



## SUPPLIER CODE OF CONDUCT

**This supplier code of conduct formalizes the Eramet group (« Eramet ») willingness to strengthen its commitments and expectations when addressing sustainable development and ethics issues related to purchasing. This document is in line with Eramet's Corporate social responsibility (« CSR<sup>1</sup> ») roadmap, its ethics charter and its values.**

Through this code of conduct, **Eramet, details its expectations toward suppliers and commits itself to implementing best practices in sustainable purchasing.** This code of conduct is also consistent with Eramet's external commitments, particularly with respect to relations with local or regional suppliers, especially small and medium sized businesses<sup>2</sup>.

Eramet's Purchasing function contributes to the Company's creation of value and its sustainable economic performance. Considering the Purchasing function's role, we urge our suppliers, contractors and their respective subcontractors (all herein referred to as "suppliers") to work with Eramet to identify improvement opportunities in their CSR practices.

**In this context, the chapters below are intended to outline Eramet's requirements and expectations toward supplier in terms of sustainable development and ethics, divided in 3 chapters: Working conditions, environment and business ethics.**

**For Eramet, compliance with these requirements is a deciding factor when choosing and establishing its business relationships.**

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<sup>1</sup> Corporate social responsibility

<sup>2</sup> For example, in France, Innovative SME charter, Sustainable supplier relations charter

# 1. Human Rights and Working Conditions

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## → Human Rights

Eramet has adopted an Ethics Charter, and a Human Rights Policy, and requires its Suppliers to respect Human rights as recognized by the Universal Declaration of Human Rights, the ILO's Fundamental Conventions and any other applicable local, national and international regulations, as well as the principles details in its policy.

In particular, Eramet shall rule out any contractual relations with Suppliers that are known not to comply with regulations in terms of forced labor, child labor, minimum working age, discrimination, violence or which are complicit in terms of violations in these areas.

## → Health and safety

Eramet has adopted a Health Policy and a Safety Policy. Eramet expects its Suppliers to comply with standards equivalent to its own and, in particular, to provide their employees with a work environment that meets applicable

health and safety standards and manages the impact their activities have on the health of local populations.

## → Labor law

Eramet requests its suppliers to comply, wherever they operate, with all applicable local legal provisions as regards to labor law, particularly those concerning legal working hours and minimum wages.

# 2. Environment

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In accordance with its CSR roadmap and Environmental Policy, Eramet expect its Suppliers to control their activities' impact on the environment and comply with all applicable regulations. Eramet requests its Suppliers to draw inspiration from the best international practices in this area, particularly by setting up an environmental management system.

## → Energy and environmental impact

Eramet requests that its suppliers implement actions to improve their energy efficiency and reduce their greenhouse gas emissions and other environmental impacts.

## → Natural Resources and Biodiversity

Eramet requests that its Suppliers optimize their use of natural resources and water, and limit their impact on biodiversity and water resources.

## → Emissions and Waste Management

Eramet requests that its Suppliers manage emissions and discharges associated with their activities, including those linked to the generation and management of waste. Eramet encourages programs aimed at minimizing waste generation, particularly hazardous waste, and at implementing all forms of reuse and recycling.

## → Products Regulations

Eramet requests that its Suppliers comply with the market access and product regulations in force (such as the REACH regulations in Europe) and attach the greatest importance to the knowledge and management of the toxic impact of the products they use

### 3. Business ethics

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Under its Ethics Charter, Eramet has adopted principles aimed at protecting the integrity of its activities. These principles are as follows:

#### → **Corruption and conflicts of interest**

Eramet condemns all forms of corruption and prohibits any situations entailing a conflict of interest involving its employees and Suppliers. Continuation of the Group's relationships with its Suppliers 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. With regard to gifts and invitations, the transparency rule applies in all circumstances: gifts received or offered as part of a business relationship are reported to management and authorized in accordance with the conditions set out in the Group Policies in force at Eramet.

#### → **Respect of Competition Rules**

Eramet has pledged to comply with competition regulations and expects the same of its Suppliers. The Group has established procedures specifically aimed at ensuring the respect of the equality of treatment of Suppliers, and that all purchasing decisions are based on an objective and comparative assessment of the Suppliers' integrity and reliability. 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. Furthermore, the Group strictly complies with regulations which prohibit any agreement, concerted practice or abuse

of a dominant position in the market concerned, where its suppliers are concerned.

#### → **Respect of confidentiality and Patent Rights**

Eramet considers the respect of confidentiality and patent rights one of its main priorities. The information that the Suppliers share with the Group will be treated with due respect and used only for authorized purposes. Eramet expects its Suppliers to make the same commitments.

#### → **Product traceability and conflict minerals**

Eramet requests that its Suppliers ensure that materials and products delivered to Eramet are of legal origin and can be traced properly, particularly for raw materials.

Member of the Responsible Minerals Initiative (RMI), Eramet established its own conflict minerals compliance program based on the OECD recommendations<sup>1</sup>. Eramet systematically requests from all its suppliers of conflicts minerals (3TG: Tin, Tungsten, Tantalum and Gold) or Cobalt, to resort only to conformant<sup>2</sup> smelters or refiners.

#### → **Transparency and Publishing Non-Financial Information**

Eramet has obligations and has made commitments on transparency and the publication of non-financial information.

The Group expects its Suppliers to implement the same practice in their contractual relations with Eramet and their own stakeholders.

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<sup>1</sup> <http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>

<sup>2</sup> Conformant to the RMI assurance process (RMAP)

## 4. Commitment of suppliers and subcontractors

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When managing relations with its Suppliers, Eramet's Purchasing Managers may verify, namely through evaluations and/or audits, that the above principles and rules are being observed. If necessary, Eramet will take any appropriate measures following these verifications.

Eramet is convinced that this code of conduct's provisions are a sound way to improve its overall performance and that of its Suppliers, and is aware of the efforts that some of them will have to make in order to comply with these provisions. In this context, Eramet is willing to support any Supplier that undertakes an improvement process, to the extent of its possibilities.

By accepting the principles of this code of conduct, Eramet suppliers and subcontractors undertake to support Eramet in the deployment of its CSR roadmap and agree to be assessed by Eramet on the principles set forth above.

Finally, Eramet also expects its Suppliers to do their utmost to pass on equivalent provisions throughout their own value chain.

Company Name	Name and title of the signing officer	Date	Signature

Séverine Schumacher, Chief Purchasing Officer


## CONFLICT MINERALS POLICY

This policy formalizes the Eramet group (« Eramet ») commitments toward conflict minerals procurement and its willingness to achieve and monitor a completely “conflict-free” minerals supply-chain. It comes in addition to the other CSR and Ethical due diligences that are conducted by Eramet.

As defined by section 1502 of the Dodd Frank Wall Street Reform and Consumer act<sup>1</sup>, “Conflict Minerals” refers to specific minerals, also known as the “3TG’s” (Tin, Tantalum, Tungsten and Gold), originating from or being transported through the Democratic Republic of the Congo (DRC) and its nine adjoining countries, and which may be directly or indirectly financing armed groups engaged in conflicts resulting in serious social and environmental abuses.

This conflict minerals policy may see its perimeter extended to other regions and countries if the European union or any other applicable jurisdiction decides to update its conflicts area and high-risk area definition or provide a list of such areas.

In line with its human right policy and its supplier code of conduct, Eramet fully supports the intent of the Dodd Frank act and the European Union Regulation 2017/821<sup>1</sup> to eliminate the social and environmental harm brought by the use of Conflict Minerals and any funding that supports armed groups in the DRC region.

This policy is systematically shared with our prospects and suppliers of conflicts minerals to inform them of our requirements and expectations on the matter.

# 1. Commitments

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## → Eramet Commitments

Eramet does not directly source 3TG from mines, smelters or refiners, nevertheless we are working toward ensuring to all our stakeholders that all the 3TG used in our production processes come from conflict-free sources and did not support or fund conflicts within the Democratic Republic of Congo or its adjoining countries.

Therefore, we are committed to:

- Identifying and listing all our Tin, Tantalum, Tungsten, and Gold suppliers to target and monitor our efforts accordingly.
- Requesting these suppliers to work towards ensuring that any 3TG supplied to Eramet originates from Conflict Free Sources. To comply with our request of conflict free sources, suppliers will be required to:
  - Complete the latest version of the Conflict Minerals Reporting Template (CMRT) proposed by the Responsible Minerals initiative<sup>3</sup> ("RMI") for the datasheets: Declaration, Smelter List (if applicable) and Product List.
  - Pass this reporting requirement through their own supply chain to determine the source of the minerals, at least up to the smelter or refiner.
  - Supply from smelters or refiners validated as conformant under the Responsible Minerals Assurance Process ("RMAP"), proposed by RMI.
- Suspending or terminating engagement with suppliers after failed attempts at mitigation, remediation or non-conformance with Eramet policy.
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of 3TG based in the covered countries.
- Collaborating with third party on cross-industry efforts, such as RMI, to support responsible and conflict-free 3TG supply chains

# 2. Measures

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## → Five-Step Framework

To respect its commitments and identify, prevent, mitigate and, when appropriate, remediate risks associated with 3TGs, Eramet developed and integrated the Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain, recommended by the OECD<sup>4</sup>.

## → Five-step documentation

The integration of the OECD five-step framework led to the definition or review of the following documents and tools that will be made public to all stakeholders on Eramet's website and will help to monitor our conflict minerals supply chain in adequation with our commitments:

- Step 1: Establish Strong Company Management Systems
  - **Eramet Conflict Minerals policy**
  - **Eramet suppliers code of conduct**
  - **Eramet grievance mechanism**
- Step 2: Explore Risks in the Supply Chain
  - Step 3: Design and Implement a Strategy to Respond to Identified Risks
  - Step 4: Carry out independent third-party audit of smelter's due diligence practices
    - **Eramet conflict minerals due diligence procedure**
- Step 5: Report Annually on Supply Chain Due Diligence
  - **Eramet Conflict Minerals annual report**

## → Grievance Mechanism

The Eramet grievance mechanism allows interested internal or external parties to raise concerns about the circumstances of mineral extraction, trade, handling and export in a conflict affected or high-risk area. They can raise their concerns regarding

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<sup>3</sup> <http://www.responsiblemineralsinitiative.org>

<sup>4</sup> <http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>

human rights violations such as child labor, forced labor, or modern slavery in Eramet supply chain. Available worldwide in the thirteen main languages spoken in the Group, the service is outsourced to ensure full transparency, confidentiality and protection for whistleblowers.

If you are a victim of or witness to non-ethical behavior, such as discrimination, unfair treatment, harassment, fraud, bribery, or human rights violations, please let us know through the website: [eramet.integrityline.org](http://eramet.integrityline.org)

