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ETHICS CHARTER



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Eramet's Policies

FOREWORD

The purpose of this ethics charter (the “**Charter**”) is to formulate a set of action-related and behavioural rules and principles applicable to all employees of the Eramet Group (the “**Group**”), and to its representatives and agents. It echoes our purpose: to become a reference in the responsible transformation of the Earth’s mineral resources, for ‘living well’ together.

Applying to all of the Group’s entities, the Charter is also promoted by its employees beyond this scope and brought to the attention of all stakeholders involved in working or acting on a recurring basis with the Group.

Individual and collective compliance with the fundamental rules set out in the Charter is a daily duty for all Group employees regardless of the country they are in.

Based on the responsibility, citizenship and integrity of individuals, the Charter aims to promote exemplary behaviour in all circumstances.

These rules are not exhaustive but, combined within the meaning of the responsibilities of each individual, they constitute as many benchmarks as neces-

sary for all the members of the Group and all stakeholders.

In addition to this Charter, Eramet also has the **Eramet Management System**, a platform for the commitments of references and common standards made up of policies, manuals, authorities, key standards and procedures applicable by all Group companies and their employees. These reference systems put in place obligations incumbent on all Group employees and, according to their terms, on subcontractors and suppliers. These documents are available at: <https://www.eramet.com/en/csr/commitments/policies-charters>.

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By delegation of the Chief Executive Officer, the Group’s Ethics and Compliance Director is responsible for the application and implementation of the Group’s compliance programme and for ensuring compliance with it.



ERAMET'S COMMITMENTS



Eramet is committed to its employees on diversity and social inclusion

Eramet's production and activities would not exist without employee mobilisation and the quality of their work. A company cannot be successful without ensuring the fulfilment and development of its employees, nor without worrying about their working conditions.

For constant progress in practices, the Group values teamwork, departmenting and exchange in all its companies.

Discrimination, unfair treatment based on criteria other than performance and competence, racism, violence, exploitation of children, forced labour and hazardous or inhumane working conditions are not acceptable. As a result, Eramet employees are careful not to associate themselves with third parties who may be guilty of such practices.

Eramet is committed to the safety of its employees

The safety of its employees is a priority for Eramet. The Group therefore implements preventive and protective measures in order to ensure the greatest possible safety on its sites, avoid accidents at work and reduce their severity if they do occur.

Eramet also expects each employee to set an example and demonstrate vigilance and responsiveness to risks that may arise on a daily basis. In factories and on mining sites, its activities require constant vigilance in order to avoid accidents and not endanger the health of employees or that of external stakeholders present on the Group's sites.

To this end, employees are regularly informed of the existing risks and the procedures to be followed. Eramet ensures that its employees are prepared for the management of health problems or industrial risks.

The safety policy is led by a safety officer at Group level and by local contacts in the countries where the Group is located.

Eramet is committed to a safe and healthy work environment

Eramet implements actions to create a safe and healthy work environment on its sites. The health of employees, staff of suppliers and partners, visitors, as well as people living close to industrial sites is a priority for the Group. Every day, health and working conditions are criteria taken into account in any decision, regardless of the managerial level concerned.

In this regard, the Group applies an information policy on the risks and precautions to be taken. The Group is also engaged in action to prevent addictive conduct (alcohol, tobacco, drugs) based on awareness-raising campaigns and support for rehab actions.

Eramet's health policy is led by the Group Medical Officer and is broken down into actions the implementation of which relies on the network of doctors and managers of the Group's health services. The content and frequency of these actions are adapted to the job type, the associated risks and potential exposure.

Eramet is committed to the preservation of safety on its various sites

The Group operates in countries with a wide variety of political and economic issues. Its sites and employees may sometimes be located in areas where safety risks exist.

The Group therefore ensures that its employees are prepared for management of crises and unstable political situations and puts in place the necessary protection measures, particularly for the protection of people and facilities.

Eramet is committed to human rights

Through its Human Rights Policy, Eramet is committed to promoting and respecting internationally recognised Fundamental Human Rights and Freedoms, in particular those defined by the United Nations International Declaration of Human Rights, the Fundamental Conventions of the International Labour Organisation (ILO) and the United Nations Recommendations and Guiding Principles on Business and Human Rights.

Eramet is committed to fighting all forms of discrimination

Any discrimination, whatever its form, is not tolerated.

Eramet fights against all forms of discrimination, regardless of their basis:

- gender,
- age,
- disability and/or illness,
- sexual orientation,
- gender identity,
- family status,
- pregnancy,
- physical appearance,
- trade union activities,
- the status of whistleblower,
- political opinions,
- religious beliefs,
- ethnic, social, cultural or national origins.

This commitment applies at all times of business life: from hiring to promotion, training, remuneration, job retention and working conditions. The Group encourages its employees to report any situation that runs counter to this commitment against discrimination through our Integrityline whistleblowing system.

At Eramet "Our Strength Lies in our Differences".

Eramet is committed to diversity and professional mobility

Eramet is a diverse and global Group. It is convinced that the diversity of its employees constitutes a strength and ensures the promotion of equal opportunities.

Only the competence, experience and skills of staff are taken into account in the selection of employees and the development of their careers. Recruitment is justified by objective criteria.

The Group ensures that it develops a common culture that respects the uniqueness of each individual.



Eramet is committed to combating all forms of harassment

Eramet fights against any form of harassment in the workplace and is committed to ensuring that no one can be the subject of acts leading to an infringement of his/her rights and dignity. The Group will take all necessary measures to prevent or sanction any form of coercion, harassment or persecution.

If an employee falls victim to or witnesses such behaviour, they must immediately report it to their line manager, the Human Resources Department, or the Ethics and Compliance Director. No retaliation action may be taken against an employee who has made a report in good faith.

Eramet is committed to fair social dialogue

Eramet makes every effort to ensure honest and truthful social dialogue, guaranteeing the relationship of trust between employees and the Group. Throughout the world, it guarantees the exercise of trade union rights and respects the right of employees to join trade unions or workers' organisations of their choice. Everywhere, the departments of the Group and the subsidiaries communicate and negotiate openly with the social partners on issues of collective interest and will encourage all forms of dialogue, whether individual or collective.

To facilitate this dialogue, Eramet has set up dedicated consultation bodies, in each of its subsidiaries and at Group level.

Eramet is committed to respecting the privacy and personal data of its employees

Eramet attaches the utmost importance to the respect of the privacy of its employees. It therefore protects the confidentiality of any personal data communicated to it by employees. The Group ensures that the information provided to the Group for a particular purpose is not sent to third parties or used for any other purpose without the authorisation of the party who initially transmitted it.

Eramet is committed to community development

Eramet has a presence in more than twenty countries with very different cultures and traditions. Eramet must ensure that the rights of people and local communities are respected.

The Group is working to develop lasting relationships with the local populations, regional authorities

and local communities in the territories where it is located. It is committed to fully respecting traditions and cultures.

In accordance with the applicable laws and regulations, the Group may make donations to charitable organisations and sponsorship actions. These actions are governed by a Group procedure.

Eramet maintains total political neutrality in the countries where it is present. When the Group contracts with public authorities, state or regional authorities, in order to contribute to the financing of development projects, it shall refrain from any contribution or provision of services to holders of public mandates, parties or political organisations. The Group respects the right of its employees to get involved individually in local political and civic life: they must separate their personal political activities from their mission within the Group.

Eramet is committed to relationships of respect and trust with all stakeholders

Eramet fosters relationships with its service providers and suppliers based on respect and trust and considers these relationships to be long term.

Eramet's Supplier Code of Conduct and the applicable procedures govern relations with service providers and suppliers and ensure fair treatment between suppliers and between service providers. The criteria of price, quality, performance, delivery times and the determination of the services offered for the Group's needs are the foundations of all its purchasing decisions. Group employees are subject to strict impartiality and objectivity in their relations with all stakeholders.

The Group has adopted a CSR/Ethics evaluation procedure for suppliers that formalises its commitment to take into account the issues of sustainable development related to procurement (working conditions and standards, respect for the environment, contribution to the fight against global warming, good business practices).

Eramet is committed to respecting and protecting the environment

Eramet has an Environmental Responsibility Policy. Making protection of the environment and management of its risks and impacts a priority, the Group strictly complies with the applicable regulations and develops performance standards in accordance with best industry practices. It pays particular attention to the characteristics of its products as well as the risks and impacts related to their use.

Eramet's goal is to meet the best global standards for sustainable development. Knowing precisely the reality of the impacts of its operations is a necessity. Knowing how to anticipate and assess progress as well as difficulties is essential for management of the Group's industrial projects.



Eramet is committed to its customers

Eramet builds long-term relationships with its customers based on loyalty and a constant demand for quality. In this respect, Group employees ensure that Group customers are informed and made aware of the principles and values promoted by the Charter.

Eramet is committed to treating all its customers fairly and objectively, regardless of their size. Thus, Eramet's employees are constantly seeking to offer the Group's customers the most appropriate products and services to meet their needs and are always striving for their satisfaction.

In addition, Eramet ensures that it does not market products that are derived from or made up of ore from conflict areas or countries subject to embargo or sanctions.

Eramet is committed to reliable and truthful market information, and to the prevention of insider trading

Eramet ensures that it provides stakeholders with accurate, precise and truthful financial information. To meet this transparency objective, accounting rules have been put in place within the Group that meet the best international standards and strictly comply with the regulations in force.

Eramet attaches the utmost importance to avoiding insider trading and establishes strict rules to ensure compliance with these obligations by its employees. The Group ensures that all of its employees are aware of the rules/principle of professional confidentiality.



THE COMMITMENTS OF ERAMET EMPLOYEES

Eramet employees must set an example and adopt ethical behaviour that does not violate the laws of the countries in which they operate or this Charter.

Compliance with the law

Employees undertake to comply with all applicable laws. This is a fundamental and non-negotiable aspect of Eramet's activities. In certain circumstances, the Ethics Charter may go beyond what is required by law. In this case, Eramet expects its employees to meet the standards defined by the Charter.



it operates. Each Group employee undertakes to comply with the legislation of the country in which he/she works and never to be involved, directly or indirectly, in an act of active or passive corruption.

In order to put its corruption prevention policy into practice, Eramet is committed to ensuring that, through the Group's Anti-Corruption Policy, each of its employees and partners understands exactly what this phenomenon covers and is able to identify actions that could be assimilated to acts of corruption and imply certain risks to the Group.

The fight against extortion

Eramet is aware of the pressure that can be exerted on its employees in order to force them by various means of extortion to make payments or grant benefits.

In the event of an extortion attempt, Eramet will systematically inform the authorities and file a complaint if necessary. Everywhere, it will work with the public authorities to stop the corruption practices of which it is a victim, while at the same time ensuring the safety of its employees and third parties who are victims of these practices.

Prevention of corruption

The Eramet Group is committed to preventing corruption

The fight against corruption is a top priority for the Group.

The Group has a duty to prevent corruption, out of respect for the States and partners alongside which

Prevention of all forms of money laundering

Money laundering is when sums of money obtained illegally are reinvested in legal activities.

Eramet is committed to ensuring that, in accordance with the Anti-Corruption Policy, the prevention of any form of money laundering is subject to particular attention, particularly in the context of the above-mentioned third-party evaluation processes.

THE COMMITMENTS OF ERAMET EMPLOYEES

The fight against conflicts of interest

The Group requires its employees to demonstrate loyalty and avoid putting themselves in a position in which they may find themselves in a situation of conflict of interest. The Conflict of Interest Policy governs management of these situations.

If an employee is in a situation that could create conflict between their personal interests or those of their family or relations, and the Group's interests, they must immediately and transparently inform their line manager, who will then contact the Ethics and Compliance Department. This procedure will enable the employee to be granted a specific written waiver, if appropriate. Otherwise, the employee must put an end to the conflict of interest.

Compliance with competition rules

The Group strictly complies with the regulations relating to competition, which in particular prohibit any cartel, concerted practice or abuse of a dominant position on the market concerned, vis-à-vis its customers and suppliers.

Respect for confidentiality and industrial property

Eramet considers confidentiality one of its priorities. The Group assures its employees and partners that the confidential information they communicate to it will be processed and used only for authorised purposes. All the information made available to employees must be used with respect for the security, confidentiality and image of the Group companies, as well as in compliance with all the legal and regulatory requirements likely to incur the civil or criminal liability of the employees.

Every Eramet employee is bound by a general duty of discretion on the information of which he/she becomes aware in the course of his/her duties.

Eramet employees must exercise the utmost care in order to adequately preserve and handle the Group's intellectual and industrial property (patents, know-how, business and manufacturing secrets, registered trademarks and industrial concepts).



Preservation of Eramet's image and reputation

Employees are committed to preserving Eramet's image and reputation.

Communication tools and social networks must be used responsibly by employees. Only duly authorised employees are authorised to communicate, on behalf of the Group, on its activities and products. Employees will refrain from publicly taking a stance on these sharing tools likely to engage or compromise the interests or image of the Group.

In addition, employees will respect the Policy for the use of the IT resources made available to them.

IMPLEMENTATION OF THE ETHICS CHARTER

The Charter is available on the Group's website: www.eramet.com. It is distributed to all employees of the Group and will be handed over when each new employee of the Group signs their employment contract.

As of 18 September 2023, it cancels and replaces the previous version of the Ethics Charter.

Training will be organised regularly across all Group entities in order to raise employee awareness of the principles and values expressed in this Charter, and to provide answers to any questions they may have in the context of the implementation and day-to-day compliance with the Charter.

In addition, Eramet will be sensitive to ensuring that those who work or act recurrently with the Group have ethical concerns that are compatible with its own. This will be an important selection criterion when establishing its commercial relations. In addition, the Group's relations with its partners, in particular its intermediaries, will be dependent on them refusing any act of corruption or money laundering, any conflict of interest situation or any other violation of the legal provisions applicable in the countries in which they operate.

With this in mind, the Group will reserve the right to ensure that its partners themselves comply with the principles and values expressed in the Charter. In particular, it will be able to verify that its partners comply with conventions and laws criminalising corruption.

The Ethics and Compliance Department

Eramet has created, at the highest level of management, a dedicated position of Ethics and Compliance Director in charge of deployment and monitoring of the Group's compliance programme.



The Ethics and Compliance Director:

- is appointed by the Chairman/Chief Executive Officer,
- is independent of the Group's divisions and subsidiaries,
- reports directly to the Chairman/Chief Executive Officer.

He/she has operational responsibility for the Eramet compliance programme. His/her missions cover, among other things: the design, dissemination and implementation of policies on all matters relating to compliance and ethics; the training of employees in compliance-related topics; management of the conformity risk related to third parties; verifications, audits and investigations, in collaboration with the internal audit department, on compliance issues and events reported by Group or third-party employees; management of the Integrityline whistleblowing platform.

He/she shall submit each year to the Chairman and Chief Executive Officer a report describing the procedures for deploying and monitoring the compliance programme as well as any violations of the principles contained in this Charter and the actions taken to remedy them. Eramet's Executive Committee reviews twice a year the actions on ethic and compliance related topics. The Eramet's Audit Committee also reviews these actions twice a year.

Furthermore, signature of the Group's main contracts that may pose a compliance risk may be subject to the prior opinion of the Ethics and Compliance Director.

The Eramet whistleblowing system (eramet.integrityline.org)

Each employee must be vigilant in order to ensure compliance with the Charter. Any employee who believes that a principle or a value promoted by the Charter is being violated must inform his or her supervisor.

Employees may also use the Group's whistleblowing system.

This whistleblowing system meets the requirements of the Reference System of the French Data Protection Authority (the "CNIL") relating to the processing of personal data intended for the implementation of a whistleblowing procedure as adopted on 18 July 2019.

This whistleblowing system is open to all Group employees and all external stakeholders and can be used to report the following:

- corruption, bribery and facilitation payments,
- money laundering,
- favouritism, influence peddling and illegal taking of interest,
- fraud and/or falsification of documents,
- theft and embezzlement of funds,
- conflict of interest,
- anti-competitive practices,
- unfair discrimination and treatment,
- moral or sexual harassment at work,
- gender-based action or violence,
- infringement or risk of infringement of the human rights and fundamental freedoms of Group employees or third parties affected by the Group's activity,
- violation of laws relating to the protection of personal data,
- conduct contrary to the Group's policies and standards relating to health and safety, security at work and protection of the environment, and more generally any crime or offence, threat or harm to the public interest.

Employees and stakeholders wishing to use the whistleblowing system should submit their report via a secure portal the address of which can be found on the Ethics and Compliance page of the Group's website. Only the Ethics and Compliance Department and the persons selected by it have access to the content of this message as well as to the identity of the person who used this system, if the latter revealed it. All measures are taken to respect the confidentiality of the information contained in the report.

The facts reported will be handled with the utmost rigour and will then be investigated, in accordance with the professional whistleblowing management procedure.

The information collected through this whistleblowing system may only be used in accordance with the procedure mentioned above.

Eramet undertakes to ensure that the whistleblower, whether internal or external, and any natural person or legal entity assisting them in making the report or disclosing it will not undergo any form of reprisal due to the use in good faith of the whistleblowing system, even if the facts subsequently prove to be inaccurate or do not give rise to any follow-up. On the other hand, misuse of the system may expose the author to disciplinary sanctions as well as legal proceedings.

In any event, in accordance with the legal provisions in force, Eramet guarantees impartial processing of reports by the persons charged with this mission, compliance with the rules relating to the protection of personal data in the procedures for recording reports collected verbally, and reiterates that the whistleblower may also contact the competent public authority.

ERAMET'S POLICIES

The policies form a set of principles, standards and behaviours that reflect the Group's long-term intentions concerning the nature of its business and the company's relations with the main internal stakeholders (staff and their representatives) and external stakeholders (suppliers, customers, shareholders, competitors, etc.). They have been adopted on subjects considered essential in terms of performance and commitment for the Group.

Policies	
Human Rights Policy	Anti-Corruption Policy
Security Policy	Responsible Lobbying Policy
Health & Safety Policy	Responsible Purchasing Policy
Human Resources Management Policy	Tax Policy
Environmental Policy	Risk Management Policy
Energy and Climate Policy	Digital Use Policy
	Management Control Policy





Eramet **Management** System

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