

# **THE ERAMET GROUP'S ETHICS CHARTER**



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## FOREWORD

The purpose of this ethics charter (the “**Charter**”) is to form a set of rules and principles for actions and conduct that apply to all employees of the Eramet Group (the “**Group**”) as well as to its representatives and agents.

Individual and collective respect of the fundamental rules set out in the Charter is an everyday duty for all employees of the Group, going beyond the diversity of their cultures and experience.

Applicable to all the entities of the Group, the Charter should also be promoted externally by employees, being brought to the attention of all stakeholders working or acting for the Group on a regular basis, as well as those impacted by Group actions.

Based on people's individual responsibility, civic duty and integrity, the Charter aims to promote exemplary conduct in line with the Group's fundamental values in all circumstances, these values being:

- ∞ customer and stakeholder orientation,
- ∞ sustainable performance,
- ∞ initiative and team spirit,
- ∞ respect and people development,
- ∞ integrity and courage.

These rules are not exhaustive but, combined with the sense of responsibility each person has, they are useful benchmarks for all members of the Group and all stakeholders.

The Group has therefore established a solid compliance program combining the rules set out in the Charter with those in other texts such as the Risk Management Charter and its associated procedure, the Confidentiality Charter, the Computer Security Charter, the Environment Charter, the Responsible Purchasing Charter and the guidelines on gifts and invitations.

In order to implement the Group's compliance program and ensure its respect, it has been decided to appoint a dedicated person to this function (hereinafter the “Ethics Officer”) whose roles and responsibilities are laid down in this Charter.

## **ERAMET'S COMMITMENTS**

### **ERAMET is Committed to DEVELOPMENT**

ERAMET is present on five continents and in more than twenty countries with very different cultures and traditions. For the thousands of Group employees around the world, and because of the international nature of its sites, customers and positions in each of its activities, ERAMET must ensure that the rights of all individuals and communities are respected.

The Group works to develop sustainable relationships with the local populations, authorities and communities in its various locations. It seeks to ensure the full respect of local traditions and cultures.

Subject to the applicable laws and regulations, the Group makes many donations to charitable organizations. All donations are subject to the prior written agreement of the Ethics Officer and must be duly registered and disclosed, where applicable.

Moreover, subject to compliance with the applicable laws and regulations, sponsorship activities form part of ERAMET's communications policy.

ERAMET maintains a policy of total political neutrality in the countries in which it conducts business. The Group may contract with public, state or territorial authorities, to contribute to the financing of development projects, but it refrains from any contribution or provision of services to holders of public offices, parties, or political organizations. The Group respects the right of its employees to become involved individually in local political and civic life. But employees must clearly separate their personal political activities from their duties within the Group.

### **ERAMET is Committed to a Relationship of Respect and Trust with All STAKEHOLDERS**

ERAMET maintains relationships with its service-providers and suppliers that are based on respect and trust and considers these relationships to be part of a long-term approach.

ERAMET's Procurement function contributes to the creation of value in the Group and to its sustainable economic performance. The Group's Procurement function establishes procedures to oversee the relations with service-providers and suppliers. Applicable by all employees, these procedures are designed to ensure the respect of the equality of treatment between suppliers and between service-providers. The Group develops the practice of calls for tender to

ensure free competition between its service-providers and suppliers. It takes into account the particular characteristics and constraints imposed by the local environment, to ensure the respect of fair competition. Procurement decisions are based on an objective assessment of the integrity and reliability of the service-providers and suppliers. All its procurement decisions are based on the criteria of price, quality, performance, lead times and the suitability of the proposed services for the Group's needs in those specific circumstances. The Group's employees exercise strict impartiality and objectivity in their relations with all stakeholders.

The Group has established a Responsible Procurement Charter that lays down its commitment to increased consideration of sustainable development issues connected with procurement (working conditions and standards, environment, best business practice).

ERAMET respects the image of its suppliers, service-providers and partners and refrains from any disparaging comments about them. Moreover, its employees ensure they protect the confidential nature of all data provided by third parties in the course of business relationships.

### **ERAMET is Committed to Respecting and Protecting the ENVIRONMENT**

With a view to ensuring continuous improvement, ERAMET has established an Environment Charter and a Sustainable Development Policy. By giving priority to the protection and development of its employees and to the control of risks and impacts, the Group strictly adheres to the applicable regulations and develops performance standards in accordance with the best practices of the industry. It pays particular attention to the characteristics of its products as well as to the risks and impacts associated with their use.

ERAMET's goal is to meet the highest world standards in terms of sustainable development. The environmental, health and social aspects and impacts are taken into account from the design stage to the conclusion of all activities and projects. Precise knowledge of the real impact of its operations is a necessity. Being able to anticipate and assess both progress and problems is essential for managing the Group's industrial projects. Communicating the results achieved is becoming a regulatory obligation. By establishing the EraGreen information system for the environment, the Group has thus given itself the means required to meet its ambition.

## **ERAMET is Committed to Acting in the Interests of Its CUSTOMERS**

ERAMET forges relationships with its customers that are long-term and are marked by loyalty and a constantly renewed requirement for quality. In this respect, the Group's employees ensure that they inform and raise awareness among the Group's customers of the principles and values promoted by the Charter.

ERAMET undertakes to treat all its customers fairly and honestly, regardless of the scale of their operations. The availability and ability to adapt of Group employees shall enable the Group to provide its customers with the best possible level of services. Thus, ERAMET's employees constantly seek to offer their customers the products and services that are most appropriate for their needs and continuously act to satisfy them.

The Group undertakes to ensure that all information communicated to customers, in presentations, statements or any other forms of communication, is honest and accurate.

Moreover, ERAMET is careful not to market products that, fully or in part, consist of or are derived from ores from areas of conflict or countries subject to an international embargo.

## **ERAMET is Committed to Acting in the Interests of Its EMPLOYEES**

ERAMET's production and activities can only exist through the engagement of its employees and the quality of their work. A company cannot achieve any success without ensuring that its employees prosper and receive training or being concerned about their working conditions.

To guarantee constant progress in practices, the Group promotes teamwork, decompartmentalization and exchange in all its companies.

Discrimination, inequalities of treatment between men and women, racism, violence, exploitation of children, forced labor and dangerous or inhumane living or working conditions shall not be tolerated in any for whatsoever or in any location. Accordingly, ERAMET's employees everywhere shall take care not to associate themselves with third parties that could be guilty of such practices.

## **ERAMET is Committed to Sincere COLLECTIVE BARGAINING**

ERAMET takes all measures to ensure sincere and good faith collective bargaining, the guarantee of the trustful relationship that exists between the Group's employees. It guarantees the exercising of trade union rights worldwide and respects the right of employees to join trade unions or workers' organizations of their choice. The Group's divisions and subsidiaries everywhere shall communicate and negotiate openly with the workforce on issues of collective interest and shall encourage all forms of individual or collective bargaining.

To facilitate these negotiations, ERAMET has set up dedicated and regular consultation bodies, based on a climate of trust and in a spirit of loyalty. The Group Works Committee and the European Works Council, in particular, bring together personnel representatives not only in France, but also internationally.

Locally, where required by the laws of the countries in which ERAMET is established, there is employee representation. Thus, virtually all the Group's employees are represented through dialog and consultation structures equivalent to works councils, health & safety committees or through trade union organizations.

## **ERAMET is Committed to Combating any Form of COERCION and HARASSMENT**

ERAMET fights against any form of coercion or persecution in the workplace and endeavors to ensure that no-one may suffer actions resulting in infringement of their rights or loss of dignity. The Group will take all necessary measures to prevent or punish all forms of psychological or sexual harassment, including, where appropriate, termination of employment.

If an employee is a victim of or a witness to this kind of behavior, they may refer the incident immediately to their supervisor, the Human Resources Department, or the Ethics Officer. No action may be taken against an employee who has reported an incident in good faith.

## **ERAMET is Committed to Promoting DIVERSITY and Professional Mobility**

Due to its history, ERAMET is a diverse and global group. Indeed, it believes that the diversity of the origins of its employees constitutes one of its major strengths. Consequently, the Group promotes equality of opportunity and respect of laws and regulations prohibiting any discrimination related to age, sex, ethnic origin, disability or political or philosophical opinions.

Only skills, experience and personal aptitudes are taken into account in the selection of employees and the development of their careers. Recruitments will be supported by objective criteria that will exclude any suspicion of favoritism.

To ensure the development and progress of its employees, ERAMET develops many internal training courses accessible to a large number of people as well as methods of collaborative work favoring the transfer of skills.

The Group seeks to develop a common culture that is respectful of each person's specific characteristics. Motivation, managerial practices, trust and the feeling of belonging to the Group are essential to ERAMET's overall performance and that of its employees.

### **ERAMET is Committed to Creating a Safe and Healthy WORKING ENVIRONMENT**

ERAMET undertakes to implement measures to create a safe and healthy working environment on all its sites. The health of employees, suppliers' and partners' personnel and visitors, as well as of people living around industrial sites, is a Group priority. Health and working conditions are criteria for all day-to-day decision-making, regardless of the level of management concerned.

In order to protect the health of its employees and prevent the health risks related to activity, the Group has implemented prevention programs and makes its employees aware of the various occupational diseases they may face. In this respect, it applies an information policy concerning the risks and the precautions to take. The Group is also engaged in action for preventing addictions (alcohol, tobacco, drugs), organizing awareness campaigns as well as support for treatment activities. Moreover, the Group supports research activities carried out by scientists and independent experts in order to improve control over all health and environmental impacts that could be linked to certain of its products.

The implementation of ERAMET's health policy is led by the group's Occupational Medical Officer and is presented in the form of activities whose implementation relies on the network of doctors and officers in charge of the group's health services as well as the sites' safety and environment correspondents in respect of the technical aspects associated with it. The content and frequency of monitoring are adapted to the type of job, the associated risks and potential exposure.

## **ERAMET is Committed to Promoting the SAFETY of its Employees and their Close Relatives**

In all places, the safety of its employees and their families is an absolute priority for ERAMET. The Group thus implements preventive and protective measures to ensure the greatest possible safety at its sites, to avoid workplace accidents and to reduce their severity if they do occur.

ERAMET also expects each employee to demonstrate exemplary conduct, vigilance and responsiveness regarding the risks that may arise on a daily basis. Both in the plants and on the mining sites, its activities require constant vigilance to avoid accidents and ensure that the health of Group employees and external contractors is not endangered.

To this end, the employees are regularly informed of the existing risks and the procedures to be followed. ERAMET takes care to train its employees in managing health problems and industrial risks. The sharing of best practices, through awareness activities and training of the teams and sub-contractors, forms part of this approach.

Implementation of the safety policy is led by a safety officer at Group level and by local correspondents in the countries in which the Group is established.

## **ERAMET Is Committed to Preserving SECURITY on Its Various Sites**

The Group is present on all five continents, in countries characterized by widely varied political and economic environments. Its sites and employees are sometimes located in areas where security risks exist.

The Group therefore takes care to train its employees in managing crises and politically unstable situations and implements required protection arrangements in the following three areas:

- ∞ the protection of individuals, including expatriates;
- ∞ the protection of facilities;
- ∞ the protection of information.

For this purpose, the Group has created the function of Security Director. This director, whose function is to assist the Executive Committee and the operational managers, must:

- ∞ specify the nature of the threats and measure the risks to the Group's activities and personnel;

- ∞ help assess and implement the human resources and technical means required for prevention and protection;
- ∞ inform the Group's employees and raise their awareness of the reality of the risks, the means implemented to deal with them and the practices to adopt.

### **ERAMET is Committed to Respecting the PRIVACY and the Personal Information of All Stakeholders**

ERAMET attaches the greatest importance to respecting the privacy of its employees and partners. Therefore it protects the confidentiality of private information provided by its employees and partners. The Group will ensure that no information communicated to the Group for a particular purpose will be sent to third parties or used for any other purpose without the permission of the person who initially provided it.

### **ERAMET is Committed to Promoting Reliable and Sincere Market Information, and PREVENTING INSIDER TRADING**

ERAMET takes care to provide stakeholders with accurate, precise and honest financial information. To attain this goal of transparency, it has set up Group accounting rules that meet the best international standards and comply strictly with the regulations in force.

It attaches the greatest importance to avoiding any situation of insider trading. The Group takes care to raise its employees' awareness of the issues of professional confidentiality. Any employee who, through their professional activity, has access to information not yet known by the general public, and which, if disclosed, would be likely to influence the stock market price of the securities of one of the Group's companies or that of another company, is forbidden from buying or selling the shares or other securities of this company or to do so via an intermediary, for as long as this information is not made public.

In order to prevent the existence of insider trading within the Group, very strict rules have been implemented on the issue and a detailed list of all employees holding insider information relating to its activities is kept. This applies at all levels and in all the Group's departments, not just at the most senior levels of management or in the accounting and financial departments.

These rules also apply to privileged information that its employees may have about other companies, in particular its customers, suppliers or partners.

## **THE ETHICAL COMMITMENTS OF ERAMET'S EMPLOYEES**

ERAMET's employees require of themselves exemplary behavior and ethical conduct that do not violate the laws of the countries in which they operate or the values to which they adhere.

### **Prevention of Corruption**

#### *1. The ERAMET Group is firmly committed to preventing corruption*

Corruption is defined as the abuse of public or private functions for personal benefit. The fight against corruption is an absolute priority for the Group. ERAMET observes the rules of the OECD Anti-Bribery Convention signed on December 17, 1997 as well as all laws in force in the countries in which the Group operates and more generally the international conventions that are applicable to it.

Preventing corruption is a moral duty that is required by the Group, out of respect for the countries and the partners with which it operates. Each of the Group's employees undertakes to respect the legislation of the country in which they work, and never to be involved, directly or indirectly, in any act of corruption.

Preventing corruption is also an economic imperative for ERAMET. Corrupt practices, through the personal draining of significant resources, and through the malfunctions this creates, are costly both for society and for the Group.

For the practical implementation of its corruption prevention policy, ERAMET requires all its employees and partners to understand exactly what this phenomenon entails and to be able to identify activities that could be considered corrupt acts and pose certain risks to the Group. For this purpose, it pursues policies focusing on raising awareness in fighting corruption.

Facilitating payments, which are payments to a government official or political party of insignificant amounts in order to speed up the processing of a routine action, must be prohibited. These extortion practices may indeed be considered by some regulators as corrupt acts and result in legal risks for the Group and its employees.

ERAMET also reminds all employees and third parties that they are strictly prohibited from paying or accepting bribes, i.e. *“any undue advantage, pecuniary or otherwise”*, directly or through an intermediary, to or from a public official or private person, anywhere in the world, for the purpose of obtaining preferential treatment or influencing the outcome of negotiations in which the Group itself is an interested party.

Employees must never, directly or through a third party, make or propose payments in cash or services to civil servants, public officials or people in a position to influence them. Likewise, they must not receive payments or benefit from services likely to affect their judgment in conducting the Group's business.

In the event of reported corrupt practices, the Group will immediately organize appropriate audits and investigations, will put an end to these activities if they are proven and will, if necessary, take appropriate action.

The exchange of gifts and gestures of hospitality are part of the traditions and customs of the conduct of business in most cultures. However, these practices may be considered by certain regulators of the countries in which the Group operates as corrupt acts or may be used by certain ill-intentioned individuals as a form of disguised corruption. The Group therefore strictly controls these practices. The transparency rule is required in all circumstances: gifts received or offered as part of a business relationship must be reported to management. Moreover, the value of gifts and invitations received by employees may not exceed a maximum limit set by the Group Policies in force at ERAMET.

Where the practice of the local cultural deviates from this limit in relation to gifts and invitations, employees must inform management in advance and seek an exemption from the Ethics Officer.

## *2. Combating extortion*

ERAMET is aware of the pressures that may be placed on its employees to compel them, by various means of extortion, to make payments or to confer advantages.

Confronted by attempts at extortion, ERAMET will systematically inform the law-enforcing authorities and engage legal proceedings if necessary. Everywhere, it will work with the public authorities to eradicate corrupt practices, while taking care to ensure the safety of its employees and third parties who are victims of these practices.

## **Prevention of Any Form of Money Laundering**

Money laundering consists in reinvesting sums of money obtained illegally in legal activities.

ERAMET takes all appropriate measures to prevent any form of money laundering in the course of its activity.

In order to combat this type of practice, the Group asks its employees to prohibit the following types of transaction:

- ☞ transactions in which the names and contact details of the parties are not known;
- ☞ transactions conducted by unknown or unnecessary intermediaries;
- ☞ unnecessary or unexplained transactions;
- ☞ unusual payment methods.

Each employee must demonstrate the utmost vigilance with regard to payments made, in order to be able to detect any irregularity. Should an employee, as part of their activity, witness a money-laundering act, they must immediately inform the Ethics Officer. The Ethics Officer will organize appropriate audits and investigations to put an end to these actions, if they are proven, and take the appropriate legal action in conjunction with the public authorities.

### **Combating Conflicts of Interest**

A conflict of interest is any situation where interference between a public interest and public or private interests is likely to compromise the independent, impartial and objective exercise of a function.

The Group requires its employees and partners to demonstrate loyalty and avoid placing themselves in a position in which they could find themselves in a situation of conflict of interest.

If an employee is in a situation that could create a conflict between their personal interests or those of their family members or relatives and those of the Group, they must immediately and transparently inform their supervisors, who will contact the Ethics Officer. This procedure will enable this person to be granted a specific written waiver, if appropriate. Otherwise, the employee will have to put an end to the conflict of interest.

Any situation that could adversely affect employees' impartiality and judgment must be avoided. In this respect, employees must, as far as possible, avoid holding interests or investments in the companies of service-providers, suppliers, customers, competitors or consultants of ERAMET, and in all circumstances make them public.

### **Respect of Competition Rules**

Open and fair competition between companies, as guaranteed by competition legislation, is in the direct interest of ERAMET and all its customers, partners and consumers. In this respect, the Group strictly complies with competition regulations, which particularly

prohibit any agreement, concerted practice or abuse of a dominant position in the market concerned, where its customers or suppliers are concerned.

Employees must not adopt any unfair conduct toward competitors. The Group prohibits any unlawful understanding, in particular through agreements, projects, arrangements or coordinated practices between competitors regarding prices, territories, market shares or customers. Employees are also prohibited from exchanging information with competitors with a view to restricting competition.

Where an employee has doubts about whether an action or transaction complies with the competition legislation in force, they must inform the Ethics Officer.

### **Respect of Confidentiality and Patent Rights**

ERAMET considers the respect of confidentiality and patent rights one of its main priorities. The Group assures its employees and partners that the information they provide it with will be treated with due respect and used only for authorized purposes. All information made available to employees must be used with respect for the security, confidentiality and image of the Group's companies as well as for all the legal and regulatory provisions likely to involve employees' civil or criminal liability.

All ERAMET employees have a general obligation of secrecy regarding information made known to them in the course of their functions, whether information belonging to a Group company or information entrusted by a third party to a Group company, particularly in the course of business relations.

Confidential information means information whose disclosure to an unauthorized person may seriously damage the reputation of the Group, its employees or its partners. Confidential information includes financial and strategic data, information about human resources and personal data, as well as technical information about industrial processes. This list is not exhaustive. The dissemination of confidential information is limited to those employees, services or departments of the Group who need to have knowledge of it for the accomplishment of their duties or for a specific assignment.

ERAMET employees must demonstrate the greatest possible vigilance in preserving and adequately addressing the Group's intellectual property rights, which specifically include intellectual property rights covering patents, know-how, trade secrets, trademarks and industrial concepts.

The Group's employees are subject to a duty of secrecy and confidentiality outside the Group, in particular regarding the work and projects that are entrusted to them.

**Preservation of ERAMET's Image and Reputation and Those of Its Employees and Their Partners**

The Group must preserve its image and reputation. This issue poses new challenges at a time when new communications tools such as social networks and content-sharing websites are becoming more and more widespread.

These new tools must be used responsibly by employees. Only duly authorized employees are allowed to communicate on the Group's behalf about its activities and its products. Employees shall voluntarily and consciously avoid taking a public stance on these networks and sharing tools in such a manner as to commit or compromise the Group's interests or image.

Moreover, it is strictly prohibited to use the company's communications tools, in particular the e-mail and Internet networks, for improper or inappropriate purposes, especially for sending or receiving messages or images that could be considered offensive, abusive or disrespectful to individuals. Each employee is responsible for their use of the computing resources and the network to which they have access.

## **IMPLEMENTATION OF THE ETHICS CHARTER**

The Charter is available on the Group's website: [www.eramet.com](http://www.eramet.com). It is distributed to all the Group's current employees and it will be given to every new employee of the Group at the time they sign their employment contract.

With effect from January 1, 2015, it will cancel and replace the previous version of the ethics charter dated 2010.

Training will be organized regularly in all the Group's entities to raise awareness among employees of the principles and values expressed in this Charter and provide answers to the questions that they may ask in the context of implementing the Charter and its everyday observance.

Moreover, ERAMET will be vigilant in ensuring that partners working or acting regularly with the Group have ethical concerns that are compatible with its own. This will be an important criterion of choice in establishing its business relations. Furthermore, continuation of the Group's relationships with its partners, in particular its intermediaries, shall be conditional on the latter refusing any corrupt act or money-laundering, any situation of conflict of interest and any other breach of the legal provisions applicable in the countries in which they operate.

For this purpose, the Group shall require the means of verifying that its partners themselves comply with the principles and values expressed in the Charter. In particular, it may check that its partners comply with the conventions and laws regarding corruption as a criminal offence.

### **The Ethics Officer**

At the highest level of management, ERAMET has created a dedicated position of Ethics Officer in charge of deploying and monitoring the Group's compliance program.

The Ethics Officer is:

- ∞ appointed by the Chief Executive Officer;
- ∞ independent of the Group's divisions and subsidiaries.
- ∞ placed under the direct authority of the Chief Executive Officer, to whom he reports directly.

He or she has operational responsibility for ERAMET's compliance program. His/her duties include: the design, dissemination and implementation of policies in all areas covered by compliance and

ethics; the training of employees on subjects related to conformity; the management of compliance risk related to third parties; inspections, audits and investigations, in conjunction with the internal audit department, regarding compliance issues and facts reported by Group employees or third parties; the management of the whistleblowing platform.

Every year, he/she must deliver a report to the Chief Executive Officer providing details of the deployment and monitoring of the compliance program and of any breaches of the principles contained in this Charter and the actions undertaken to rectify them.

In addition, the conclusion of major Group contracts that could present a compliance risk shall be submitted to the Ethics Officer's prior opinion.

### **ERAMET's Professional Whistleblowing System**

Each employee must be vigilant to ensure that the Charter is properly implemented. An employee who believes that a principle or value promoted by the Charter has been breached must inform their supervisor.

However, where alerting their supervisor causes difficulties for Group employees, they may use the Group's whistleblowing system.

The professional whistleblowing system adopted by Eramet has received from the National Commission on Information Technology and Freedoms a single authorization No. AU-004 of December 8, 2005, amended on January 30, 2014, granting individual authorization for automated processing of personal data used as part of professional whistleblowing systems.

This professional whistleblowing allows notification of information of the following nature:

- ↪ financial, accounting, banking and regarding the fight against corruption;
- ↪ anti-competitive practices;
- ↪ regarding the fight against discrimination and harassment at work;
- ↪ regarding health and safety in the workplace; and
- ↪ regarding the protection of the environment.

Employees wishing to use the professional whistleblowing system should send an e-mail to the following address [Deontologue-Eramet@erametgroup.com](mailto:Deontologue-Eramet@erametgroup.com). Only the Ethics Officer shall have access to the contents of this message and to the identity of the employee

who has used this system. All measures are taken to ensure the security and confidentiality of the information contained in the alert sent by the employee.

The reported facts will be treated with the utmost rigor and will then be subject to an investigation, organized by the Ethics Officer. Should this investigation establish illegal acts, practices prohibited by the Charter or a risky situation, the Ethics Officer will be responsible for informing the Chief Executive Officer who will take the appropriate measures.

Any person referred to in an alert shall be informed as soon as information about them is recorded. They may have access to it and ask for it to be corrected or removed if it is inaccurate, misleading or outdated. When precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the alert, informing the person referred to in an alert may occur after the measures have been adopted.

However, the information collected through this whistleblowing system may only be used by the Ethics Officer, with the aim of conducting investigations relating to ethical issues. In no case may this information be used for other purposes or by other divisions of the Group.

The protection of the Group's employees and their reputation is central to ERAMET's concerns.

ERAMET undertakes to ensure that no employee will suffer any form of discrimination, harassment, change of status or other consequence due to use of the professional whistleblowing system in good faith, even if the facts subsequently prove to be inaccurate or result in no action being taken. The whistleblower is therefore protected. On the other hand, misuse of the system may expose its author to disciplinary sanctions as well as to legal action.