

ArcelorMittal USA

California Transparency in Supply Chains Act Disclosure

The ArcelorMittal group of companies in the USA ("AMUSA") commits to respect all human rights, of employees and local communities, and is committed to promoting these principles to its suppliers as set out in the ArcelorMittal human rights policy (the "Policy"). Our human rights policy affirms that we are opposed to the use of forced labor, child labor, and by implication, human trafficking, and will work with our subcontractors and suppliers to avoid benefitting from or promoting such illegal activities. We are also opposed to the use of child labor and will work with our subcontractors and suppliers to prevent and remove any instances of child labor in a manner that is consistent with local law while seeking to respect human rights and the interests of the child. AMUSA's salaried employees, including its purchasing management personnel, have received training regarding the Policy.

Our [Code of Responsible Sourcing](#) (the "Code") and our [Responsible Sourcing at ArcelorMittal, A Guidance Document for ArcelorMittal's Buyers and Suppliers](#) (the "Guidance Document"), incorporates the Policy and has been communicated to our employees responsible for purchasing. The Code and Guidance Document explain how we will work with our suppliers to comply with our Policy and other policies. Training of AMUSA purchasing management employees regarding the code and guidance document was completed in May, 2013. The training addressed the identification and mitigation of risks related to forced or compulsory labor and child labor. Trained employees are made aware that any violation of the Code or Policy could result in disciplinary action taken against the employee, including termination of employment.

ArcelorMittal intends to begin performing risk assessments of the suppliers in our supply chains for compliance with our Policy. These assessments will be based on factors such as potential spend, nature of product or service and country of origin. The assessments will be conducted internally but may utilize third party information sources including the U.S. Department of Labor's *List of Goods Produced by Child Labor or Forced Labor*, the U.S. Department of State's *Trafficking in Persons Report*, *Tier Placements* and the International Labour Organization's *Combating Forced Labour, A Handbook for Employers and Employees*. We intend to prioritize our approach to selectively engage with our suppliers, and focus attention on those parts of the supply chain where risk of violation of our Policy is the highest. For suppliers identified as high risk, supplier's performance would be assessed against the responsible sourcing criteria established in the Code and Guidance Document.

After the institution of risk assessments, ArcelorMittal intends to monitor compliance. This activity may take the form of self assessments, site visits and follow up on remediation plans. Based on our assessment of the level of risk, we may conduct audits of suppliers. Currently, we intend to conduct any such audits utilizing our own employees, but, if appropriate, we may use third parties to conduct audits in the future. At this time, ArcelorMittal does not intend to conduct unannounced audits.

The Policy applies to all our suppliers and contractors we expect them to meet the requirements in the Policy. In 2011 and 2012, we incorporated into our general contract forms a representation from the supplier that it has read, understands and will comply with our Policy. A weblink to the Policy makes it easy for the supplier to review the Policy. This requirement subjects the vendor to the potential for termination and damages if it is violated. We consider the representation to be a certification from the vendor that it will not engage in utilizing forced labor or human trafficking. We do not currently require suppliers to certify that all materials incorporated in the products they supply comply with laws regarding slavery and human trafficking in the country or countries in which they are doing business.

Our contracts also contain a right to audit supplier's compliance with the Policy. Where appropriate, AMUSA may require suppliers to complete a self-assessment questionnaire, provide us with copies of relevant information, and demonstrate what efforts they are making to meet the requirements of the Policy. Suppliers that do not meet the requirements of the Policy or who cannot provide or commit to an improvement plan are subject to termination.