

# Aperam Inclusion & Diversity Policy

Approved by Aperam Disclosure Committee on 2023/11/21

*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** All Aperam

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At Aperam, everyone has an equal opportunity to participate in our success and to be heard and valued for the unique skills, experiences and perspectives that one brings to the table. This is reflected in our values and policies, with both our Code of Conduct and the Human Rights policy aiming at eliminating harassment and discrimination in the Workplace.

Furthermore, Aperam promotes an inclusive and diverse workplace, reflecting the diversity of the society in which we operate.

The Global Inclusion and Diversity Policy is intended to ensure Aperam is a welcoming workplace for all, and in particular for caregivers, people in visible or invisible 'vulnerable'<sup>1</sup> groups, examples of which are ethnic minorities, LGBTQ+, or persons with a disability or chronic disease.

## I- Objectives and directions

This policy seeks to establish governance guidelines for the purpose of:

- a. Providing, through people, equipments or process adjustments, a welcoming and inclusive workplace for all employees
- b. Valuing employees for their skills, experiences, and the unique perspectives they bring to the company
- c. Promote education and knowledge for understanding the barriers and prejudices faced by vulnerable groups, in order to avoid discriminatory and prejudiced attitudes
- d. Strengthening the culture of promoting diversity, inclusion and equal opportunity throughout the company's internal processes
- e. Improving the staff diversity in all its dimensions at Aperam, at all levels, functions and areas of the company

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<sup>1</sup> Women and persons belonging, or perceived to belong, to groups that are in a disadvantaged position or marginalised. According to the United Nations, vulnerable groups often include Indigenous People ; People of African descent ; Roma, Sinti and Travelers ; Persons Belonging to National or Ethnic, Religious and Linguistic Minorities ; Children and Adolescents ; Migrants, Refugees, Asylum-seekers, and Internally Displaced People as well as People Living in Extreme Poverty ; People with a Disability or Chronic Disease and LGBTQ+ People.

## II- Company's commitment

To support Inclusion and Diversity at Aperam, we are committed to the following 6 points.

1. **Communication & Training:** Ensuring that all Aperam employees know these principles, thanks to appropriate training, and apply practices aligned with our Code of Business Conduct with our Values and our Human Rights policy and its appendix.  
>> We will do so with a regular update of our policies and the roll-out of mandatory training as needed.
2. **Management of risks and alerts:** Anticipating and eliminating discriminatory behavior at every step of work life, based upon regular risks assessments and the efficient management of alerts;  
>> We will investigate and report on alerts and risks in a fair and respectful manner, using if need be independent third parties.
3. **Monitoring of Staff composition:** Aiming at a diverse representation across our entire workforce – our strategic priority for representation and inclusion is at least to mirror the composition of the communities where we are located, reflecting the commitment to offer equal opportunities to locally under-represented groups.  
>> We will do so through the follow-up of the relevant indicators and the definition of targets to monitor our progress at all levels of the organization hierarchy.
4. **Making internal processes more inclusive:** Promoting inclusive recruitment and career management tools and practices, equitable pay and advancement as well as the provision of a safe, respectful and supportive physical and virtual work environment, to reduce the impact of unconscious bias.  
>> We will make this operational within Aperam and promote with our supply chain through :
  - training and awareness on the nuances and benefits of diversity and inclusion and recommended wording for inclusive communications
  - human-resources adjusted processes for equal career development, opportunities such as human-resources adjusted processes such as staffing, C&B and L&D
  - auto-assessments, census and indicators, to understand our level of diversity and monitor its improvement
5. **Engaging:** Encouraging internal and external stakeholders to bring new ideas and diverse perspectives to continually improve both our internal processes and promote externally our belief in Inclusion and Diversity, with shared practices and guidelines, such as:  
>> We will do so with (affinity) internal networks to maximize the chances that anyone feels free not to hide and be one's self, fully welcomed within Aperam ; exchanges with employees representatives, exchanges with associations, peers and governmental agencies, external marketing, participation to and sponsoring of external events and advocacy, for example against homophobia, racism and violence against women.
6. **Adapting our Governance for topics related to Human Rights, Inclusion and Diversity :** we ensure that the perspectives of Aperam employees, its Supply Chain and broader area of influence are taken into account in the definition and validation of the action plan.  
>> We will do so with an organization combining the perspectives of Human Resources, Operations, Compliance and Sustainability teams, with in particular:
  - an oversight of at least two LT members
  - overall review of alerts at group level
  - a network of persons of trust in charge of running investigations
  - the support of a network of site-level ambassadors

- regular exchanges with our Employees' Representatives completed with other relevant external stakeholders

### III- A shared responsibility

#### 1- A Managerial responsibility

Every Manager has a role to play in achieving a workplace that is equitable and inclusive, in particular in:

- a. hiring and promoting decisions, which should be free of bias, recognizing merit and broadening the mental views of what is the right person for the job beyond stereotypes and the usually selected profiles
- b. promoting their own respectful, inclusive and positive managerial style and cohesion routines, far from aggressive or paternalistic stereotypes
- c. addressing inappropriate behaviors, even those of the most talented professionals, up to sanctions in line with the severity of the misconduct.

#### 2- Everyone's responsibility

Every single employee has a role to play in achieving a workplace that is equitable and inclusive including:

- d. being aware of one's own beliefs and behaviors and how this may influence the way one treats others
- e. listening with an open mind to understand different points of view
- f. being proactive in offering support to others

Aperam encourages everyone working with or for the Company to familiarize themselves with these principles, respecting them on a daily basis, adopt inclusive practices and react swiftly in case of voluntary or involuntary breach by anyone in the organization or at our premises.

Alerts can be brought to:

- the immediate direct line manager, the site's Human Resources, Harassment Correspondent and/or Employee representative.
- the Human Rights correspondents:  
[mariane.andre-taille@aperam.com](mailto:mariane.andre-taille@aperam.com)  
[lorena.castro@aperam.com](mailto:lorena.castro@aperam.com) (for Brazil)
- **Aperam Whistleblowing hotline**:: [www.aperam.com/alert](http://www.aperam.com/alert) (Check [your rights as a whistleblower](#))