



ArcelorMittal

GRIEVANCE MECHANISM PROCEDURE- 2023

Business Unit: Corporate Affairs, Legal, and Equality, Diversity and Inclusion
Department: Communications and Sustainability
Document No: CS-6990-010



Purpose / Scope

The purpose of this document is to describe the process for receiving, documenting, and responding to all written or verbal complaints/grievances from external stakeholders with regards to ArcelorMittal Dofasco related activities that comply with standards and guidelines such as those set out by ResponsibleSteel and ISO 14001.

Our approach to managing external stakeholder grievances follows a dialogue-based approach. We strive to conduct our operations in a way that limits any disruption to our neighbouring communities to a minimum; however, grievances may still arise periodically. We manage these grievances through a process for systematically receiving, investigating, responding to, and closing out complaints or Grievances from affected communities in a timely, fair, and consistent manner.

We define grievances as an expression of dissatisfaction stemming from a real or perceived impact of our business activities through our own actions or through actions of our suppliers.

Complaints/grievances can be addressed to the company via various contacts. Contact numbers are posted and have been communicated to the community via our external website, the Community Liaison Committee (CLC) and the Hamilton Industrial Environmental Association. All complaints/ grievances received are kept in a register.

This Grievance Mechanism Procedure is reviewed annually by ArcelorMittal Dofasco, as well as the monitoring and evaluation process which seeks to optimize the performance of our ArcelorMittal Dofasco operations regarding our community grievance management. The ArcelorMittal Dofasco Community Liaison Committee (CLC) is consulted on the design of the mechanism, that the grievance process exists and is in place. If part of the objective is to comply with ResponsibleSteel or any other standard (e.g., ISO), it should be stated in this section. This declaration will help support future audits.

This document will enable the following:

- Define the role and attributions of all concerned parties so that their responsibilities are clear and precise.
- Facilitate communication and thus encourage and stimulate the exchange of information between the different parties; and
- Resolve in a coordinated and consensual manner the various problems related to management plans relating to ArcelorMittal Dofasco activities.

Scope

This document applies to all ArcelorMittal Dofasco operations in Hamilton, Ontario. It includes aspects relating to the resolution and monitoring of issues linked to ArcelorMittal Dofasco commitments which are covered in various plans (i.e.: Comprehensive (site-wide) Certificate of Approval (Air), and associated Orders, Community Engagement Plan, etc.) and to site activities.

Specific objectives

ArcelorMittal Dofasco seeks input with its Community Liaison Committee (CLC) on the design of its grievance procedures to ensure that it addresses, at minimum:

a. The effectiveness criteria outlined in Principle 31 of the United Nations Guiding Principles on Business and Human Rights¹, which include the need for the mechanism to be:

1. Legitimate,
2. Accessible,
3. Predictable,
4. Equitable,
5. Transparent,
6. Rights-compatible,
7. A source of continuous learning, and
8. Based on engagement and dialogue.

b. How grievances will be filed, acknowledged, investigated, and resolved, including general timeframes for each phase.

c. How confidentiality of a complainant's identity will be respected, if requested.

d. The ability to file anonymous grievances, if deemed necessary by stakeholders.

e. Options for recourse if an initial process does not result in satisfactory resolution or if the mechanism is inadequate or inappropriate for handling serious human rights grievances; and

f. How grievances and their resolutions will be tracked and recorded.



Grievance Process

The first step of the process is to inform stakeholders (once they have been consulted on the design of the mechanism), that the grievance process exists and is in place. ArcelorMittal Dofasco's Communications and Sustainability team will determine the most culturally appropriate method to communicate the process to communities.

The specific objectives of this grievance mechanism are to have any complaint/grievance expressed by a stakeholder goes through the 5-step process below.

1. Receive and acknowledgement of the complaint/grievance

- Grievances can be written or verbal. They can be lodged by walk-in, phone, email, social media channels, or our dedicated channels on our website. The grievances can be expressed anonymously. Each grievance is acknowledged within 24 hours of having been received, and the complainant is informed of the next steps.
- When grievances are received by another party (i.e., Ministry of Environment, City of Hamilton), they must also be registered and acknowledged within 24 hours of the incident being received by ArcelorMittal Dofasco.

2. Complaint/grievance is assessed and assigned

- Once a complaint/grievance is received, ArcelorMittal Dofasco's Communications and Sustainability team in conjunction with its Environment group, will assess its severity and assign who will follow through to ensure that the issue is investigated by departments that are best suited to do so, and that the complainant is responded to in due course. Grievances with high severity levels are escalated to senior management levels that may include the Director of Communication and Sustainability, the General Manager of Environment, the Vice President of Corporate Affairs, Legal, and Equality, Diversity and Inclusion, the Vice President of Manufacturing or the President and CEO.

3. Investigate and respond

- A representative from ArcelorMittal Dofasco's Communications and Sustainability Department and / or Environment Department and any other respective departments involved will investigate the grievance and respond to the complainant informing them whether the matter can be attributed to our operations and if it is about a proposed resolution. In some cases, more information may be requested from the complainant to ensure a thorough investigation.

4. Close out

- We strive for our community grievance process to be based on dialogue where a resolution can be found together with the complainant. Remedies may be proposed depending on the case. If the solution is refused, the complainant can appeal to other alternate parties depending on the nature of the complaint (i.e., Ministry of Environment, Conservation and Parks, The City of Hamilton). Once the complainant accepts the solution, the grievance is considered resolved
- Depending on the severity level of a grievance and the type of issue raised we aim for the following:
 - a) a response to the complainant within the first 24 hours in cases where immediate resolution can be found.
 - b) 30 days in cases where detailed investigations or resolutions are required.

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- Depending on the severity level of a grievance and the type of issue raised we aim for the following:
 - a. a response to the complainant within the first 24 hours in cases where immediate resolution can be found.
 - b. 30 days in cases where detailed investigations or resolutions are required.

5. Lessons Learned

- A key step in the process is regular review and extraction of lessons learned from the grievances received. Grievance trends are reviewed by the Communications and Sustainability department and the Environment department. They inform the adaptation of operations to prevent future repetition of the same community concerns, or improvements to the grievance management process itself.
- The Communications and Sustainability team will monitor the key indicators relating to grievance and will communicate the results of these monitoring efforts internally and externally (to the Corporate Community Liaison Committee (CLC) on a quarterly basis. The report will include:
 - (a) a summary on the number of grievances registered by category and severity,
 - (b) the average resolution time,
 - (c) the number of unresolved grievances, and
 - (d) all high-risk issues.



ANNEX 1

Grievance Collection

Site/ Title: Reference No:

Name of complainant:

Date:

Time:

Does the complainant request a call back or reply to discuss how to possibly resolve the complaint/grievance?
(Y or N)

Yes
No

Is the grievance linked to a zone impacted by ArcelorMittal Dofasco activity? (Y or N)

Yes

No – closure of grievance

Is the complaint/grievance environmentally related? (Y or N?)

Yes

No

Detailed description of the grievance:

General atmosphere: Positive – Negative -- Neutral

Area of damage:

Witness / Observed by:

Risk Level: (circle one)

Minor Major
Moderate Catastrophic
High

Photos: (Y or N)

if Yes. Please attach photos

ArcelorMittal Dofasco Representative (name/ title)

ANNEX 2

Grievance Follow-up and Investigation Template

Name of investigator:

Type of follow-up: Action Feedback General Note

Ref No:

Date:

Title:

Complainant Information

First Name:

Last Name:

Address:

Contact telephone number(s):

Description of photos (if applicable):

Details of the investigation and actions undertaken (correction measures):

Next Steps:

ArcelorMittal Dofasco Representative (name/ title)

ANNEX 3

Grievance Flowchart

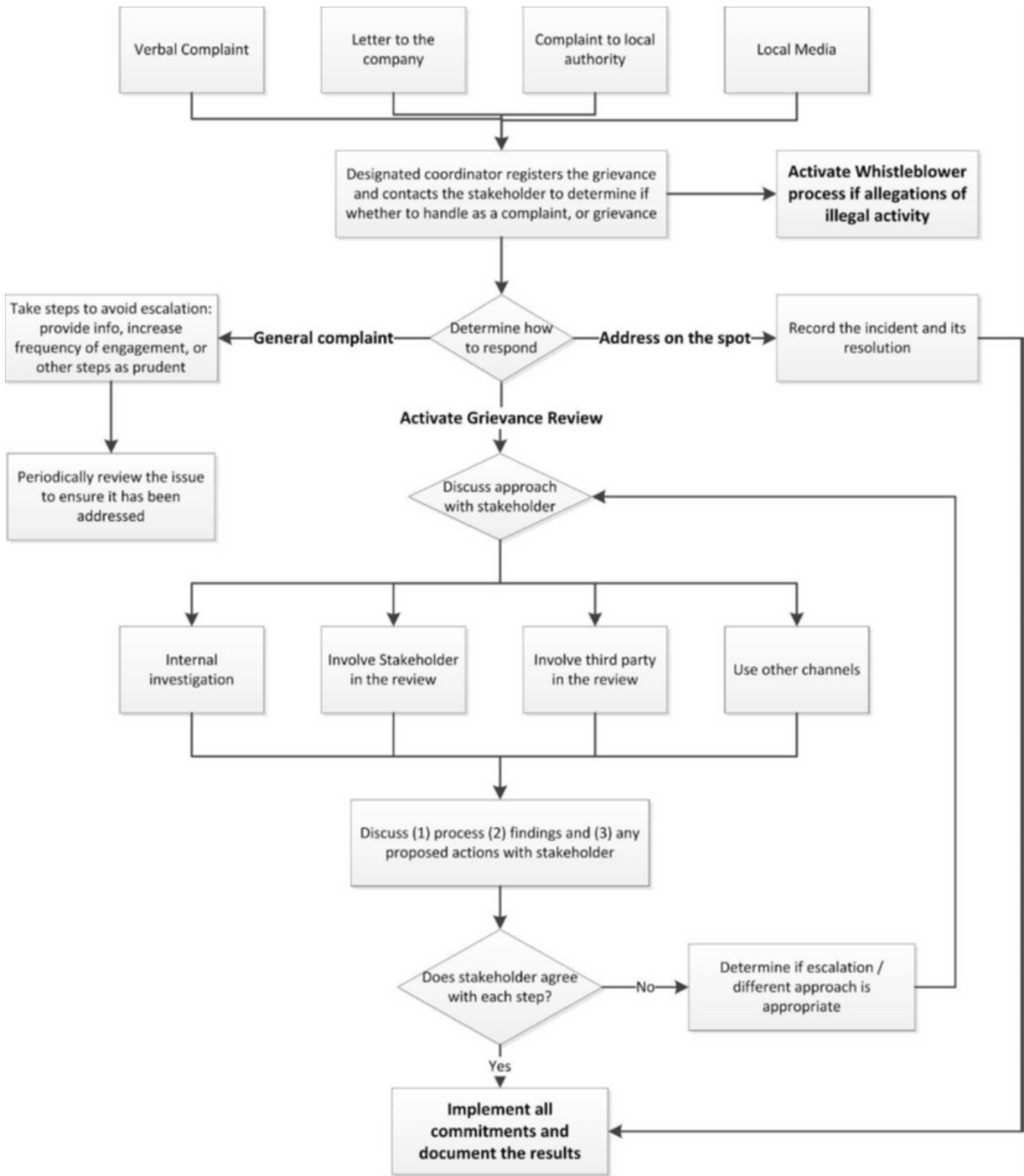
We encourage community members who may have any questions or concerns about our operations, especially those related to emissions, odours or noise to contact us with such concerns and provide as much information as possible (time of day, detailed description, wind direction, etc.) so that we can investigate properly.

They can contact us by any of the following methods:

Phone: (905) 548-7200 and enter 0 - available 24 hours a day, 7 days a week.

Email: environment.dofasco@arcelormittal.com - response may be delayed until the next business day depending on time of outreach.

Mail: ArcelorMittal Dofasco
Communications and Sustainability Department
1330 Burlington Street East, Hamilton, Ontario L8N 3J5



For more information:

ArcelorMittal Dofasco, G.P.
1330 Burlington Street East
Hamilton, Ontario, Canada
L8N 3J5

Telephone: (905) 548-7000 ext. 2490

Email: <https://dofasco.arcelormittal.com/contact-us>

Social Media:

