

PRE-AGM QUESTION AND ANSWER SESSION WITH INVESTORS

Held on 4 May 2022 at 14:00 CET plus answers to written questions received

Questions have been received from the following groups of investors:

- 1. CLIMATE ACTION 100+**
- 2. VBDO**
- 3. FIR**
- 4. DWS**
- 5. Nordea**

CLIMATE ACTION 100+:

As lead investors of the Climate Action 100+ (CA100+) investor group for ArcelorMittal, LAPFF, Ruffer, Aegon Asset Management and MFS Investment Management welcome the continuing positive engagement we have had to date with ArcelorMittal representatives.

We would like to commend ArcelorMittal for actions it has taken since the 2021 AGM and the issuing of the second Group climate action report.

In particular we note:

- Implementation of zero-carbon initiatives, such as the full-scale zero carbon emissions plant in Sestao, Spain and the decarbonisation project in Hamilton, Canada
- Fostering partnerships such as supporting the renewable hydrogen hub in Spain and working with the French government on initiatives to accelerate decarbonisation in Dunkirk and Foss sur Mer
- Provision of information to shareholders such as the report mapping the company's advocacy alignment with the goal of net zero by 2050 and publishing the CA100+ benchmark in the second group climate action report

We would like to ask the following:

- 1. We welcome the setting of the group-wide target for 2030 in the second climate action report. What progress do you expect to be able to make towards a more ambitious target in line with some European peers aligned with a 1.5°C scenario?**

So, as you well know last year, we set for the first time a 2030 target for the group. We are targeting to reduce CO2 intensity across the group by 25% by 2030 – and by 35% in Europe (which previously had a 2030 target of 30%). I think you cannot assume this is not in line with a 1.5-degree scenario.

It is not yet confirmed by the science-based target initiative whether this is in-line with 1.5 degrees. The SBTi has only recently started its steel industry working group of which we are a central member. That process will take at least 12 months – our team has attended 3 or 4 meetings already and it seems a draft methodology may be published by the end of this year. Until then what is – or is not – a target aligned with 1.5 degrees is not confirmed

But based on publications by the MPP – the Mission Possible Partnership - and the IEA – the International Energy Agency - it seems possible that our targets could be aligned with a 1.5-degree scenario. Which we would hope is the case, as our intention is very much to lead the decarbonisation of the industry on the global stage.

In some countries we believe our plans are more ambitious than our peers. By the end of this year, for example, we will be operating the world's first smart carbon blast furnace in Ghent, Belgium. By mid-decade, we plan to have the world's first zero carbon emissions steel plant in Spain. By 2028 if not before, we plan to reduce our emissions in Canada by 60%. Earlier this week we announced a very important milestone at our long Canada assets – using green hydrogen for the first time in a full-scale operating plant. This is a major moment.

Also, for us a target is something that we have a good chance of achieving. I know you know this – but the steel industry's ability to decarbonize doesn't start with us. It starts with lots and lots of clean energy being first, available and second, available at competitive prices. Those steel plants who have been able to be more ambitious - including our competitors - operate in countries in the world which have really prioritized a transition to clean energy, and so they are working on natural advantages. This is the case for example in Sweden – and in Canada – which is why our Canadian long steel plant has been able to be the first to test green hydrogen in the Midrex DRI plant – the green hydrogen is available.

If you take Europe alone – for our European plants to achieve net zero with green hydrogen, we need ten times more electricity than we use today – and we need all of that electricity to be green. That is half of Europe's entire installed renewable energy today. When it comes to target setting, we need confidence we will achieve them, which comes down to policy for accelerating the development of massive amounts of clean energy.

And remember as well that beyond Europe and Canada, across the group we are operating in many other countries with far less mature environments when it comes to decarbonisation. So, ArcelorMittal is working – usually with the industry associations in these countries – to promote policies that would effectively support steel's decarbonisation. In each and every one of these countries, we are continually looking at how we can accelerate our plans, engaging with government on how they can support us further and sooner, and ensuring that ArcelorMittal is at the forefront of industrial decarbonisation in each country. And our ambition to be the steel sector leader means we will not cease in driving this mission forward.

Understanding the long-term investment time-frame and capex required for implementing zero-carbon production, what short-term emissions target in line with a 1.5°C scenario could you set that would show investors an understanding of the crucial time-frame of the next five year period?

We can understand your desire to encourage us to make accelerated progress on our target, given the urgency of the action needed to limit the global average temperature increase to 1.5C, as well as the leadership role we have said we will play. We want to reassure you that we are absolutely committed to our global 2030 target of reducing our CO2e intensity of our steel and mining operations (Scopes 1 and 2) by 25%, and by 35% in Europe.

To come back to your question about short term targets, how can we give you confidence that we will start to make significant reductions towards our CO2 target in the next few years?

The reality is that the most meaningful progress will come in the second half of the decade. That is because of the time required for the construction of these assets as well as the timeline for the clean energy to be available. But that doesn't mean we won't make meaningful progress in the next five years. In Canada, the project funding is confirmed, and we should be commencing our investments there in the near future. In Europe, however, these projects still depend on the public funding that has been offered by member states, but we are still awaiting approval for this from the Commission. Until we receive this, the orders for the first plant equipment cannot be made, and so this does delay our ability to make progress. So, if there is anything you can do to urge the Commission to speed up the approval process – well that would be very much appreciated! And if they do – we still very much hope to have Europe's first large scale zero emissions steel plant in operation in Sestao by 2025. This year we will invest \$300m capex in carbon reduction projects in 2022.

2. As is becoming more common practice, will you put your zero-carbon transition strategy to shareholders for approval at the 2023 AGM?

We have engaged with our shareholders on this question – there is consistent support for our decarbonization plans, our disclosures and positive reactions to the Climate Action reports we have published; however, the reality is that there is currently no clear consensus that supports taking our zero-carbon transition strategy to shareholders for approval; this dialogue will of course continue and we will continue to monitor the developments in this area before taking a decision ahead of next year's AGM.

VBDO QUESTIONS

VBDO Question 1: Strategic company performance

This year ArcelorMittal celebrated that ResponsibleSteel certifications had been achieved in Belgium, Germany, and Luxembourg. In 2021 a new version of the ResponsibleSteel Standard was published, including revisions related to reporting GHG emissions and targets. VBDO applauds the development of this process and believes that the continuous development of the ResponsibleSteel Standard should go hand in hand with development plans regarding its application to various suppliers in the industry. What does the roadmap look like regarding the expansion of ResponsibleSteel audits across all ArcelorMittal sites, beyond Europe? Can VBDO expect ambition in this regard?

We have been involved with it from the start and believe it is an important development for the steel industry, developed by a broad-ranging community of stakeholders that includes customers, suppliers, civil society, and academics alongside steelmakers. We are proud to have been the first steel company to have sites certified against the ResponsibleSteel site standard in 2021 in Germany, Luxembourg, and Belgium.

We are also very pleased to say that ArcelorMittal Tubarao, our leading steel plant in Brazil, also achieved ResponsibleSteel certification this year – the first steel plant in the Americas to do so.

Responsible Steel is a comprehensive ESG standard and so of course we are considering how and when it could be rolled out more broadly across the group. Several other sites across the group in Europe and the Americas are already in the process of being certified, audited, or preparing for audits. And we have introduced the promise of a year-on-year increase in ResponsibleSteel certifications as part of our

revolving credit facility with our banks. By 2025, we anticipate that our key sites in half of the countries where we produce steel will have been audited against the 'Certified site' standard. [Back up excluding JVs: Certified sites in 4 - Belgium, Germany, Luxembourg, Brazil; Sites validated by RS, awaiting certification, in 2 - France (Nord and Med), Spain (Asturias and Sestao). Awaiting completion in 1: Poland (DG). Preparing in 1: Canada (Dofasco). Not yet committed in 7: Bosnia, USA, Ukraine, Kazakhstan, South Africa, Mexico, Argentina.]

You also mentioned the new additional Responsible Steel requirements, which cover responsible sourcing and GHG emissions. This is now out for final consultation and as a committed member we are providing our feedback. It is important that Responsible Steel covers all the most material issues for steel companies and these developments demonstrate how it is managing to do so.

VBDO Question 2: Biodiversity

The loss of biodiversity is seen as one of the largest threats to both humanity and the planet. Therefore, in the coming years, VBDO will focus on the impacts and dependencies of companies on biological diversity and ecosystems. It is good to see that ArcelorMittal has formulated the aim of protecting "biodiversity in the environments where it operates" (AR, p.59), and that biodiversity is included in the materiality matrix under SD outcome 5. Regarding the intention to protect biodiversity, ArcelorMittal notes in its Annual Report that the ResponsibleSteel audit process enables sites to prove they meet biodiversity standards (AR, p.56). VBDO applauds these efforts, but wonders how biodiversity standards are guaranteed on ArcelorMittal's own sites that have not yet been assessed by the ResponsibleSteel audits? How will these be included in its due diligence approach? Furthermore, what measures will ArcelorMittal take in 2022 aimed specifically at reducing the negative impact its activities have on biodiversity and natural capital?

We must look not only at our carbon emissions in isolation but at our impacts on these other forms of natural capital – water, biodiversity, and so on.

However, the requirements for companies to consider these elements in their strategies are only now catching up with the draft TNFD framework – the Taskforce for Nature related Disclosures. The Board is aware of this new draft framework and is supportive of the philosophy behind it. ArcelorMittal is doing a lot of work on this topic.

ArcelorMittal's sustainable development framework includes a commitment to be a trusted user of air, land, and water, at each and every site. This includes biodiversity, in those places where the company have a material impact. So, the way these are managed, the improvement plans that are implemented, and the exchanges the company has with its stakeholders on these issues, at site level and globally, are critical to our fulfillment of this commitment.

As mentioned before, we are looking at the new draft framework that has recently been published by the TNFD. Our teams are working to understand this in more detail – but fundamentally we have seen the benefits of the TCFD in helping our shareholders better understand our climate risks and opportunities – and the TNFD should do the same for all nature-related impacts including biodiversity.

In 2022, we will therefore be reviewing and strengthening our corporate environmental policy and the systems by which it is implemented, so that we can be sure that we know about our impacts on

biodiversity across the business, and wherever this is material, it is systematically addressed and remedied through a defined plan.

ResponsibleSteel, again, also has a role to play here. The process of preparing for a ResponsibleSteel 'Certified Site' audit has been immensely valuable for ArcelorMittal, teaching us many lessons on how to ensure that our sustainability policies and management systems are really doing the job they are intended to do. So, we are learning from these audits to improve our management systems more broadly.

So, as well as ensuring that we know the impacts we have on biodiversity, natural ecosystems, and resources, we are using the expertise we have across the group to ensure that we are addressing and improving these appropriately. This is work we will expand in 2022 that will allow us to report further detail on this in future years aligned with the TNFD.

VBDO Question 3: Labour conditions in supply chains

The European Parliament has recently introduced new due diligence legislation, which requires businesses to map actual or potential negative effects on human rights and the environment, as well as to avoid or reduce them. 4 In ArcelorMittal's annual report, VBDO could not discover any reporting on negative impacts on labour conditions in the supply chain and how these are addressed by ArcelorMittal. Also considering the new legal requirements, how does ArcelorMittal plan to report more transparently on risks and negative impacts on labour conditions in the supply chain?

We are aware of the European Parliament's new due diligence legislation and we are aware this is an area where we need to do more work. ArcelorMittal has had a commitment to responsible sourcing for many years. But a commitment is nothing without a real assessment of what the risks are in the supply chain and where these risks lie. We have previously undertaken such assessments, and we know that our greatest ESG risks lie in the procurement of our raw materials.

In 2022, we will undertake a fresh review of how we identify, assess, manage and report on environmental and social risks in our supply chains, including encouraging our raw materials suppliers to commit to being certified to a comprehensive multi-stakeholder standard. On the mining side, we are pushing the IRMA standard. [Initiative for Responsible Mining Assurance]

As you are probably aware the next part of the Responsible Steel standard also includes a supply chain element in its new proposed standard for certified steel.

We will of course provide an update of our review to stakeholders in our 2022 integrated annual review.

FIR – Forum POUR L'INVESTISSEMENT RESPONSIBLE

FIR Environment :

- 1. Are you explicitly committed to aligning your revenues and investments (CAPEX/OPEX/R&D/M&A...) with the objective of the Paris Agreement, which aims to limit warming limited to 1.5°C? How do you ensure that these revenues and investments respect this objective (please describe the methodologies used)? What are the main action plans and, if**

applicable, the associated investment amounts put in place to achieve this objective the short, medium, and long term?

This is really three questions in one.

ArcelorMittal has a net zero by 2050 target – to achieve that we must align our revenues and investments with this objective. We believe we are making good progress towards this end – but perhaps how we are doing this is not yet fully clear from our disclosures. As already mentioned, we remain optimistic that this target is aligned with 1.5C.

In terms of our investments, we have laid these out in our Climate Action report, and I believe we are making very good progress.

[Regarding decision-making regarding our investments, each major capital expenditure project proposal is required to demonstrate its carbon impact to the Investment Allocation Committee (IAC). The IAC considers both the potential future carbon cost as well as the capital cost of decarbonization, to maximize our chances of achieving our CO₂ reduction targets while ensuring each project is economically justifiable and earns its cost of capital.]

[In terms of revenues, we are observing and responding to a step change in the pace of demand growth for steel solutions that help our customers reduce their emissions. Across the board, ArcelorMittal will capture value where it can meet the needs of customers in these growing markets through innovative product design. Where we can also offer steel with an advantageous embodied CO₂, there is further value to be gained, as we have seen with our XCarb™ products launched in 2021. In 2021, we also launched our XCarb™ innovation fund, which has already invested \$180 million to foster the development of technologies that will support both our own and the steel industry's decarbonization plans.]

We would invite you to read our Integrated Annual Review. Here we outline our initial response on the EU Taxonomy, specifically on the proportion of economic activities that meet the criteria for sustainable economic activities established by the EU taxonomy and its delegated acts (read more in the Integrated annual Review 2021 page 57), and will develop this reporting in our reporting next year. In 2021, we set out a clear roadmap for achieving our medium-term 2030 CO₂ targets with anticipated cost of \$10 billion, and our commitment to achieve net zero steelmaking globally by 2050 (read more in the Climate Action Report 2).

Ultimately the impacts of climate change need to be factored into our financial accounts – what is sometimes referred to as 'Paris-aligned accounting'. In 2021, we initiated this process. The benefits and risks of our planned decarbonization investments in Europe and Canada – where reaching net zero by 2050 is a legal requirement - were considered in the Impairment modelling, estimates of the useful lives of our assets and cash flow projections. In 2022 we are developing tools to conduct more in-depth climate scenario analysis, which will enable us to further consider the potential impact of different severity levels of climate change on our asset value.

2. What percentage of your business (expressed as sales, net banking income, etc.) is directly depends on biodiversity? What are your expenditures in favor of biodiversity?

As we have said earlier, we understand the importance of the emerging TNFD framework to encourage companies to look at how their business strategy relates to natural capital. And this is something we will be looking at in the coming months to assess nature-related risks and impacts in more detail.

If we take biodiversity in the broadest sense, the business of ArcelorMittal of course relies on a range of resources that are generated by natural ecosystems, such as the carbon and water cycles, and sources of energy. This is one of the reasons we place such importance on mitigating climate change. Importantly, we also recognize that our operations have an impact on biodiversity and indeed nature more generally. Often this impact is positive, through the many programmes ArcelorMittal manages to conserve and promote biodiversity and natural capital, whether it's in France, Liberia or in Brazil.

ArcelorMittal runs a range of biodiversity projects at local level, and you can read about some of these in our integrated annual review and the country level sustainability reports we publish. But to answer your question, we don't yet break out expenditures in terms of specific biodiversity programmes at group level.

But we'd like to cover one example of what we do. The example that stands out for me is in Liberia, where we operate an iron ore mine in the western Nimba Mountains, in the vicinity of some areas of particularly sensitive and significant biodiversity. We established a Biodiversity Conservation Programme when we first started our operations there, in 2011. This scheme aims to address the multiple threats to biodiversity, including the insecurity in people's livelihoods and unsustainable farming practices that are often an underlying driver. We are working closely with Liberian government bodies and both international and local NGOs, and we now have conservation agreements and livelihood programmes in 13 communities in Nimba County. We have found that working in collaboration with local communities is the most effective way to create long-term change and protection.

In an expansion of our programme, last year we also embarked on a new joint initiative with the World Bank on nature-based solutions in Liberia and signed a memorandum of understanding with the University of Monrovia to collaborate on biodiversity.

With the experience and success, we have built up in Liberia, we can share this across the group. In particular, we are now looking at rolling out a similar approach to our Canadian mining operations and associated communities.

3. List the strategic natural resources necessary for your activity and/or that of your clients (water, energy, materials, etc.)? How do you evaluate and calculate the impact of the of these resources on your business models? What actions are you taking to combat supply difficulties and seize opportunities to develop "circular business models"? What are your objectives in this area?

As mentioned, our business is interdependent with the natural ecosystems that provide us with sources of energy, water, energy, and raw materials.

In 2021 the importance of this was born out when we refreshed our understanding of the ESG issues that are material to our business, with a new “double materiality assessment”. This was designed to ensure that our view on our most material social and environmental impacts are well aligned with our stakeholders’ views. The results supported our understanding that several elements of natural resource management are key to our business operations: tailings dam management, for example, in our mining operations; in water- constrained areas, water management; our emissions to air and water; and our impacts on biodiversity – again particularly salient in our mining operations.

When it comes to the input materials for steelmaking, circularity is part of the way we do business. The recycling rates the steel industry achieves today are already far higher than those competing materials have set as targets for the future. We utilize as much ferrous scrap as is available to make recycled steel. We do the same with the numerous residues from our processes, generating co-products for example by turning blast furnace slag into a cement substitute, an activity through which we avoided 7 million tonnes CO2 a year in 2021. Our steel plants recycle water sometimes hundreds of times, losing only a small amount through evaporation in the process. And we recover our waste gases to reuse the energy they contain across our operations, thus saving the use of new sources of primary energy.

So, steel starts from having a natural advantage when it comes to being a circular material. But we do not take that for granted – rather see it as a real opportunity to build on and solidify steel’s position as the best material for a circular low-carbon world.

And of course, there is more we can do to develop circular business models as we transition to green forms of energy. Green electricity and green hydrogen will play an important role. But one other part of the circular economy we are particularly excited about is ‘circular carbon’ - rather than thinking of carbon in the traditional linear way. Carbon is only a bad thing when it is emitted into the atmosphere as a greenhouse gas such as CO2. Where it can be reused, ideally in an endless loop, it can continue to play a role in a sustainable economy. In Ghent we are installing technology that will enable us not only to use forms of waste biomass as a replacement for coal, but that will capture the carbon waste gases and convert them into chemical feedstocks, to make plastic for example. Imagine a steel plant of the future, using waste plastics as a fuel, and at the same time producing plastics as a co-product, closing the loop just as we have done with iron through the recycling of scrap.

FIR Social

- 4. What is the proportion of your corporate officers and employees (broken down by type) concerned by the integration of environmental and social criteria (E&S) in the determination of their variable compensation (bonus, long-term compensation, profit-sharing, etc.)? Which governance bodies are responsible for selecting and validating these E&S criteria? How do they ensure that these criteria are relevant, sufficiently incentive-based and correlated to the objectives to be achieved to carry out the group's environmental and social strategy? (Please specify the extra-financial criteria used for corporate officers and for employees).**

We understand the increasing importance of recognizing these metrics in the company’s remuneration schemes.

Specific health and safety objectives are part of the global short-term incentive scheme which has the same structure for all 12,000 managerial employees worldwide, who make up over 7% of the

workforce. In 2021 the weight of these health and safety objectives (vs the total set of short-term incentive objectives) was increased by half, to reach 15% of the total set of objectives.

When it comes to local short-term incentive schemes, which are applicable for the remainder of employees, these are often like the global scheme, with most local short-term incentive schemes including specific health and safety targets.

Specific ESG criteria are also integrated into our long-term incentive scheme. This applies to our Executive Office and the top 300 employees of the company, as well as additional employees nominated by the discretion of their manager. These ESG targets include specific health and safety targets, as well as decarbonization and diversity & inclusion objectives. The decarbonisation and diversity elements were introduced only last year. Vesting of the LTI grants partially depends upon achievement of these longer-term objectives.

For other employees, performance incentive plans are usually based on balanced scorecards, which normally include Health & Safety and may extend to other aspects ESG elements such as CO2 depending on the role of the individual.

- 5. What lessons have you learned from the new ways of organizing work related to the Covid-19 (remote work, digitalization of communication methods, increased flexibility, etc.) implemented in your company in terms of impact on working conditions? How does your Human Resources strategy integrate these new organizational modes? What social dialogue has been conducted on the subject (agreements, shared reflection on the future of work, etc.) in all your businesses and sectors?**

We all wish that we did not have to experience Covid-19, even though there's a plus in terms of CO2. We lost employees to the virus – and many employees lost relatives and friends.

But there have been lessons learnt in the areas you mention. Before Covid if anyone had told us we could operate this way I think we would not have believed them – it is often only when you have to face a situation head on that you see what is possible.

Our company is at heart a people operation – we need our people on the shop floor making steel – or we would not have a business. But we surprised ourselves about what we are capable of.

At the outbreak of the COVID pandemic, our operations worldwide have quickly locked down or moved to a safe operation modus, with strict rules of hygiene and social distancing. Thanks to these strict measures, we have been able to contain the number of work-place originated contaminations or outbreaks.

Most office workers have been remote working, with the required digital support, as long as required by the pandemic situation, with gradual / partial return to the offices. Still today, a work organization with a partial remote working opportunity has been maintained in many of our office sites as we recognize the benefits offering flexible working has in terms of employee engagement as well as encouraging diversity, particularly gender.

Consultation about these changes in work organization always takes place in line with local requirements and consultation protocols with workers representatives, and agreements about adapted work organization and conditions have been concluded with social partners locally.

But we can see that there have certainly been lessons learned and we want to make sure we evolve in line with this direction to ensure we can continue to attract the highest talent to ArcelorMittal but recognizing that a very significant part of our work can only be done by being physically present. We want to attract talent, to help us decarbonize the industry. So, we need to strike a balance, in terms of time on the shop floor, remote working, work life balance and so on.

- 6. To be able to evaluate the evolution from one year to the next, we will ask the question posed in 2021 for which the responses did not reach a satisfactory level. Do you have a definition of "living wage" that goes beyond the local legal minimum wage? If so, which one? What is it? How does your company ensure that its employees, but also the employees of its suppliers, receive a living wage?**

We strongly support the concept of "fair wages", and this level is identified as appropriate within each place of operation, in consultation with our workers' representatives. In each country we work with our unions to ensure pay levels are agreed as fair under our collective bargaining agreements. I should highlight that most of our operations are in middle and high-income countries, where salaries are set at levels that would cover a reasonable cost of living, in liaison with our social partners. Where economic circumstances are particularly challenging, such as in the Ukraine at present, ArcelorMittal works hard to ensure employees are not disadvantaged due to the position they find themselves in, and are continued to be paid a fair wage, so that they are able to purchase basic goods such as food, medicine, school uniforms and hygiene products.

The principle of a fair wage is recognised throughout several of ArcelorMittal's policies, including our human rights policy and code for responsible sourcing, to promote fair wages and compensation. When it comes to ensuring implementation, the rigorous process of site certification against the ResponsibleSteel and IRMA standards, in particular, is bringing us reassurance that our practices are aligned with such expectations.

The ResponsibleSteel site certification standard, developed through a multistakeholder process and launched in 2019. While not achieved at all our sites, this standard requires the site being audited – under Criterion 4.8 – to "pay at least the applicable legal minimum wage to all workers or the wage set through a collective agreement, whichever is higher. Where there is no legal minimum wage and no collective agreement, the site pays the prevailing industry standard". Rigorous independent audits require evidence that these requirements are being met. To date, nine of our steelmaking sites have been awarded ResponsibleSteel site certification – the first such sites to be certified under this very demanding standard.

For our supply chain, as we've already described, in 2022 we will undertake a fresh review of how we identify, assess, manage, and report on environmental and social risks in our supply chains, including the risk of unfair wages.

So, we believe we are performing well in this area – but we hear your comment and that you are not satisfied with our policy and disclosure on this topic so it is something we will look at with further scrutiny in the year ahead.

- 7. France perimeter: apart from investments in your company's securities, what proportion of the employee savings funds offered to your employees are labeled responsible (SRI, Greenfin, CIES or Finansol)? How do you explain the maintenance of non-responsible funds when there is no difference in profitability and when the Paris financial center is a leader in this area? In your other countries of operation: do your employee savings schemes (retirement or other) also include ESG criteria? How does the board of directors or supervisory board encourage the subscription of these types of employee savings funds?**

This appears to be a specific question in relation to France. Here, two out of the 9 funds offered to our employees are labelled as 'socially responsible' under the Sustainable Finance Disclosure Regulation. We do not operate similar savings plans for employees in other countries, so our response relates directly only to the 15.000 employees in France.

FIR Governance

- 8. Do you publish a charter detailing your commitments to fiscal responsibility? If so, how does fiscal responsibility fit into your broader social responsibility? Does the board review and approve this charter? Do you report annually on the application of the charter's principles through a fiscal responsibility report? Does this report detail the taxes paid country by country?**

ArcelorMittal Group ensures the highest level of compliance to fulfill its fiscal responsibility.

Please refer to: <https://corporate.arcelormittal.com/media/0q2is1dl/tax-policy-2022-gb.pdf>

We file all the tax reporting required by the laws and regulations in the countries where we operate, including Country by Country report which has information of ArcelorMittal and all its consolidated entities.

In addition, on an annual basis we report on our 10 Sustainable Development outcomes including the "Contribution to society measured, shared and valued", where we quantify our consolidated tax contribution to society. It is part of our wider approach to reporting at a global and local level, supported by reports that provide details on specific areas of our work or are designed for the use of specific stakeholder groups. We seek to follow best practice in reporting. We draw on the standards of the Global Reporting Initiative and the Sustainability Standards Accounting Board, as well as industry guidelines from the World Steel Association.

ArcelorMittal Group also reports its tax payments in the consolidated report on payments to governments with respect to its extractive activities in accordance with the European Union 'transparency' directives, which is available on the Company's website. Please refer to [arcelor-mittal-fact-book-2021.pdf \(arcelormittal.com\)](#)

ArcelorMittal also contributes to the development of tax transparency by engaging with respected platforms and initiatives. For example, we support the Extractive Industry Transparency Initiative (EITI), since we believe that this initiative will strengthen governance, foster socio-economic development, and help the overall business climate to become more open, fair, and competitive.

- 9. Do you publish a responsible lobbying* charter? Are you a member of professional associations whose positions are controversial in the public interest? If so, what actions are you taking to reorient the positions of these associations? What consolidated resources (human and financial) (i.e., throughout your geographical area) do you allocate to interest representation?**

Yes, we do. We are aware of our responsibilities in this area and have made some important changes in our activity in recent years. For example, ArcelorMittal advocates for its relevant memberships to be aligned with the Paris Agreement targets in relation to climate change. Our Government Affairs teams typically lead on engagement and alignment in accordance with our climate advocacy principles and, in this context, ArcelorMittal works not only with policymakers and trade associations but is proud to work with a range of climate-focused membership bodies and stakeholder initiatives. We are fully committed to conducting all our direct and indirect policy lobbying and advocacy work in line with the Paris Agreement and have published updated policies in this regard in-line with the Climate Action 100 Net Zero Benchmark. For further, please refer to our latest Climate Advocacy Alignment report online: <https://corporate.arcelormittal.com/media/news-articles/arcelormittal-publishes-second-advocacy-alignment-report>

- 10. The law on the duty of vigilance provides for the preparation of the vigilance plan in association with the company's stakeholders, in particular the social partners. In addition, one of the measures of this plan is the establishment of a mechanism for alerting and collecting reports concerning the existence or occurrence of risks, established in consultation with representative trade unions. The trade unions have knowledge of the field and the ability to alert society and to alert the company and to provide valuable information in the exercise of the duty of vigilance. How does your Group integrate its social partners - at local and global levels - in the various stages of the development, evolution, and implementation of its compliance plan? What resources does the Group provide them with to accomplish this mission? How are the social partners involved in reporting on the effective implementation of the Compliance Plan?**

The French duty of vigilance is of course specific to our French subsidiary, and I will ensure our French team responds to your question in more detail. However, in relation to the topic of social and environmental due diligence, I will provide you with some comments at the group level since there are additional similar laws being implemented or pending in other EU member states and the new EU-wide proposal for a supply chain due diligence directive. We are reviewing and consolidating our Group-level approach to ESG due diligence.

A supply chain due diligence working group comprising representatives from relevant corporate functions and segments has been formed and a project to conduct a gap analysis against all requirements will be completed this year to provide recommendations to inform whether any changes to our management approach are needed.

In addition, we are participating in multi-stakeholder standards (e.g. ResponsibleSteel, CSR Europe, WBCSD) where such topics are discussed and approaches developed including, for example, an inclusive transition and decarbonization of scope 3, to ensure that the needs and concerns of our social partners (employees, unions, communities etc.) will be understood and considered in our decision-

making. In this regard, the focus is to have good visibility of our supply chain: we need to assess the risks, and where these risks are material, we need to ensure our suppliers are mitigating them well.]

DWS QUESTIONS

Overboarding

Directors should not hold an excessive amount of mandates to ensure that they have sufficient time and capacities to fulfill their board commitments. DWS considers directors overboarded in case they hold more than two external non-executive mandates and the candidate assumes any executive role (three overall maximum) or more than five mandates (including the nominated position) in total, in case the candidate assumes nonexecutive roles only. Due to their extended responsibilities, DWS attributes an additional mandate to all members assuming an executive position of CEO or any position as chair of the Board or chair of an audit committee. In principle, internal board seats are counted as one if they are clearly indicated as such.

In this context, we noticed that Mr Lakshmi Mittal has meanwhile more than three mandates as he serves ArcelorMittal S.A.'s Board as the executive Board Chair, Aperam S.A. as the Chair (which we count separately) and the Board of The Goldman Sachs Group Inc.

QUESTION 1: Are there any plans that Mr Lakshmi Mittal reduces his mandates soon and if so, which mandates?

Mr. Lakshmi Mittal holds three mandates – not more than three mandates - two of which - Aperam and Goldman Sachs - are non-executives.

The board does not consider that Mr Mittal is overboarded. Only one of his directorships is executive. Two of his directorships are in the steel industry in companies in which he and his family have a significant shareholding – Arcelormittal and Aperam. Mr. Mittal has an unequalled and proven track record as well as a strategic vision for the steel industry in general and is fully aligned with the interests of both Aperam's and ArcelorMittal's shareholders. He is uniquely positioned to lead the Board of Directors in his role of Chairman, whether executive or non-executive. And the requirement of time consumption will be substantially less. Therefore, Mr Mittal has only one non-executive directorship outside the steel industry – he has been a non-executive and much valued member of the board of Goldman Sachs since [2007].

Mr. Mittal should not be considered over-boarded as he has the necessary time and availability to fulfill his roles and duties.

Independence

Qualified, experienced, and independent directors are essential for competent and efficient decision-making processes at board level. Having a majority of independent members serving on boards and committees, as well as respective independent Chairs, is important for us to ensure objective-driven decision making and challenging discussions within the Board. In the case where one person assumes a combined CEO and Chair role or the Chair is considered not independent due to our Policy (for example, due to a tenure of more than ten years), a qualified and strong lead independent director must be in place in order to counterbalance the presence of a non-independent Chair and to ensure the proper work of the Board. In this context, DWS appreciates that Mr Bruno Lafont serves the Board as a lead independent director to counterbalance the presence of a non-independent Chair. However, since DWS assesses the independence of directors by, inter alia, analyzing the tenure of the individual

members, we cannot consider Mr Bruno Lafont as independent anymore because his Board membership exceeds 10 years.

QUESTION 2: Are there any considerations for introducing a new lead independent director?

ArcelorMittal has a maximum term of office of independent Directors of twelve-years. This limit duration is in line not only with the EU Recommendation no. 2005/162 but also with the best practices recommended by the main companies leading institutional investors. Furthermore, it is essential to comprehend that Directors of a company operating in a complex business sector such as that of ArcelorMittal must necessarily have a mandate duration appropriate and suitable to the time required for learning the specific business carried out by the Company itself. Mr. Lafont's twelve-years of office will be reached in 2023 and the Company will therefore appoint a new Lead Independent Director

CVs

In order to assess not only the qualification of directors but also a potential overboarding, DWS expects that the resume/CV of each executive and non-executive director is permanently published on the Investee Company's website and states the year the individual was first appointed, information about the qualification, the year of birth and any mandates (including external listed companies, internal mandates, mandates also related to other than commercially oriented organizations). DWS observed that the CVs of the members of the Board of directors on the company's homepage are incomplete. Some CVs do not indicate that the respective director also serves on other boards and that these external mandates are listed companies. This lack of information makes it difficult for investors to assess the qualifications and mandates of the Board members.

QUESTION 3: When can we expect you to update the CVs of the Board members so that investors can fully assess the qualifications and the mandate situation of the directors?

The curricula of Board members are constantly monitored and updated on a regular basis. We hope that the most important information is always available, but we take on board your comment and will look into what more can be done to ensure all relevant information is published in the CVs of our directors.

With the emergence of new areas of common interest for investors, for example the recent developments in the healthcare, cyber security and risk management, the significant pre-existing experiences of the Directors in such areas have been highlighted accordingly on our platforms.

With regard to the mandate situation of the Directors, websites always need to strike a balance between completeness of information disclosed and easy access to them. Nevertheless, the complete curricula are available on 20-F form and in the Annual Report, but we take in consideration your comment about the inclusion, also in the web summaries of curricula, of the listed companies where our Directors hold mandates.

Sustainability: climate change

Climate change is one of the greatest environmental challenges. Therefore, corporations and investors, as owners and lenders, have a key role to play towards the need for emissions to be reduced in the mutual goal of coping with the impacts of global warming. In this regard, we are supporter of the Climate Action 100+ and the Net Zero Asset Managers initiatives with the aim to enhance the governance of climate change risk and opportunities, curb emissions and strengthen climate-related financial disclosures. Our active ownership approach revolves around carefully monitoring our

investees and engaging with them with the aim of improving their financial and non-financial performance, building a sound understanding of their business and a constructive dialogue on their sustainable development.

QUESTION 4: When can we expect the disclosure of measurements and targets on your scope 3 emissions?

Our 2030 targets published last year extend to Scope 1 and Scope 2 as these form the biggest part of our carbon emissions. So, this is the obvious first place for us to focus, and it is where we can make the biggest difference.

However, we also recognize the importance of Scope 3 as part of achieving net zero. We have always reported on those emissions that come from core steelmaking activities where we do not own them ourselves – such as coke making or pellet making – to ensure that our stakeholders can assess the actual core emissions from our steelmaking, per tonne of steel.

We are currently undertaking a comprehensive study of our scope 3 emissions, covering our upstream emissions and also those of our joint ventures. This data is complex and also often hard to pin down, given it depends on getting the right information from our suppliers. However, we are putting the systems into place for this including training for our procurement teams to work effectively with our suppliers. We hope this work will be sufficiently complete to be able to publish the results next year.

We are also engaging with the Science Based Target Initiative on a steel sector methodology. Part of this will look at how scope 3 should be included in steel sector science-based targets or SBTs, and so the work ArcelorMittal is doing on scope 3 will enable us to prepare for the design of our own SBT. Assuming this project runs according to plan, we anticipate that we will be able to conclude this work by the end of 2023.

QUESTION 5: When can we expect full disclosures that are aligned with the Task Force on Climate-related Financial Disclosures (TCFD) benchmark?

We were an early supporter of the TCFD, and the disclosures we make in our climate action reports have at least partly been designed to align with their recommendations. With these, and also the carbon data we publish in our Factbook, I am pleased to say that we align with the vast majority of the TCFD recommendations – and this was assessed recently in the Climate Action 100+ Net Zero Benchmark.

In 2022 we are developing a framework of climate scenarios that will enable us to comprehensively assess the strategic implications of climate change for the business, both in terms of the transition to a low-carbon world, and the potential physical impacts of climate change. We believe as we disclose the results of this work during this year, we will align with the TCFD recommendations on scenario analysis and indeed that element of the CA100+ benchmark.

QUESTION 6: When do you intend to publish your third Climate Action Report because DWS expects detailed information on climate action on an annual basis?

We certainly intend to continue disclosing detailed information on our climate action with frequency, though this may not be in a dedicated Climate Action report each year. In 2022, we invite our investors to read about our progress in one place in our Integrated Annual Review, which we have just published, and we will also update you in our quarterly results. In recognition of the need to provide an annual

update we are also considering publishing an annual TCFD update – with the full climate action report every two years.

Sustainability: social controversies

As a responsible investor in ArcelorMittal S.A., DWS expects Boards to not only take climate change seriously but also to address social sustainability. DWS noted that the company has been involved in several accidents in the last year in which employees were injured and died. An explosion in Vanderbijlpark resulted in the death of the three employees. Furthermore, an explosion at Lenin mine led to the death of one employee and gas poisoning of two employees. Moreover, six mine workers died after an explosion at Abaskaya coal mine.

QUESTION 7: Can you please elaborate as to why the company has experienced so many accidents?

We completely agree with you 2021 was a terrible year for the company's safety performance. As you would expect this was devastating for everyone working at the company. This disappointment was even tougher because we had been discussing the fact our safety performance had plateaued at the highest levels of the company from the shop floor to the Executive office and the board, for a number of years and had taken action to drive improvement.

First and foremost, we have increased the physical presence of senior leadership on the shop floor.

We have re-designed the global health and safety council, chaired by the EVP whose segment has the best safety results – and raising the seniority of the people attending the council to COO level.

At one level there is a cultural element. We have the same best-in-class policies and rules in place everywhere and yet while we have some plants and operations that consistently report zero fatalities and zero accidents, we have others which clearly are struggling. 13 of the fatalities we experienced for example were in Kazakhstan. But this can never be an excuse. As a global group we must be able to deliver the same levels of performance everywhere.

Over the course of the last year we have looked at every aspect of our safety performance to ensure we leave no stone unturned. Working closely together the now strengthened corporate health and safety team and the chair of the health and safety council and his team of experts, have worked to develop a comprehensive plan to build on everything we already have in place with the intention of being able to significantly improve performance and get us well and truly back on the path to zero fatalities and zero accidents.

This covers multiple elements but at its core is building on the rules and processes to create the interdependent safety culture that supports the safest working operations. And this really all comes down to training, shop-floor presence, and the supportive environment where people feel empowered and encouraged to speak out if they see something, they think could be unsafe.

So, we have strengthened our training programs, both internal and external, and mandated across the group a minimum amount of time leaders must spend on the shop floor each week. We have mandated all leaders to carry out more regular layered safety evaluations, and everyone will be appraised to ensure their safety knowledge is at the correct level, following which they will be given access to additional external training and support.

Our global health and safety policy has been refreshed and relaunched, supported by our updated lifesaving rules. The quarantine process successfully used in some segments – where after a near miss, leadership presence on the shop floor is intensified for a set period, is being rolled out across the group. Corporate is providing specific support to the segments that are struggling most. And those segments are having monthly safety focused meetings with the Executive Office.

The remuneration element for safety performance has also been increased from 10% of the short-term incentive plan to 15%.

It is very difficult to say precisely why we experienced so many/more accidents/fatalities in 2021. I think there probably is some truth in there being some correlation with Covid – less time on the shop floor etc. – but again this is not an excuse.

So, we are leaving no stone unturned. What I say to people when I go on the shop floor is to imagine every colleague is a family member. What I can say with absolute determination is that we are going to do everything in our power to get on top of this.

We have tragically experienced fatalities in the year to date – but again I want to reassure you this is a topic I – and indeed the entire leadership team – are taking extremely seriously. I hope that we will be able to make significant progress this year – and make big strides forward to reach a place where we have zero fatalities and accidents anywhere in the group. It is what we must deliver.

QUESTION 8: Can you please explain what measures the company took after the explosions at the plant in Vanderbijl Park, at the Lenin mine or at the Abaskaya coal mine?

South Africa Vanderbijlpark explosion:

Background: the un-detected accumulation of un-combusted coke oven gas in the stack.

Actions:

- in improving the maintenance program of these valves,*
- in modifying the sensors and software of the program to detect the malfunctioning of the valve and prevent the combustion cycle to keep on in case of defective valve*
- in the management of the gas analyzers to better detect potential combustion problem and trigger corresponding alarms*

These actions were discussed with each coke plant within the Group, and lead to a written Group standard. Group CTO team is auditing the compliance with this standard during their planned sites visit in each coke plant.

Kazakhstan mining accident: 6 victims

Lenina mine (Jan 13th, 2021) & Abaskaya mine (Nov 7th, 2021)

Background: these are rather methane intensive mines, where gas outburst phenomena are not uncommon. Indeed, a total of 62 gas outburst phenomena were recorded since 1959 in Karaganda area. These occur because of special geological, geotechnical and mines design conditions.

Considering the previous safety challenges, we have seen at these mines, we had already brought in one of our top experts from our corporate mining team following previous challenges at our Kazakhstan mines. Following this tragic incident, we brought in even more expertise to look at the specific circumstances surrounding it, and as a result a comprehensive programme of actions to

modernize the mines has been accelerated. A detailed 40 actions plan was developed after in depth consultation of international experts from industry and academic bodies, and validated by local authorities, in 7 main areas, covering organizational aspects, methodologies and modernization of technical equipment. It includes e.g. recruitment of geologist's specialists, including foreign experts, the improvement of the geological modeling and seismic exploration of coal seams, purchase of auger drilling machines, ... Longest term actions to be operational at the latest by end of 2023. Overall, our action plan includes an expanded capex plan totaling US\$75 million. These projects will start to be effective in the second half of this year, and some will be completed in 2023. [BACK UP: (\$57 million were already planned but we have accelerated these 57 and we have added another \$18m].

With these plans we intend to ensure that the risk of such accidents is so far reduced that we never see such an awful loss of life again.

- **QUESTION 9: Do you plan to further increase the weighting of the non-financial health and safety KPI in the executive remuneration?**

In short, this is precisely what we have done. We have always taken health and safety seriously, not only of our employees but also of the local communities surrounding our production sites. For this reason, great attention is given to the achievement and consolidation of increasingly positive results on safety – by means of specific health and safety objectives.

In order to reinforce the Company's health and safety component the Board's Appointment, Remuneration & Corporate Governance Committee decided in 2021 to increase the health and safety component of the Short-Term Incentive Program by 50% and also to introduce a health and safety component in the Long -Term Incentive Program.

NORDEA

Could you please provide some more details around the outstanding projects and financing needed to achieve ArcelorMittal's 2030 emissions reduction target?

- *We have a comprehensive programme of projects designed to achieve our 2030 target for a CO2 intensity reduction of 25% across our global steel and mining operations.*
- *We are currently pursuing investments in both the Innovative DRI route and the Smart Carbon route. There is a third pathway, direct electrolysis, and whilst this is promising it is not yet mature.*
- *The announcements we have made to date to transition our existing assets via these two routes amount to over \$6 billion - these cover investments in in Spain, France, Belgium, and Canada. To date these are mostly via the Innovative DRI route.*
- *In Ghent, Belgium, we have a particularly unique plant where we are investing in both the Innovative DRI route and the Smart Carbon route in each of the two blast furnaces there. We believe it is important to continue to pursue both these technology routes given the significant challenge ahead. While green hydrogen attracts more of the attention in Europe, reports by the*

IEA and MPP indicate that CCUS is likely to achieve the biggest share of the steel industry's decarbonization by 2050.

- We have said that we anticipate the gross investment needed to implement our 2030 target plan comes to US\$10bn. Given the economic realities of these technologies today, we are asking government to fund 50% of the cost of the decarbonisation projects we are planning.*
- This request is well understood and accepted, and where we have already secured a strong enough commitment from the government to support this funding request, we have announced the projects.*
- However, as I mentioned earlier, I should point out that the commitments of public funding we have received in Europe to date have been from members states, and we are still awaiting approvals from the Commission - hopefully this will be forthcoming so we can really start to progress with these projects.*
- Beyond those investments announced, we are planning further projects to progress our transition where policy is supportive. And we also have specific plans to address the emissions from our higher emitting assets in CIS, for example through fuel switching and modernisation plans.*
- I should mention that we are also pursuing green hydrogen initiatives, as partners both of Hydeal Espana and the Green Hydrogen Catapult. And we have already mentioned the first trials of green hydrogen in our DRI plant undertaken very recently in Contrecoeur, Canada.*
- Also recently in the US, we recently acquired 80% of the Voestalpine HBI plant in Texas. HBI is a premium, compacted form of Direct Reduced Iron ('DRI') developed to overcome issues associated with shipping and handling DRI. This will provide us with opportunities to supply reduced iron to our steelmaking furnaces in North America to produce high-quality steel grades.*
- Finally, we are also actively pursuing opportunities to secure sufficient clean electricity for our needs, both in Europe and in India, South America, and South Africa.*