

## STATEMENT UNDER THE UNITED KINGDOM MODERN SLAVERY ACT, 2015 FOR THE YEAR JANUARY – DECEMBER 2021

ArcelorMittal SA (the “**Company**”) is the world’s leading steel and mining company and the leading supplier of quality steel products in all major markets including automotive, construction, household appliances and packaging. ArcelorMittal has a presence in 60 countries and primary steelmaking facilities in 17 countries.

This statement is made by the Company on behalf of itself and on behalf of its subsidiaries (together referred to as the “**ArcelorMittal Group**”) that are required to make a statement pursuant to the United Kingdom Modern Slavery Act, 2015. The ArcelorMittal Group is committed to driving out acts of modern-day slavery and human trafficking within its business and supply chain and expects the same from suppliers and partners.

For further information on the ArcelorMittal Group, its structure, its business and operations please refer the Company’s [online Annual Review](#).

### **Our Approach to Human Rights**

Our approach to Human Rights (which is derived from various International Human Rights Declarations including the United Nations Declaration of Human Rights) is contained in various policy documents and focuses on respecting the human rights of our employees and local communities. We also seek to extend our influence on our supply chain to share our commitment to improve social (including health and safety and human rights), environmental and ethical standards.

### **Our Policy Framework**

**Code of Business Conduct**: Articulates the fundamental legal and ethical principles that guide our conduct. It also sets out our commitments to a work environment free of harassment and discrimination, promoting occupational health and safety and respecting the environment.

**Human Rights Policy**: Articulates our commitment and respect for all human rights in line with the United Nations Guiding Principles on Business and Human Rights. The ArcelorMittal Group opposes the use of forced or compulsory labour, human trafficking and all forms of human rights violations known as ‘modern slavery’, within our own operations and through our supply chain.

**Code for Responsible Sourcing**: Sets out the expectations we have of our supply chain in relation to human rights, health and safety, the environment and anti-corruption. This includes ensuring that all work is freely chosen and without the use of forced or compulsory labour. The code is supplemented by a guidance document for the ArcelorMittal Group’s buyers and suppliers which details specific expectations in relation to child labour and forced or compulsory labour.

### **Identifying and Managing Risk**

***Risk Assessment and Mitigation***: The ArcelorMittal Group has implemented a risk assessment framework that invites local units to consider human rights issues during their local risk assessments. We revised our Code for Responsible Sourcing to include explicit references and targets relating to our commitment to ResponsibleSteel™, IRMA and other industry initiatives.

***Supply chain evaluation***: Most of our new suppliers are subject to due diligence processes and are required to accept our Code for Responsible Sourcing as part of our new supplier registration process. We may also conduct a site visit to identify potential breaches of the Code and agree on a timeline and process for mitigating them. We also require most of our core and strategic suppliers

to respond to an annual survey to verify their compliance with the Code for Responsible Sourcing and offer support to suppliers in their efforts to comply if they do not meet our standards. Any new suppliers are required to commit to the terms of our Code and adopt practices in line with ResponsibleSteel™ or equivalent standards.

**Conflict minerals:** The ArcelorMittal Group procures a small amount of tin and tungsten (considered conflict minerals). Our procurement team carries out an annual due diligence process in accordance with the US Dodd Frank Act section 1502, to ensure that the smelters from which our tin and tungsten are sourced have been assessed by an independent validation scheme. ArcelorMittal also issues an annual Report on Conflict Minerals.

**Reporting mechanisms:** The ArcelorMittal Group operates a confidential and anonymous whistleblowing facility on our website, through which all stakeholders may report ethical concerns. Our global assurance team monitors the volume, type and response to such concerns, and we report on this in our Annual Review.

**Measuring effectiveness:** The ArcelorMittal Group has no reason to believe that the process described above is not effective. Individual matters brought to the attention of the management are investigated.

**Continuous Improvement:** Management, along with the Corporate Responsibility team, undertake reviews of policy implementation in order to identify further areas or opportunities for continuous improvement. In 2020 we initiated the process of certifying a number of the ArcelorMittal Group's sites against the ResponsibleSteel™ standard. This includes assessing the controls and processes in place to prevent modern slavery and human trafficking within our operations, where no issues of concern were highlighted. In 2021, nine ArcelorMittal plants in Belgium, Germany and Luxembourg became the first sites globally to become ResponsibleSteel™ certified. We will continue with these efforts in the remaining plants in Europe, Brazil and at NAFTA sites.

## **Our Training Efforts**

All employees are required to be trained and to refresh their training on our Code of Business Conduct every three years. 96.% of General Managers and above have completed this training for 2021. General Managers and above, and those in relevant roles, also undertake specific Human Rights training which is also to be refreshed every three years (95.1% in 2021). Where we observe concerns, additional training is provided onsite. Buyers who interact with suppliers are also provided with training in our Code for Responsible Sourcing.

This statement is hereby approved by the Board of Directors of ArcelorMittal SA in July 2022 and will be reviewed annually.



Lakshmi N. Mittal, Executive Chairman of the Board of Directors

**Annex: List of the Company`s UK-based subsidiaries that are covered by this declaration:**

ArcelorMittal Orbit Limited

ArcelorMittal Sheffield Limited

ArcelorMittal Commercial UK Ltd

ArcelorMittal Distribution Solutions UK Limited

ArcelorMittal Tailored Blanks Birmingham Limited

Industeel UK Limited

ArcelorMittal Limited

ArcelorMittal Shipping Limited

Sutherland Limited

ArcelorMittal Mining UK Limited

Ferrosure (Isle of Man) Insurance Company Limited

ArcelorMittal Kent Wire Limited

Total Ship Services Limited

Arcelor SSC UK Barking Limited

Arcelor Construction UK Ltd