

Aperam Environmental Corporate Policy

Approved by the Disclosure Committee on 2025/03/28

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 employees of Aperam.

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1. Purpose

At Aperam, we strongly believe that a long term successful business is only possible if our most valuable assets are protected: our people and the trust that links us with our surrounding communities. We are convinced that no single activity is so important that we don't have time to perform it safely and in compliance with all applicable laws and regulations.

In addition, steel, stainless steel and alloys are materials of choice for environmental protection: not only are they environmentally friendly, but their lifecycle outperforms other materials as it is endlessly recyclable and can help our customers reach their own sustainability objectives. The same goes for our Recycling and Renewables segment, which are delivering sustainable input elements for the steel industry in replacement of extractive materials.

So, as part of our roadmap to sustainable excellence, we aim to rank Aperam among the best players of its industry in terms of environmental protection and to exceed environmental regulations. The respect of the environment is also part of our civic responsibility, in particular towards our neighbouring communities and future generations. We are inspired by frameworks such as the United Nations Sustainable Development Goals (SDGs), the OECD Guidelines for Multinational Enterprises (MNEs) and the Convention on Biological Diversity (CBD) and its Kunming-Montreal Global Biodiversity Framework as well as by the best practices.

Everyone working for Aperam has an important role to play in implementing the guidelines issued by the company and is responsible and held accountable for the environmental compliance and performance. To reach our highest standards, we must always take into account pollution prevention and resource-efficiency in all our actions and decisions.

2. Principles

We, as Aperam employees from any Aperam entity, are committed to always strive to:

1. **Operate in compliance** with all relevant environmental laws and regulations, and other company commitments such as internal objectives and procedures with the aim to exceed the compliance level;
2. **Implement environmental management systems** e.g. ISO 14001, to ensure a continuous improvement in the environmental performance, taking advantage of systematic/continuous monitoring and aiming at pollution prevention, reduction and mitigation to ensure no pollution to the environment ;
3. **Develop an efficient management and prevention** of operational and natural risks, incidents and emergency situations in our operations and, to the possible extent, in the value chain. If and when they occur, control, limit and if necessary promptly remedy their impact on people, the environment and our operations ;
4. **Use efficiently our natural and renewable resources** (soil, energy, land, water), with the aim **to protect and manage adverse impact on biodiversity and natural ecosystems** - and commit to never participate in deforestation ;



For more, see
Aperam policies

► [Aperam Climate & Energy Corporate Policy](#)

► [Responsible Procurement Policy](#)

► [Aperam Freight Transport Charter](#)

5. **Organize the development, improvement and application of low-impact, environmentally-friendly production methods**, leveraging locally available raw materials and minimizing primary raw materials, transitioning away from the use of virgin resources and increase the use of secondary (recycled) resources by sustainable sourcing ;

6. **Monitor and reduce** (whenever technically and economically feasible) :

- i. greenhouse gas emissions, to mitigate climate change impacts ;
- ii. energy consumption & intensity, via technical improvements and the use of renewable energy ;
- iii. ducted dust, limiting diffuse dust and other air emissions ;
- iv. fresh water intakes, and ensure the careful treatment and monitoring of water discharges ;
- v. noise around our plants, taking into account our stakeholders' feedback ; and prevent vibrations when applicable ;
- vi. waste, by the management (identification and preparation for proper treatment) of all residues, prior to internal/external reuse or recycling, with the aim to reduce the landfilled waste down to zero ;
- vii. transportation impact on environment ;
- viii. if applicable, the use of substances of concern, and phasing out substances of very high concern ;
- ix. the non-circular material use.

7. **Communicate and engage** on Environmental matters with :

- i. employees, for a company-wide commitment and accountability in environmental performance ;
- ii. suppliers and contractors, for awareness and respect of Aperam's environmental policy;
- iii. Neighboring companies and public authorities for the consideration of climate-related impacts and the planning of climate change adaptation measures;
- iv. policy-makers through our professional associations for the implementation of relevant Environmental standards and policies.
- v. all other stakeholders affected by Aperam's operations ;

For more guidelines on these topics ➤

For more, see
Aperam policies

► [Communication policy](#)
(internal)

► [Communication &
Confidentiality guidelines](#)
(internal)