.

Audit 2025: OFI remains open. Further activities are planned. It starts with exchange with relevant stakeholders and risk assessment. It is documented in the Stakeholder-Engagement-List; the resulting action plan will also be documented.