

Anticorruption Policy

The fight against corruption is everyone's business.

At Eramet, we ensure that our company operates in an ethical, sustainable and responsible manner in all the countries in which it operates. Consequently, corruption, in any form, is never tolerated.

In order to support this ethical approach, a Compliance Programme has been implemented, including an Ethics Charter – the founding text –, associated policies, a dedicated organisation (Ethics Compliance Officers and Ambassadors) and a professional whistleblowing system to receive alerts, and now complemented by an **Anticorruption Guide**, in accordance with the provisions of the "Sapin 2" Law.

Many national and international anticorruption regulations have been adopted, applying to all companies regardless of their sector of activity, location... The competent authorities have been active in the fight against corruption and strong cross-border judicial cooperation has developed. Thus, the responsibility of both companies and individuals has been engaged, with a risk of strong sanctions for all.

This Guide sets out the main principles of corruption and influence peddling. It is intended to **assist you in your daily activities**.

By adopting this Anticorruption Guide, we reaffirm our **zero tolerance policy** towards corruption or any other practices that would be contrary to Business Ethics. This Guide applies to all Group employees and those who act alongside us, in our name or on our behalf.

We count on you to respect and promote this Guide, so that **Together we act in an ethical, sustainable and responsible manner**.

1. Our expectations

→ From our employees

As collaborators of Eramet, we count on your full commitment to defend our **ethical values** and to make Eramet a company recognised for its integrity.

By respecting and promoting our values, you contribute not only to reinforce the trust of our clients, partners and external stakeholders, but also to protect the company, its assets and all the collaborators and above all yourself.

We expect from each of you a total respect of this Anticorruption Guide and of all internal dedicated rules, policies and procedures provided by the Group.

→ From our business partners

The Eramet Group's companies may be held accountable for their business partners' behaviours (business providers, intermediaries, suppliers...).

Thus, it is essential that our business partners be informed of our zero tolerance policy towards corruption and aware of this Anticorruption Guide. They must respect it.

Eramet may need to refuse to work with business partners who do not respect applicable rules.

2. In case of doubts

→ Consult this Guide

In case of doubts on the appropriate behaviour to be adopted, you must consult this Guide.

→ Get help

If you need assistance on a situation that you believe is contrary to Ethics and/or in case of persistent doubt, you can refer to your line manager. He/she will be able to help you identify the nature of the unethical behaviour. He/she will guide you on the actions to be taken with regard to the nature of the alleged facts.

If you do not feel comfortable to speak to your line manager or if no appropriate answer was provided,

alert your Ethics Compliance Officer, whose contact details are available to all Group employees and notably on the Group intranet.

→ Raise a concern

If you were unable to raise your concern via these two channels, you can use the professional whistleblowing system by addressing directly to the Ethics & Compliance Director at: Deontologue-Eramet@eramet.com.

Eramet will not tolerate any form of retaliation against the person reporting an act of corruption in good faith and selflessly.

