

Human Rights Policy

Approved by Aperam Disclosure Committee on 2025/01/06

Note: This policy is released in English. In case of divergence between the English version and other translated versions, the English version will prevail.

Scope: Relevant to all Aperam, its Value Chain and Stakeholders

Aperam is committed to conducting its business in a manner that respects and promotes human rights as outlined in the Universal Declaration of Human Rights¹ the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work², and the United Nations Guiding Principles on Business and Human Rights³ (UNGPs).

The Aperam Human Rights Policy complements and brings together the Human Rights aspects from other Aperam Company policies and guidelines such as its Code of Business Conduct, its Health & Safety, Environment, and Code for Sustainable Purchasing.

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¹ <https://www.un.org/sites/un2.un.org/files/2021/03/udhr.pdf>

² https://www.ilo.org/sites/default/files/2024-04/ILO_1998_Declaration_EN.pdf

³ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf

1. Policy statement and commitments to stakeholders

Policy statement

-Aperam commits to respecting Human Rights and ensures that our operations do not contribute to Human rights abuses.

-Engaging with stakeholders (incl. value chain workers) to identify and address Human Rights potential impacts associated with our activities.

-Continuously improving our Human Rights promotion practices. We are dedicated to consistently improving and refining our practices based on experience, ensuring alignment with the principles and the evolving local contexts in which we operate.

- Where necessary, provide or contribute to the remediation of any potential adverse Human Rights impacts in our business activities thanks to effective and accessible grievance mechanisms and remediation processes, all driven by principles of fairness, timeliness, and transparency.

For more guidelines on these topics ➤

Commitments to stakeholders

Employees : We are committed to respect the Human Rights of our employees.

External business partners : We seek to respect and promote Human Rights when engaging with customers, subcontractors, suppliers, joint venture partners and other third parties.

Local communities : We work on developing 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.

2. Aperam specific areas of focus

Health and Safety : We make sure the Safety culture is the primary focus of anyone working with or for Aperam. Aperam is committed to work towards a goal of zero accidents, zero injuries and general physical and mental wellbeing in the workplace. This is endorsed by Aperam's Health and Safety Policies and Procedures that apply to all at every moment.

Eliminating Forced or Compulsory Labor: Aperam opposes the use of forced, bonded or compulsory labor, human trafficking, as well as any form of modern slavery. We work with our subcontractors and suppliers to avoid indirectly benefiting from or promoting such illegal practices.

Abolishing Child Labor: We firmly prohibit the use of child labor in any of our business activities. We have established an internal procedure based on the UN

Aperam Corporate Policies and Procedures



► [Internal procedure on Child Labor Aperam checkpoints](#)

► [Code of Business Conduct](#)

► [Code for Sustainable Sourcing and Purchasing specifies our expectations with respect to our suppliers, contractors, and affiliates.](#)

► [Stakeholder Engagement policy](#)

► [Health & Safety Policy](#)

Checkpoints procedure to identify, eliminate and prevent child labor. Knowing that the age limits defining child labor may vary across different jurisdictions, we commit not to accept people under 16 to work in Aperam.

However, we recognize the value of educational work experiences for youth. Therefore, we allow exceptions for internships where the primary purpose is to provide education opportunities and practical experience. These internships are designed to offer safe, meaningful, and developmentally appropriate work conditions.

To this end, Aperam guarantees safe conditions, avoiding night shifts and dangerous work, and not interfering with school education activities.

Eliminating Unlawful Discrimination in the Workplace: Aperam is committed to ensure that each employee and potential employee are treated with fairness and dignity. Any discriminatory practice on who the person is or their personal characteristics, will not be tolerated.

Eliminating Harassment and Violence: Aperam has developed measures aiming that no harassment or violence can be perpetrated on our premises nor by any of our employees or people working on behalf of Aperam. We prevent behaviors and verbal attacks that could be seen as debasing, even if the people concerned do not complain. We will not accept disciplinary practices that undermine workers' dignity, and commit to effectively address any detected incidents.

Promoting Freedom of Association: In Aperam, we uphold freedom of peaceful assembly and association and the effective recognition of the right to collective bargaining. We respect the right to strike, however it is essential that the exercise of this right does not unduly compromise the company's safety and operational integrity.

We don't tolerate any discrimination nor intimidation towards members of unions or employee representatives. In jurisdictions where freedom of association and collective bargaining is not ensured nor protected by local laws, we will help define operating modes that facilitate employee consultation.

Promoting freedom of thought, opinion, and expression: At Aperam, every individual has the inherent right to think freely, to form and hold their own opinions, and to express those views without fear of censorship, discrimination, or persecution. However, during working hours and on the company premises, systems and equipment, this right must be exercised with due regard for the rights and dignity of others, and cannot be used to incite violence, spread hatred, or promote intolerance. At all times, in line with the employees' duty of loyalty and discretion further detailed in our Communications policy and guidelines, freedom of expression shall be exercised avoiding any confusion between personal opinions and company statements in order to protect our company reputation.

Providing Competitive Compensation and Remuneration: Aperam aims to pay competitive wages based on local market assessments, and at a minimum seeks to provide a living wage that stands as a commensurate compensation for

► [Internal procedure on Child Labor Aperam checkpoints](#)

► [Aperam's Gender Diversity Policy](#)

► [Procedure Diversity and Human rights/ prevention of discrimination \(internal\)](#)

► [Aperam's Inclusion & Diversity Policy](#)

► [Aperam Communication Policy](#)

► [Aperam's Social Media Communications and AI Procedures](#)

each employee. In particular, we promote the principle of “equal pay for equal work that is performed” and that include parental leave options to uphold the right to found a family.

Upholding Conditions of Employment: Aperam complies with laws regarding conditions of employment, including freedom of movement and right to rest and leisure, with periodic holiday with pay, basic and overtime working hours, and without any arbitrary interference with his or her privacy, family, home or correspondence, or attacks on his or her honor and reputation. We abide by all the agreements negotiated with our employee representatives, aiming to promote healthy working conditions and allowing our employees to thrive as individuals, citizens, and professionals.

Engaging with Local Communities: Aperam cannot thrive to the detriment of our local communities that provide us with the workforce and infrastructure we need. As a consequence, we aim to maintain a constructive engagement and find mutually beneficial solutions with them. We ensure that we have proper grievance mechanisms in place to react promptly in case of potential issues .

Sustainable use of Land and Water: In line with the 2010 resolution from the United Nations⁴, Aperam is committed to protect the Environment and to make sure, based on its Environmental strategy and in accordance with its licenses to operate, that we apply sound practices for a sustainable land and water use, in view of current and future generations’ needs.

► [Aperam Compensation & Benefits Policy](#)

► [Aperam External Stakeholder Engagement Policy](#)

► [Aperam Environmental Corporate Policy](#)

3. Implementation and Due Diligence

Aiming at ensuring the perfect applicability of the above principles and preventing incidents and non-compliances, Aperam will apply the following approach:

Risk Assessment and Management

- Regularly conduct Human Rights risk assessments to identify, prevent, and mitigate adverse Human Rights impacts.
- Implement effective monitoring systems to address alerts, incidents and identified risks.
- Organize benchmarking, legal watch and identification of best practices to provide local support and overall consistency.

► [Procedure Diversity and Human rights/ prevention of discrimination](#) (internal)

Training and Awareness

- Provide various training and resources to employees, depending on their functions and responsibilities, to ensure understanding and implementation of Human Rights principles.
- Promote awareness of Human Rights issues within the supply chain.
- Company-wide communications.

⁴ In 28 July 2010, through Resolution 64/292, the United Nations General Assembly explicitly recognized the human right to water and sanitation.

Monitoring and Reporting

- Regularly monitor compliance with this policy through audits and assessments.
- Report publicly on Human Rights performance and progress.

4. Grievance Mechanism & Accountability

Aperam provides accessible and confidential grievance mechanisms for employees, contractors, and other stakeholders to report concerns about Human rights violations. In the event of any employee becoming aware of Human rights hotspots within our operations or supply chain, he or she will inform the senior executive responsible for the relevant business as soon as possible, and share this information with the Diversity/Inclusion team, Human Resources, Legal, or Purchasing departments, and the Compliance & Sustainability teams.

In addition, anyone including non Aperam people having doubts on the same can report them to compliance.officer@aperam.com or via www.aperam.com/alert .

Aperam's Leadership Team has overall responsibility for the implementation of this Policy and quarterly reporting on the matter is organized, as part of one of its ESG committees. The responsibility for the oversight of this policy lies with the Board of Directors.

Aperam will periodically review this Policy and its implementation with respect to its suitability and effectiveness.

► [Prevention of misconduct and Whistleblowing Policy](#)