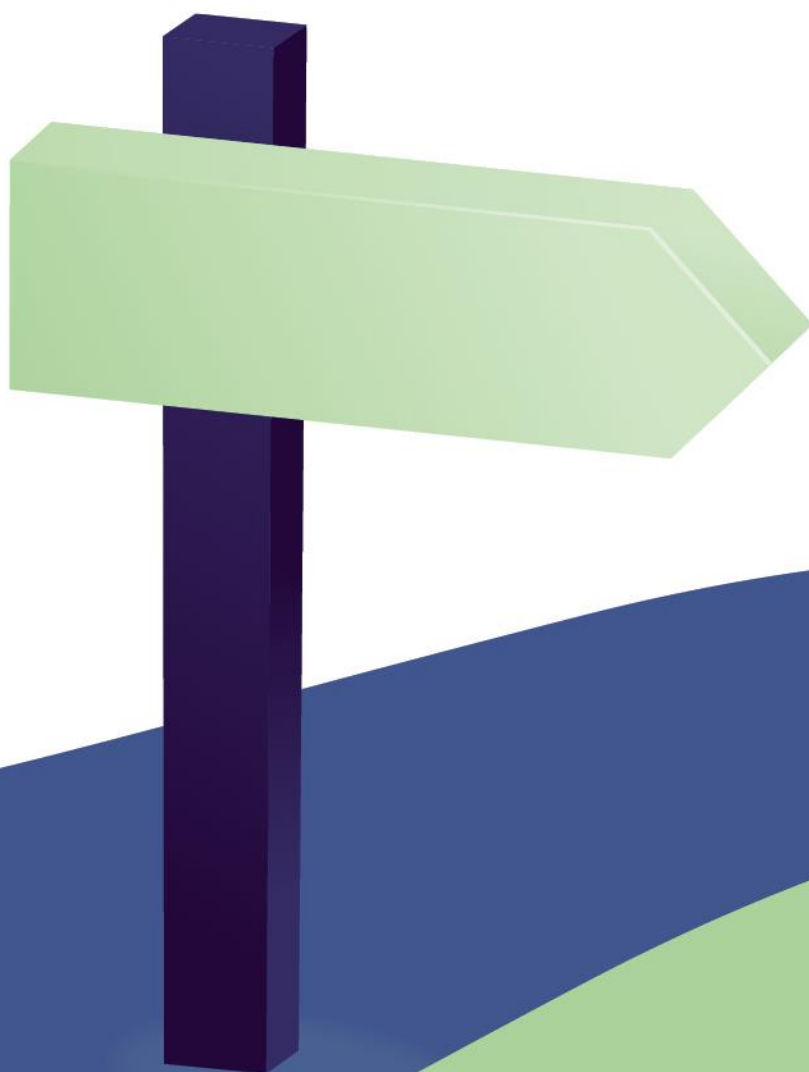


September 2023

# POLICY

## Human Rights





## OUR LONG-TERM OBJECTIVES

The Eramet group believes that businesses should be a vehicle for respect and promotion when it comes to protecting Human Rights.

The Group is committed to promoting and upholding the fundamental principles of internationally recognized Human Rights, as defined in the International Bill of Human Rights, the International Labour Organization's Fundamental Conventions, following the recommendations and of the Guiding Principles on Businesses and Human Rights.

The Human Rights policy herein formalises this commitment and reaffirms its fundamental role, both in terms of the Group's managerial and operational processes, as well as its relations with stakeholders.

It is in line with the guidelines set out in the Group's Ethics Charter.

It complements the Group's other policies and applies to all employees, business partners and local communities.

This commitment is fully in line with the Group's strategic vision and its vigilance approach.

C. BORIES

A. Le MAIGNAN

N. CARRE

C. NOUEL

G. VERCAEMER

V. De CHASSEY

G. STREETON

# 1. ERAMET GROUP COMMITMENTS

As part of its Human Rights Policy, the Eramet Group commits to:

## Towards employees

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- **Implement preventive and protective** measures to create a safe and healthy work environment on all its sites. It shall strive to prevent any accidents or occupational illnesses. Eramet shall ensure the safety of its employees during their work. Where long-term accommodation is provided for employees, it must comply with international recommendations.
- **To provide working conditions that respect its employees** and comply with applicable local laws, in accordance with agreements reached with employee representatives.
- **Firmly oppose child labour, forced labour and modern slavery.** Should any such practices be discovered, the company shall act immediately to put a stop to them and to protect the best interests of the individuals concerned.
- **Not to tolerate any form of harassment or violence in the workplace** and will take the necessary measures to prevent or punish such behaviour.
- **Promote equal opportunities and comply with laws and regulations prohibiting all forms of discrimination.**
- **Guarantee the free exercise of union rights** uphold the right of employees to join unions or labour organisations, in accordance with their freedom of association and collective bargaining rights.  
**Eramet shall make every effort to maintain fair and honest labour relations.**
- **Respect employees' privacy and the confidentiality** of their data, in accordance with applicable regulations.

## Towards commercial partners

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- Eramet believes that all its business partners should share the same principles and values. **It therefore aims to be part of a value chain that respects human rights** and **communicates** the principles of this Policy to its customers, suppliers, subcontractors and partners.

## Towards local communities

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Eramet seeks to cultivate, in partnership with local and national governments, a positive footprint for its host communities in addition to its established processes for limiting and offsetting the impacts of its activities.

- **Respect the rights of indigenous populations affected by our operations**, as defined by the United Nations Declaration on the Rights of Indigenous Peoples, through free, prior, and informed consent.
- **Respect the identity, culture, heritage, traditions and customs** of indigenous communities and populations.
- **Build and maintain a relationship of trust with local communities**, including the most vulnerable among them, by establishing mechanisms to foster ongoing dialogue and process complaints.
- **Avoid involuntary resettlements**. Where this is unavoidable, Eramet will comply with applicable local legislation and refer to international standards in the field, such as the IRMA (Initiative on Responsible Mining Assurance) requirements on relocation, land acquisition and involuntary resettlement activities.
- **Take all necessary steps to reduce its footprint and environmental liabilities on its active sites**, as well as any environmental impacts related to projects under development. The measures taken are designed to limit harm to neighbouring communities, eliminate the risk of pollution, and prevent any risks related to reducing their access to natural resources, particularly access to water.
- **Prevent security risks through dialogue with local communities**. Eramet adheres to the "Voluntary Principles on Security and Human Rights". The use of force is strictly limited to cases of extreme necessity and to a degree proportional to the threat.

## 2. IMPLEMENTATION METHODS

Eramet complies with international legislation and local legal requirements. Where there is a conflict between local laws and the commitments contained in its Policy, Eramet seeks to apply the most protective Human Rights requirements.

The **Group CSR Steering Committee** is the supervisory and monitoring body for this Policy. It is responsible for revising the Policy to take account of internal and external developments. Compliance with the principles is integrated into the risk management and internal control processes. The Policy is implemented by the Group's managerial and operational functions.

To promote and ensure compliance with its commitments, Eramet communicates its policy and conducts regular training sessions and awareness-raising initiatives for its employees and interested stakeholders according to their specific issues.

Eramet reports publicly on progress in this area through its **annual non-financial reporting**.

Eramet uses the following resources to implement its Human Rights Policy:

- **Carry out due diligence on its partners and business relations to** identify, prevent, and mitigate any human rights violations that may be detected, and take appropriate measures where necessary.
- **Deployment of a whistleblowing system** enabling anyone who witnesses or is the victim of a human rights violation related to Eramet's activity to report such behaviour directly to the Ethics and Compliance Department via the [EOS Integrity Line](#).

Furthermore, Eramet does not tolerate any form of reprisal against anyone who reports a Human Rights violation in good faith and selflessly.