

ArcelorMittal

Detailed assessment of ArcelorMittal’s corporate climate policy engagement review

This document outlines a detailed breakdown of InfluenceMap's assessment of the company's disclosure on climate policy engagement. Further detail on the assessment methodology is available in the Appendix, and on InfluenceMap’s CA100+ Investor Hub [here](#).

A summary of ArcelorMittal's disclosures on climate policy engagement is shown below. ArcelorMittal has undertaken three reviews of its climate policy engagement to date. The Review Score represents InfluenceMap’s overall assessment of the quality of the company’s review process, where 100 would indicate that a company has met investor expectations for all criteria related to the review process.

Date of Review	Review Score
May 2020	29 / 100
March 2022	50 / 100
May 2023 (Update)	57 / 100

This assessment focuses solely on ArcelorMittal's disclosure on climate policy engagement, which can be found [here](#). This assessment does not include an analysis of the company's actual climate policy engagement, which can be found on InfluenceMap's online profile of ArcelorMittal [here](#). The table below provides a breakdown of ArcelorMittal's performance, using the traffic-light assessment framework summarized below.

Key	Explanation
■	Has broadly met investor expectations in this area.
■	Has made some progress on investor expectations in this area, but with significant deficiencies.
■	Has fallen short of investor expectations in this area.

Disclosure & Transparency	Policy Alignment Process
Corporate climate positions	Identify & Assess
Industry group climate positions	Monitor & Review
Alignment assessment method	Act
Framework for misalignment	

ArcelorMittal's Company Scorecard

The tables below highlight, for each indicator, the criteria for companies to meet investor expectations, ArcelorMittal's assessment, and examples of better practice by companies to date.

While InfluenceMap did not find an example of best practice across the entire industry association review process, some companies have demonstrated better practice under specific metrics under the 'Disclosure & Transparency' and 'Policy Alignment Process' assessments.

Disclosure & Transparency

Corporate climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond 'top-line' climate statements. This includes descriptions of the company's positions and policy engagement activities on specific items of regulation and legislation which are material to the company's operations, business sector, and/or the region(s) in which it operates.

<p>ArcelorMittal</p>	<p>ArcelorMittal's 2022 review and 2023 update outlined some of ArcelorMittal's climate policy positions, but this was limited to broad top-line statements such as support for the Paris Agreement and the need to decarbonize steel. The review does not disclose a breakdown of ArcelorMittal's positions on, or engagement with, specific items of regulation and legislation.</p> <p>ArcelorMittal's 2022 review did however include a reference to ArcelorMittal's Climate Action Report 2 (July 2021) for further details. This report provides some information on the company's positions on specific policies such as the EU Emissions Trading System (EU ETS) and EU Carbon Border Adjustment Mechanism (CBAM).</p> <p>Despite this, ArcelorMittal has not provided any updates on its positions on, or engagement with, specific climate-related policies in 2022-23. As such, the company has omitted evidence of detailed and negative advocacy. For example <i>in June 2022 feedback to EU policymakers</i>, ArcelorMittal did not support the EU Commission's proposed Delegated Act on Renewable Fuels of Non-Biological Origin and Recycled Carbon Fuels. The company advocated in a March 2023 <i>open letter</i> for policymakers to allow low-carbon hydrogen to contribute towards renewable hydrogen targets in the Renewable Energy Directive reform, a position which is misaligned with the EU Commission.</p>
<p>Best Practice</p>	<p>In its review, <i>BP</i> provides a link to a dedicated webpage titled 'Advocacy activities' which includes clear and detailed advocacy updates on specific government policy consultations in Europe, Australia and the US. These include specific consultations with climate-related policies under 6 topics, and a link to <i>another webpage</i> which discloses further details on the company's advocacy activities in the US. BP also includes links to public submissions via the EU Transparency Register, the Scottish Lobbying Register, and the US Lobbying Disclosure Act.</p>

Industry association climate policy positions and influencing activities

To meet investor expectations under this indicator: The company has to disclose a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond 'top-line' statements.

<p>ArcelorMittal</p>	<p>In its 2022 review, ArcelorMittal disclosed a summary of each industry association's climate policy positions, but the level of disclosure is varied.</p> <p>For some industry associations, the company disclosed positions on, and engagement with, specific items of regulation and legislation. For example, Eurofer's engagement on the EU ETS and MEDEF's support for a Carbon Border Adjustment Mechanism. In its 2023 update, ArcelorMittal disclosed further examples of advocacy by five industry associations.</p> <p>For some industry associations, the disclosure is limited to broad top-line policy positions, without reference to specific climate-related policies (e.g. National Association of Manufacturers).</p> <p>In both cases, the disclosure appears to overlook evidence of detailed negative lobbying by these industry associations, identified by InfluenceMap's database, which suggests their climate policy engagement is misaligned with the Paris Agreement. For example:</p> <p><i>National Association of Manufacturers:</i> In 2022, NAM supported adopting a Five-Year program for offshore oil and gas production and advocated to expedite the permitting process for onshore and offshore oil and gas production.</p> <p><i>BDI:</i> In 2022, the BDI advocated that the EU Carbon Border Adjustment Mechanism should only be applied to sectors which support it and emphasized the risk of carbon leakage from reducing the number of free emissions allowances in the EU ETS.</p> <p><i>Eurofer:</i> In 2022, opposed the inclusion of GHG emissions in the Industrial Emissions Directive reform.</p> <p><i>Canadian Chamber of Commerce:</i> In 2022, consistently supported the Line 5 pipeline in Michigan, taking legal action to ensure its continuation.</p>
<p>Best Practice</p>	<p>No companies have met investor expectations in this area, although <i>Shell</i> exhibits current leading practice. Shell has disclosed a detailed account of all key industry associations' climate policy positions, and a summary of their influencing activities. However, it still appears to overlook detailed negative lobbying by a number of industry associations identified by InfluenceMap's database.</p>

Alignment assessment method

To meet investor expectations under this indicator: The company has to: (1) disclose a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently apply this framework across *all* industry associations; and (3) provide a clear and detailed explanation behind each evaluation.

<p>ArcelorMittal</p>	<p>In its 2022 review, ArcelorMittal disclosed a clear and detailed explanation of its alignment assessment method, based on the six high-level policy priorities, including what constitutes a finding of alignment, partial alignment, and misalignment. The company also disclosed how this methodology has been applied to each industry association, describing the level of alignment with each policy priority. In its 2023 update, ArcelorMittal provided an update of its assessment of five industry associations, including the level of alignment with each policy priority.</p>
<p>Best Practice</p>	<p><i>Shell</i> has disclosed a clear explanation of its alignment assessment method along with a clear and detailed explanation of how it has been applied to each industry association. The company also provided clear criteria which were used to categorize the degree of alignment of Shell's climate policy positions with the positions of its industry associations.</p>

Framework for addressing misalignment

To meet investor expectations under this indicator: The company must disclose a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.

ArcelorMittal	In its 2022 review, ArcelorMittal disclosed a clear and detailed framework for addressing potential cases of misalignment, including escalation steps. The company states that it will communicate directly with the association to request further alignment, ensuring its financial contribution is ring-fenced for non-lobbying activities, and/or cease membership. However, the framework does not include clear deadlines for industry associations which do not amend misaligned practices.
Best Practice	<i>Rio Tinto</i> has disclosed clear and detailed steps for addressing potential misalignment, including an escalation strategy and clear timelines attached. The company states that it will clarify its own positions with misaligned industry associations, seek common ground, seek leadership positions to influence associations, and consider suspending membership if differences are not resolved after 12 months.

Policy Alignment Process

Identify & Assess

To meet investor expectations under this indicator: The company has to identify all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's *database* on corporate lobbying.

ArcelorMittal	<p>In its 2022 review, ArcelorMittal disclosed two cases of misalignment with the American Petroleum Institute and UkrMetallurgProm. The company also disclosed 11 cases of partial misalignment, three of which are currently covered by InfluenceMap's database: National Association of Manufacturers, the American Iron and Steel Institute (AISI), and the Indian Steel Association. ArcelorMittal has since left the American Petroleum Institute.</p> <p>In its 2023 review, ArcelorMittal provides an update on five industry associations and finds two to be partially misaligned – AISI and International Federation of Industrial Energy Consumers (IFIEC).</p> <p>InfluenceMap analysis indicates that the company likely has memberships to seven industry associations with climate policy engagement misaligned with the Paris Agreement (<i>Eurofer, National Association of Manufacturers, BusinessEurope, International Federation of Industrial Energy Consumers, Federation of German Industries (BDI), Mouvement des Entreprises de France (MEDEF), Canadian Chamber of Commerce</i>) and six memberships to industry associations with climate policy engagement potentially misaligned with the Paris Agreement (<i>South African Iron and Steel Institute, Mining Association of Canada, World Steel Association, European Roundtable for Industry, American Iron and Steel Institute, Indian Steel Association</i>).</p>
Best Practice	<i>Enel</i> is the only company to meet investor expectations in this area, identifying all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's database, although the company does not disclose additional details of why they are not fully aligned. InfluenceMap analysis indicates that most companies have missed key cases of misalignment with industry associations lobbying counter to the goals of the Paris Agreement.

Monitor & Review

To meet investor expectations under this indicator: The company has to publish a review of industry associations on an annual basis, commit to do so at least once a year, or commit to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company’s alignment and engagement with the industry association concerning these activities.

ArcelorMittal	ArcelorMittal has published two full reviews in 2020 and 2022. The company also provided an update to its review in 2023, focusing on five industry associations that have displayed changes in their positions since the last report. In its 2023 update, ArcelorMittal stated that it will likely publish its next full report in Q4 2023.
Best Practice	<i>Rio Tinto</i> has published detailed assessments of its industry association memberships every year, with detailed updates on misaligned industry associations each year. Rio Tinto has published six full reviews of its industry associations, annually from 2018 to 2023. The company has committed to continue reviewing its memberships on an annual basis.

Act




To meet investor expectations under this indicator: The company has to show evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap’s *database* on corporate lobbying. The investor expectations outlined by *PRI*, *IIGCC* and *Ceres* include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.

ArcelorMittal	<p>ArcelorMittal has shown some evidence of action to address misalignments. In its 2022 review, the company terminated its membership with the American Petroleum Institute, and outlined specific engagement undertaken with UkrMetallurgProm.</p> <p>In its 2023 review, ArcelorMittal outlined next steps at five industry associations, although these lacked detail on the specific actions taken to reform the climate policy engagement of the associations. The company also stated that it continues to engage with other industry associations that are misaligned, and will review its action plan with those associations in its next report (likely in Q4 2023) – but did not name any specific industry associations.</p> <p>However, the company does not appear to have addressed key cases of material and potential misalignment with the Paris Agreement identified by InfluenceMap’s database (see Identify & Assess).</p>
Best Practice	No companies have met investor expectations in this area by showing evidence of action to address all cases of misalignment identified by InfluenceMap’s database, although some companies have made more progress. <i>Rio Tinto</i> terminated its membership to Queensland Resources Council in 2022 following findings of misalignment in past reviews, and also outlined detailed actions to be taken at two "partially aligned" industry associations. <i>Total</i> announced in January 2021 that it had decided not to renew its membership to the American Petroleum Institute due to divergences on climate positions. <i>Fortum</i> has not left any industry associations but has disclosed its engagement on specific climate change policy issues with four industry associations, including details of the results of this engagement in 2022. Similarly, <i>General Motors</i> has disclosed that it has not financially contributed to advocacy campaigns against the Build Back Better Act by the Business Roundtable and US Chamber, and has publicly advocated a supportive position to ensure its stance is differentiated from them.

Appendix: InfluenceMap’s Methodology for Assessing Corporate Climate Policy Engagement Disclosures

Scoring Disclosures and Policy Alignment Process



InfluenceMap assesses corporate performance against seven assessment criteria, using the traffic-light framework summarized below. A ‘Green’ scores 2 points, a ‘Yellow’ scores 1 point, and a ‘Red’ scores 0 points. This total is converted into a percentage from 0 to 100, calculated using the total number of points available (14). As such, only certain scores within the 0 to 100 range are possible under this methodology.

Key	Score Explanation
	Has broadly met investor expectations in this area.
	Has made some progress on investor expectations in this area, but with significant deficiencies.
	Has fallen short of investor expectations in this area.

Assessing Disclosures

Since BHP’s 2017 industry association review, around 60 major global corporates have delivered similar, specific disclosures on their industry association links in response to investor pressure. This positive momentum is undermined, however, if the resulting disclosures are of poor quality.

In its *‘Investor Expectations on Corporate Climate Lobbying’* report, the PRI highlights the need for disclosure on the company’s positions and activities on climate change policy engagement, as well as the positions and activities of the industry groups it supports. The PRI further requests information on the governance processes and actions taken to ensure alignment between these activities and the company’s stated climate goals. *IIGCC* and *Ceres* articulate similar expectations, also requiring companies to disclose a material impact assessment of lobbying by an organization that opposes their public position. InfluenceMap uses the following assessment criteria to test the clarity, accuracy and scope of information provided by companies against four key issues.

Disclosure Item	Score	InfluenceMap’s Assessment Criteria
Corporate climate policy positions and influencing activities		The company has disclosed a detailed and clearly referenced breakdown of its own climate policy positions and influencing activities beyond ‘top-line’ climate statements. This includes descriptions of the company’s positions and policy engagement activities on specific items of regulation and legislation which are material to the company’s operations, business sector, and/or the region(s) in which it operates.
		The company has disclosed a breakdown of its own climate policy positions and influencing activities. However, the company’s description of its positions and policy engagement activities on specific items of regulation and legislation lacks detail, and/or the company has not disclosed its position and engagement activities on key items of

		regulation and legislation which are material to its operations, business sector, and/or the region(s) in which it operates.
		The company has made no attempt to disclose its climate policy positions and influencing activities, or the company's disclosure is limited to a brief overview of its 'top-line' climate statements and operational commitments without reference to specific items of regulation and legislation.
Industry association climate policy positions and influencing activities		The company has disclosed a detailed and accurate account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, including descriptions of positions and policy engagement activities on specific items of regulation and legislation beyond 'top-line' statements.
		The company has disclosed an account of the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, beyond 'top-line' statements. However, the disclosure lacks detail on positions and policy engagement activities on specific items of regulation and legislation, and/or does not disclose evidence of negative climate lobbying by one or more of its industry associations.
		The company has not disclosed the climate policy positions and influencing activities of each industry association actively engaged on climate change policy, and/or the company's disclosure is limited to a brief overview of 'top-line' climate statements without reference to specific items of regulation and legislation.
Alignment assessment method		The company has: (1) disclosed a clear and detailed framework for assessing alignment with its industry associations across all relevant areas of policy engagement; (2) consistently applied this framework across <i>all</i> industry associations; and (3) provided a clear and detailed explanation behind each evaluation.
		The company has disclosed a framework for assessing alignment with its industry associations but the disclosure lacks detail regarding <i>one</i> of the above steps (1-3).
		The company has not disclosed a framework for assessing alignment with industry associations, or it has disclosed a framework but the disclosure lacks detail regarding <i>more than one</i> of the above steps (1-3).
Framework for addressing misalignment		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps and clear deadlines for industry associations which do not amend misaligned practices.
		The company has disclosed a clear and detailed framework for addressing misalignments with its industry associations including escalation steps, but there is no clear deadlines for industry associations which do not amend misaligned practices
		The company has not disclosed a framework for addressing misalignments with its industry associations, or the company has disclosed a framework but the steps are ambiguous and lack sufficient detail.

Assessing Policy Alignment Process

As well as transparent disclosures on industry group links and lobbying activities, the investor expectations communicated by IIGCC, CERES and the UN PRI also set out the need for robust processes to ensure alignment between the company's stated policy positions and the positions and lobbying activities of their industry groups. These processes consist of the following three elements:

Alignment Process	Score	InfluenceMap's Assessment Criteria
Identify & Assess	Green	The company has identified all cases of misalignment with its industry associations and the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying.
	Yellow	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss up to three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
	Red	The company has not identified key cases of misalignment with the Paris Agreement in line with InfluenceMap's <i>database</i> on corporate lobbying. Companies are scored in this category if they miss one case of misalignment (industry associations with Organization Scores 0-50) or more than three cases of "potential" misalignment (industry associations with Organization Scores 51-75 in InfluenceMap's database).
Monitor & Review	Green	The company has published a review of industry associations on an annual basis, has committed to do so at least once a year, or is/has committed to disclose regular updates on its review and alignment process. Updates should accurately report on relevant material and on-going lobbying activities of potentially misaligned industry associations, as well as the company's alignment and engagement with the industry association concerning these activities.
	Yellow	The company has committed to publish an update to its review of industry associations but not an annual basis or not specified a timeframe.
	Red	The company has not committed to any follow-up processes as part of its review of industry associations.
Act	Green	The company has shown evidence of action to address all cases of misalignment with its industry associations and the Paris Agreement, in line with InfluenceMap's <i>database</i> on corporate lobbying. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Yellow	The company has shown some evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, but has not addressed key cases of misalignment or "potential" misalignment identified by InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75 in InfluenceMap's database. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Steps should include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.
	Red	The company has shown no or limited evidence of action to address cases of misalignment with its industry associations and the Paris Agreement, missing key cases of misalignment or potential misalignment identified in InfluenceMap's <i>database</i> on corporate lobbying, i.e. industry associations with Organization Scores 0-75. The investor expectations outlined by <i>PRI</i> , <i>IIGCC</i> and <i>Ceres</i> include several steps companies can take to address misalignment. Action will be scored under this category if it does not include terminating memberships or taking specific action to reform the detailed and material lobbying activities undertaken by misaligned organizations.

To assist this assessment, InfluenceMap will be applying its database on corporate and industry group climate change lobbying. This tracks in real-time the detailed climate policy lobbying of around 500 companies and 250 industry associations globally, allowing like-for-like comparisons of organizations' positions on climate policy that are compared to a benchmark of Paris-aligned climate policy. This system can track the evolution of corporate and industry group climate lobbying positions over time.