

# Human Rights Policy

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

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

The Human Rights policy herein formalizes 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 completes the Group's other policies and charters and covers all employees, commercial partners and host communities.

This commitment is a key part of the Group's strategic vision and its vigilance approach.

## 1. Commitments to employees

### → Health, Safety & Security

Eramet is committed to implementing preventive and protective measures in order to create a safe and healthy work environment on all of its sites. It shall strive to prevent any accidents or occupational illnesses. Eramet shall ensure the safety of its employees during the course of their work.

When long-term housing is provided to employees, such housing must be in line with international recommendations.

### → Working conditions

Eramet is committed to providing its employees with respectful working conditions that are in line with the applicable local laws and its agreements with personnel representatives.

### → Forced labor and child labor

Eramet is firmly opposed to child labor, forced labor, and modern slavery. Should any such practices be discovered, the company shall act immediately in order to put a stop to them and to protect the best interests of the individuals concerned.

### → Harassment and violence

Eramet does not tolerate any harassment or violence in any form in the workplace and shall take the necessary steps to prevent or punish such behavior.

### → Equal opportunity and discrimination

Eramet is committed to promoting equal opportunity and to complying with anti-discrimination laws and regulations.

### → Labour relations

Eramet guarantees the free exercise of union rights and upholds the right of employees to join unions or labor organizations, in accordance with their freedom of association and collective bargaining rights. Eramet shall make every effort to maintain fair and honest labor relations.

### → Privacy and data confidentiality

Eramet is committed to protecting its employees' privacy and the confidentiality of their data, in accordance with applicable regulations.

## 2. Commitments with commercial partners

Eramet believes that all of its commercial partners must share the same principles and values. The Group is committed to promoting internationally recognized Human Rights throughout its value chain and actively communicates with its customers, suppliers, subcontractors and partners in order to inform them of the principles herein, which are wholly applicable to them.

Eramet establishes due diligence mechanisms for its partners and business relationships, in order to identify, prevent and mitigate any Human Rights violations that may arise, and thereby take appropriate measures, if necessary.

## 3. Commitments to local communities

The Group 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. Eramet is devoted to upholding and preserving the traditions and cultures of indigenous communities and peoples living around its sites.

### → Dialogue and complaint resolution

Eramet is committed to building and maintaining a relationship of trust with local communities, including the most vulnerable among them, by establishing mechanisms to foster ongoing dialogue and process complaints.

### → Land acquisition and resettlement

Eramet endeavors to avoid involuntary resettlements. Wherever it is unavoidable, Eramet shall adhere to the local legislation in force and refer to the Performance Standard of the International Finance

Corporation on relocation, land acquisition and involuntary resettlement activities.

### → Environmental and climate impacts

Eramet makes every effort necessary 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 neighboring communities, eliminate the risk of pollution, and prevent any risks related to reducing their access to natural resources.

### → Safety and local communities

The prevention of safety risks is primarily achieved through dialogue with local communities. Eramet bases its approach on the "Voluntary Principles on Security and Human Rights", in particular. Use of force is strictly limited to cases of extreme necessity and is proportional to the magnitude of the threat.

## 4. Gouvernance

### → Local laws

Eramet adheres to international legislation and local legal requirements. In the event of a conflict between local laws and the commitments contained in this policy, Eramet seeks to apply the most protective human rights requirements.

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.

### → Implementation of the Policy

In the event of divergent interpretations between the French version and any translation of the Human Rights Policy, the French version of the Human Rights Policy will prevail.

The CSR steering committee is the supervisory and monitoring body for this policy. It is tasked with revising the policy in order to account for new internal or external developments. Compliance with the principles is integrated into the risk management and internal control processes. The implementation of the Policy is based on the Group's managerial and operational functions.

In order to promote and ensure compliance with its commitments, Eramet communicates its policy and conducts regular training

### → Whistleblowing system

Any person who is a witness to or victim of a Human Rights violation in connection with Eramet's activities can report such conduct through the whistleblowing system, or by directly contacting the Ethics and Compliance Department at the following email address: [Deontologie-Eramet@eramet.com](mailto:Deontologie-Eramet@eramet.com).

Eramet does not tolerate any form of retaliation against any person who selflessly and in good faith reports a Human Rights violation.

