C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?
- Direct engagement with policy makers
- Trade associations
- Funding research organizations

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

<table>
<thead>
<tr>
<th>Focus of legislation</th>
<th>Corporate position</th>
<th>Details of engagement</th>
<th>Proposed legislative solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cap and trade</td>
<td>Support with minor exceptions</td>
<td>SSAB participated directly in EU decision making process both at member state and EU level by discussing mostly with Swedish and Finnish government members and parliamentarians</td>
<td>As part of the steel industry SSAB realizes that climate change is a critical issue that urgently needs to be addressed, and fully supports the efforts to reduce the European CO2 emissions through the ETS system. To make this as efficient as possible, the current EU ETS should not have a cross-sectional correction factor for manufacturers and the benchmarks should be achievable by 10% of the best performers. Full off-setting of the indirect costs (CO2 cost pass-through in electricity prices) at the level of the most efficient installations should be applied consistently in all member states. Comprehensive international agreement on emission reductions is vital for a level playing field in the industry. While the steel industry supports the EU's measures to effectively combat climate change, the Commission proposal in 2015 to review the EU ETS may not deliver the needed level of protection for our sector against carbon and investment leakage.</td>
</tr>
<tr>
<td>Climate finance</td>
<td>Support</td>
<td>SSAB participates directly and through trade associations in EU decision making process both at member state and EU level</td>
<td>New financial instruments should be introduced to enable high-risk breakthrough climate innovations.</td>
</tr>
<tr>
<td>please specify (US greenhouse gas emissions standards)</td>
<td>proposed actions that may have an adverse impact on US energy-intensive operations and provide recommendations for legislative amendments or regulatory changes for corrective and preventative action.</td>
<td>technologically feasible in order to ensure reliability and affordability of electricity. New regulations should be supported by quality data, sound science and be subject to an open and transparent public review process</td>
<td></td>
</tr>
</tbody>
</table>

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**C12.3b**

*(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?*

Yes

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**C12.3c**

*(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.*

**Trade association**

Eurofer

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**Is your position on climate change consistent with theirs?**

Consistent

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**Please explain the trade association’s position**

Current EU ETS should not have cross-sectional correction factor for manufacturers and the benchmarks should be achievable by 10% of the best performers. Comprehensive international agreement on emission reductions is vital for industrial level-playing-field. While steel industry supports the EU’s measures to effectively combat climate change, the upcoming EU ETS period may not deliver the needed level of protection for our sector against carbon and investment leakage

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**How have you influenced, or are you attempting to influence their position?**
Trade association
Jernkontoret

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
Current EU ETS should not have cross-sectional correction factor for manufacturers and the benchmarks should be achievable by 10% of the best performers. Comprehensive international agreement on emission reductions is vital for industrial level-playing-field. While steel industry supports the EU’s measures to effectively combat climate change, the upcoming EU ETS period may not deliver the needed level of protection for our sector against carbon and investment leakage.

How have you influenced, or are you attempting to influence their position?
SSAB is represented in various Committees and Working Groups of Jernkontoret. SSAB an active role in the decision making bodies of the federation.

Trade association
Association of Finnish Metal Producers

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
Current EU ETS should not have cross-sectional correction factor for manufacturers and the benchmarks should be achievable by 10% of the best performers. Comprehensive international agreement on emission reductions is vital for industrial level-playing-field. While steel industry supports the EU’s measures to effectively combat climate change, the upcoming EU ETS period may not deliver the needed level of protection for our sector against carbon and investment leakage.

How have you influenced, or are you attempting to influence their position?
SSAB is represented in Committees and Working Groups of the association of Finnish Metal Producers. SSAB an active role in the decision making bodies of the association. EVP, Head of SSAB Europe division is the chairman of the board of the Finnish Metals Producers.

Trade association
worldsteel

Is your position on climate change consistent with theirs?
Climate change is the biggest issue for the steel industry in the 21st century. The worldsteel Climate Action Recognition Programme recognizes steel producers that have fulfilled their commitment to participate in the worldsteel CO2 emissions data collection programme

**How have you influenced, or are you attempting to influence their position?**

SSAB is represented in the decision making bodies of the association

**Trade association**

National Association of Manufacturers

**Is your position on climate change consistent with theirs?**

Consistent

**Please explain the trade association’s position**

NAM opposes any federal or state government actions regarding climate change that could adversely affect the international competitiveness of the U.S. marketplace economy. Any climate change policies should focus on cost-effective reductions, be implemented in concert with all major emitting nations, and take into account all greenhouse sources and sinks

**How have you influenced, or are you attempting to influence their position?**

SSAB Americas is represented in Committees and Working Groups of the Association. SSAB Americas Director of Government Relations serves on the National Public Affairs Steering Committee for the NAM

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C12.3d

**C12.3d Do you publicly disclose a list of all research organizations that you fund?**

No

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C12.3f

**C12.3f What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?**

In line with the SSAB sustainability strategy that was launched in 2015, SSAB places an even stronger focus on managing and coordinating sustainability and corporate responsibility-related issues on Group level. EVP Sustainability reports directly to the CEO. To ensure group-wide collaboration, a Sustainability Management Team has been formed. The team is chaired by EVP Sustainability. The members of the team create a network of expertise having the responsibility of coordinating SSAB’s sustainability initiatives on