



ArcelorMittal

2023 Stakeholder Engagement Plan

Department: Communications and Sustainability	Title: Stakeholder Engagement Plan	Document No: CS-6990-020
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1. Introduction

ArcelorMittal Dofasco's 700-acre integrated steelmaking complex has made Hamilton, Ontario its home since the company was founded in 1912 and features state of the art facilities that are among the most efficient, flexible, and technologically advanced in North America. These include two coke plants, three blast furnaces, a basic oxygen steelmaking furnace, an electric arc furnace, two slab casters, a hot strip rolling mill, pickling lines, cold rolling mills, galvanizing lines, an electrolytic tinning line and two tube mills. The site has an annual production capacity of approximately 4.5 million net tons of high-quality flat steel.

ArcelorMittal Dofasco employs approximately 4700 hourly and salaried employees and is the largest private sector employer in the region. Our belief, 'Our Product is Steel. Our Strength is People', best defines our culture and our belief that our people are our competitive advantage. Underpinning this are our corporate values of Safety, Sustainability, Quality and Leadership. ArcelorMittal Dofasco is an equal opportunity employer and encourages and values a diverse workforce.

ArcelorMittal Dofasco's principal products include a broad range of hot rolled, cold rolled, galvanized, Galvalume, tinplate, chromium-coated and pre-painted flat rolled steels, as well as tubular products. This wide range of steel products is sold to customers in the automotive, construction, energy, manufacturing, pipe, and tube, packaging, and steel distribution industries.

ArcelorMittal Dofasco sells its products to a highly diversified customer base representing all major steel consuming markets as well as to third-party processors and service centres. Its customers are primarily in Ontario, Quebec, Western Canada, and the Midwest of the United States.

Our engagement plan addresses employees, customers, suppliers, trade unions, local community, non-governmental and not-for-profit groups, individuals, government authorities and other interested parties who may be affected or are interested in our activities. Our future plans for engagement will also include Indigenous people and First Nations.

1.1 Objectives of the Engagement Plan

The objectives of this Engagement Plan (EP) are to:

- Systematically and comprehensively identify all stakeholders affected by ArcelorMittal Dofasco's Hamilton, Ontario steelmaking operations.
- Establish and maintain a constructive dialogue between ArcelorMittal Dofasco and its internal and external stakeholders by building on, and learning from, the information and consultation activities carried out to date.
- Design and plan the implementation of information and consultation activities with its various stakeholders in an appropriate, effective and accessible manner.
- Identify vulnerable people likely to be excluded or marginalized in the consultation process and design tools to ensure that they are fully included in the process and that their views are listened to and taken into account.
- Improve awareness of our stakeholders expectations and improve the ability to address them within a positive working relationship. Conversation often leads to collaboration, and this is the approach we are taking in tackling our most pressing issues as they relate to our six Sustainable Development themes and 10

Sustainable Development goals, including:

- Health & safety: ensuring the safety, health and wellbeing of our employees and the general community at large;
- Climate Change: the decarbonization of our products and processes.
- Customer reassurance: ResponsibleSteel certification for our site.
- Social performance: ResponsibleSteel certification of our Environmental, Social and Governance (ESG) management system standards for steelmaking at our site, including a robust community grievance mechanism that allows for the expression and treatment of grievances and complaints from those affected by our site, socio-economic investments in our local community and through our Equality, Diversity, and Inclusion (ED&I) initiatives

2. Regulations and Requirements

2.1 Stakeholder engagement requirements from legislation

- In Canada and in the Province of Ontario, stakeholder engagement is not regulated or required outside of public hearings for environmental permits (air, land and water) but because of the importance we place on internal and external engagement both internal and externally, ArcelorMittal Dofasco has established a variety of processes, policies and communications vehicles to better connect with all our stakeholders.
- ArcelorMittal Dofasco has established a formal stakeholder engagement process to better understand and monitor our impact with those potentially affected by our operations. To facilitate the exchange of information with the local community, we host four (4) Community Liaison Committee (CLC) meetings each year. These open meetings allow us to respond quickly to stakeholder inquiries and to create a record of public correspondence. They are integrated with the ISO 14001 Environmental Management System reporting process which requires organizations to address and record inquiries from the public.

- ArcelorMittal Dofasco is also a member of the Hamilton Industrial Environmental Association (HIEA). A very important aspect of HIEA's mandate is partnering with the community. To help foster this partnership, HIEA's Community Advisory Panel provides an opportunity for dialogue between industry and our community stakeholders. Several times a year representatives from local neighbourhood associations and community advocacy groups meet with HIEA member company representatives and citizens to exchange information and discuss issues of concern to the community.

3. Stakeholder Engagement Program

3.1 Stakeholders, interaction, and communication methods

One of the most important elements of a good approach to stakeholder engagement is stakeholder identification. ArcelorMittal Dofasco has identified the main stakeholders for its site who are generally representatives of groups that may be affected by our activities or are interested in the Company's operations, products, or services.

Internal stakeholders

ArcelorMittal Dofasco's internal stakeholders include its employees, contractors, and trade unions.

External stakeholders

ArcelorMittal Dofasco's external stakeholders include local communities, government authorities and regulatory bodies, customers, suppliers, media, non-governmental organizations and Indigenous Peoples and First Nations.

3.2 Stakeholder engagement mechanisms

Forms of engagement	Engagement tools
Regular information	<ul style="list-style-type: none"> • Internal communications (Senior leadership letters, MyNews, digital displays) • Online Corporate Magazine (1Magazine available to employees and retirees) • Website • Social Media posts (Twitter, Instagram, Facebook, LinkedIn) • News stories posted to website • Company updates posted to website (Incident log) • Personal meetings • Community Information post cards • Paid advertisements and inserts • Quarterly Community Liaison Committee (CLC) meetings • Annual Sustainable Development Report (North America) • Annual site performance fact sheet (to be published beginning in 2023)
Exchange of opinions	<ul style="list-style-type: none"> • Consultations • Negotiations • Information sessions • Meetings • Conferences
Identification of stakeholder opinions and interests	<ul style="list-style-type: none"> • Annual community survey • Annual materiality assessment • Quarterly Community Liaison Committee (CLC) meetings • Focus groups • Responses to inquiries
Joint activity	<ul style="list-style-type: none"> • Programs • Projects • Events • Volunteer activities

3.3 Measures to engage with Indigenous Peoples and First Nationsvulnerable people

ArcelorMittal Dofasco recognizes the importance of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) in the context of existing Canadian law, and legal and constitutional rights possessed by Indigenous peoples in Canada and the importance of the relationship between Indigenous peoples and their traditional lands and resources. In 2023, ArcelorMittal Dofasco will develop an Indigenous Peoples Policy and Reconciliation Plan with the assistance and guidance of an expert consultancy. Refer to the Indigenous Affairs Workplan for 2023 to ensure that our projects and operations are carried out in an environmentally responsible manner.

3.4 Equality, Diversity and Inclusion

ArcelorMittal Dofasco recognizes the need to eliminate the significant socio-economic barriers that continue to prevent vulnerable [GL1] people regardless of their race, colour, gender, sexual orientation, age, religion, ethnic or national origin or disabilityfrom participating in the economy.We will look for opportunities to have them included in socioeconomic benefits resulting from our projects and operations. These may include partnerships and opportunities in training and education, employment, procurement, equity participation, business development and community development.

3.5 Stakeholder Identification

Key Stakeholder Groups:

Employees (Internal)		
Interactions	Types of issues	Strategic Benefits
<ul style="list-style-type: none">• Open Door grievance mechanism• Intranet sites• Special Events• Town hall forums• Employee surveys/climate surveys• Digital Displays, weekly all employee emails (MyNews) and 1Mag	<ul style="list-style-type: none">• Health and safety issues• Business performance• Employee satisfaction• Equality, Diversity & Inclusion (ED&I)• Low / zero emission carbon steel• Decommissioning of assets	<ul style="list-style-type: none">• Healthy, safe, quality working lives for our employees• Shared goals and vision• Increased engagement in community activities and giving

Customers, Suppliers, Associations, Trade Unions (External)

Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • Site visits • Specific publications and events • Partnerships • Join committees and task forces 	<ul style="list-style-type: none"> • Low / zero emission carbon steel • Decommissioning of assets • Product quality and innovation • Ethical practices (i.e. labour) • Renewable technologies • Light weighting of steel products • Sustainable supplier questions 	<ul style="list-style-type: none"> • Tailoring our business to meet our customer's and supply chain Sustainable Development Outcome needs • Continuous improvement of sustainability initiatives • Fostering a culture of transparency • Shared goals and vision

Federal, Provincial and Municipal Governments (External)

Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • Steering groups • Conferences • 1:1 meeting • Formal dialogues • Site visits and tours 	<ul style="list-style-type: none"> • Decarbonization Project • Decommissioning of assets • Trade • Climate Change / Environmental policies • Attracting investment • Employment opportunities • Economic and social development 	<ul style="list-style-type: none"> • Assist different levels of government in understanding our business • Encourages growth and investment for product innovation

Local Communities (External)		
Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • Community grievance channels • Community Liaison Committee (CLC) meetings • 1:1 meetings • Boards and Committees 	<ul style="list-style-type: none"> • Low / zero emission carbon steel • Decommissioning of assets • Environmental Performance • Social investment 	<ul style="list-style-type: none"> • Keeping an open channel of transparent communication with the community we serve • Open communications with families and friends of our employees • Fostering a culture of transparency • Shared goals and vision

Non-governmental Organizations (External)		
Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • Granting and in-kind partnerships • Formal meetings • 1:1 meetings • Volunteer events • Public-private partnerships 	<ul style="list-style-type: none"> • Decarbonization Project • Decommissioning of assets • Community Investments (STEM, Environment and Conservation, Health, and Social Services, with a particular focus on mental health) 	<ul style="list-style-type: none"> • Partners provide insight into our communities' needs and impacts of our investments • Dedication to increasing our local STEM investments as a pipeline of talented scientists and engineers for tomorrow • Increased strategic relationships with key stakeholders throughout our communities

Academia (External)		
Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • Granting relationships • Campus recruiting • High school Advanced Manufacturing Program • Volunteer events 	<ul style="list-style-type: none"> • STEM education • Skilled Trades education and certification • Recruiting • Job placement • Job readiness 	<ul style="list-style-type: none"> • Provides the company with a steady stream of qualified applicants • Invests in the continuous education of students in the fields of science and technology, engineering, and mathematics, crucial to the future of our workforce • Provides coop and internship opportunities for students

Media (External)		
Interactions	Types of issues	Strategic benefits
<ul style="list-style-type: none"> • 1:1 meeting • 1:1 interview • Email • Social media • Attendance at public meetings and events 	<ul style="list-style-type: none"> • Decarbonization Plans • Decommissioning of assets • Operational Upsets impacting community • Socio-economic investments • Business performance 	<ul style="list-style-type: none"> • Keeping an open channel of transparent communication with the community we serve • Objective assessment of performance

OPERATIONAL AREA OF INFLUENCE

The area of influence has been defined through the consideration of various environmental and social topic areas which are presented in Table 3.6.

Table 3.6. The defining of our operating unit's area of influence is the size of the receptor area we currently use in our air emission summary dispersion model, specifically, O. Reg. 419 that governs our air compliance and we refer to namely, "Guideline A-10 (ESDM Procedure Document)", and "Guideline A-11 (Air Dispersion Modeling for Ontario)". It can be between 2 km and 5 km, depending on specifics of modeling terrain and land classification. For our facility the 3 km area of influence is a recommendation per the above documents.

Topic area	Approach used to define the area of influence
Noise and vibration from routine activities	<p>3km from the outer boundaries of the main site to reflect noise and odour generated from routine operations.</p> <p>500m either side of the public road network to reflect the generation of noise from road movements used for the transport of workers, the importation of raw material, and the export of products.</p>
Air emissions from routine activities	<p>3km from the outer boundaries of the main site to reflect the dispersion of air emissions to background levels within the airshed.</p> <p>500m either side of the public road network to reflect the generation of dust and air emissions from road movements used for the transport of workers, the importation of raw material, and the export of products.</p>
Landscape and visual impacts	500m from the outer boundaries of the main site to reflect the use of artificial lights.
The generation of waste	<p>Off-site Canadian transportation of waste routes include the following:</p> <ul style="list-style-type: none"> - City of Hamilton Municipal Roads – Burlington Street, Nicola Tesla Blvd, Centennial Parkway - Queen Elizabeth Way (QEW) - Highway 401 - Highway 403 - Highway 402

Topic area	Approach used to define the area of influence
Ecology and biodiversity	Across our site we are developing with the assistance of a third-party consultant a workplan to measure any potential impacts our operations have on nearby ecosystems, and habitats, in partnership with local individuals, groups, and regulators to monitor, manage and protect local ecology and biodiversity. This The Study Area will be comprised of ArcelorMittal Dofasco property and a buffer area of 10 km to incorporate species in the vicinity.
Community Health and Safety and road transport	3km either side of the public road network to reflect the generation of community health and safety risks from road movements used for the transport of workers, the importation of raw material, and the export of products.
Employment	Greater Hamilton, Toronto Halton area (GTHA) Region of Niagara Haldimand County Brant County
The procurement of materials and services	Province of Ontario Province of Quebec United States of America
Accidental and emergency events	City of Hamilton (Crown Point Neighbourhood, Hamilton Beach Strip Community, Homeside Community)

Stakeholders identified in the list below is representative but not exhaustive.

Stakeholder category	Stakeholders
National government ministries	<ul style="list-style-type: none"> • City of Hamilton, Elected Council, and various departments • Hamilton area Members of Provincial Parliament – Government of Ontario • Hamilton area Members of Parliament – Government of Canada • Invest Ontario – Government of Ontario • ISED – Government of Canada.
Government regulators	<ul style="list-style-type: none"> • Ontario Ministry of the Environment, Conservation and Parks • Environment and Climate Change Canada • Ontario Ministry of Labour
Regional / local government	<ul style="list-style-type: none"> • Government of Canada • Government of Ontario • City of Hamilton
The workforce	<ul style="list-style-type: none"> • Executive Leadership • ArcelorMittal Dofasco Permanent Employees • ArcelorMittal Dofasco Casual Employees • Trade Unions • Third party contractors (MH&L, Cleaning and Cafeteria Services)

Stakeholder category	Stakeholders
<p>Business partners and suppliers*</p> <p>(*The aim of our engagement with business partners and suppliers is to ensure we have a representative level of engagement. In associations this ranges from board membership and participation in working groups. In all cases, ArcelorMittal Dofasco sees its role in actively engages in discussion on key strategic topics (e.g. environment, climate change, product life cycle, supply chain management, etc.</p>	<ul style="list-style-type: none"> • Canadian Steel Producers Association • Canadian Manufacturers & Exporters • Association of Women in the Metal Industries • Automotive Parts Manufacturers' Association • Chamber of Marine Commerce • Hamilton Chamber of Commerce • Ontario Chamber of Commerce • CN • Air Liquide Canada • The State Group • BDI • Teck Coal Limited • Taylor Steel • Samuel, Son & Co. • Welded Tube of Canada • AO Smith – Corporate
<p>Local communities and their representatives</p>	<ul style="list-style-type: none"> • Crown Point Neighbourhood • Hamilton Beach Strip Community • Homeside Community
<p>Indigenous Peoples and First Nations*</p> <p>(*see workplan for 2023 Indigenous Affairs Policy and Reconciliation Plan).</p>	<ul style="list-style-type: none"> • Six Nations of the Grand River • Mississaugas of the Credit First Nation • Haudenosaunee Development Institute (HDI)
<p>NGOs and civil society groups</p>	<ul style="list-style-type: none"> • Bay Area Restoration Council • Sustainable Leadership • Environment Hamilton • Hamilton Wentworth District School Board • Centre for Climate Change Management at Mohawk College

Stakeholder category	Stakeholders
Main media outlets	<ul style="list-style-type: none"> • The Hamilton Spectator • 900 CHML Radio • CBC Hamilton • CHCH Television • Bay Observer

4 Summary of any previous stakeholder engagement activities

In Hamilton, we are the largest private sector employer, and we take a strong leadership role in stakeholder engagement. Engaging with stakeholders, both internally and externally, in pro-active two-way communication is essential to fulfilling our goal of being a transparent and ethical company.

ArcelorMittal Dofasco's Corporate Responsibility initiatives continued to focus on our 5 Sustainable Development themes and our 10 Sustainable Development outcomes. Our major stakeholder engagement activities included the following:

- Community Liaison Committee (CLC):
1. As part of our commitment to keeping the local community informed of the implications of our operations, ArcelorMittal Dofasco established a Community Liaison Committee (CLC).
 2. The CLC meets four (4) times a year (once a quarter).
 3. All meeting minutes and presentations are posted to our ArcelorMittal Dofasco external website.
 4. The objectives of the CLC are to:
 - Keep our various stakeholders informed of the status of the Company's compliance with our Comprehensive (site-wide) Certificate of Approval (Air), and) and Altered Air Standard Approval and associated Orders.
 - Keep the company informed of community concerns about any impacts of ArcelorMittal Dofasco's operations in Hamilton, Ontario; and
 - A forum for the dissemination, review and exchange of information.

The following methods to provide stakeholders with information on the operating unit's environmental and social risks and impacts were used:

- Ontario Ministry of Environment, Conservation and Parks (MOECC) Daily reports
- Community Liaison Committee (CLC) Quarterly Meetings
- ArcelorMittalDofasco.com - Company Updates
(<https://dofasco.arcelormittal.com/media/company-updates>)
- Neighbour Update Postcard Drops
- ArcelorMittal Dofasco Facebook
(<https://www.facebook.com/arcelormittaldofasco>)
- ArcelorMittal Dofasco Twitter (ArcelorMittal_D)
- ArcelorMittal North America Sustainability Report
(<https://northamerica.arcelormittal.com/sustainability/reporting/sustainability-report-2021>)
- Environmental Management System and Community Engagement Report
(<https://dofasco.arcelormittal.com/media/1r1lp1jw/amd-ems-and-community-engagement-report-for-the-2021-operating-year-june-2022.pdf>)
- Emission Summary & Dispersion Modelling Report
(https://dofasco.arcelormittal.com/media/2j1ft0no/amd_2020aws_execsummary.pdf)
- National Pollutant Release Inventory
(<https://www.canada.ca/en/services/environment/pollution-waste-management/national-pollutant-release-inventory.html>)
- Emissions Summary and Dispersion Model
(<https://sadofascoprod.blob.core.windows.net/media/py2hhwhs/2021-esdm-executive-summary.pdf>)
- ArcelorMittal North America annual Sustainable Development (SD) Report
(<https://northamerica.arcelormittal.com/sustainability/reporting/sustainability-report-2021>)

A summary of recent feedback from stakeholders on the operating unit's environmental and social risks and impacts is summarised in Table 4.1.

Table 4.1. Recent stakeholder concerns

Topic area	Stakeholder category raising the concern	Summary of the concerns raised	Date concerns were raised
Cokemaking Facilities	<ul style="list-style-type: none"> Non-governmental organizations Local communities Governmental Authorities 	<ul style="list-style-type: none"> stack opacity visible emissions number of ovens out of service coke plant restoration control of particulate from coke quenching operational adjustments Timeline for shutdown of coke plant assets Lid and door leaks Site Specific Standard limits for BAP 3 Coke Plant performance 	<p>November 2022 January 2022 October 2021 July 2021 April 2021 October 2019</p> <p>July 2022</p> <p>May 2022 October 2019</p> <p>April 2021 January 2021 October 2020</p>
Decarbonization Project	<ul style="list-style-type: none"> Non-governmental organizations Local communities Governmental Authorities Media 	<ul style="list-style-type: none"> Plans for any surplus lands Hydrogen infrastructure as fuel source New asset process start dates Job impacts and retraining Construction timelines Government funding for project 	<p>November 2022 October 2021 July 2022 May 2022 January 2022</p> <p>October 2021</p>

Topic area	Stakeholder category raising the concern	Summary of the concerns raised	Date concerns were raised
Air emissions	<ul style="list-style-type: none"> Local Communities Non-governmental organizations 	<ul style="list-style-type: none"> Inversions creating poor air quality Cokemaking stack opacity and visible emissions BaP, PM 2.5, PM 10, TSP, benzene 	November 2022 July 2020 October 2020
Steelmaking	<ul style="list-style-type: none"> Non-governmental organization Local Community 	<ul style="list-style-type: none"> #2 caster fire EAF visible emissions 	January 2021 October 2020
Water	<ul style="list-style-type: none"> Local community 	<ul style="list-style-type: none"> #2 Cold Wastewater Treatment plant – any upgrade plans 	July 2022
Ironmaking	<ul style="list-style-type: none"> Non-governmental organization Local Community 	<ul style="list-style-type: none"> Iron in the slag runner – visible emissions 	January 2021
Odour	<ul style="list-style-type: none"> Local community 	<ul style="list-style-type: none"> Odours believed to be originating from operations 	July 2020

5. Internal and External Resources and Roles + Responsibilities

Internal Resources

- Joanne Diemert, Employee Relations, ArcelorMittal Dofasco
- Marc Tucker, Investigator, Security and Loss Prevention, ArcelorMittal Dofasco
- Lelia Costantini, Assistant General Counsel & Compliance Officer, ArcelorMittal Dofasco
- Lisa Marcuzzi, Vice-President, Head of Corporate Affairs, Legal and ED&I.

Internal Stakeholder Grievance Process

<https://arcelormittal.sharepoint.com/sites/Dofasco-EmployeePortal/SitePages/Policies/Open-Door-Process---Policy-5.aspx>

External Resources

- Richard Do Couto, Senior Specialist, Corporate Affairs, ArcelorMittal Dofasco
- Marie Verdun, Director, Communications & Sustainable Development, ArcelorMittal Dofasco
- Lisa Marcuzzi, Vice-President, Head of Corporate Affairs, Legal and ED&I
- Mike Cortese, Manager, Environment, ArcelorMittal Dofasco
- Gas Gerbara, General Manager, Environment and Energy, ArcelorMittal Dofasco
- Hervé Mouille, Vice President Technology, ArcelorMittal Dofasco

External Stakeholder Grievance Process

6. Grievance Mechanism

Community Grievance Mechanism

- <http://intranet.dofasco.ca/Default.aspx?cid=74243>
- <https://dofasco.arcelormittal.com/sustainability/community-resources>

Monitoring and Reporting

The ArcelorMittal Communications and Sustainability team will monitor the key indicators relating to its Stakeholder Engagement Plan (SEP) efforts internally and externally on a quarterly basis. This will include:

- (a) the number of stakeholder engagements completed broken down by stakeholder category and local community, against what was planned.
- (b) the number of activities completed that are designed to support the informed, consultation and participation of vulnerable groups.
- (c) the number of stories concerning ArcelorMittal Dofasco operations covered in the media.
- (d) the number of community grievances raised broken down by gender and affected community.
- (e) the number of community grievances raised that were resolved within the specified target time.
- (f) the number of community grievances that can be classified as having occurred a second time.

To evaluate the continuous success of our ArcelorMittal Dofasco stakeholder engagement, we will monitor our progress using the following qualitative and quantitative methods:

1. Communicate every quarter to our Community Liaison Committee (CLC) quarterly on issues of interest.
2. Conduct an annual community survey.
3. Map stakeholder social and environmental areas of interest and concern through an annual Materiality Survey.
4. Hold quarterly internal meetings to understand the number and types of external grievances filed, outstanding and resolved.