



ArcelorMittal



# External Stakeholder Engagement Procedure

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Minimum requirements for engaging with external stakeholders that all major subsidiary operations must meet.

## Scope

Relevant to all ArcelorMittal operations, subsidiaries and affiliates worldwide.

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## 1. Purpose

The ArcelorMittal External Stakeholder Engagement Procedure defines the minimum requirements for engaging with external stakeholders for all Company operations and subsidiaries. It is mandatory, and is to be reported at unit and corporate level as part of ArcelorMittal's commitment to transparent reporting.

## 2. Contents

### A. Scope and objectives

The ArcelorMittal External Stakeholder Engagement Procedure provides guidelines for establishing and maintaining good relationships with local stakeholders including residents, non-governmental organisations, local authorities, customers, suppliers, academia and other institutions.

This Procedure does not apply to engaging with ArcelorMittal employees, contractors, sub-contractors or Trade Unions, which is covered by the ArcelorMittal Employee Relations Policy.

External stakeholder engagement at ArcelorMittal has three objectives:

- To earn the trust and respect of our external stakeholders.
- Demonstrate active and visible leadership in stakeholder engagement.
- To build and protect our brand, reputation and safeguard our license to operate.

### B. Minimum requirements

Each operating subsidiary must meet the following requirements.

#### i) Legal obligations

In implementing this Procedure, each site must comply with all applicable local laws and regulations on stakeholder engagement and community consultation, which must be incorporated into the basic design of a stakeholder engagement programme.

#### ii) Stakeholder identification, analysis and engagement

- Develop an understanding of the Company's stakeholders and their concerns, including those stakeholders who may be vulnerable because of their age, race, ethnicity, gender, status in the community or any other defining factor.
- Undertake regular, at least quarterly, stakeholder and issue prioritisation and integrate the information into Company decision-making processes.
- Have a dedicated, regular and inclusive programme for engaging stakeholders in a culturally appropriate manner through informal and formal events.

#### iii) Information disclosure

- Disseminate Company information in a format and language(s) that is accessible to stakeholders.
- Devise and publish an annual Stakeholder Engagement Plan.
- Publish an annual overview of the stakeholder engagement activity, through a local Corporate Responsibility report, website, stakeholder engagement plan or newsletter.
- Publish regular summaries of outcomes of stakeholder meetings, in a locally appropriate format.

#### iv) Grievance mechanism

- Establish an accessible grievance mechanism to handle complaints on Company activity in a systematic way and ensure that stakeholders are made aware of it and how it works.
- Ensure that the complainant, or other persons associated with the complaint can seek redress with a guarantee of protection from harassment, prosecution or any other form of reprisal or retaliation,

#### v) Management functions

- Include stakeholder engagement in the Company's formal management structure with the appropriate human and financial resources, including at least one person to coordinate activities.
- Record details of stakeholder engagement activity and prepare documentation for audit reviews.
- Report to the CEO and the management board regularly on the activity.
- Submit the annual Stakeholder Engagement Plan to the Group Corporate Responsibility Team.
- Review the external stakeholder engagement activity annually.