



# Human Rights Policy

Approved by the Leadership Team,

Last update approved by Aperam Disclosure Committee on 26/11/2018

## General principles

Aperam's Human Rights Policy expresses our respect for all Human Rights. It focuses on the areas that have been identified as priorities for our industry and is inspired by key International references<sup>1</sup>.

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. This Policy is the overarching statement for other standards that will be developed as necessary by Aperam on specific human rights matters and that will be added as appendices.

As all Aperam policies, this Policy applies to all employees of Aperam subsidiaries and affiliates worldwide. In joint ventures where Aperam does not have overall control, the managers of these entities are strongly encouraged to adopt the same or similar standards.

In addition, our subcontractors working at our sites are expected to comply with this Policy. We also intend to promote its principles to our suppliers, including via the adoption of legal contractual clauses.

In implementing this Policy, we are subject to the laws of the countries in which we operate and we are committed to comply with all such applicable laws. Where local law prohibits us from upholding certain aspects of this Policy, we comply with these local laws while seeking to respect human rights.

Should we inadvertently cause or directly contribute to adverse human rights impacts, we would initiate appropriate remediation processes on our own or in cooperation with other stakeholders.

If any of us believe that someone is violating this Human Rights Policy or the law, we have a duty to report it immediately to our usual contacts:

- our manager,
- the Human Resources department,
- the Legal Department,
- the Compliance Officer, also via [compliance.officer@aperam.com](mailto:compliance.officer@aperam.com),
- or through appropriate whistleblowing lines.

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<sup>1</sup> Including the Universal Declaration of Human Rights (UDRH) and the two International Covenants making up the International Bill of Human Rights; The United Nations Guiding Principles on Business and Human Rights (UNGPs); The OECD Guidelines for Multinational Enterprises; The International Labour Organisation's (ILO) Declaration of Fundamental Principles and Rights at Work; and The United Nations Global Compact.



We are all equal in dignity and rights

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## Commitments to stakeholders

### Employees

We are committed to respect the human rights of our employees. We develop our employment policies with the aim to achieve uniform worldwide application of the relevant aspects contained in the International Human Rights Declarations. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.

### Business partners

We seek to respect and promote human rights when engaging with customers, subcontractors, suppliers, customers, joint venture partners and other third parties. We will do this, as appropriate, through proactive engagement, monitoring and contractual provisions.

### Local communities

We seek to respect human rights and to develop 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.

## Aperam's specific areas of focus

### Health and Safety

Aperam is committed to work towards a goal of zero accidents, zero injuries and general wellbeing in the workplace. This is endorsed by Aperam's Health and Safety Policies and Procedures that apply to all at every moment. Beyond this undisputable priority, we will also promote off-the-job safety and healthy habits for our employees and we will also make sure the Safety culture is the primary focus of anyone working with or for Aperam. We also commit to run our operations safely and taking all precautions to avoid any risk for the surrounding populations, environment and habitat.

### Eliminating Forced or Compulsory Labour

Aperam opposes the use of forced, bonded or compulsory labour, 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 Labour

Aperam opposes the use of child labour. We do not accept children under 18 to work in Aperam, unless in cases of internships, apprenticeships, summer jobs compatible with the highest Health & Safety standards and not interfering with school education. We will work in collaboration with subcontractors and suppliers to prevent and remove any instances of child labour in a manner that is consistent with the best interests of the child.

### Eliminating Unlawful Discrimination in the Workplace

Aperam is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, political or other opinion, disability, birth or any other basis will not be tolerated. Aperam seeks

to provide each employee with equal opportunity for advancement without discrimination and based on what the employee *does* rather than on who the employee *is*.

To go further on this field, we have also published a Charter and a Policy to promote Gender diversity, added as an appendix to this policy.

## Eliminating Harassment and Violence

Aperam is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence. We promote the values of respect and freedom of speech and will ensure that no harassment or violence can be perpetrated on our premises nor by any of our employees. We ban behaviours, jokes and remarks that could be seen as debasing, even if the people concerned do not complain.

We expect our business partners to contribute to our fight against any type of violence or discrimination.

## 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 recognize also the right to strike. We will not 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. We also work with our subcontractors and suppliers to promote the achievement of this principle.

## Providing Competitive Compensation and Remuneration

Aperam aims to pay competitive wages based on local market assessments and at a minimum seeks to provide a commensurate compensation for each employee. In particular, we promote compensation & benefits packages that are based upon the principle of “equal pay for equal work” and that include parental leaves options to uphold the right to found a family.

We expect our business partners to follow similar guidelines and to ensure that the wages paid locally allow a decent living.

## Upholding Conditions of Employment

Aperam complies with all 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 will abide by agreements negotiated with our employee representatives, aiming to promote working conditions that provide a comfortable work-life balance 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. In our trade, with long-established sites and no mining operations, we have no topics of resettlement or indigenous rights to tackle but we ensure that we have proper grievance mechanisms in place to react promptly in case of problems.

## Sustainable use of Land and Water

In line with the 2010 resolution from the United Nations<sup>2</sup>, Aperam is committed to protect the Environment and to make sure, based on its Environmental strategy and in accordance with its licences to operate, that we apply sound practices for land and water use.

## Governance and accountability

Aperam's Leadership Team has overall responsibility for the implementation of this Policy..

## Implementation and monitoring

The implementation of this policy is supported by training and Company-wide communications.

In support of this Policy, we also intend to develop operating procedures to create an environment where human rights are respected, and to also help ensure that we do not engage in activities that directly or indirectly violate human rights. In particular, our Code for Sustainable Sourcing and Purchasing specifies our expectations with respect to our suppliers, contractors and affiliates and it engages them to cascade these principles in their own supply chain. Aperam will periodically review this Policy and its implementation with respect to its suitability and effectiveness. Our human rights performance is ranked high in our organisation and will also be reported in one of the Committees of our Board of Directors at least annually, starting in 2019 and reported publicly in our annual Sustainability Report, available at: [www.aperam.com/sustainability](http://www.aperam.com/sustainability) .

We also welcome feedback from, and dialogue with, interested parties via [sustainability@aperam.com](mailto:sustainability@aperam.com).

## Reporting human rights hotspots

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 Compliance & Sustainability team, and as adequate, to Human Resources or Purchasing departments.

In addition, anyone including non-Aperam people having doubts on the same can report them to [compliance.officer@aperam.com](mailto:compliance.officer@aperam.com) .

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<sup>2</sup> In 28 July 2010, through Resolution 64/292, the United Nations General Assembly explicitly recognized the human right to water and sanitation

# Aperam Corporate Policy

## Aperam's Gender Diversity Policy

Aperam is committed to providing a welcoming and inclusive workplace for all our employees. At Aperam, everyone has an equal opportunity to participate in our success and to be valued for the unique skills, experiences and perspectives that he or she brings to the table.

Below is our Gender Diversity Policy, which drew its inspiration from the United Nations' Women Empowerment Principles<sup>1</sup>. We encourage everyone working with or for Aperam to familiarise themselves with these principles and commit to respecting them on a daily basis.

### **Principle 1: A strong commitment from management**



Aperam is committed to establish company-wide goals for gender diversity. Using specific targets, we will systematically monitor and evaluate our progress throughout the entire organisation. The results will be factored into managers' performance reviews.

*Illustration:* Aperam will disseminate a series of communication materials on our Gender Diversity Policy, goals and progress throughout the organisation. These materials will be available in various languages. We will also establish specific targets, starting with the Management performance appraisals.

### **Principle 2: Health, safety and ergonomics**



In-line with our commitment to health and safety, Aperam is committed to pay special attention to:

- Providing safe working conditions and protections against dangerous materials for all employees, regardless of gender.
- Reaffirming our zero-tolerance policy on all forms of workplace violence, including verbal and/or physical abuse or sexual harassment.

*Illustration:* Aperam will build and/or adapt facilities to meet the needs of our female employees and review procedures for improving ergonomics for both genders. Special attention will be given to any medical risks that could affect pregnant women.

<sup>1</sup> Aperam considers that WEP Principles 6 & 7: "Promote equality through community initiatives and advocacy" and "Measure and publicly report on progress to achieve gender equality", are already covered throughout the Principles and specific commitments enacted in this Charter.



### **Principle 3: Equal remuneration**



Aperam is committed to achieving equal remuneration and benefits for the same performance level in a similar job for both genders with a strict respect of real merits. Aperam will also improve flexible work options and caregiver benefits (child and dependent) in a manner compatible with the local organisation.

*Illustration: Aperam will train managers on avoiding any gender-based bias in salary-related decisions.*

### **Principle 4: Equal career opportunities**



Aperam is committed to providing equal opportunities for professional development to all of our employees. This includes:

- Ensuring equal access to training.
- Encouraging women to enter non-traditional roles.

*Illustration: Aperam will ensure that all levels of the company use a fair assessment process that is based on performance and competencies and regardless of gender or any other personal trait.*

### **Principle 5: Fighting stereotypes**



To stop the use of stereotypes, and in particular gender stereotypes, Aperam is committed to implement internal and external communication practices, including:

- Training and awareness-raising about unconscious biases within Aperam.
- Enhanced recruitment practices, built in partnership with local universities and professional associations.
- Engaging with our business partners to ensure that they too are committed to respecting Aperam's Gender Diversity Policy and its principles.

*Illustration: Aperam will specifically engage with our interim partners to make sure they are aligned on our commitment to gender diversity.*