

AM/NS

INDIA

HUMAN RIGHTS POLICY

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TABLE OF CONTENTS

1. INTRODUCTION	3
2. PURPOSE.....	3
3. SCOPE.....	3
4. SPECIFIC COMMITMENTS AND PROVISIONS.....	4
5. GOVERNANCE AND ACCOUNTABILITY	6
6. IMPLEMENTATION	6
7. REPORTING	7
8. MONITORING AND REVIEW	7

1. INTRODUCTION

ArcelorMittal Nippon Steel India Ltd (“the Company” or “AM/NS”) is one of India’s leading steel companies. The Company operates steel production and distribution facilities, as well as iron ore mines, ports and power plants.

AM/NS Human Rights Policy (“Policy”) articulates our responsibility and commitment to respect all Human Rights in line with the UN Guiding Principles on Business and Human Rights (the UNGPs). This Policy focuses on the areas that have been identified as priorities for our industry.

The Policy is derived from:

- The United Nations (UN) Universal Declaration of Human Rights and the two International Covenants making up the International Bill of Human Rights;
- The International Labour Organisation’s (ILO) Declaration of Fundamental Principles and Rights at Work;
- The United Nations Global Compact.

Together, for the purposes of this Policy, the above documents are called the “International Human Rights Declarations”.

2. PURPOSE

This Policy sets out the principles for our actions and behaviour in relation to human rights. The Policy and associated practices are expected to strengthen over time as the Company firmly believes in creating 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.

3. SCOPE

This Policy applies to all employees of AM/NS and its subsidiaries. In addition, subcontractors working at our sites are expected to comply with this Policy. We will promote its principles to our subcontractors and suppliers through our Code of Conduct, and we will also engage our customers on these issues.

The Policy complements and brings together the human rights aspects from various other Company policies and guidelines. These include our Code of Conduct, the Health & Safety, Environment Policy, various Human Resources policies and the Anti-Bribery & Anti-Corruption Policy. In implementing this Policy, we are subject to the laws of the countries in which we operate and are committed to comply with applicable laws.

4. SPECIFIC COMMITMENTS AND PROVISIONS

4.1 Commitments to stakeholders

Employees: We are committed to respect the human rights of our employees including the fundamental rights as enshrined in the Constitution of India, as may be applicable. 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 and respect 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 subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring, certification and contractual provisions. Suppliers operating in, or procuring from, areas where we identify our most severe risks, will be the key focus of this engagement.

Local communities: We seek to respect the human rights of the local potentially affected people 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. Our dialogue gives specific considerations to the marginalized and often under-represented groups such as women, children and indigenous people.

4.2 Specific provisions

- **Health and Safety**

Promoting Health and Safety

AM/NS is committed to work towards a goal of zero accidents, injuries and general wellbeing in the workplace. This is endorsed by the Health and Safety Policies and Procedures that promote our philosophy of Safe Sustainable Steel.

- **Labour**

Fair and Equal Treatment

AM/NS believes in fair and equal treatment of all its employees without any discrimination.

Eliminating Forced or Compulsory Labour, Human Trafficking and all forms of Modern Slavery

AM/NS opposes the use of forced or compulsory labour, human trafficking and all forms of modern slavery both within its own operations and through its supply chain. We will strive to work with our subcontractors and suppliers including due diligence within our supply chains to avoid indirectly or directly benefitting from or promoting such illegal practices.

Abolishing Child Labour

AM/NS opposes the use of child labour. 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

AM/NS is committed to ensure that each employee and potential employee is treated with fairness and dignity. Accordingly, any unlawful discriminatory practice based on race, colour, gender, sexual orientation, age, religion, ethnicity, national or social origin, property, political or other opinion, disability, birth or any other basis will not be tolerated. AM/NS seeks to provide each employee with equal opportunity for advancement without discrimination. The company is also committed to provide an inclusive workplace to the employees with special needs and ensure that they are provided with adequate measures.

Eliminating Harassment and Violence

AM/NS is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the applicable laws.

Providing Competitive Compensation and Remuneration

AM/NS aims to pay competitive wages based on local market assessments for each employee.

Upholding Conditions of Employment

AM/NS complies with all laws regarding conditions of employment including basic and over-time working hours, and will abide by agreements negotiated with our employee.

Ensuring confidentiality of complaints

AM/NS is committed to take actions to ensure the observance of this Policy. People Persons who may become victims of or witness any to non-compliance with the principles laid down in this Policy may raise their concerns in a confidential manner using the Whistleblower process. Complaints suggesting any violation of this Policy will be treated with utmost confidentiality.

- **Local Communities**

Avoiding Involuntary Resettlements

AM/NS seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government's or regional authorities' guidelines on resettlement and rehabilitation.

Respecting Indigenous Peoples' Rights

AM/NS respects the rights of Indigenous Peoples as defined by applicable national and emerging international standards.

Adopting Proportionate Security Arrangements

AM/NS aims to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines. We will adapt our security arrangements to balance the need for safety while respecting human rights

Developing practices for Land and Water use

AM/NS works towards understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights.

5. GOVERNANCE AND ACCOUNTABILITY

Responsibility for the implementation of this Policy lies with the most senior executive responsible for each business segment, and for our centralized procurement system, and human resources department. These executives will report on any human rights hotspots arising within our operations or our supply chain to the CEO at least annually.

6. IMPLEMENTATION

The implementation of this Policy occurs through our due diligence procedures as well as targeted interventions and this is expected to strengthen over time and corporate guidance increasingly focuses on the potential for severe human rights issues.

Implementation is supported by Procurement, Human Resources, Internal Audit, Legal & Compliance, Internal Assurance, Community, and Environment functions. In the event of any employee becoming aware of human rights hotspots within our operations or supply chain, they will inform the senior executive responsible for the relevant business segment as soon as possible, and share this information with the Compliance, Internal Assurance and Human Resources teams.

This Policy is the overarching statement for other standards and procedures that will be developed as necessary by AM/NS on specific human rights matters.

This Policy is supported by training and Company-wide communications, with the aim of establishing effective channels for redress for local stakeholders in relation to this Policy

7. REPORTING

We will publicly report on the performance of these processes in our Annual Review or other statement as may be required under the applicable law.

8. MONITORING AND REVIEW

AM/NS will periodically review the Policy and our implementation with respect to its suitability and effectiveness.



Approved by: Mr Dilip Oommen, CEO