

Company Name ArcelorMittal
Industry Extractive
Overall Score (*) 26.3 out of 100

Theme Score	Out of	For Theme
2.7	10	A. Governance and Policies
2.0	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
9.4	20	D. Performance: Company Human Rights Practices
5.3	20	E. Performance: Responses to Serious Allegations
4.4	10	F. Transparency

(*) 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 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (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	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: In its Human Rights Policy, the Company states: 'The ArcelorMittal Human Rights Policy articulates our responsibility to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs). [...] We are committed to respect the human rights of our employees. [...] We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. [...] We seek to respect the human rights of local potentially-affected peoples and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our operations.' In addition, in its Code for responsible sourcing, the Company indicates: 'ArcelorMittal respects all human rights, of employees and local communities, and is committed to promoting these principles to its suppliers, as set out in ArcelorMittal's Human Rights Policy.' [Human Rights Policy, May 2017: corporate.arcelormittal.com & Code for responsible sourcing, Jun 2013: corporate.arcelormittal.com] Not met: International Bill of Rights: See above [Human Rights Policy, May 2017: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: Its Human Rights Policy is 'in line with the UN Guiding Principles on Business and Human Rights (the UNGPs).' However, "in line with" is not consider a clear commitment. [Human Rights Policy, May 2017: corporate.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	2	<p>• Not met: OECD</p> <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: In its Human Rights Policy, the Company states: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining.[...] ArcelorMittal opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. [...] ArcelorMittal opposes the use of child labour. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child. [...] ArcelorMittal is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated.' [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Met: Explicitly list All four ILO apply to EX BPs: As indicated above, the Company's Human Rights Policy covers all ILO Core. With respect freedom of association and collective bargaining the Policy says: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining. We also work with our subcontractors and suppliers to promote the achievement of this principle.' In addition, it adds: 'This Policy applies to all employees of ArcelorMittal subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code for Responsible Sourcing, and also by driving industry based social and environmental standards, and we will also engage customers and joint venture partners on these issues.' [Human Rights Policy, May 2017: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Human Rights Policy, cover all ILO Core, including freedom of association and collective bargaining, where it states: 'ArcelorMittal upholds freedom of association and the effective recognition of the right to collective bargaining.' [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Met: Respect H&S of workers: In its Human Rights Policy the Company states: 'ArcelorMittal is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures.' In addition, in its Health and Safety Policy, the Company indicates: 'Our commitment to Health and Safety of all employees both on and off the job is a clear component of our brand promise to 'transform tomorrow''. [Human Rights Policy, May 2017: corporate.arcelormittal.com & Health and Safety Policy, Feb 2014: corporate.arcelormittal.com] • Met: H&S applies to EX BPs: See above. In addition, in its Code of responsible sourcing, the Company indicates: 'ArcelorMittal requests its suppliers to eliminate all work related injuries on their workforce or community, and to meet the standards of ArcelorMittal's Health and Safety Policy.' [Human Rights Policy, May 2017: corporate.arcelormittal.com & Code for responsible sourcing, Jun 2013: corporate.arcelormittal.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Based on UN Instruments: In its Human Rights Policy, the Company states: '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.' In addition, its Security Policy is derived from: 'The International Code of Conduct for Private Security Service Providers by the Swiss Confederation, The Voluntary Principles on Security and Human Rights (VPSHR) also referred to in the ArcelorMittal's Human Rights Policy, The United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, The United Nations Code of Conduct for Law Enforcement Officials'. However, 'derived from' does not imply actual commitment to the initiatives. [Security Personnel Policy on the use of Force, Arms and Firearms, Dec 2011: corporate.arcelormittal.com & Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: Voluntary Principles (VPs) participant: According to its Security Personnel Policy, this Policy is derived from Voluntary Principles on Security and

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			<p>Human Rights. In its Responsible Sourcing Guide it indicates: 'ArcelorMittal applies security standards which are consistent with the Voluntary Principles on Security and Human Rights.' However, the Company does not indicate that it is a participant in the VPs. [Security Personnel Policy on the use of Force, Arms and Firearms, Dec 2011: corporate.arcelormittal.com & Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com]</p> <ul style="list-style-type: none"> • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: In its Human Rights Policy, the Company states: 'ArcelorMittal respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.' [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights: See above. In its Human Rights Policy, it indicates: 'This Policy applies to all employees of ArcelorMittal subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code for Responsible Sourcing, and also by driving industry based social and environmental standards, and we will also engage customers and joint venture partners on these issues.' However, no evidence found of formal commitment in relation to security, as indicated above. [Human Rights Policy, May 2017: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards: In its Human Rights Policy, the Company 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.' However, 'act in line' is not consider a clear commitment to IFC. [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: In its Human Rights Policy, the Company indicates: 'The ArcelorMittal External Stakeholder Engagement Procedure requires us to conduct an open and inclusive dialogue with local communities, including engaging with often under-represented groups such as women, children and Indigenous Peoples.' However, CHRB could not find a statement where the Company commits to engage with all its potentially and actually affected stakeholders. [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Met: Regular stakeholder engagement: In its website section 'Stakeholders', the Company indicates: 'Our key stakeholder groups are our employees, shareholders, governments and regulators, our customers, and the communities in which we work. Lenders, unions, suppliers, NGOs, business multilateral organisations and research institutions are also important.' In addition, it reports its engagement activities with different stakeholders including employees and local communities in specific website sections. [Stakeholders: corporate.arcelormittal.com & People - Employee relations and engagement: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human	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 attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		

A.2 Policy Commitments (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: CEO or Board approves policy: Its Human Rights Policy was approved by Audit Committee May 2017 and it is signed by the CEO. [Human Rights Policy, May 2017: corporate.arcelormittal.com] Not met: Board level responsibility for HRs: In its Human Rights Policy, the Company indicates: 'Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment, and for our centralized procurement system. These executives will report on any human rights hotspots arising within our operations or our supply chain to the Chairman of the Board of Directors at least annually.' In addition, HR Policy was approved by Audit Committee. However, CHRB could not find further information about specific governance oversight of one or more areas of respect for human rights. [Human Rights Policy, May 2017: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO: There is an interview to its Chairman & CEO posted in its website where the Company's approach to human rights and its importance to business is discussed, however, the interview is from 2012. [A conversation with Chairman & CEO, 2012: corporate.arcelormittal.com]
A.2.2	Board discussions	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/Committee review of salient HRs Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both examples and process
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: Incentives for at least one board member: In its Annual Report, the Company describes its Remuneration and incentives scheme. According to this scheme: 'Targets associated with ArcelorMittal's 2018 performance short-term incentive were aligned with its strategic objectives of improving health and safety performance and overall competitiveness. For the CEO and the President and CFO, the 2018 short-term incentive formula is based on: [...], Health and safety performance at the Group level: 10%. [...]' [Annual Report 2018, 2018: corporate.arcelormittal.com] Not met: At least one key EX RH risk, beyond employee H&S: See above. However, it is not clear whether it includes health and safety of local communities and workers of extractives business partners. [Annual Report 2018, 2018: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Performance criteria made public: The Company describes the criteria linking Board/CEO remuneration in its Annual Report 2018. [Annual Report 2018, 2018: 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: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, May 2017: corporate.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Senior responsibility for HR: In its Human Rights Policy, the Company indicates: 'Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment, and for our centralized procurement system. These executives will report on any human rights hotspots arising within our operations or our supply chain to the Chairman of the Board of Directors at least annually.' In addition, in Integrated Annual Review 2017, it states: 'The company's sustainable development council oversees the direction of corporate responsibility and sustainable development across the company, and tracks stakeholder expectations and long-term trends and considers their implications for the business. Its members include senior managers from the corporate functions of strategy, technology, finance, risk, government affairs, CMO, communications and corporate responsibility/sustainable development. The company also has sponsors for each of the 10 SD outcomes, who drive the direction of each outcome in conjunction with the CR team and experts from across the group. The company also convenes a number of working groups on particular topics, such as human resources, government relations and climate change, that bring together senior managers from relevant functions.' Its 10 sustainable development outcome include human rights issues. [Human Rights Policy, May 2017: corporate.arcelormittal.com & Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: In its Human Rights Policy, the Company indicates: 'The Company's implementation of this Human Rights Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time as local operations prepare plans against our 10 sustainable development outcomes and corporate guidance increasingly focuses on the potential for severe human rights issues. Implementation is supported by Procurement, Human Resources, Internal Audit, Compliance, Community, Environment, and Corporate Responsibility functions. In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the Compliance and Corporate Responsibility teams.' [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: Day-to-day responsibility for EX BRs: See above. However, CHRB could not find specific information describing how day-to-day responsibilities for managing human rights issues with its extractive business partners is allocated. [Human Rights Policy, May 2017: corporate.arcelormittal.com]
B.1.2	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: Senior manager incentives for human rights: In its Annual Report 2018, the Company indicates for its Executive Officers 'the 2018 short-term incentive formula has been tailored for their respective positions and is generally based on the following: [...] Health and safety performance; [...]'. [Annual Report 2018, 2018: corporate.arcelormittal.com] • Not met: At least one key EX HR risk, beyond employee H&S: See above. However, it is not clear whether this include the health and safety of local communities and workers of extractive business partners. [Annual Report 2018, 2018: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: In its Integrated Annual Report 2017, the Company indicates: 'Safety – as the company's top priority – makes up 10% of the incentive scheme for the leadership of the company, from managers to the CEO Office.' [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com]
B.1.3	Integration with enterprise risk 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: HR risks is integrated as part of enterprise risk system: Its Annual Report 2018 includes a Disclosure about Market Risk, however, CHRB could not find references to human rights issues. On the other hand, in its Form 20F, the Company presents its Risks Factors. One of these Risks Factors is Health and Safety: 'ArcelorMittal is subject to stringent health and safety laws and regulations that give rise to significant costs and could give rise to significant liabilities'. However, Health and Safety alone is not sufficient. [Annual Report 2018, 2018: corporate.arcelormittal.com & Form 20F, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Met: Communicates its policy to all workers in own operations: In its Human Rights website section, the Company indicates: 'Our policy was developed in collaboration with NGOs, investors, and academic experts with experience in business and human rights, and was published in 2010. It applies to every employee and is available online in 20 languages.' In addition, Its HR Policy 'is endorsed by the ArcelorMittal Board of Directors. It is supported by a guidance manual, training and Company-wide communications'. [Human Rights Policy, May 2017: corporate.arcelormittal.com & Human Rights: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy to EX contractors and joint ventures: In its website section 'Responsible Sourcing', the Company states: 'We ask all our suppliers to formally commit to meeting the requirements set out in our code [Code for responsible sourcing]'. Its Code for Responsible Sourcing says: 'The supplier must always comply with the most demanding requirements, whether relevant applicable laws, the Human Rights Policy or this Code.' Its Human Rights Policy says: 'This Policy applies to all employees of ArcelorMittal subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code for Responsible Sourcing, and also by driving industry based social and environmental standards, and we will also engage customers and joint venture partners on these issues.' However, there is no further information describing the steps taken to communicate/engage joint venture partners on these issues. [Code for responsible sourcing, Jun 2013: corporate.arcelormittal.com & Responsible Sourcing: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Including to EX BPs (removed): (Removed) • Met: How HR commitments made binding/contractual: Its Responsible Sourcing Guide says: 'All new suppliers will be required to sign up to the Code [Code for Responsible Sourcing] as part of the new supplier qualification process. Additional requirements for health and safety are included for all Requests for Proposal/contracts for high risk activities ' [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com] • Not met: Including on EX BPs: In its Code for Responsible Sourcing, the Company indicates: 'This Code applies to all of ArcelorMittal's suppliers and contractors and their affiliates and applies to all products and services that ArcelorMittal purchases. We strongly encourage our suppliers to promote the requirements of this Code within their own supply chain, and will give recognition to suppliers who do this.' However, extractive business partners are not included. [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com & Code for responsible sourcing, Jun 2013: corporate.arcelormittal.com]
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: Scores at least 1 on A.1.2: See indicator A.1.2 [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: Trains all workers on HR policy commitments: In its Integrated Annual Review 2017, the Company states: 'We require all relevant employees to undergo human rights training every three years. In 2017, 66% of the Company's relevant workforce had completed up-to-date human rights training, down from 84% in 2016.' However, not all workers are trained. [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] • Not met: Trains relevant EX managers including security personnel: See above. However, it is not clear whether security personnel is included in 'relevant workforce'. [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met: See above.

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments: In its Human Rights Policy, the Company indicates: 'ArcelorMittal may seek to commission independent third parties to monitor its adherence to this Policy. We also welcome feedback from, and dialogue with, interested parties.' However, there is no further information about any independent third parties monitoring its HR Policy. On the other hand, in its website section 'Risk management and audit', the Company indicates: 'we have measures in place to ensure compliance with regulations and best practice regarding internal control, risk management, audit and whistle-blowing.' However, neither its Risk management system nor its audits include references to its Human Rights Policy or human rights issues. [Human Rights Policy, May 2017: corporate.arcelormittal.com & Risk management and audit: corporate.arcelormittal.com] • Not met: Monitoring EX BP's: In its Responsible Sourcing Guide, the Company indicates: 'On request, we require our suppliers to: Complete a self assessment questionnaire based on this Code; Provide ArcelorMittal or its representatives with copies of all relevant information, to co-operate and to use reasonable endeavours to ensure that their sub-contractors do the same; Demonstrate what efforts they are making to meet the requirements of the Code. 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 it is not clear how it monitors its extractives business partners. [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging 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: HR affects selection EXs business partners: Its Responsible Sourcing Guide says: 'We acknowledge that some of our suppliers may not be able to meet all of the requirements of the Code straight away. This may be acceptable, as long as the supplier can commit to implement an agreed action plan, over a reasonable period of time. If a supplier refuses to make a commitment to meet these standards, we will seriously consider whether this is a supplier we can do business with. However, this decision will only made as a last resort.' It is not clear how human rights performance is taken into account in the identification and selection of potential business relationship. [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com] • Not met: HR affects on-going EX business partner relationships: See above [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above. • Not met: Working with EX business partners to improve performance: In its Responsible Sourcing Guide, the Company indicates: 'We are looking for a long-term commitment to our Responsible Sourcing goals, and we will work actively with any suppliers who don't currently meet our standards to help them improve. Our objective is to make progress in partnership, for a greater overall goal.' In addition, its points out to the 'Buyer': 'Where there are areas that need improvement, you need to work with the supplier on a plan to address them.' However, CHRB could not find examples which show how it works with business relationships to improve human rights performance. [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com]
B.1.8	Approach to engagement with potentially 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: Stakeholder process or systems: In its website section 'Stakeholders', the Company states: 'Our key stakeholder groups are our employees, shareholders, governments and regulators, our customers, and the communities in which we work. Lenders, unions, suppliers, NGOs, business multilateral organisations and research institutions are also important. In 2013, we carried out a review of our stakeholders, bringing in peer group analysis, a review of emerging best practice across the world, and an assessment of our different stakeholder groups based on the principles of the AA1000 Stakeholder Engagement Standard 2011. This has

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			<p>given us renewed confidence that we have identified the stakeholders who are most important to us.' In this website section, the Company describes engagement activities with some stakeholders and uses specific websites to describe its engagement with its employees and Community. In addition, the Company has an 'External Stakeholder Engagement Procedure' where it sets out minimum requirements for engaging with external stakeholders. [Stakeholders: corporate.arcelormittal.com & External Stakeholder engagement procedure, Jan 2012: corporate.arcelormittal.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement: The Company includes in its website some information about frequency for engagement. However, CHRB could not find information about the triggers for engagement. [Stakeholders: corporate.arcelormittal.com] • Not met: Engagement includes EX business partners workers: See above. It is not clear whether extractive business partners' workers is a stakeholder. [Stakeholders: corporate.arcelormittal.com] • Met: Engagement includes EX business partners communities: See above. [Stakeholders: corporate.arcelormittal.com & Community: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views and company's actions on them: The Company provides a summary analysis of some inputs given by its stakeholders, for instance, in its website section about its '10 outcomes', the Company indicates: 'Our stakeholders' expectation: The protection of human dignity is perhaps the most important social issue for the 21st century, and crucial to the relationships between different nations, and between employers and employees. Despite international recognition of labour and safety standards, accidents, discrimination and unfair treatment in the workplace persist, and gender inequality is considered a major barrier to sustainable development. The importance of health, wellbeing and gender equality is reflected in the UN's Sustainable Development Goals 3 and 5. And investors, unions, local communities and other influential stakeholders increasingly expect to see comprehensive policies and disclosures covering human rights, equality and diversity, and behaviour in the workplace. So employers wanting to attract, develop and retain the brightest talent have to address these issues and create a positive working culture that respects them.' It also states: 'We have been working on all of these since the company's inception, and whilst our company is decentralized in its management approach, we have developed certain policies and programmes to improve the working lives of our people at corporate level. Our overall approach is outlined in separate pages on safety, health, employee relations and engagement, diversity and inclusion and employee development'. [People: corporate.arcelormittal.com & Community: corporate.arcelormittal.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: In its Integrated Annual Review 2017, the Company indicates: 'Our due diligence to date has identified our most salient human rights risks to be in the raw materials part of our supply chain, [...]' In addition, in its Supply chain website section, the Company indicates: 'As well as encouraging our raw materials suppliers to collaborate on global sustainability standards, on a day-to-day level we assess how our suppliers manage their performance by assessing them against our code for responsible sourcing. [...] In order to identify and manage social and environmental risks in our supply chain, we apply supply chain due diligence.' However, CHRB could not find further information describing this process to identify its human rights risks and impacts covering its own operations. [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com & Supply Chain: corporate.arcelormittal.com] • Not met: identifying risks in EX business partners: See above. However, it is not clear whether the supply chain due diligence process includes extractive business partners. [Supply Chain: corporate.arcelormittal.com & Code for responsible sourcing, Jun 2013: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks: In its Integrated Annual Review 2017, the Company states: 'Our due diligence to date has identified our most salient human rights risks to be in the raw materials part of our supply chain, and this is also the focus of interest for our customers.' However, there is no further information about which are these most salient human rights risks. [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In its Integrated Annual Review 2017, the Company states: 'Both employees and other stakeholders can report any breaches of our policies and standards via the confidential whistleblowing facility on our corporate website. [...] We provide our stakeholders – including employees, contractors, and community members – with the facility to raise a grievance of any kind with the Company via a confidential grievance mechanism at site level, or via whistleblowing lines at country-level. We also have a central whistleblowing line on our corporate website.' [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] Score 2 <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: In its Integrated Annual Review, the Company indicates: 'Investigating and resolving grievances relating to workforce issues, not only through line management but also via our whistleblowing lines. In 2017, our global assurance team received 160 such complaints, of which 36 were substantiated. During the year they resolved 156 such complaints (some of which were received the previous year)'. Some of these grievances were health and safety, harassment and discrimination. [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages: The Company discloses that 'whistleblowing complaints may be made on the ArcelorMittal website or using hotlines made available in each country'. The company also state that it has 'confidential whistleblowing hotlines in 30 major countries of operation. [Whistleblower Policy, May 2019: corporate.arcelormittal.com] • Not met: Expect EX BPs to have equivalent grievance system • Not met: Opens own system to EX BPs workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<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: Grievance mechanism for community: In its External Stakeholder Engagement Procedure, which applies to 'all ArcelorMittal operations, subsidiaries and affiliates worldwide', the Company sets out minimum engagement requirements with external stakeholder ('local stakeholders including residents, nongovernmental organisations, local authorities, customers, suppliers, academia and other institutions'), some of these requirements are: 'Establish an accessible grievance mechanism to handle complaints on Company activity in a systematic way and ensure that stakeholders are made aware of it and how it works; Ensure that the complainant, or other persons associated with the complaint can seek redress with a guarantee of protection from harassment, prosecution or any other form of reprisal or retaliation.' [External Stakeholder engagement procedure, Jan 2012: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: See above. In addition, the Company indicates in its website that it has 'community grievance guidelines in place – formal mechanisms sitting alongside our more informal, ongoing partnerships to help us understand stakeholders' expectations. ' However, CHRB could not find these guidelines or any other evidence showing how it ensures the grievance mechanisms are accessible to all potentially affected external stakeholder at all operations, including local languages. [Community - Listening: corporate.arcelormittal.com] • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system: In its Integrated Annual Review, the Company indicates that it has ' a central whistleblowing line on our corporate website.' However, CHRB could not find further information about the different grievance channels or the whistleblowing facility on its website which allows any stakeholder to report breaches of its policies. CHRB only found a Whistleblower section which is 'intended for the reporting of concerns regarding fraud and corruption, accounting and auditing matters, not for general business complaints or product-related issues. Reports of general ethical violations will be communicated to the appropriate bodies and departments within the group. Any submissions not related to fraud and corruption, accounting or auditing matters, or ethical violations will be disregarded.' [Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com & Whistleblower: corporate.arcelormittal.com]
C.3	Users are involved in the design and performance of the channel(s)/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: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are 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: Response timescales: The Company discloses that 'if the reporting person's identity is known, he/she 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. No details will be released relating to specific individuals and the feedback might be of a general nature, taking into account the necessity to conduct further, related investigations, the interest of ArcelorMittal to keep its information confidential and the rights of any third parties'. However, no evidence of the time needed to respond to the complaint. [Whistleblower Policy, May 2019: corporate.arcelormittal.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public statement prohibiting retaliation: ArcelorMittal discloses that 'will take the necessary measures to protect employees who have, in good faith, made reports through the Whistleblower Policy, against any retaliation'. However, by this statement it is not clear if the Company prohibits retaliation on people who make complaints through the grievance channels. [Whistleblower Policy, May 2019: corporate.arcelormittal.com] Met: Practical measures to prevent retaliation: The Company discloses that 'Whistleblowing reports and subsequent investigation reports shall be treated with utmost confidentiality. Information shall be disclosed to employees or third parties on a strict «need to know» basis for the purpose of the investigations. All employees involved in the Whistleblower Policy will maintain strict secrecy of the content of reports in accordance with applicable law'. [Whistleblower Policy, May 2019: corporate.arcelormittal.com] Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects EX BPs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Living wage target timeframe or achieved Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> Not met: Pays living wages: In its Human Rights Policy, the Company states: '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, there is no mention to minimum wages and discretionary income including reference to family or dependents. [Human Rights Policy, May 2017: corporate.arcelormittal.com] Not met: Reviews livings wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Member of EITI: In its Tax Policy, the Company indicates: 'The Group also supports the Extractive Industry Transparency Initiative (EITI), since it believes that this initiative will strengthen governance, foster socio-economic development and help the overall business climate to become more open, fair and competitive.' [Tax policy, Jun 2016: corporate.arcelormittal.com] Score 2 <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 payments to governments in respect of extractives activities 2017, 2017: corporate.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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Human Rights Policy, the Company states: 'Promoting Freedom of Association. 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. The company also has 88% of its employees covered by union agreement. [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Met: Discloses % covered by collective bargaining: In its Annual Report 2018, the Company indicates that '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.' And in its Fact Book 2017, the Company discloses that in 2017 88% of its employees were covered by collective bargaining agreements. [Annual Report 2018, 2018: corporate.arcelormittal.com & Fact Book 2017, 2017] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above
D.3.4	Health and safety: Fatalities, lost days, injury rates (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: Injury Rate disclosures: In its Fact Book 2017, the Company report fatalities, lost-time injury rate and accident severity rate. These figures cover ArcelorMittal and its significant operating subsidiaries own personnel, contractors and temporary work. [Fact Book 2017, 2017 & Guidelines for ArcelorMittal sustainable development indicator, Apr 2017: annualreview2017.arcelormittal.com] • Met: Lost days or near miss disclosures: The company indicates that 'took a range of measures designed to strengthen our culture of vigilance, improve our reporting, especially of potential serious injuries and fatalities (PSIFs). In 2018 the company reported 0.69 as the number of lost-time injuries per million hours worked'. [Fact Book 2017, 2017 & Integrated Annual Review, 2018: annualreview2018.arcelormittal.com] • Met: Fatalities disclosures: The company reports that there were 10 fatal accidents in 2018. [Integrated Annual Review, 2018: annualreview2018.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: In its Health and Safety Policy, the Company states: 'We will work vigorously towards a goal of zero accidents and injuries.' [Health and Safety Policy, Feb 2014: corporate.arcelormittal.com] • Met: Met targets or explains why not: The company has a Journey to zero programme which "aims to create a culture of shared vigilance in which risks and hazards are understood and monitored, best practices are shared, and appropriate action is taken at every level. It has driven consistent and significant improvement in our lost-time injury frequency rate (LTIFR), from 3.1 incidents per million hours worked in 2007, to 0.69 in 2018 – our safest year on record. As part of our emphasis on potential incidents, we have focused on training and culture."
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 indigenous rights holders: In its External Stakeholder Engagement Procedure the Company sets out minimum requirements which each operating subsidiary must meet. These requirements include: '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.' However, there is no specific information describing the process to identify and recognise affected or potentially affected indigenous peoples and/or how it engages with indigenous peoples in carrying out the assessment. [External Stakeholder engagement procedure, Jan 2012: corporate.arcelormittal.com] • Not met: How engages with communities in assessment: See above [External Stakeholder engagement procedure, Jan 2012: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights (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: Approach to identification of land tenure rights holders: In its website section 'Community - Understanding', the Company indicates: 'we're committed to respecting best practice in community land use and protecting indigenous peoples' rights. This is part of our human rights policy. We do everything we can to avoid involuntary resettlements, and where this is unavoidable we aim to adhere to international standards and comply with national or relevant regional authorities' guidelines on resettlement and compensation. In practice, this means consulting the people affected and devising an approach that will best benefit them, and offer a better quality of life as a result.' However, CHRB could not find further information describing how it identifies legitimate tenures rights holders. [Community - Understanding: corporate.arcelormittal.com] • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works: See above [Community - Understanding: corporate.arcelormittal.com] • Not met: Steps to meet IFC PS 5 in state deals: In its Human Rights Policy, the Company 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.' However, there is no further information describing the steps taken too meet standards with respect to legitimate tenure rights holders. [Human Rights Policy, May 2017: corporate.arcelormittal.com] • Not met: Describes approach if no recent deals
D.3.7	Security (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"> • Not met: How implements security (inc VPs or ICOC): In its website section 'People - Safety and Security' the Company indicates: 'We have a detailed security policy which sets out how and when our security personnel can use force, arms or firearms. We expect our officers to act in a way that respects human rights at all times, and to comply with all applicable national, state and local laws. Our policy is based on the Voluntary Principles for Security and Human Rights and the UN Code of Conduct for Law Enforcement Officials.' However, it is not clear how it actually implements it. [Security Personnel Policy on the use of Force, Arms and Firearms, Dec 2011: corporate.arcelormittal.com & People - Safe and security: corporate.arcelormittal.com] • Not met: Example of respecting HRs in security • Met: Ensures Business Partners follow security approach: In its Responsible Sourcing Guide, the Company indicates: 'ArcelorMittal applies security standards which are consistent with the Voluntary Principles on Security and Human Rights. These give guidance on the best ways for mining and other extractive industries to ensure the safety of their sites and personnel. The Principles apply to both our own security staff and the third-party security firms we work with, and cover how these people interact with public security forces. We expect our suppliers to follow these Principles in their turn, wherever that's appropriate.' In its Human Rights Policy, it states: 'ArcelorMittal applies security standards which are consistent with the Voluntary Principles on Security and Human Rights. These give guidance on the best ways for mining and other extractive industries to ensure the safety of their sites and personnel. The Principles apply to both our own security staff and the third-party security firms we work with, and cover how these people interact with public security forces. We expect our suppliers to follow these Principles in their turn, wherever that's appropriate.' The HR Policy 'applies to all employees of ArcelorMittal subsidiaries and affiliates worldwide. In addition, our subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code for Responsible Sourcing, and also by driving industry based social and environmental standards, and we will also engage customers and joint venture partners on these issues.' [Responsible Sourcing Guide, Sep 2011: corporate.arcelormittal.com & Human Rights Policy, May 2017: corporate.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks: In its website section 'Community - Responding', the Company indicates: 'We also want to find ways to support shared operational and community needs, something we're doing in the US, for example, by working on water management through the Sustain our Great Lakes partnership.' In its Integrated Annual Review 2017, the Company reports: 'The outcome we need is for our stakeholders to trust us to share the vital resources of air, land and water. They will do this because we operate responsibly and transparently, demonstrate we want to reduce our negative environmental impacts, and work in collaboration with partners and local communities to enhance the natural resources we all rely on. [...] Among our highlights from 2017, we: [...] Worked collaboratively to reduce our risks and improve our positive impacts, including through: Working with peers to further consider the materiality of water risk to steel plants in different geographies.' In addition it discloses its Annual Plan 2017 related to this issue and the progress made during the year. This Plan included: 'Map sites in water stressed-areas and report on their water management plans (In progress). [Community - Responding: corporate.arcelormittal.com & Integrated Annual Review 2017, 2017: annualreview2017.arcelormittal.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made

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		No allegations meeting the CHRB severity threshold were found, and so the score of 21.03 out of 80 points scored in themes A-D & F has been applied to produce a score of 5.26 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, ArcelorMittal made data public that met one or more elements of the methodology in 19 cases, leading to a disclosure score of 2 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: In its Integrated Annual Review 2017, the Company indicates: 'Our 2017 Integrated Annual Review aims to reflect the principles and guidelines of the International Integrated Reporting Council's integrated reporting framework, and the Global Reporting Initiative (GRI) Sustainability Reporting Standards 2016'. [Reporting Index, 2017: annualreview2017.arcelormittal.com & Annual Report 2017, 2017: corporate.arcelormittal.com]
F.3	Key, High Quality Disclosures	0.4 out of 4	<p>ArcelorMittal met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

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

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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