

Responsible Lobbying Policy

For responsible interest representation

In relation to the United Nation's Sustainable Development Goals (SDGs), Eramet places Corporate Responsibility at the heart of its development strategy. Eramet is a committed, contributive and corporate citizen with 3 goals:

- Committed to women and men;
- Responsible economic player ;
- Committed to our planet.

In this context, Eramet undertakes to practice a responsible lobbying.

Lobbying refers to any action carried out by one of the Group's interest representatives, aimed at exercising influence over public authorities or providing them with information, with a view to guiding a political decision. The purpose of lobbying is to defend the Group's interests and provide public decision-makers with technical expertise regarding the consequences and practical scope of legislation in force or under consideration.

This policy completes Eramet's Ethics Charter, the Human Rights Policy, the Environmental Policy, the Anti-corruption Policy and the Purchasing Policy.

The present policy applied to all person who represent Eramet's interest to public decision-makers, whether employees or thirds parties appointed by the Group.

1. ERAMET GROUP'S COMMITMENTS

Within the framework of interest representation activities carried out in its name or in its interest, Eramet undertakes:

→ **To respect:**

- Institutional rules governing influence practices and business relations, and applies the most demanding international standards (OECD, ILO, Global Compact).
- National regulations and/or code of ethics, in particular the French law of December 9th, 2016 on transparency, the fight against corruption and modernisation of the economy.

→ **To communicate:**

Reliable, verifiable and up-to-date information and position by providing public officials and authorities. Eramet abstains from communicating information that is deliberately biased or obtaining information through illegal means.

→ **To publish:**

- A list of the main professional associations of which Eramet is member or is active, as well as the criteria governing these relationships. If Eramet's public positions and those held by a professional association to which it belongs prove to be different, Eramet's position will prevail.
- Its lobbying activities on dedicated platforms, particularly in France towards the register of « Haute Autorité pour la Transparence et la Vie Publique » and towards the European Union Transparency Registry.
- The budget allocated to lobbying activities by Eramet (Human resources, fees to the professional association or think tank...).

→ **To ensure:**

That people in charge of lobbying activities have the required skills to carry out their functions, receive the required instructions and benefit from regular trainings.

Eramet's employees acting as interest representatives undertake:

→ **To respect:**

The principles of this policy, the Ethics charter, the Environmental Policy and the Human Rights Policy and to submit it to their potential service providers.

In accordance with the Group's Ethics Charter, Eramet maintains total political neutrality in the countries in which it carries out economic activities. Whenever the Group enters into contracts with public, state or territorial authorities to help finance development projects, it refrains from making any contribution or providing services to public office holders, political parties or organisations. The Group respects the right of its employees to invest as individuals in local political and civic life. However, employees must clearly separate their personal political activities from their mission within the Group.

2. MODALITIES OF IMPLEMENTATION

Lobbying activities within Eramet are placed under the responsibility of the Group Public Affairs Vice-President.

The Public Affairs Department manages the lobbying activities in coordination with the Country managers.

The Eramet Group Public Affairs Department is responsible for deploying and ensuring compliance with responsible interest representation commitments throughout the Eramet Group.

The present policy is also available on Eramet's website.