

# Aperam Corporate Policy

## Engaging - the Aperam way.

Short description: Communication policy for engaging with external local stakeholders.

Scope: Relevant to all Aperam operations, subsidiaries and affiliates worldwide.

Reference: This policy should be read in conjunction with our Code of Conduct and:

- Aperam Communication policy (internal)
- Aperam Communication & Confidentiality guidelines (internal)
- Aperam's Guidelines regarding Charitable Contributions (internal)
- Appendix 1: Internal Guidelines

### 1. Purpose

Aperam places considerable importance on effective communication. Indeed, we are strongly convinced that close relationships with all our stakeholders, through regular communication, is highly valuable for Aperam and demonstrates our integrity and transparency.

The purpose of this policy is to encourage regular and standard communication and engagement with our stakeholders, such as local communities or authorities, and provide guidance to our sites in this respect, in accordance with our Communication policy and with all processes regarding the disclosure of sensitive information.

### 2. Content

#### 1. Scope and objectives

This policy is meant to establish and maintain good relationships with external local stakeholders<sup>1</sup> including local communities, non-governmental organisations, local authorities, subcontractors, local suppliers, academia and other institutions.

External stakeholder engagement at Aperam has three objectives:

- To be aware of risks and opportunities, enriching our analysis with our stakeholders' views,
- To find sustainable and mutually profitable ways forward,
- To earn the trust of our external stakeholders, thereby protecting our brand and reputation and finally safeguarding our social license to operate.

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<sup>1</sup> This document does not address engagement schemes with customers, global suppliers or contractors nor other stakeholders such as lenders or shareholders,

## 2. Specifications

### Minimum requirements

#### Legal obligations

Although it is stating the obvious, our first and foremost duty is to comply with all applicable local laws and regulations, in particular to those regarding stakeholder engagement, community consultation and public reporting. All these requirements are therefore incorporated into our management routines.

#### Stakeholder identification, analysis and engagement

In line with best practices, all sites should develop an understanding of local stakeholders and their concerns, especially of those stakeholder groups that may be particularly vulnerable. This means:

- Maintain a list of the locally significant stakeholder groups, with main contact details.
- Organise regular interactions to stay aware of stakeholders' main concerns,
- Maintain a sufficient grievance management mechanism to collect complaints, notably through our Aperam standard "Open contact channels" (see below paragraph)
- Provide information adequately regarding the site's activity, material topics and progresses.

To this regard, all industrial sites are invited to:

- Display Aperam's standard "Entrance poster", with key indicators on our Social and Environmental performance as a token of transparency,
- Share Aperam's view on material topics, in line with the best standards of stakeholder engagement (materiality matrix or other means),
- Implement communication routines with frequency and operating modes in line with the sites' size and their impact on their stakeholders.

#### Open contact channels to collect feedback

Aperam has defined a standard process using a contact form with the aim to make sure that the interactions of sites with their local stakeholders are managed adequately and in the local language(s). It is intended to be able to collect positive feedback while addressing the need of an efficient Grievance mechanism.

Each site will manage their own web-based contact form in local language so that local stakeholders can provide their feedback anytime, using predefined categories to facilitate routing and follow-up.

### Key orientations

#### Principles

- **Transparency:** The principle of our engagement is to inform our local stakeholders regularly and proactively to build trust and social value while anticipating problems.
- **Consistency:** Internal guidelines (to be updated periodically) will be provided to help sites organise this engagement consistently across Aperam, with recommended frequencies per type of sites. Best practices will also be exchanged internally.
- **Materiality:** The engagement should cover the "material topics" of the different stakeholders and take into account the differences in size, complexity and local impact of Aperam sites. This means that the recommended frequency of engagement will be higher and the scope of stakeholders to be

involved broader for main plants<sup>2</sup> than, for example, service center activities (see categorization further).

- **Local management:** The operating mode, key messages and timing of the engagement will be defined at site level and can be summarized in a one-page summary view of their yearly stakeholder engagement plan (see example in Table 3 in Appendix 1). The data collected through the contact forms will be stored in a local database, managed locally in accordance with Aperam GDPR policies and procedures and the responses to the questions or feedback received will be handled by the site.

## Multiple communication modes

Knowing that local stakeholders correspond also to groups that are very different in interests and routines -even inside one country/region-, the engagement modes will have to be defined locally and shall leverage existing communication carriers and rituals and develop other means as requested to ensure efficiency in the engagement and compliance with local culture.

As a result, sites are invited to use a combination of tools including: posters, intranet/internet pages, newsletters, in-site screen messaging ("TV plants"), meetings, events, ads, etc.. They are also encouraged to use alternative modes of exchanges or synergy-buildings such as: working groups, job fairs, open house days, sponsoring, lectures or internships, lending of equipment, etc, as detailed in internal guidelines.

## Roles and responsibilities:

We at Aperam believe strongly that our employees best represent our values of benevolent and transparent engagement.

Our local leaders at the different sites have a key role when it comes to listening to, interacting and working with local communities and stakeholders. And across all geographies that we operate in, we endeavor to listen and act per the specific demands of our surroundings.

## Follow-up and reporting

The deployment of this engagement policy will be followed-up through:

- **Continuous update of the materiality matrix:** The takeaways of the continuous engagement at site level shall be reflected in local matrices, which in turn will contribute to the update of the group consolidated materiality matrix as per the GRI method. The updates are reported yearly on the externally-verified Group Sustainability report published on the internet.
- **Monitoring of the engagement level of our sites:** Our sites' compliance to this Engagement policy will be assessed yearly and reported within the externally-verified Group Sustainability report published on the internet.
- **Follow-up of the feedback through our open contact channels:** A consolidated view of the feedback received based on aggregated data will allow a monitoring of the topics raised and potential local grievances, in accordance with all privacy regulations.

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<sup>2</sup> Primarily Timoteo, BioEnergia (BR), Genk, Châtelet (BE), Imphy, Isbergues, Gueugnon, Pont-de-Roide (FR).