

Company Name ArcelorMittal
Industry Extractive
UNGP Core Score (*) 8.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
8.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: In its Human Rights Policy, the Company states: 'The ArcelorMittal Human Rights Policy articulates our responsibility to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs). [...] We are committed to respect the human rights of our employees. [...] We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. [...] We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations.' In addition, in its Code for responsible sourcing, the Company indicates: 'ArcelorMittal respects all human rights, of employees and local communities, and is committed to promoting these principles to its suppliers, as set out in ArcelorMittal's Human Rights Policy.' [Human Rights Policy, 05/2017 & Code for responsible sourcing, 06/2013] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: Its Human Rights Policy is 'in line with the UN Guiding Principles on Business and Human Rights (the UNGPs).' However, "in line with" is not consider a clear commitment. [Human Rights Policy, 05/2017] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: In its Human Rights Policy, the Company states: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining.[...] ArcelorMittal opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. [...] ArcelorMittal opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child. [...] ArcelorMittal is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated.' [Human Rights Policy, 05/2017] • Met: Explicitly list All four ILO apply to EX BPs: As indicated above, the Company's Human Rights Policy covers all ILO Core. With respect freedom of association and collective bargaining the Policy says: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our subcontractors and suppliers to promote the achievement of this principle.' In addition, it adds: 'This Policy applies to all employees of ArcelorMittal subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code for Responsible Sourcing, and also by driving industry based social and environmental standards, and we will also engage customers and joint venture partners on these issues.' [Human Rights Policy, 05/2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy, cover all ILO Core, including freedom of association and collective bargaining, where it states: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining.' [Human Rights Policy, 05/2017]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Respect H&S of workers: In its Human Rights Policy the Company states: 'ArcelorMittal is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures.' In addition, in its Health and Safety Policy, the Company indicates: 'Our commitment to Health and Safety of all employees both on and off the job is a clear component of our brand promise to 'transform tomorrow''. [Human Rights Policy, 05/2017 & Health and Safety Policy, 02/2014] • Met: H&S applies to EX BPs: See above. In addition, in its Code of responsible sourcing, the Company indicates: 'ArcelorMittal requests its suppliers to eliminate all work related injuries on their workforce or community, and to meet the standards of ArcelorMittal's Health and Safety Policy.' [Human Rights Policy, 05/2017 & Code for responsible sourcing, 06/2013]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: In its Human Rights Policy, the Company indicates: 'The ArcelorMittal External Stakeholder Engagement Procedure requires us to conduct an open and inclusive dialogue with local communities, including engaging with often under-represented groups such as women, children and Indigenous Peoples.' However, CHRB could not find a statement where the Company commits to engage with all its potentially and actually affected stakeholders. [Human Rights Policy, 05/2017] • Met: Regular stakeholder engagement: In its website section 'Stakeholders', the Company indicates: 'Our key stakeholder groups are our employees, shareholders, governments and regulators, our customers, and the communities in which we work. Lenders, unions, suppliers, NGOs, business multilateral organisations and research institutions are also important.' In addition, it reports its engagement activities with different stakeholders including employees and local communities in specific website sections. [Stakeholders, N/A: corporate.arcelormittal.com & People - Employee relations and engagement, N/A: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: In its Human Rights Policy, the Company indicates: 'Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment, and for our centralized procurement system. These executives will report on any human rights hotspots arising within our operations or our supply chain to the Chairman of the Board of Directors at least annually.' In addition, on its website, it states: 'The Sustainable Development Council oversees the direction of corporate responsibility and sustainable development across the company. This group takes a strategic view of the issues raised and reports directly to the Chairman and CEO. Its members include senior managers from the corporate functions of strategy, technology, finance, risk, government affairs, CMO, communications and corporate responsibility/sustainable development. The company also has sponsors for each of the 10 SD outcomes, who drive the direction of each outcome in conjunction with the CR team and experts from across the group.' Its 10 sustainable development outcome include human rights issues. [Human Rights Policy, 05/2017 & Sustainability Governance, N/A: corporate.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: In its Human Rights Policy, the Company indicates: 'The Company's implementation of this Human Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time as local operations prepare plans against our 10 sustainable development outcomes and corporate guidance increasingly focuses on the potential for severe human rights issues. Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions. In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the Compliance and Corporate Responsibility teams.' [Human Rights Policy, 05/2017] • Not met: Day-to-day responsibility for EX BRs: See above. However, no description found on how day-to-day responsibilities for managing human rights issues with its extractive business partners is allocated. [Human Rights Policy, 05/2017]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: In its Supply chain section of the Website, the Company indicates: 'As well as encouraging our raw materials suppliers to collaborate on global sustainability standards, on a day-to-day level we assess how our suppliers manage their performance by assessing them against our code for responsible sourcing. [...] In order to identify and manage social and environmental risks in our supply chain, we apply supply chain due diligence. We conduct this both using third party information, and via an industry-wide project on supply chain risks for the steel industry. Particular investigations may be triggered by our site visits or when we receive stakeholder concerns, for example from investors, customers, workers or local residents, following an assessment of severity.' However, no description found of this process to identify its human rights risks and impacts covering its own operations. [Supply Chain, N/A: corporate.arcelormittal.com] • Not met: identifying risks in EX business partners: As indicated above, the Company states on its website: 'In order to identify and manage social and environmental risks in our supply chain, we apply supply chain due diligence. We conduct this both using third party information, and via an industry-wide project on supply chain risks for the steel industry'. However, it is not clear whether the supply chain due diligence process includes extractive business partners. [Supply Chain, N/A: corporate.arcelormittal.com & Code for responsible sourcing, 06/2013] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks: In its Integrated Review 2019, the Company reports: 'The most salient human rights risk was identified in the raw materials part of our supply chain and this is also the focus of interest for our customers.' However, there is no further information about which are these most salient human rights risks. [Integrated Annual Review 2019, 05/2020: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks: See indicator B.2.1 Not met: Comms plan re assessing risks: See indicator B.2.2 Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company states in its website: 'Both employees and stakeholders can report any breaches of our policies and standards via the confidential whistleblowing facility on our corporate website, and in addition we now have confidential whistleblowing hotlines in 30 major countries of operation.' [Ethics and Integrity, N/A: corporate.arcelormittal.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: In its Annual Review 2018, the Company reports: 'In 2018, our global assurance team received 158 such complaints, of which 27 were substantiated.' In Addition in its Annual Review 2019 the Company reports that 'In 2019 we received 162 complaints relating to alleged fraud. All allegations were referred to and duly investigated by our Internal Assurance Department. Following review by the Audit and Risk Committee, none of these complaints were found to be significant'. However, no details found describing how many of the human rights complaints were filed and addressed or resolved. [Integrated Annual Review 2019, 05/2020: corporate-media.arcelormittal.com & Integrated Annual Review 2018, 04/2019] Met: Channel is available in all appropriate languages: The Company discloses that 'whistleblowing complaints may be made on the ArcelorMittal website or using hotlines made available in each country'. The company also state that it has 'confidential whistleblowing hotlines in 30 major countries of operation. [Whistleblower Policy, 05/2019: storage.arcelormittaluat.blob.core.windows.net] Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Grievance mechanism for community: In its External Stakeholder Engagement Procedure, which applies to 'all ArcelorMittal operations, subsidiaries and affiliates worldwide', the Company sets out minimum engagement requirements with external stakeholder ('local stakeholders including residents, nongovernmental organisations, local authorities, customers, suppliers, academia and other institutions'), some of these requirements are: 'Establish an accessible grievance mechanism to handle complaints on Company activity in a systematic way and ensure that stakeholders are made aware of it and how it works; Ensure that the complainant, or other persons associated with the complaint can seek redress with a guarantee of protection from harassment, prosecution or any other form of reprisal or retaliation.' [External Stakeholder engagement procedure, Jan 2012: storage.arcelormittalprod.blob.core.windows.net] Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages: See above. In addition, the Company indicates on its website that it has 'community grievance guidelines in place – formal mechanisms sitting alongside our more informal, ongoing partnerships to help us understand stakeholders' expectations. ' However, CHRB

Indicator Code	Indicator name	Score (out of 2)	Explanation
			could not find these guidelines or any other evidence showing how it ensures the grievance mechanisms are accessible to all potentially affected external stakeholder at all operations, including local languages. [Community - Listening, N/A: corporate.arcelormittal.com] <ul style="list-style-type: none"> • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system: On its website, 'Ethics and Integrity', the Company indicates: 'Both employees and stakeholders can report any breaches of our policies and standards via the confidential whistleblowing facility on our corporate website, and in addition we now have confidential whistleblowing hotlines in 30 major countries of operation.' However, no further information found about the different grievance channels or the whistleblowing facility on its website which allows any stakeholder to report breaches of its policies. The Company indicates in the Whistleblower section that it is 'intended for the reporting of concerns regarding fraud and corruption, accounting and auditing matters, not for general business complaints or product-related issues. Reports of general ethical violations will be communicated to the appropriate bodies and departments within the group. Any submissions not related to fraud and corruption, accounting or auditing matters, or ethical violations will be disregarded'. [Ethics and Integrity, N/A: corporate.arcelormittal.com & Whistleblower, N/A: corporate.arcelormittal.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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