

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name ArcelorMittal
Sector Extractives
Overall score 19.6 out of 100

Theme score	Out of	For theme
3.6	10	A. Governance and Policy Commitments
2.5	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
6.3	25	D. Performance: Company Human Rights Practices
3.8	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: General HRs commitment: The Company's Human Rights Policy indicates that it 'articulates our responsibility to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs)'. The Code for Responsible Sourcing adds: 'ArcelorMittal respects all human rights, of employees and local communities'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Code for Responsible Sourcing, 02/2021: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Company's Human Rights Policy indicates: '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)'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] Met: Explicitly lists all four ILO core principles: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of

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			<p>association and collective bargaining, it specifies: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: As indicated below, the Company's Human Rights Policy covers each ILO Core commitment and includes business partners. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] • Met: Explicitly lists all four ILO core principles for BPs/JVs: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it specifies: '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'. It also adds: 'This Policy applies to all employees [...] In addition, our subcontractors working at our sites are expected to comply with this Policy'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<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: Commitment to respect H&S of workers: The Company's Human Rights Policy indicates: 'ArcelorMittal is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace'. The Health and Safety Policy specifies: 'We are committed to the following principles to guide our decision-making and actions: All injuries and work-related illness can and must be prevented; Management is accountable for health & safety performance; Employee engagement and training is essential; Working safely is a condition of employment; Health & safety must be integrated into all business management processes; Excellence in health & safety drives excellence in business results'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Health and Safety Policy, 09/10/2022: corporate.arcelormittal.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company's Human Rights Policy indicates: 'ArcelorMittal complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with our employee representatives'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: The Company's Human Rights Policy indicates: 'ArcelorMittal is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace'. 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'. The Health and Safety Policy specifies: 'We are committed to the following principles to guide our decision-making and actions: All injuries and work-related illness can and must be prevented; Management is accountable for health & safety performance; Employee engagement and training is essential; Working safely is a condition of employment; Health & safety must be integrated into all business management processes; Excellence in health & safety drives excellence in business results'. It 'applies to all ArcelorMittal operations (including joint ventures where we have majority ownership or operational control) and covers all ArcelorMittal employees and contractors' employees performing work on ArcelorMittal premises'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Health and Safety Policy, 09/10/2022: corporate.arcelormittal.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: See above. The Human rights policy covers business partners. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and	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: Commitment to respect land ownership/natural resources as in IFC Performance Standards: It also states: 'ArcelorMittal seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government's or regional authorities' guidelines on resettlement and rehabilitation and also act in line with international human rights norms on this subject including the International Finance Corporation Performance Standards'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]

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	indigenous peoples' rights (EX)		<ul style="list-style-type: none"> • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Company's Human Rights Policy indicates: 'ArcelorMittal respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] • Met: Expects EX BPs to make these commitments: See above. 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'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Commitment to respect the right to water: The Company's Human Rights Policy indicates: 'ArcelorMittal works towards understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights'. However, no commitment to respecting the right to water found. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] • Not Met: Expects EX BPs to make these commitments: As above. The policy applies to business partners working at the Company's assets. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	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: Commitment to Voluntary Principles on Security and HRs: The Company's Human Rights Policy indicates: 'ArcelorMittal aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines, such as the Voluntary Principles on Security and Human Rights. We will adapt our security arrangements to balance the need for safety while respecting human rights'. However, 'consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. The Company's Security Personnel Policy on the use of Force, Arms and Firearms derives from different international standards and principles, including The Voluntary Principles on Security and Human Rights (VPSHR) also referred to in the ArcelorMittal's Human Rights Policy. However, to be 'derived from' does not entail a commitment according to CHRB standards. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Security Personnel Policy on the use of Force, Arms and Firearms, 01/2011: storage.arcelormittalprod.blob.core.windows.net] • Not Met: Uses only ICoCA members as security providers: The Company's Security Personnel Policy on the use of Force, Arms and Firearms derives from different international standards and principles, including The International Code of Conduct for Private Security Service Providers by the Swiss Confederation. However, 'derived from' is not considered a formal statement of commitment according to CHRB wording criteria. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Security Personnel Policy on the use of Force, Arms and Firearms, 01/2011: storage.arcelormittalprod.blob.core.windows.net] • Not Met: Commits to International Humanitarian Law: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: See above. The policy applies to business partners. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights Policy, 2021: corporate-media.arcelormittal.com]
A.1.4	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: Commitment to remedy adverse HRs impacts: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Expects EX BPs to make this commitments: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Commitment to work with EX BPs on remedy: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance of threats/attacks on HRDs: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Expects BPs to make this commitment: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<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: Board level responsibility for HRs: According to the 2021 Integrated Report, 'the Board Sustainability Committee oversees SD [Sustainable Development]'. Human Rights topic is among the 'Material SD topics underpinning our 10 SD outcomes'. The webpage section Board committees indicates that the Sustainability Committee has some of the following functions: 'Review Group level frameworks, policies, standards, and guidelines in sustainability matters. [...] Support and provide guidance to management in developing and updating policies and procedures relating to employee health & safety, environment, climate change and community relations. Monitor any current, pending or threatened legal actions with respect to safety, climate change, environment, and community relations'. [Integrated Report 2021, 29/04/2022: corporate.arcelormittal.com] & [Board committees_web, N/A: corporate.arcelormittal.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The 2021 Annual Report indicates: 'The SC [Sustainability Committee] reviews the Company's progress against each of the below five management themes on a quarterly basis ensuring active, specific and robust governance'. The themes include: safety and social. Regarding Management Theme 'Social', it remarks: 'ArcelorMittal wants communities to recognize it as a good neighbor, one that actively engages with local stakeholders to make a positive contribution by creating economic and social value through employment, procurement, taxation, sustainable development initiatives, strong risk management and respect for human rights'. The 2022 Annual Report adds that the Sustainability Committee 'meets quarterly to review health, safety and environmental matters as standing agenda items and discusses specific topics in depth (e.g. climate change, social performance, responsible sourcing etc.) in the intervening periods. It provides its findings and recommendations to the Board'. [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] & [2022 Annual Report, 2023: corporate.arcelormittal.com] • Not Met: Example of HRs issues/trends discussed in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0.5	<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: At least one board member incentive linked to HRs commitments: The 2021 Annual Report indicates: 'Targets associated with ArcelorMittal's 2021 Annual Performance Bonus Plan were aligned with the companies' strategic objectives of improving health and safety performance and overall business

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			<p>performance and competitiveness. For the Executive Chairman and the CEO, the 2021 annual performance bonus formula is based on the achievement of the following performance targets: [...] Health and safety performance targets at Group level: 15% (fatalities act as circuit breaker for this measure) [of short-term incentives]'. The 2022 Integrated Annual Review indicates: 'In line with the group's move to focus more on leading KPI indicators, the executive Short-Term Incentive Plan (STIP) has been changed from June 2022 to be linked to the frequency of proactive potential serious injuries or fatalities (PSIFs), and no longer on the lagging KPI of lost time injury frequency rate (LTIFR). The proportion of bonuses linked under this scheme to safety was increased from 10 to 15% in 2021. Safety also represents 10% of the Long-Term Incentive Plan'. The 2022 Annual Report adds: 'For the Executive Chairman and the CEO, the 2022 annual performance bonus formula is based on the achievement of the following performance targets: [...] Health and safety performance targets at Group level: 15%. In order to help focus attention, energy and resources on detecting and eliminating the causes of serious injury or fatality precursors, we have moved from a target of long term injury frequency rate in first half of the year to a target of potential severe injury or fatality in the second half'. The Executive Chairman and the CEO is a Board member. [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] & [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although Executive Chairman and the CEO has an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: As indicated above, health and safety performance represent 15% of de Executive Chairman and the CEO's short-term incentives. [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] & [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com] • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and 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: Board process to review business model and strategy for HRs risks: The annual report explains the role of the Board Sustainability Committee (BSC) which: 'meets quarterly to review health, safety and environmental matters as standing agenda items and discusses specific topics in depth (e.g. climate change, social performance, responsible sourcing etc.) in the intervening periods. It provides its findings and recommendations to the Board'. It also provides further information on the Sustainable Development Council and the Climate Change Committee, both at executive-level. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. [2022 Annual Report, 2023: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes frequency and triggers for reviewing business model • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews: The annual report discloses information on its decarbonization strategy and on how it is addressing fatalities in Kazakhstan. However, no example found of an action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at Board level or a Board committee. The Company is expected to provide an example that reflects a change in model or strategy because of specific human rights inherent risk. [2022 Annual Report, 2023: corporate.arcelormittal.com]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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: Score of 1 on A.1.2.a: See A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The Company's Human Rights Policy 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'. The 2021 Annual Report indicates: 'At the Executive level, a Sustainable Development Council ("SDC") also meets quarterly in between SC [Sustainability Committee] meetings to drive progress and respond to feedback from the SC. The SDC is chaired by Brad Davey, an Executive Vice President ("EVP") and head of corporate business optimization, who is responsible [...] corporate responsibility [...]. As SDC chair, he discusses environmental, social and governance ("ESG") issues with the Executive Office and recommends topics to be discussed with the SC and the Group Management Committee'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Annual Report 2021, 05/04/2022: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2021 Annual Report indicates: 'In 2021, we continued to deepen our understanding of the relevant risks in our supply chain by strengthening our supply chain risk management and audit processes, and the work on this will continue in 2022'. In the Company's Human Rights Policy it is remarked that its 'Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Annual Report 2021, 05/04/2022: corporate-media.arcelormittal.com] • Not Met: Day-to-day resources and expertise allocation in own operations: Although the Company indicates that different departments support implementation, no further details were found. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Resources and expertise allocation with EX BPs
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The 2021 Annual Report indicates: 'For the CFO and other Executive Officers, the 2021 annual performance bonus formula has been tailored for their respective positions and is generally based on the following performance targets: [...] Health and safety performance targets at Group, Segment or Business unit level (fatalities act as circuit breaker for this measure) [...]'. The 2021 Annual Report indicates: 'Starting in 2021, the performance criteria for the PSUs for the Executive Office and Executive Officers include an ESG criteria comprised of a health & safety, a climate action and a diversity & inclusion. However, it is not clear which are the actual metrics/indicators for these targets. [Annual Report 2021, 05/04/2022: corporate-media.arcelormittal.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: Although the CFO and other Executive Officers have an incentive for health and safety performance, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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: HRs risks integrated as part of enterprise risk system: The 2022 Integrated Annual Review indicates: 'ArcelorMittal pursues a rigorous approach to risk management across the business, to identify key threats to its operations, assets and people. [...] Management is responsible for internal control in the company and it has implemented a robust short, medium and long-term risk management and control system, which is designed to ensure the business is focused on achieving its objectives and that significant risks are identified and mitigated'. The report discloses information on different areas, including how it integrated into this risk management. In chapter 6, it focuses on 'Value chains our stakeholders trust', for which, under the subheading 'risk management', it indicates: 'The risk in the company's assurance and value chain considerations primarily relate to effective implementation of our plans, and management of actual and potential adverse impacts on human rights and environment across the company's complex value chain, which comprises over 40,000 direct suppliers across the globe. Developing and implementing these systems to achieve full coverage, and engaging suppliers

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			<p>to adopt higher standards could take several years to achieve'. Also, chapter 8 is about 'Communities and Just Transition', to which, under 'risk management', it notes: 'It is clear that companies must maintain constructive and positive relationships with their community stakeholders. Failure to do so can lead to highly challenging operating environments that present a significant risk to their social licence to operate resulting in substantial investments in time, energy and resources to regain trust. The quality of our community relationships and the processes used to monitor and manage their health will become more transparent through the mandatory CSRD and CS3D disclosure requirements. However, this also represents an opportunity to improve our management and reporting processes in relation to community engagement to better demonstrate our commitment to this critical stakeholder group'. [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com]</p> <ul style="list-style-type: none"> • Met: Provides an example: See above. As for how it Minimising and mitigating risk [Value chains our stakeholders trust], it adds: 'During 2022, we completed a comprehensive gap analysis against the various corporate sustainability due diligence laws that are already in force and those that are pending. From this, the company identified a set of strategic actions to strengthen its existing business processes for managing its value chains to cover core requirements of such laws while supporting specific reporting requirements in certain geographies'. Regarding risks related with community engagement, it notes: 'Investing in our local communities through better stakeholder engagement, needs assessment and grievance management. The concerns felt by communities around the ArcelorMittal operations can be very specific to their locality, and range across employment, skills, social development, human rights, health, safety and the environment. ArcelorMittal's community outreach work is driven largely by local teams, which are best placed to understand the needs of those who live near its operations'. [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The Company provided feedback to CHRB regarding this indicator, however, this subindicator looks for a description of how it assesses the adequacy of the enterprise risk management system specifically in managing human rights during the Company's last reporting year. The assessment is expected to either be overseen by the Board Audit Committee or conducted by an independent third party. No evidence found. [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Human Rights Policy remarks that 'It is supported by a guidance manual, training and Company-wide communications'. Moreover, the website states: 'We require all employees in appropriate functions to undergo human rights training every three years'. However, it is not clear if the commitments are communicated to all workers including in local languages, as it indicates that trains 'all employees in appropriate functions'. The 2021 Modern Slavery Statement indicates: 'All employees are required to be trained and to refresh their training on our Code of Business Conduct every three years'. However, the Code does not seem to contain the Company's Human Rights commitments. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights_web, N/A: corporate.arcelormittal.com] & [Human Rights Policy, 2021: corporate-media.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a. • Met: Describes steps to communicate HRs policies to EX BPs: The Company's Human Rights Policy indicates: 'We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions'. The 2021 Integrated Report adds: 'Any new suppliers are required to commit to the terms of our Code and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>adopt practices in line with ResponsibleSteel™ or equivalent standards'. The Code for Responsible Sourcing contains human rights expectations for suppliers.</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company's Human Rights Policy indicates: 'We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions'. The 2021 Integrated Report adds: 'Any new suppliers are required to commit to the terms of our Code and adopt practices in line with ResponsibleSteel™ or equivalent standards'. The Code for Responsible Sourcing contains human rights expectations for suppliers. [Human Rights Policy, 2021: corporate-media.ancelormittal.com] & [Integrated Report 2021, 29/04/2022: corporate-media.ancelormittal.com] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.
B.1.5	Training on Human Rights	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"> • Met: Score of at least 1 on A.1.2.a: See A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company's Human Rights Policy indicates: 'We require all employees in appropriate functions to undergo human rights training every three years'. However, although the Company indicates it trains its employees, no further details were found. The 2022 Integrated Annual Review indicates: 'In November, 2022 the company staged a three-day immersive training course for 16 selected personnel from key corporate functions (compliance, legal, sustainable development, human resources, procurement and internal assurance) and business units to become Certified Human Rights Officers (certification awarded by the ESCP business school based in Berlin). The course focused on human rights within the supply chain, and looked at internal roles, risk analysis, policies, preventative measures, remedial actions, grievance mechanisms and reporting, both from a regulatory and business strategy perspective'. However, although the Company has described the training received by these 16 people, no description found on whether and how the Company trains workers, in general, in its human rights commitments. [Human Rights Policy, 2021: corporate-media.ancelormittal.com] & [2022 Integrated Annual Review, 2023: annualreview2022.ancelormittal.com] • Not Met: Trains relevant managers including security on HRs: The 2021 Modern Slavery Act Statement indicates: 'Buyers who interact with suppliers are also provided with training in our Code for Responsible Sourcing'. However, it is not clear it trains relevant managers and workers, including security personnel. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [2021 Modern Slavery Act Statement, 07/2022: corporate-media.ancelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The Company's Human Rights Policy indicates: 'We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, [...]. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement'. However, although the Company indicates it engages with business partners, no evidence found of general human rights training (policy commitments) conducted for extractive business partners. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Human Rights Policy, 2021: corporate-media.ancelormittal.com] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	0.5	<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: Score of at least 1 on A.1.2.a: See A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The webpage section Human Rights indicates: 'We have actively contributed to the development of ResponsibleSteel™, a third-party certification standard, as well as several mining certification standards. We are working to ensure that our sites and our supply chain uphold these standards, reflecting international human rights, environmental and governance standards, and in 2019 began preparation for certification of sites against the ResponsibleSteel™ standard by third parties'. The 2022 Integrated Report explains: 'We also continued to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>progress ResponsibleSteel™ certification for our steel operations and IRMA certification programme for our mines. As the ResponsibleSteel™ certification process is being rolled out, our sites prepare for the rigorous audit against a range of ESG issues, including social ones such as human rights, health and safety and stakeholder engagement. The 2021 Integrated Report adds: 'The process and benefits of the audit [ResponsibleSteel audit] may be summarised as follows: The audit focused on our relationship with the outside world, such as local elected officials, public inspection authorities, industry associations, NGOs as well as our customers, suppliers and employees; We sought to align the expectations of each of our stakeholders with our own position and developed a detailed stakeholder engagement programme along with a comprehensive social management system monitored by the management committee; The AFNOR certification audit team carried out an intensive one week audit on our two sites, covering nine production departments and detailed interviews with employees, suppliers and local stakeholders; Action plans were developed to address the minor non-conformities that were identified during the audit; The whole process fostered the involvement of our management and employees towards our broader sustainability plans and targets'. [Human Rights Policy, 2021: corporate-media.armacelormittal.com] & [Integrated Report 2021, 29/04/2022: corporate-media.armacelormittal.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2.a • Not Met: Describes corrective actions process: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	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: HRs performance affects selection EX BPs: The 2022 Integrated Annual Review indicates: 'In 2021 we revised our Code for Responsible Sourcing to include explicit references to our commitment to ResponsibleSteel™, IRMA and other industry initiatives. The Code sets out the minimum standards we expect from our core suppliers, in areas such as health and safety, human rights, ethics and environmental stewardship. The Code includes our expectations that suppliers will adopt practices in line with ResponsibleSteel standards'. The Code for Responsible Sourcing adds: 'ArcelorMittal requests its suppliers to develop and implement policies and procedures to ensure respect of all human rights in their businesses, and those of their suppliers. [...] ArcelorMittal will work with its suppliers to address identified gaps. ArcelorMittal reserves the right to disengage from suppliers that do not meet the requirements of this Code or who cannot provide or commit to an improvement plan'. The Responsible Sourcing Guidance notes: 'All contractual documents (contracts, purchasing orders) are to also refer to the Code and our desire for all ArcelorMittal suppliers to confirm their commitment to the Code'. However, the Company is expected to describe how human rights performance is considered when choosing their suppliers, not after the decision was made and then suppliers have to agree to comply with certain expectations. This subindicator focuses on the selection process. [2022 Integrated Annual Review, 2023: annualreview2022.armacelormittal.com] & [Code for Responsible Sourcing, 02/2021: corporate-media.armacelormittal.com] • Not Met: HRs performance affects ongoing BPs relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with EX BPs to meet HRs requirements: The Code for Responsible Sourcing notes: 'The Code forms an integral part of ArcelorMittal's supplier relationship management and evaluation procedure. ArcelorMittal will take a risk based approach in assessing suppliers' compliance with the requirements of this Code. Monitoring may take the form of self-assessments, site visits, and follow up on remediation plans'. However, no further details found on how it supports business partners in meeting the Company's requirements. Support could come in the form of training, sharing expertise, collaborative working.
B.1.8	Approach to engagement with affected stakeholders	0.5	<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: Describes how workers and communities identified and engaged in the last two years: The webpage Stakeholders indicates: 'Our key stakeholder groups are our employees, [...] and the communities in which we work. Trade unions, suppliers, NGOs, multilateral organisations and research institutions are also important. We identified these key stakeholder groups through analysis based on peer group analysis, best practice across the world and the principles of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>AA1000 Stakeholder Engagement Standard 2011. [...] We ask all our sites to develop a stakeholder engagement plan and manage a stakeholder grievance mechanism in line with company standards, explained on our Social performance page. [...] At a corporate or segment level, we engage in a number of stakeholder networks for each of our six SD themes, including: [...] Health & safety: Joint Global Health and Safety Committee, with representatives from our management and our unions'. In addition, the Company has an 'External Stakeholder Engagement Procedure' where it sets out minimum requirements for engaging with external stakeholders. The 2021 Integrated Report remarks: 'In 2021, nine of our steelmaking sites in Europe and one in Brazil achieved ResponsibleSteel™ site certification'. Part of the site certification audit process, includes interviews with employees. [Stakeholders, N/A: corporate.arcelormittal.com] & [Integrated Report 2021, 29/04/2022: corporate.arcelormittal.com]</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholder views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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: Describes process of identifying risks in own operations: The 2021 Integrated Report indicates: 'We continue to carry out additional ESG risk mapping and analysis and apply further layers of due diligence based on OECD guidelines where our Code assessments highlight areas of social and environmental concern. We develop action plans where needed, and pay particular attention to 'conflict minerals', such as tin and tungsten, which are needed in small quantities for effective steelmaking, and engage with suppliers over the ESG concerns we identified'. However, it is now clear the process it uses to identify its human rights risks and impacts covering its own operations. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Integrated Report 2021, 29/04/2022: corporate.arcelormittal.com] • Not Met: Describes process for identifying risks in EX BPs: Regarding the identification and the monitoring of its supply chain risk, the website indicates: 'To identify and manage social and environmental risks in our supply chain, we apply supply chain due diligence. Over recent years, we have deepened our mapping of the social and environmental risks in our raw materials supply chain, working with the Dragonfly Initiative to analyse these risks by supplier, by country and by material. This has been a challenging piece of work given the complexity of our supply chain. We have also worked with worldsteel to create tools for our industry on supply chain due diligence'. However, it is not clear the process it uses to identify its human rights risks and impacts in specific locations or activities, covering its extractive business partners. The evidence found seems to focus on its raw material supply chain. The Company's Human Rights Policy adds: '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. We will undertake work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly benefitting from or promoting such illegal practices'. However, no description of the process found. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Customer reassurance_web, N/A: corporate.arcelormittal.com] & [Human Rights Policy, 2021: corporate-media.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: The website also states: 'To identify and manage social and environmental risks in our supply chain, we apply supply chain due diligence. Over recent years, we have deepened our mapping of the social and environmental risks in our raw materials supply chain, working with the Dragonfly Initiative to analyse these risks by supplier, by country and by material. This has been a challenging piece of work given the complexity of our supply chain. We have also worked with worldsteel to create tools for our industry on supply chain due diligence'. However, although the Company indicates that it works with external Human Rights experts on its risk mapping on its raw material supply chain, it is not clear the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities, also involving consultation with affected stakeholders. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Customer reassurance_web, N/A: corporate.arcelormittal.com] • Not Met: Describes how risk identification system is triggered by new circumstances: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing 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: Describes assessment process and discloses salient HRs risks: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Describes how process applies to EX BPs: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Public disclosure of results of HRs risk assessment: The webpage section Human Rights indicates: 'In 2018, we continued to deepen our understanding of the relevant risks in our supply chain by strengthening our supply chain risk management and audit processes. 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'. The webpage section Customer reassurance expands on the topic: 'There is also continued concern that some conflicts around the world are being financed by the trade in minerals such as tin, tantalum, tungsten and gold. From a portfolio of more than 2,000 steel products, only a very limited number of ArcelorMittal products contain tin and tungsten, which are necessary for the functionality or production of certain products'. However, no information found on the results of its assessments [Human Rights_web, N/A: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Describes how global system applies to EX BPs: See below example of action taken in supply chain. No description found of a system to prevent, mitigate or remediate its salient human rights issues among its extractive business partners. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Customer reassurance_web, N/A: corporate.arcelormittal.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: The webpage section Customer indicates: 'An essential element of supply chain due diligence is demonstrating action on the ground to address issues we've identified. For example, we have been part of the TinWorking Group (TWG). This coalition of high-profile consumer electronics brands, metal manufacturers, NGOs, and government and industry bodies has been run by the Responsible Minerals Initiative, and aims to address the social and environmental impacts of tin mining. Working with miners, local government and other stakeholders to understand the situation in Bangka island, Indonesia, the TWG supports a road map for improvements. With a grant from the European Partnership for Responsible Minerals (EPRM), the TWG has supported two pilot projects: one focused on the sustainable reclamation of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			mining land and one to improve health and safety among miners'. However, the example found refers to the Company's procurement of goods. No example was found on the Company's actions decided regrading extractive business partners in the understanding of the CHRB. [Customer reassurance_web, N/A: corporate.arcelormittal.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public.
B.2.4	Tracking 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: Describes system for evaluation effectiveness of actions: The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company indicates that 'We provide our stakeholders – including employees, contractors, and community members – with the facility to raise a grievance of any kind through a confidential grievance mechanism at site level, or through whistleblowing lines at country level. We also have a central whistleblowing channel'. [Human Rights_web, N/A: corporate.arcelormittal.com] Score 2 <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: The 2021 Integrated Report indicates: 'ArcelorMittal also has confidential whistleblowing hotlines in all major countries where it operates'. As indicated above, it has grievance mechanisms both at site level and country level. It is assumed that these are created in local languages. The Whistleblowing system is described in its Code of Business Conduct. The 2021 Modern Slavery Act Statement indicates: 'All employees are required to be trained and to refresh their training on our Code of Business Conduct every three years'. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [2021 Modern Slavery Act Statement, 07/2022: corporate.arcelormittal.com] • Not Met: Describes how workers in EX BPs access grievance mechanism: The webpage section Human Rights indicates: 'We provide our stakeholders – including employees, contractors, and community members – with the facility to raise a grievance of any kind through a confidential grievance mechanism at site level, or through whistleblowing lines at country level. We also have a central whistleblowing channel'. However, it is not clear if extractive business partners' employees can file complaints in relation to their employers' behaviour. [Human Rights_web, N/A: corporate.arcelormittal.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for 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 accessible to all external individuals and communities: The webpage section Human Rights indicates: 'We provide our stakeholders – including employees, contractors, and community members – with the facility to raise a grievance of any kind through a confidential grievance mechanism at site level, or through whistleblowing lines at country level. We also have a central whistleblowing channel'. [Human Rights_web, N/A: corporate.arcelormittal.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: As indicated above, it has grievance mechanisms at site

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>level and country level, as well as a central whistleblowing channel. It is assumed that these are created in local languages. However, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. [Human Rights_web, N/A: corporate.arcelormittal.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: As stated above, the webpage section Human Rights indicates: 'We provide our stakeholders – including employees, contractors, and community members – with the facility to raise a grievance of any kind through a confidential grievance mechanism at site level, or through whistleblowing lines at country level. We also have a central whistleblowing channel'. However, it is not clear that external individuals and communities have access to it, in order to raise complaints or concerns about human rights issues at the Company's extractive business partners. [Human Rights_web, N/A: corporate.arcelormittal.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.3	Users are involved in the design and performance of the mechanism(s)	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: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	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: Describes procedure and timescales for managing complaints or concerns: The Whistleblower Policy indicates: 'Matters unrelated to fraud and corruption, will be investigated by the appropriate internal functions and the corresponding report should be shared with Global Assurance. All reported concerns will be dealt with as soon as reasonably practicable, taking into account the complexity and the nature of the issue. External investigative resources may be used from time to time if required. [...] Where possible, the reporting person will receive feedback about how the report has been dealt with, whether any corrective measures or process improvements have been recommended and if any further steps will be taken'. However, no description of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant found. [Whistleblower Policy, 05/2019: corporate-media.arcelormittal.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators: It also states that 'All reported concerns made pursuant the Whistleblower policy will be reported to the Group Audit Committee with information on the status or results of investigations conducted. The Group Audit Committee may decide on the next step based on the result of the investigation'. However, it is not clear how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [Whistleblower Policy, 05/2019: corporate-media.arcelormittal.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: The Whistleblower Policy indicates: 'ArcelorMittal will take the necessary measures to protect employees who have, in good faith, made reports through the Whistleblower Policy, against any retaliation'. The External Stakeholder Policy states among its minimum requirements: 'Each operating subsidiary must meet the following requirements. [...] Ensure that the complainant [using the grievance mechanism], 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'. [Whistleblower_web, N/A: corporate.arcelormittal.com] & [External Stakeholder Engagement Policy, 01/2012: storagearcelormittalprod.blob.core.windows.net] • Met: Describes practical measures to prevent retaliation: The Whistleblower webpage indicates: 'You can register your report anonymously via the website using the form [found in the webpage]'. [Whistleblower_web, N/A: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Code for Responsible Sourcing indicates: 'It is the policy of the Company not to allow retaliation of reports of misconduct by others that we make in good faith'. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at extractive business partners level, as it is not clear the mechanism is open to them. [Code for Responsible Sourcing, 02/2021: corporate-media.arcelormittal.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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: Pays living wage or sets time-bound target: The Human Rights Policy indicates: 'ArcelorMittal aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying living wage • Not Met: Reviews definition living wage with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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: Member of EITI: The Group is a member of the Extractive Industry Transparency Initiative (EITI). [EITI Membership, N/A: eiti.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company reports taxes and royalties by country in its Report on Payments to Governments for extractives activities: 'The Report states the total amount of payments made to each government in accordance with the Transparency Law and the amount per type of payment made to each government'. [Report on Payment to Governments 2021, 2022: corporate-media.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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: Measures to prohibit violence/retaliation against workers for joining trade union: The Human Rights Policy indicates that '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'. High union recognition, in this case 88% percent, is taken as a proxy for not intimidating or retaliating in practice. See below. [2022 Fact Book, 2023: corporate.arcelormittal.com] & [Human Rights Policy, 2021: corporate-media.arcelormittal.com] Met: Discloses % of total direct operations covered by CB agreements: The 2021 Annual Report states: 'A majority of the employees of ArcelorMittal and of its contractors are represented by labor unions and are covered by collective bargaining or similar agreements, which are subject to periodic renegotiation'. The 2022 Book Fact indicates that 88% of employees were covered by collective bargaining agreements in 2022. [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] & [2022 Fact Book, 2023: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Meets both requirements under score 1: See above
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	<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: Describes process to identify H&S risks and impacts: The 2022 Integrated Annual Review indicates: 'Achieving safe working operations is a function of a safety culture maturity and appropriate risk management. Alongside the actions we have already taken, we are now seeking to move from what has, in our most challenged locations, been a 'find-and-fix' culture to a 'predict-and-prevent' culture, seen already in our best-performing operations where we identify and mitigate risks before they happen. We will do this through more professional application of risks management tools such as Hazards Identification and Risk Assessment (HIRA), Pre-Task Risks Assessment (PTRA also called HIRA-lites) Bow Ties analysis, Checking Controls relevance, effectiveness and reliability on the shop floor'. Also, 'We are working closely with a leading safety consultancy to better understand the interaction of risks arising from behaviour, working with machinery and from asset integrity in terms of their respective contributions to serious injuries and fatalities, so that we can develop better controls and mitigation actions'. [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com] Met: Discloses injury rate or lost days for last reporting period: The 2021 Fact Book reports the total Lost-time injury rate per million hours worked in 2022: 0.70. [2022 Fact Book, 2023: corporate.arcelormittal.com] Met: Discloses fatalities for last reporting period: The 2022 Fact Book reports the total of fatalities in 2021: 22. [2022 Fact Book, 2023: corporate.arcelormittal.com] Not Met: Discloses occupational disease rate for last reporting period: The Company provided feedback to CHRB regarding this indicator, however, no disclosure of its occupational disease rates for the last reporting period found. <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Set targets for H&S performance: The Company's Human Rights Policy indicates: 'ArcelorMittal is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace'. The 2021 Integrated Report adds that 'Improving health and safety' is a strategic priority and among its inputs and actions in 2021 in order to achieve it were: 'Renewed efforts to improve safety performance; 15% incentive plan for leadership based on LTIFR [Lost Time Injury Frequency Rate]'. The 2022 Integrated Annual Review notes: 'from 2023, the percentage of proactive PSIFs [potential serious injury and fatality] tackling the top fatality causes will become a key new KPI followed at segment level, together with the setting of associated targets to bring the number of these events down. We will also track the completion of actions taken to eliminate those events, and the number of risks that have been reviewed in each plant or site'. The 2022 Annual Report has further information on how safety related KPIs are connected to Executive Directors incentive plans. However, no evidence found of specific targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [Integrated Report 2021, 29/04/2022: corporate.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Met targets or explains why not or actions to improve H&S management systems: The 2021 Integrated Report indicates the outputs and outcomes related to health and safety in 2021. Although it is not clear it has achieved its goals: 'We are acutely aware that our safety performance is nowhere near good enough as it stands today. We have conducted an intensive review to build on and complement our existing efforts with the aim of ensuring we never have another year like 2021'. It indicates how it works to improve its health and safety management systems: 'Renewed focus on improving safety performance with governance and accountability strengthened; 2022 safety strategic focus on: leadership and shop floor presence, fatality prevention, revamp of H&S policy reflecting best practice standards, worse performing assets'. The 2022 Integrated Annual Review notes: 'We have significantly enhanced our training and coaching regimes and committed to rolling out intensive programmes harnessing external experts, with mandatory coaching provided for those who are not at the required level'. [Integrated Report 2021, 29/04/2022: corporate.ancelormittal.com] & [2022 Integrated Annual Review, 2023: annualreview2022.ancelormittal.com]
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify/recognise indigenous rights holders: The Human Rights Policy indicates: 'ArcelorMittal respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards'. However, it is not clear the process it has in place to identify and recognise affected indigenous peoples. [Human Rights Policy, 2021: corporate-media.ancelormittal.com] • Not Met: Describes how indigenous communities are engage during assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to FPIC • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	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: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The webpage section Air, Land and Water indicates: 'In mining, we can have responsibility for an area of land approximately 90% larger than the land that is actually being 'used' by the company. Expectations about how this land is managed – particularly areas not currently used for industrial purposes – are growing, around issues such as access rights and livelihood dependency. And there are liabilities associated with land tenure, which can require remedial action for decades after the end of the 'use' phase of the land'. However, it is not clear how it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation, when acquiring, leasing or making other arrangements to use or restrict the use of or access to land or natural resources. [Air, land and water_web, N/A: corporate.ancelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation: The 2022 Annual Report indicates: 'Since 2019, safety measures stricter than those required by legislation have been adopted, including the relocation of residents within the Self-Rescue Zone. The process of reparation and compensation of the families affected has been carried out in accordance with the Complementary Agreement Term (CAT) established with the Public Prosecutor's Office and community'. The Company has provided additional sources to the subindicator, however, they were in Portuguese and only documents in English are accepted according to CHRB criterion. It is not clear how it provides financial compensation or other compensation alternatives, including its valuation methods and how legitimate tenure rights holders were involved in the determining the valuation for any new or on-going land resettlements. [2022 Annual Report, 2023: corporate.ancelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes steps to meet IFC PS 5 in state deals: The Company’s Human Rights Policy indicates: 'ArcelorMittal seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government’s or regional authorities’ guidelines on resettlement and rehabilitation and also act in line with international human rights norms on this subject including the International Finance Corporation Performance Standards'. The 2022 Annual Report indicates: ‘Since 2019, safety measures stricter than those required by legislation have been adopted, including the relocation of residents within the Self-Rescue Zone. The process of reparation and compensation of the families affected has been carried out in accordance with the Complementary Agreement Term (CAT) established with the Public Prosecutor’s Office and community’. However, it is not clear the steps it would take to meet the standards with respect to legitimate tenure rights holders. [Human Rights Policy, 2021: corporate-media.arcelormittal.com] & [2022 Annual Report, 2023: corporate.arcelormittal.com]
D.3.7	Security (in own extractive operations, which includes JVs)	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: Describes security implementation (incl. VPs or ICOC) and provides an example: It has a Security Personnel Policy on the use of Force, Arms and Firearms which contains its principles, including guidelines on: Possession of arms and firearms; Use of force, arms or firearms; Use of Law Enforcement Forces; Apprehending persons; Torture and Inhumane treatment; Assistance to injured persons; Incident reporting; Grievance procedure; Training and Auditing. The Policy derives from international standards and principles including The Voluntary Principles on Security and Human Rights (VPSHR) also referred to in the ArcelorMittal’s Human Rights Policy. However, no description found of how it implements a commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers. The Company provides, in its 2021 Annual Report, examples of courses and programmes introduced by it, for instance in Liberia: ‘the Company has introduced VPSHR scenario-based workshop sessions. It trained 383 employees in 2020 and another 237 completed the instruction by the end of 2021’. However, no example found of how it ensures respect for human rights (including the human rights of people in local communities) in the course of maintaining the security of company-managed operations, including when working with contracted private or public security providers, if applicable. [Security Personnel Policy on the use of Force, Arms and Firearms, 01/2011: storage.arcelormittalprod.blob.core.windows.net] & [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] • Not Met: Ensures Business Partners/JVs follow security approach: It has a Security Personnel Policy on the use of Force, Arms and Firearms which is applied ‘to all employees assigned to provide security services and to external security service providers contracted by ArcelorMittal (the “Security Personnel”) at all plants, mines, offices and other sites and premises owned or leased by ArcelorMittal. It applies also during the transfer of persons and company assets’. The Policy contains its principles, including guidelines on: Possession of arms and firearms; Use of force, arms or firearms; Use of Law Enforcement Forces; Apprehending persons; Torture and Inhumane treatment; Assistance to injured persons; Incident reporting; Grievance procedure; Training and Auditing. The Policy derives from derived from international standards and principles including The Voluntary Principles on Security and Human Rights (VPSHR) also referred to in the ArcelorMittal’s Human Rights Policy. No description found of how it ensures the implementation of a commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers. [Security Personnel Policy on the use of Force, Arms and Firearms, 01/2011: storage.arcelormittalprod.blob.core.windows.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities • Not Met: Two examples of working with local communities to improve security

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Describes preventative/corrective action plans for water and sanitation risks: The 2021 Integrated Report indicates: 'Our work in this area is aligned with the UN's SDG 6 ("Clean water and sanitation"), with particular reference to targets 6.3 (water recycling), 6.4 (water efficiency) and 6.5 (water management). Our net water use, [...] is measured, monitored and managed at each site by a dedicated team. We generally treat and recycle the same intake of water repeatedly, losing it only through evaporation. [...]. We are committed to ongoing reductions in our water consumption. In pursuing our responsibilities, we are investing significantly in innovative techniques for water recovery, water treatment, establishing alternative water sources and reduced energy usage. In our mining operations, some sites recycle as much as 98% of their water. At AMMC in Canada, we are working on a \$36 million multi-year holistic water management project that includes installing treatment units to control surface effluents on waste rock piles. The project is expected to be completed by the end of 2022'. The 2021 Integrated Report adds: 'Newcastle, South Africa is investing \$8 million in a water treatment project by constructing a 460,000m3 stormwater runoff dam and reducing the plant's overall water demand. It will include increased capacity stormwater interceptors integrated with existing water treatment facilities. It is due for completion in May 2023'. In its webpage section Air, Land and Water, it also describes a desalination plant in Brazil: 'The project mainly aims to increase water security and ensure the stability of our operations, putting ArcelorMittal Tubarão at the forefront of water management, with an appropriate strategy for future adaptation to climate change'. More information on this desalination plant can be found in the 2022 Annual Report. However, although the Company describes many water management projects, it is not clear how it addresses specific risks to the right to water and sanitation in its own operations, as evidence found refers to water management context, but does not reference surrounding communities or other users in the vicinity of its operations, particularly in water risk context. [Integrated Report 2021, 29/04/2022: corporate.armacelormittal.com] & [Air, land and water_web, N/A: corporate.armacelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities • Not Met: Reports progress in meeting targets and trends demonstrating progress
D.3.9	Women's rights (in own extractive operations, which include JVs)	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: Describes processes to stop harassment and violence against women: The Company's Human Rights Policy indicates: 'ArcelorMittal is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate'. The Code of Business Conduct remarks: 'ArcelorMittal is committed to providing a work environment that is free of any form of sexual or other harassment, whether it be harassment by an employee of another employee or harassment by an employee of a customer or supplier or vice versa. [...] An employee who believes he or she has been the victim of, or a witness to, a situation involving harassment or discrimination should immediately report that situation to the head of the Legal Department. All such reports will be treated in confidence'. However, no description found of the process to prohibit and address harassment, intimidation and violence specifically against women. [Human Rights Policy, 2021: corporate-media.armacelormittal.com] & [Code of Business Conduct, 2011: corporate-media.armacelormittal.com] • Not Met: Working conditions take into account gender issues

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 Annual Report indicates: 'the Company announced new plans to double the number of women at leadership positions within the next decade. By 2030, the aim is to reach 25% management positions held by women. To achieve this figure, the Company is reviewing its policies and HR practices to give women employees greater flexibility to fit work into their lives; it will tackle unconscious bias and discrimination through training; and intend to consider at least one woman (either internal or external) in its recruitment shortlists for all professional and leadership positions. [...] A number of programs are in place to develop women as leaders. These are supported by initiatives including training programs for women employees, mentoring and coaching, networking, and role model involvement. This is aligned with a commitment to support future leaders in science, technology, engineering and mathematics ("STEM")'. However, it is not clear how it measures, and steps it takes to address any gender pay gap throughout all levels of employment, not only in leading positions. The 2022 Integrated Annual Review notes: 'Our D&I [diversity and inclusion] Roadmap is based around the premise that a high-performing organisation benefits from diverse perspectives and leverages innovation and engagement, which in turn drives productivity and performance. [...] Leverage local initiatives: Specialist panels, forums, and networking groups, reviews of policies and procedures, analysis of gender pay gap, training senior leadership team, inclusive leadership. Succession planning and active career pathing'. However, this subindicator looks for a description how it measures gender pay gap and the steps it takes to address it throughout all levels of employment. No further evidence found. [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com] & [2022 Integrated Annual Review, 2023: annualreview2022.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to security of persons, including freedom from torture and cruel, inhuman or degrading treatment • Headline: Prosecutor requested the elevation to trial in the human rights violations case against Acindar, ArcelorMittal's subsidiary in Argentina • Story: On 25 December 2021, the investigation of the state repression unleashed in March 1975 in the Santa Fe town of Villa Constitución after the events known as the "Villazo" was elevated to trial after several years of instruction. The prosecutor of the Unit of Assistance to cases of human rights violations committed during state terrorism in Rosario, Adolfo Villate, requested the elevation to trial of the case that has 25 defendants, including civilian personnel, executives of the metallurgical company Acindar, ArcelorMittal's subsidiary, police and military in retirement. <p>"Villazo" is the name given to a metallurgical strike with plant occupation in the companies Acindar, Marathon and Metcon, initiated in March 1974 by a group of grassroots leaders opposed to the national leadership of the UOM (Unión Obrera Metalúrgica).</p> <p>The investigation, initiated in 2013 by a complaint from survivors, focused on the repression of the union movement of the Villa Constitución branch of the Unión Obrera Metalúrgica (UOM) from March 20, 1975, which was in opposition to the national leadership led by Lorenzo Miguel. The military occupation of Villa Constitución resulted, according to the investigation, in the disappearances, torture and deprivation of liberty of more than a hundred victims -most of them union activists- and lasted until the coup d'état in March 1976, "in addition to having the support of the metallurgical companies in the region, mainly Acindar".</p> <p>Also investigated was the business participation in these events, which for the prosecutor was reportedly evidenced in the passage of José Alfredo Martínez de Hoz from the board of directors of Acindar to the Ministry of Economy during the dictatorship and that of General Alcides López Aufranc to the executive leadership of the company.</p> <p>Allegedly, Acindar offered itself in 1975 as a testing ground for an experiment on a scale of social discipline that would be imposed months later throughout the country. According to prosecutor Villate: "the company benefited, ex ante, with advantages from the State, which were returned to the "terrorist State" in a process of corrupting osmosis of mutual favors." [La Capital, 22/3/2021, "La UOM de Villa Constitución es querellante contra ex directivos de Acindar": lacapital.com.ar]</p>
E(1).1	The company has responded publicly to the allegation	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: Public response: A response by ArcelorMittal is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(1).2	The company has investigated and taken 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: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence the company implemented improvements after the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: A collision of ArcelorMittal trains injures 14 people in Liberia • Story: On 21 May 2021, two locomotives belonging to ArcelorMittal Liberia (AML) collided head-on along the rail, leaving 14 persons, including women and children wounded. The trains were coming from opposite directions when they collided around the CNC old camp on the Ganta – Saclepea highway. <p>According to press sources, AML locomotives have been involved in several accidents since the Company began shipment of iron ore almost 10 years ago, but this is first instance of their trains colliding. Regarding the passengers on board, some employees said those traveling with train were probably relatives or friends of employees working with the company. According to the AML's regulations and safety procedures, civilians are prohibited from traveling on AML trains, which are used strictly for the transportation of iron ore.</p> <p>[News Public Trust, 24/05/2021, "ArcelorMittal Liberia Investigates: Train Crash Caused By "Human Error"": newspublictrust.com] [All Africa, 23/05/2021, "Liberia: Two ArcelorMittal trains involve in accident": allafrica.com] [FPA, 24/05/2021, "ArcelorMittal Locomotives Collide, 14 Person Injured": frontpageafricaonline.com]</p>
E(2).1	The Company has responded publicly to the allegation	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: Public response: Following the rail accident, the company issued a public statement, in which it stated that: "Two ArcelorMittal Liberia locomotives were involved in a collision near Ganta City, Nimba County, early Friday morning, 21 May 2021. This accident was the first one of its kind in the 12 years that AML conducted rail operations in Liberia. [...] There were no fatalities but unfortunately two out of the four train crew sustained injuries and have been transferred to a hospital in Monrovia. The other two crew members whose injuries were less severe were immediately admitted to the AML Hospital. One has already been released and the other remains under observation. [...] The civilians involved in the accident sustained minor injuries and were provided immediate medical care by the company. Seven of them have already been released from the hospital and three remain under observation." [All Africa, 23/05/2021: allafrica.com] [GNN Liberia, 23/05/2021, "ArcelorMittal Liberia provides an update regarding a rail accident that took place early morning on 21st May 2021": gnnliberia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In the statement issued after the train accident, the company did address numbers of victims as well as the fact that several groups of stakeholders (employees and 'civilians') were injured. [GNN Liberia, 23/05/2021: gnnliberia.com]
E(2).2	The company has investigated and taken 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: Engaged with stakeholders: The statement said the civilians involved in the accident sustained minor injuries and were provided immediate medical care by the company. However, this is insufficient to infer that the company has engaged with the affected stakeholders within the meaning of the methodology. [All Africa, 23/05/2021: allafrica.com] • Not Met: Identified cause: The company's statement said that detailed investigation has commenced with initial indications suggesting human error rather than any mechanical failures. However, the company did not explain in detail how the human error resulted in the accident. <p>In addition, residents of Nimba County have blamed the incident as a result of poor communication from the management of the company. A worker speaking to the Yekepa train operator said that according to the control room, the operator was waiting for the Buchanan train in Bong County. Unfortunately, he met the train in Nimba. Therefore, the investigative conclusions reached by the company are not detailed enough to be considered to identify underlying causes of the event. [All Africa, 23/05/2021: allafrica.com] [FPA, 24/05/2021: frontpageafricaonline.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company's statement said: "Rail operations at ArcelorMittal Liberia have been temporarily impacted and recovery teams have been mobilized. The rail hardware is being inspected by the company's engineers, who are working to restore operations back to normal as soon as possible, taking all necessary safety and COVID-19 precautions for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employees, the local community and the environment." However, there is no evidence that the company has improved its railway system in any way to avoid accidents and has made changes to its management systems following the events and their human rights impacts.</p> <p>The lack of improvement can also be inferred from the fact that AML locomotives have been involved in several accidents since the Company began shipment of iron ore, raising questions about the effectiveness of the regulatory system in putting safety first. [GNN Liberia, 23/05/2021: gnnliberia.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Methane explosion at Kazakhstan's Abayskaya mine, owned by ArcelorMittal, killed six workers • Story: On 7 November 2021, the Abayskaya coal mine owned by ArcelorMittal in the town of Abay in Kazakhstan's Karaganda region saw a methane outburst that has left six people dead and another two injured. The Kazakh Emergency Situations Ministry reported: "According to tentative information, 64 workers were down at the mine at that moment. Eight workers were in the working face Windway K10 down (the place of the outburst). Of the eight workers, six have died, and two have been injured". <p>The Karaganda police department has launched a pre-trial investigation into the blast accident at the Abay one on charges of breaching safety rules. Emergency Minister Yuri Ilyin said: "At the moment, the operation at all mines in the region are put on hold until their compliance with safety standards is confirmed". [RFERL, 7/11/2021, "Blast at mine in Kazakhstan leaves six dead, two seriously injured": rferl.org] [Interfax, 25/11/2021, "ArcelorMittal Temirtau responsible for deadly accident at Abay coal mine": interfax.kz] [Metallurgprom.org, 07/11/2021, "6 miners killed in accident at ArcelorMittal coal mine in Kazakhstan": metallurgprom.org]</p>
E(3).1	The Company has responded publicly to the allegation	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: Public response: After the events, the company expressed its condolences to the families and friends of the victims and said the accident was due to a blast of gas and coal. <p>In its 2021 Annual Report, the company stated: "In 2021, 29 employees lost their lives while working at the Company's facilities: 16 in the steel business and 13 in mining (including the tragic loss of life of six employees following a gas and coal outburst that occurred at the Abayskaya mine in ArcelorMittal Temirtau, Kazakhstan in November 2021)". [Metallurgprom.org, 07/11/2021: metallurgprom.org] [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The Company's response addresses the death of six employees in the explosion. However, the Company does not refer to the two employees that were seriously injured. [Metallurgprom.org, 07/11/2021: metallurgprom.org] [Annual Report 2021, 05/04/2022: corporate.arcelormittal.com]
E(3).2	The company has investigated and taken 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: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. • Not Met: Identified cause: ArcelorMittal said the accident was due to a blast of gas and coal. However, this statement is too general and does not precisely identify the underlying causes of the accident. [RFERL, 7/11/2021: rferl.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: State industrial safety inspectors after a scheduled inspection of the mine reported that the company did not eliminate a number of violations after that tragedy and previous accidents. According to state inspectors, 200 industrial safety violations were identified. In addition, there is no evidence that the company made changes to its management systems following the events and their human rights impacts. [Business & Human Rights Resource Centre, 08/06/2022, "Kazakhstan: ArcelorMittal Temirtau fined after 200 industrial safety violations revealed at Abayskaya mine": business-humanrights.org] • Not Met: Stakeholder input to steps taken: See above
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: According to the head of the department, all the families of the victims will be paid a ten-year salary. [EKaraganda.kz, 17/11/2021, "Survivors of the explosion at the mine Abayskaya" do not want to return to the slaughter": vk.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: There is no evidence suggesting the stakeholders were unsatisfied with the remedy offered. • Not Met: Remedy delivered: According to the head of the department, all the families of the victims will be paid a ten-year salary. However, there is no evidence that the remedy was actually provided. [EKaraganda.kz, 17/11/2021: vk.com] • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Two employees dead and four injured in ArcelorMittal train accident in Liberia • Story: On 11 January 2021, ArcelorMittal's rail equipment carrying maintenance crew came in contact with loaded wagons stationed on the rail line, resulting in serious injuries to 6 ArcelorMittal employees. ArcelorMittal Liberia announced that two of its staff have succumbed to their injuries after being medically evacuated by helicopter to hospital and four were injured. A full investigation has been launched into the cause of the accident. <p>According to press sources, this train accident brings to four the number of train accident sustained by ArcelorMittal since its operations in 2005. An ArcelorMittal Liberia locomotive was involved in an accident along the Sanniquellie-Ganta highway in Nimba County in September 2021. No fatalities were reported.</p> <p>On 15 January 2022, the family of the deceased railroad technician of ArcelorMittal Liberia accused the company of negligence in the aftermath of the deadly train accident.</p> <p>Mr. Macdonald P.S. Dolo was one of two AML workers who died on 11 January 2022, after a rail equipment carrying maintenance crew came in contact with loaded wagons stationed on the rail line around Kilometres 196 in Nimba County. Four other employees were seriously injured.</p> <p>The Dolo Family said it demands answers from the company over the loss of its member who didn't have to die on duty under such a reckless manner he did. The Dolo family in their statement threatened legal action against the company. The Dolo Family, among others, lamented Arcelor Mittal's poor safety measures for its rail maintenance crew, the company's slow and inhumane response as well as the company's deliberate abandoning of the critically injured staff by dumping them at the JFK Hospital in Monrovia after being evacuated from Nimba County. [Africa Radio, 12/01/2022, "Liberia: deux employés d'une compagnie minière tués dans un accident": africanradio.com] [News Public Trust, 15/01/2022, "Family of deceased ArcelorMittal worker blames company for rail death, but AML reacts": newspublictrust.com] [African News Agency, 17/01/2022, "Family Of Deceased Staff Accuses ArcelorMittal Of Murder": africannewsagency.com]</p>
E(4).1	The Company has responded publicly to the allegation	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: Public response: The company announced the suspension of train operations, saying that two employees were killed and four others injured in a train accident in north-east Liberia.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ArcelorMittal said that 'two of its committed employees died of their injuries after being evacuated by helicopter to hospital', according to a statement released after the accident.</p> <p>In a press release of January 15, 2022, the AML management vowed to continue to support the bereaved families and families of those who suffered injuries. [AfricaRadio, 12/01/2022: africaradio.com] [News Public Trust, 15/01/2022: newspublictrust.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: ArcelorMittal management did address the number of victims both regarding fatalities and injuries. [AfricaRadio, 12/01/2022: africaradio.com] [News Public Trust, 15/01/2022: newspublictrust.com]
E(4).2	The company has investigated and taken 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: Engaged with stakeholders: There are reports that members of the Company's management visited the victims in hospital as well as some of their families. However, this does not indicate that the Company engaged with affected stakeholder groups in the investigation of the root causes of the events. [News Public Trust, 15/01/2022: newspublictrust.com] • Not Met: Identified cause: According to an ArcelorMittal press statement, a full investigation has been launched into the cause of the accident. However, the company did not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The Dolo family reported that: "'Mittal Steel only suspended its rail operations for the first day of the accident because the remnants of the accident were still on the railroad which prevented any resumption of operations at the time. At the moment, the trains have begun transporting ores again.'" There is therefore no evidence that the company has undertaken any improvements to its railway system to avoid accidents, nor that it has made changes to its management systems following the events and their human rights impacts. [African News Agency, 17/01/2022: africannewsagency.com] • Not Met: Stakeholder input to steps taken: See above
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: In its press release, the ArcelorMittal management said: "On Wednesday January 12, 2022, a chartered flight transported the other four of our injured colleagues to Dakar, Senegal for advanced medical care, following frantic efforts to process their travel documents and COVID-19 certificates." <p>Stefan Buys, ArcelorMittal's Executive Vice President and CEO for Mining [Global] along with senior executives of ArcelorMittal Liberia visited the homes of the bereaved families in Yekepa and Camp Fouand assured them of company's fullest support, beyond its legal obligations to care for the wellbeing of the families. "The organization will support you and your family and our Human Resource Department will remain in contact with you to ensure that you get all the right support" Buys said when he visited one of the families affected.</p> <p>However, the Dolo family reported that the members of the family had to assume responsibility of the hospital bill after the company totally abandoned its injured staff by not even calling medical personnel's attention to the injured at the hospital. It must therefore be concluded, in light of ArcelorMittal's complete negligence, neglect and recklessness in the aftermath of the deadly train accident, that, beyond the statements made by the company, AML did not actually engage with the families. There is no evidence that the company actually provided support to the families of the injured as claimed. [News Public Trust, 15/01/2022: newspublictrust.com]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Land Rights • Headline: ArcelorMittal extracted iron from the lands of the Nahua community of San Juan Huitzontla without having carried out a free and prior consultation or the judicial process required by law

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Story: On 21 January 2022, the Nahua community of San Juan Huitzontla, municipality of Chinicuila, won an injunction against the mining companies Las Encinas and ArcelorMittal, which allegedly extract iron from their lands without having carried out a consultation or the judicial process required by law. <p>The ruling recognized the violation of the rights of San Juan Huitzontla to be consulted freely, prior and informed about the mining activities of the companies and declared the suspension of the concession titles to the two consortiums until the community is consulted. The residents of the town began the legal process three years ago with the representation of the Miguel Agustín Pro Juárez Human Rights Center (Centro Prodh). [El Sol de Morelia, 31/01/2022, "Comunidad nahua gana amparo contra empresas mineras en Chinicuila": elsoldemorelia.com.mx]</p>
E(5).1	The Company has responded publicly to the allegation	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: Public response: A response by the company is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(5).2	The company has investigated and taken 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: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts. • Not Met: Stakeholder input to steps taken
E(5).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: The case was reviewed in court, which constitutes an independent remedy process according to CHRB methodology. However, the court decided in favour of the Nahua community. [El Sol de Morelia, 31/01/2022: elsoldemorelia.com.mx]
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: ArcelorMittal criticised for endangering workers amends the Covid-19 pandemic • Story: On March 24th, 2020, a majority of representatives of CGT (Confédération générale du travail), FO (Force ouvrière), UNSA (Union nationale des syndicats autonomes), CFTD (Confédération française démocratique du travail) had opposed the lifting of the warning right to grave and imminent danger presented by the CGT Friday, March 20, saying "inadequate" health protections in place on the Lorraine site. Despite the investigation of the labor inspection, ongoing, work slowly resumes on site on different lines concerned. <p>"There are more and more employees on sick leave," says an insider. "Today, money is more important than the health of employees" states Frank Laché (UNSA). "The state must intervene to protect us and enforce the rules," says Lionel Burriello (CGT).</p> <p>At that time ArcelorMittal, 15 confirmed cases of contamination were detected and at least 60 cases are suspected in the steelworks.</p> <p>On April 6th, 2020, ArcelorMittal Dofasco workers notified their employer of a formal work refusal amid the company's announcing its first case of COVID-19 in a worker. The ministry launched an investigation into the complaint if the issue wasn't resolved between workers and employees.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>"The work refusal concerned whether the employer had done proper cleaning and disinfecting based on having a COVID-19 positive employee," said Janet Deline, spokesperson for the Ministry of Labour.</p> <p>Under the Occupational Health and Safety Act (OHS), there is a provision where a worker in limited circumstances may refuse to work if they consider it to be unsafe, Deline said.</p> <p>On May 25th, 2020, over a thousand workers from a contracting company, working for Arcelor Mittal, went to stop for fear of being infected with coronavirus. They accused that neither their WP company (a contracting company from Guadalajara and Coconal, Mexico City), nor ArcelorMittal, has given them the apparel and inputs to prevent further Covid-19 contagion.</p> <p>They claimed that Arcelor Mittal has made massive contracts with WP, where working conditions are all about the agglomeration of workers. Miguel Marcial Santos, of the Union of Industrial Eventual Workers, noted that the situation of mass contagion within Arcelor Mittal is becoming more serious.</p> <p>Miguel Marcial Santos, of the Union of Industrial Eventual Workers claimed that the lack of measures in work areas has caused it to be impossible to have healthy distance and by not guaranteeing the conditions of health, more mass contagions have been generated.</p> <p>The workers explained that "unemployment for life", was at first an agreement between the company and workers, which was to last two to three weeks, to curb contagion. However, the contractors decided to stop working because the companies have not guaranteed safe working conditions.</p> <p>[Le Quotidien, 27/03/2020, "Coronavirus : gros malaise chez ArcelorMittal Florange": lequotidien.lu] [The Hamilton Spectator, 06/04/2020, "No orders issued to Dofasco after complaint over COVID-19": insideottawavalley.com]</p>
E(6).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: Arcelor Mittal Dofasco said in a statement that their cleaning processes are thorough and include disinfectant, and that their precautions include "taking down a line if necessary." Any employee who may have come into contact with the case has been directed to self-isolate. The company also explained the measures adopted to fight covid-19 spread at its premises in Dofasco on its website. <p>There are no public responses issued with regard to the other units of the company included in the allegation. [The Hamilton Spectator, 06/04/2020: insideottawavalley.com] [Covid-19 Update, 30/03/2020: blog.arcelormittal.com] & [ArcelorMittal Dofasco and COVID-19: How we are managing, 30/03/2020: blog.arcelormittal.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: There are no public responses issued with regard to the other units of the company included in the allegation.
E(6).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: There is no evidence suggesting the company engaged with the affected stakeholders. • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: ArcelorMittal Dofasco's website reads: "All response actions were taken swiftly and appropriately. Our response actions are based on the guidance provided by the Government of Canada and Public Health and led and administered by our Health and Safety and Medical Services Teams. <p>In addition, our Support Services team oversees an immediate thorough protocol for enhanced cleaning and disinfection of the area."</p> <p>According to statements made on the Arcelor Mittal Canada website, the company changed its policies in line with government directives to combat the spread of the virus. However, there is no evidence that the company has implemented improvements in its polices/processes and/or made changes to its management systems following the events and their human rights impacts in the other units considered in the allegation. [ArcelorMittal Dofasco and COVID-19: How we are</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			managing, 30/03/2020: blog.arcelormittal.com] & [Covid-19 Update, 30/03/2020: blog.arcelormittal.com] <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(6).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy: There is no evidence suggesting that the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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