



REPORT  
DECEMBER 2023

# HUMAN RIGHTS



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# Eramet in brief

## A key stakeholder in the responsible mining of metals

The world is facing the greatest challenge in its history: making a success of the energy transition and re-establishing the conditions for sustainable harmony between Man and Earth.

To make this transition a success, the world will need metals from responsible mines that respect people and the environment.

## Eramet's purpose embodies its vision and ambition:

Become a reference for the responsible transformation of the Earth's mineral resources for 'living well' together.

## KEY FIGURES

**10,400**  
EMPLOYEES

**16**  
MINING  
AND INDUSTRIAL  
SITES IN 15 COUNTRIES

**€5.24**  
BILLION  
IN SALES IN 2022  
(ADJUSTED TURNOVER)  
**LARGEST PRODUCER**  
OF HIGH-GRADE  
MANGANESE ORE

**LARGEST PRODUCER**  
OF REFINED  
MANGANESE ALLOYS

**LARGEST PRODUCER**  
OF TITANIUM RAW  
MATERIALS

**4<sup>TH</sup> LARGEST**  
PRODUCER OF  
ZIRCON

**LARGEST**  
NICKEL MINE IN THE  
WORLD (INDONESIA)

**LARGEST**  
EUROPEAN PRODUCER  
OF LITHIUM  
IN 2024

FIND OUT MORE ON ERAMET'S WEBSITE  
[www.eramet.com](http://www.eramet.com)

# The purpose of this report

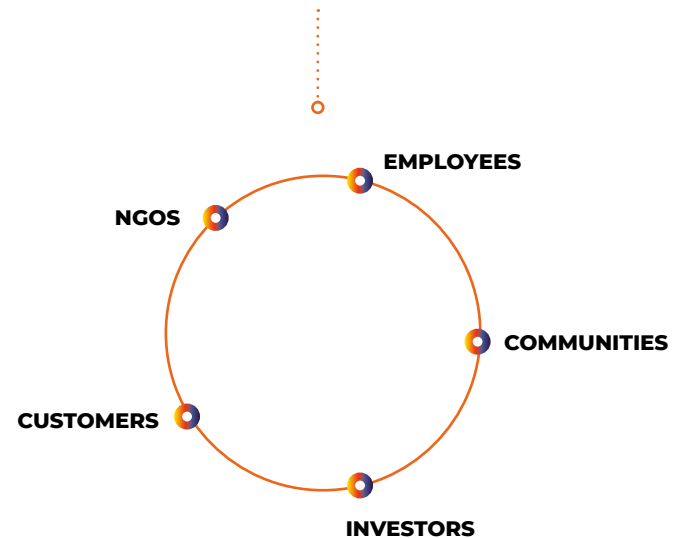
Committed to its Corporate Purpose and CSR Roadmaps, Eramet has decided to publish its first human rights report. The aim of this report is to answer external and internal stakeholders' questions about Eramet's approach to human rights.

This report is directly inspired by the United Nations Guiding Principles Reporting Framework, which is a guidance tool for companies to help them report on human rights issues in line with their responsibility to respect human rights, as established by the United Nations Guiding Principles on Business and Human Rights (UNGPs).

The purpose of this human rights report is to present everything Eramet has achieved and developed in terms of human rights and to highlight the areas where there are opportunities for continued development. This report illustrates how the Group implements its processes to respect human rights in practice and the challenges it faces. It also offers an opportunity to share the voices of stakeholders and increase transparency, providing internal and external stakeholders – such as employees, employee representatives, NGOs and investors – with information on Eramet's human rights commitments and actions.

Eramet believes that meaningful and constructive discussions with all stakeholders is key to drive change in a collaborative way.

## WHO IS IT FOR?







**CHRISTEL BORIES**  
Chair and CEO

**P**rotecting human rights is not just a legal obligation: it's a moral duty that we all share at Eramet. Human rights are non-negotiable principles and we believe that they should guide each of our decisions and actions.

We reasserted this position by publishing our first Human Rights Policy in 2019. It was drafted in cooperation with both our internal and external stakeholders and was in line with the fundamental principles defined in the International Bill of Human Rights, the International Labour Organization's Fundamental Conventions, and the Guiding Principles on Businesses and Human Rights. Since then, this policy, signed by Eramet's Executive

Committee, has been a testimony of our commitment towards our employees, our commercial partners and of course, the communities living near the sites where we operate.

To show that we're walking the talk, **we've since developed a robust and dedicated structure as well as efficient tools to monitor our human rights-related risks and make sure that our ecosystem is in line with our guiding principles.** We ensure that our employees take regular training to understand human rights and incorporate them into their work. Our Social Impact and Human Rights teams have also addressed the issue of **our responsibility towards our value chain**, working with our subcontractors,

our suppliers, our partners and our customers so that our mining and metals business also becomes a powerful force for promoting human rights on a global scale.

Today, we're taking another step forwards by publishing our first human rights report. **It showcases not only our values but also our very concrete actions to protect human rights**, as well as the challenges that we're facing in each country where we operate. I'm confident that this report will be welcomed by all our stakeholders, demonstrating once again our commitment to becoming a leading figure in the responsible processing of the Earth's mineral resources so we can 'live well' together.



**Protecting human rights is not just a legal obligation: it's a moral duty that we all share at Eramet."**

**CHRISTEL BORIES**



# The Executive Committee's human rights vision



**NICOLAS CARRÉ**  
Chief Financial Officer  
in charge of procurement  
and IT

**As an international mining and industrial company, we have a duty of care to ensure that human rights are respected throughout our value chain.** This represents a real challenge, given the complexity and diversity of our activities and geographies with numerous suppliers in very different countries. But it is also a driver of progress for all of our business partners, encouraging them to adopt – as we do – best practices in terms of respecting and developing human rights.



**ANNE-MARIE LE MAIGNAN**  
Executive Vice-President  
Human Resources  
Health and Security

**Respect for human rights and 'living well together' are part of our corporate purpose and our corporate culture.**

Wherever we operate, we foster human relations based on respect, listening, benevolence and integrity. Our aim is to guarantee all our employees a high level of security, both at work and in their personal lives, and to create the conditions for them to feel recognised and included in all their diversity. In particular, we have strengthened our Ethical Charter in favour of the LGBT+ community and engaged in several initiatives to foster inclusion in the workplace. In 2023, we also launched the Eramet Global Forum, a transnational employee representation and social dialogue body empowered to sign agreements for all Group employees – an initiative that is unprecedented in the mining industry.



**KLÉBER SILVA**  
Chief Operating Officer

**Safety is the first human right.** Our top priority is to ensure the safety of all our employees, subcontractors on and around our sites as well as the safety of our communities, by developing a zero-accident culture. This is both an individual and a collective responsibility, to which we must devote constant attention. Because when we have a culture of safety, when we take care of ourselves, others and our environment, we develop virtuous behaviours that improve all human rights and enable us to be responsible neighbors to the communities around our sites.



**GUILLAUME VERCAEMER**  
Group General Counsel

**As stated in our Human Rights Policy, Eramet does not tolerate any degree of harassment, violence or discrimination, or any unethical behaviour.**

Therefore, in addition to having set up a dedicated structure, the Group is determined to give all its stakeholders – both internal and external – the means to report any action or behaviour, whether experienced or witnessed, that does not comply with Eramet's guiding principles. That is why we have created IntegrityLine, an online whistleblowing system that guarantees protection, anonymity and confidentiality to whistleblowers.



**VIRGINIE DE CHASSEY**  
Chief Sustainability and  
External Affairs Officer

**As well as managing our social and environmental impacts, our 'Act for Positive Mining' CSR roadmap is first and foremost a tool for developing human rights in the countries where we operate.** It's organised around three priorities: Caring for people, Acting as a trusted partner to Nature, Transforming our value chain. Having laid the foundations with our 2018-2023 CSR plan, the progress made in each of these areas will have an immediate impact on improving the human rights of local communities, whether in terms of better access to healthcare, water management at our sites or the decarbonisation of metallurgical processing activities.

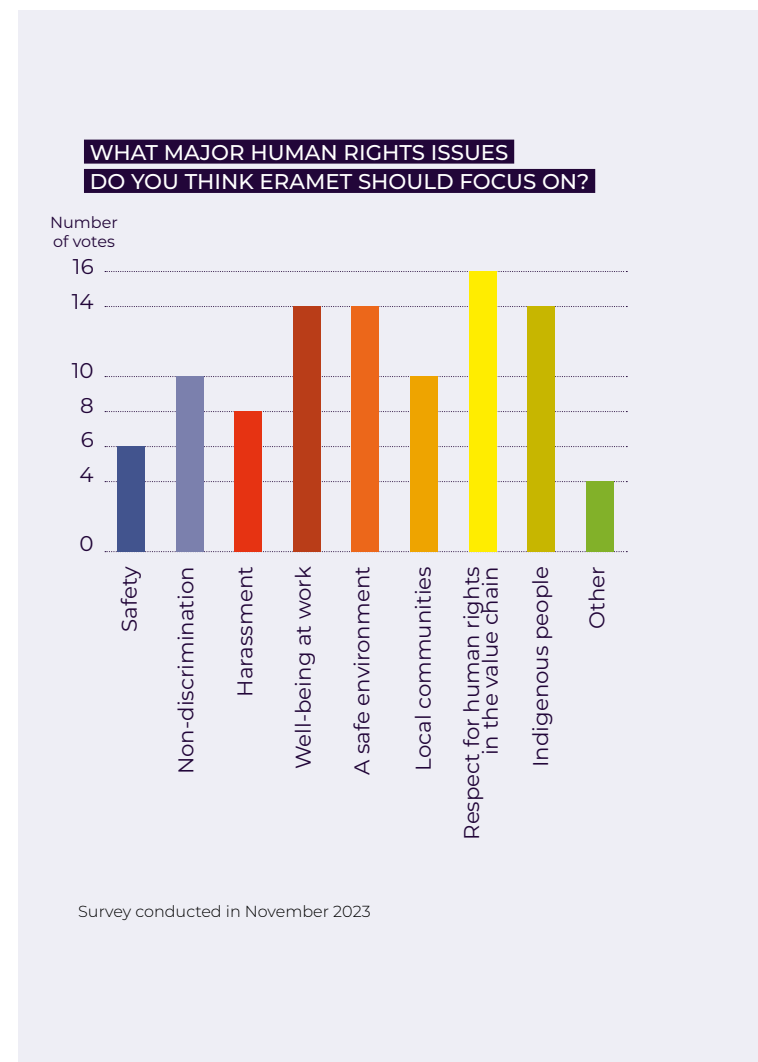


**GEOFF STREETON**  
Chief Development Officer  
in charge of strategy, innovation  
and business development

**Respect for human rights is an essential criterion for all our business operations and including our development projects.** As a responsible mining company, we refrain from operating in situations where the local political or social context creates an unacceptably high risk of human rights violations. We also seek to avoid operational practices that can have significant negative consequences and in turn lead to a decline in human rights within host communities (pollution, displacement of populations, quality of life, reduced access to social or natural resources, etc.).

# Making human rights everyone's commitments

In the process of writing this report, a selection of different employees and representatives were asked for their views on the Group's human rights approach. The survey was sent to three employee categories: employee representatives, experts from a range of fields from the different sites and experts from different fields at the corporate level. All answers were anonymous.



# PART.1

## ERAMET'S HUMAN RIGHTS COMMITMENTS

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Monada mine,  
Gabon.



# Eramet's corporate purpose

Eramet is committed to integrating human rights into all aspects of its business.



## OUR CONVICTION

The world is facing its greatest challenge yet: making a success of the energy transition and re-establishing the conditions for a lasting harmony between people and planet.

To make this transition a success, the world will need metals that are responsibly extracted, in a way that respects people and the environment.

## OUR CORPORATE PURPOSE

We want to become a reference for the responsible transformation of the Earth's mineral resources for **'living well'** together.

## MANIFESTO

Because the question of the availability and quality of raw materials is a central issue in the ecological and energy transition, we are mobilising.

Because we are convinced that environmental issues cannot be tackled without addressing societal challenges head-on, we are taking action.

Our corporate purpose underpins these values and our actions.

Our ambition is to be an effective, civic-minded, proactive company that acts as an agent for change. This ambition guides all our strategic decisions and fuels our creativity and agility.

Contributing to the circular economy, controlling our energy consumption and emissions, strategically repositioning ourselves in the metals that are essential to the energy transition, sharing added value, protecting biodiversity and more besides – this corporate purpose is our collective ambition.



It serves as a compass for our vision of people – our employees, whose safety and development are our priorities; the communities in our areas of operation, to whom we are committed; or, more generally, our fellow citizens, for whom metals are essential in terms of personal and collective well-being.

This compass aligns us with the greatest challenges of the future: meeting the needs of current and future generations by supplying the metals required for the energy transition and for economic development, ensuring that that supply is responsibly sourced and carefully managing the Earth's resources.

We are Eramet. And we are resolutely committed to becoming a key player in the mining and metallurgy industry, and to creating the conditions for lasting harmony between people and the planet.

# The Human Rights Policy

The Human Rights Policy is the key document on the Group's commitments to human rights.

Eramet believes that companies have a key role to play in respecting and promoting human rights. The Group is committed to promoting and upholding the fundamental principles of internationally recognised human rights, as defined in the International Bill of Human Rights, the International Labour Organization's Fundamental Conventions and the Guiding Principles on Businesses and Human Rights. The Human Rights Policy formalises this commitment, following the guidelines set out in the Group's Ethics Charter and complementing the Group's other policies. This commitment is fully in line with the Group's strategic vision.

Adopted in 2019, the Human Rights Policy (available on [www.eramet.com](http://www.eramet.com)) was developed in consultation with internal and external stakeholders (including NGOs and unions). It allows Eramet to reassert that this core topic is an essential part both of its managerial and operational approach and of its relations with internal and external stakeholders.

The Policy is signed, at the highest level of governance, by all members of the Executive Committee. In 2023, to comply with the Initiative for Responsible Mining Assurance (IRMA), it was revised in conformity with the Group's new standard on responsible mining.

## THE POLICY APPLIES TO STAKEHOLDERS IMPACTED BY ERAMET'S ACTIVITIES



### EMPLOYEES AND REPRESENTATIVES

#### TOPICS OF INTEREST

Employee and subcontractor health and safety, working conditions, non-discrimination, harassment, unions, etc.



### COMMUNITIES

#### TOPICS OF INTEREST

Health and safety of communities, natural resources, resettlement, cultural heritage, indigenous communities' cultures and traditions, etc.



### SUPPLIERS AND SUBCONTRACTORS

#### TOPICS OF INTEREST

Duty of care in the value chain (health and safety, working conditions, etc.)

## OTHER KEY STAKEHOLDERS



### CUSTOMERS

**TOPICS OF INTEREST**  
Product quality and innovation, traceability, environmental, social and governance (ESG) performance, duty of care and supply chain.



### STATES, ELECTED REPRESENTATIVES AND NATIONAL AND LOCAL AUTHORITIES

#### TOPICS OF INTEREST

Sharing value, contributing to the economy, human rights (for example, security and human rights), national and local development, job creation, mining contracts and agreements, compliance.



### CIVIL SOCIETY, MULTI-STAKEHOLDER INITIATIVES, NGOS, LOCAL CHARITIES, PROFESSIONAL ASSOCIATIONS ETC.

#### TOPICS OF INTEREST

Commitment to communities, biodiversity and rehabilitation, sustainable mining, energy consumption and GHG emissions, circular economy, respect for human rights, tax transparency.



### SHAREHOLDERS AND INVESTORS, DEBT HOLDERS AND LENDERS

#### TOPICS OF INTEREST

Operating and non-financial (environmental, social and governance) income, duty of care and supply chain.



### LOCAL, EUROPEAN AND INTERNATIONAL PROFESSIONAL ASSOCIATIONS

#### TOPICS OF INTEREST

Regulatory monitoring (raw materials, batteries, recycling, energy, products, CSR), local challenges specific to each operations site.

### COMMUNICATION AND DIALOGUE METHODS

Group publications, meetings, site visits, institutional letters, open dialogue, traceability tools, specific events, etc.

# Key Standards and Golden Rules

To be more operational, Eramet created golden rules specifically relating to human rights (forced labour, working conditions, etc.). They apply throughout the Group, including all entities and subcontractors. The rules were integrated into the Eramet Production System to be implemented by operational staff. They give descriptions of human rights along with examples for more clarity.

## HUMAN RIGHTS



Know the Group's human rights standards



Ensure good working conditions



Respect indigenous populations



Respect employee housing standards



Ensure the right to collective bargaining and union rights



Assess your impacts and risks on human rights



Zero tolerance of forced labour



Discrimination of any type is forbidden



Be attentive to your security



Zero tolerance of child labour



Harassment of any kind and violence is forbidden



Respect communities' human rights

## COMMUNITIES



Avoid and mitigate negative impacts on communities



Preserve the local cultural heritage



Do not access land without prior clearance



Respect community health and safety



Have a grievance mechanism



Protect temporary local staff

## ERAMET PRODUCTION SYSTEM GOLDEN RULES



Human rights are integrated into the Eramet Management System through a Key Standard. From 2023 onwards, compliance with this document will be monitored by the Group's Internal Control Department and through regular audits.



# Internal tools

## The Ethics Charter

is the second most important Group document on human rights, encapsulating key topics such as discrimination, health, safety and harassment. This document is shared with and signed by the contractors and suppliers the Group works with.

The Charter was constructed in consultation with and approved by unions and key experts.

The Ethics Charter can be updated when the context so requires (such as new laws or specific events). It is supervised by the Ethics and Compliance Department and drafted jointly by the Social Impact & Human Rights Department, Human Resources Department for matters relating to diversity & inclusion, social dialogue, discrimination, coercion and harassment, the Internal Control, Audit and Risk Department and the Data Protection Officer, and is approved and signed by the Executive Committee.

## The Supplier Code of Conduct

is a document that highlights the Group's commitments to human rights (quoting from the Human Rights Policy and the Ethics Charter) and is signed by suppliers that work or wish to work with Eramet.

## The CSR Roadmap

Eramet manages its CSR performance using a roadmap, a global tool that addresses its challenges and risks and includes its contribution to the United Nations Sustainable Development Goals. The roadmap links CSR priorities to the pillars of its strategic vision. It is shared with and approved by the CSR and Strategy Committee and the Board of Directors and is reviewed periodically. The Executive Committee also keeps a close eye on the progress of the commitments made, with reviews conducted on at least a half-yearly basis, supported by more detailed internal management tools through a quarterly ad hoc organisation, the CSR Steering Committee. The level of success of the CSR roadmap is taken into account when calculating bonuses.

## EXTERNAL INITIATIVES AND PARTNERSHIPS

# Engagement with global organisations

Share experiences and help build collective solutions



## The Global Compact,

a United Nations initiative designed to encourage companies to integrate and promote principles relating to human rights, international labour standards, the environment and the fight against corruption, and to report on the subject on a regular basis. In 2023, Eramet took part in the "Human Rights Accelerator" along with other French companies. The Group also participates in two working groups: the community relations working group and the human rights working group. Through these working groups, Eramet learns and exchanges with other major French companies on human rights practices in the private sector.

## EITI (Extractive Industries Transparency Initiative)

Eramet also works to promote transparency within the extractive industry. This initiative, which the Group joined in 2011, is based on a set of principles and rules, bringing together governments, companies, civil society groups, investors and international organisations to promote revenue transparency at a local level. By adhering to these principles, Eramet demonstrates its willingness to ensure the responsible development of natural resources and to ensure transparency in financial flows between companies and host countries, and also to ensure regular accountability to its stakeholders.



**IRMA**, which ensures the implementation of a solid human rights protection framework and certifies mines as responsible with high level standards. This initiative is specifically for the mining sector. It is governed by a Board of Directors with representatives from multiple different sectors, including mining companies, companies that purchase mined materials to make other products, NGOs, affected communities, organised labour and investment and finance companies. This is a robust human rights standard, drawing its content from existing standards such as the IFC's Performance Standards, the International Labour Organization Conventions and the Voluntary Principles on Security and Human Rights. The Group's decision to join the IRMA initiative and have its mines audited by 2027 represents a major turning point in Eramet's consideration of human rights.

(For more information, please see the Focus on IRMA p. 39)

## edh **Businesses For Human Rights –** Entreprises pour les droits de l'homme (EDH)

Eramet is an active member of EDH, a business association that specialises in human rights. The association is made up of over 20 international companies from different sectors and represents nearly 2.5 million salaried workers. Participating in this voluntary and multisectoral initiative helps to support the Group in developing its human rights due diligence, mainly through sharing best practices and tools, such as e-learning programs, rolling out Human Rights Policies in various countries and drafting the Vigilance Plan.

# PART.2

## IMPLEMENTING ERAMET'S HUMAN RIGHTS COMMITMENTS

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Nursery, Weda Bay  
Nickel, Indonesia.

# Governance

To continue to progress, human rights are integrated into all levels of governance.



“To have a significant impact, human rights must involve the highest level of governance, just like other ESG risks and opportunities. This allows for a global and operational approach involving key stakeholders from different fields, all working towards the same goal.”

**VIRGINIE DE CHASSEY**

Chief Sustainability and External Affairs Officer

## COMMITMENT AT THE TOP LEVEL

### ►The Board's CSR and Strategy Committee

The CSR and Strategy Committee, made up of directors with recognised expertise, is tasked with assisting the Board and, in particular, evaluating the degree of consistency between the Group's strategy and the CSR action plans it espouses. It ensures that management performs an analysis of internal or external factors related to CSR issues (risks and opportunities) impacting the Group and that the Vigilance Plan is implemented in accordance with legislative requirements, noting the main findings and observations of independent third-party bodies in the context of CSR regulations, assessing them and examining management's action plans, including the Roadmap.

### ►The Executive Committee

Human rights fall within the remit of Virginie de Chassey, an Executive Committee member, as part of the Sustainable Development and Corporate Commitment Department. All major projects such as human rights risk mappings, assessments and roadmaps are presented and approved at Executive Committee level.

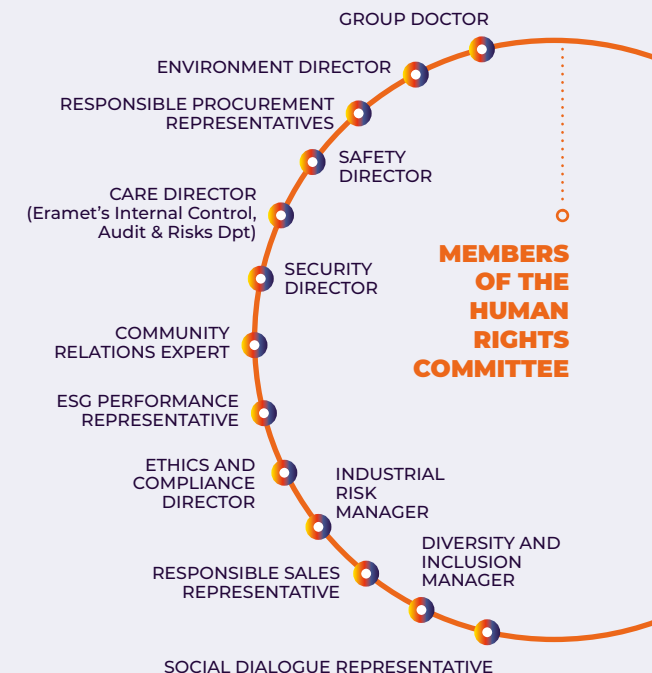
## EXECUTIVE COLLEGIAL APPROACH

### ►The CSR Steering Committee

The CSR Steering Committee closely monitors the progress of CSR commitments during interim reviews, carried out based on careful internal management and organised on a quarterly ad hoc basis. This Committee comprises representatives of the Departments in charge of the CSR Roadmap objectives and business line experts (HR, Finance, Environment, Strategy, Societal and Human Rights Impact, Ethics, Procurement, Commerce, Digital Transformation, and operational Divisions). It also generates proposals and initiatives for the Group, with the aim of continuously improving the sustainability of its operations. In addition, it monitors actions pertaining to the Group's Vigilance Plan, incorporated into the roadmap from its creation, within this context.

### ►The Human Rights Committee

The Human Rights Committee is a committee made up of the Group's various experts in areas directly related to human rights (safety, HR, health, audits, ethics, etc.). The aim of the Committee is to ensure that the recommendations made following the Group's human rights risk mapping are implemented. This committee plays an essential part in the everyday management of human rights. Indeed, human rights include a broad range of topics such as security, safety, diversity and inclusion, harassment and community relations. As such, the Social Impact and Human Rights department cannot cover all topics on its own and does not have the necessary expertise to do so. The Committee has become an effective internal tool for reporting on and communicating about the Human Rights approach. It meets every quarter and more frequently if necessary. ●●●







“The mission of the Social Impact and Human Rights department is to raise Eramet to the very best level in terms of human rights and to ensure it is recognised as a company that protects human rights within its value chain”.

**MARIE-AXELLE GAUTIER**

Social Impact and Human Rights Director



## COUNTING ON HUMAN RIGHTS EXPERTISE

### ►The Social Impact and Human Rights Department

The Social Impact and Human Rights Department was created in 2021 within the Sustainable Development and Corporate Commitment Department because this area was considered a key CSR issue for the Group. The Social Impact and Human Rights Department is responsible for meeting the Group's human rights agenda, by implementing standards, steering action plans and supporting sites in this area. Its main human rights-related missions are:

#### To roll out the Group's approach to the highest standards

- Assist sites with implementing human rights standards including IRMA
- Ensure the human rights objectives in the Group's CSR roadmap are implemented
- Manage the Group's human rights risk mappings and their action plans
- Evaluate sites' compliance with the Human Rights Policy and implement a progress approach

#### To report on the process to external stakeholders

- The human rights component of the annual report (Universal Registration Document) and the Group's Vigilance Plan
- Dialogue with NGOs and civil society organisations

#### To manage controversies

- Build evidence regarding allegations against Eramet

### ►The Human Rights Officer

The Human Rights Officer is the team's expert and direct point of contact for entities. The Human Rights Officer is responsible for carrying out the team's human rights missions: rolling out the Group's approach to the highest standards, supporting sites in implementing human rights standards, including IRMA, ensuring that the human rights objectives set out in the Group's CSR roadmap are implemented, managing the Group's human rights risk mapping and action plans and reporting externally on the process.

#### ►The Human Rights Representatives network

The Human Rights Officer can count on the Human Rights Representatives network, created in 2022, following the first assessment of Group sites' compliance with the Human Rights Policy. Action plans were drafted and the Representatives were selected by the sites' management to guide the plans and ensure they were implemented. These Representatives are the main point of contact between the Human Rights Officer and the site. Each Eramet site has a Human Rights Representative. Human rights concerns are regularly discussed by each subsidiary's management committee.



“Human rights have become a cornerstone of Corporate Social Responsibility – they are a transversal, ever-moving and complicated subject, bringing us together through teamwork, exchanges and dialogue and making us more aware of our impacts, including the positive impacts we can have.”

**SOL CASTAGNINO**

Human Rights Officer

# Global Human Rights Governance Frameworks

DOMAINS	HUMAN RIGHTS	HUMAN RESOURCES, HEALTH, SAFETY AND SECURITY	COMMUNITIES	ENVIRONMENT	ETHICS	PROCUREMENT/ SALES	CONTROL, AUDIT, RISKS
<b>CHARTER &amp; POLICIES</b>	Human Rights Policy	Human Resources Management Policy — Health Policy — Safety Policy	Included in Human Rights Policy	Climate Policy — Environment Policy	Ethics Charter	Responsible Procurement Policy — Local procurement	Risk Management Policy
<b>INTERNAL GOLDEN RULES</b>	Human Rights Golden Rules		Communities Golden Rules	Environmental Systems Golden Rules — Environmental Basics Golden Rules			
<b>INTERNAL STANDARDS</b>	Respect for Human Rights Standards	Human Resources — Application of health fundamentals — Crisis management system — Essential safety requirements — Industrial risk management — Psychosocial risks — Safety management — Security	Standards for relations with host communities	Environmental management	Use of the whistleblowing system		Risk management framework
<b>INTERNAL PROCEDURES</b>		Integrating EHS/CSR factors into projects — Accident and safety incident reporting — Cause analysis following safety events — Fatigue detection — Managing contractors — Road risk prevention — Chemical risk prevention and hazardous product management	Integrating EHS/CSR factors into projects	Integrating EHS/CSR factors into projects		Know your supplier Know your customer	Group risk management methodology
<b>PROCESSES</b>	Audits – Internal Control framework – Human Rights and CSR assessments – Social, environmental and human rights due diligence						

# How are these frameworks implemented?

## EXAMPLES OF GROUP PROCEDURES AND HOW THEY ARE IMPLEMENTED

### Environment

The Environment Policy and Key Standard aim to define the minimal requirement applicable to all sites and activities. They target the main priorities and results from risk analysis. They foster also an environment culture and a continual improvement approach. The implementation of the policy and Key Standard is coordinated at the Group level by the environment department which relies on a network of environment professional on every site. Technical reviews and audits performed regularly allow to identify the gaps, to assess the maturity of each site and support and review the definition and implementation of corrective action plans and to measure the progresses.

### Safety

The Safety Policy is the cornerstone of the Group' safety vision and is based on a number of key principles. Namely, these are that safety is a corporate value, that Eramet firmly believes all accidents are preventable and that everyone is responsible for their own safety and that of their colleagues and those around them. Safety is the primary responsibility of every manager in the company.

Eramet also expects every employee to demonstrate exemplary vigilance and responsiveness in the face of risk. The Safety Policy is a strong commitment signed by each member of the Executive Committee and countersigned by the Management Committee of each Group site.

The Safety Policy is implemented on each site by the Site Manager, with the support of the Safety Manager and their team. Furthermore, critical activities which could lead to serious or even fatal injuries are governed by rules ("Essential Requirements") and Group standards which are communicated, deployed and monitored on all sites without exception. Subcontractors are covered by the same rules and processes as employees.

### Security

Security and crisis management procedures constitute a set of guidelines that must be implemented. This process involves ongoing exchanges, including weekly meetings, communication channels, training, site visits and follow-up reporting (annually or as needed) with subsidiaries to ensure their implementation, taking into account the specific features of subsidiaries' environments. Action plans are also followed up for site implementation and the organisation of security.

The procedures include training on security and human rights for teams and subcontractors, background checks for all security company agents and inclusion of standards in contracts with companies, traceability through compulsory completion of a mission log, country information via a portal and a security guide. This ensures that employees are aware of their responsibilities in terms of security.

The different types of rules and policies are adopted at Group level, sometimes in concert with sites or other experts, and are included in the Eramet Management System.

They are then implemented within the entities through specific teams and processes, general "dos and don'ts" guidelines, assessments and descriptions of rights and obligations.





# Eramet's Human Rights Journey

In recent years, Eramet has grown and developed, and with this growth has come a path of improvement on all CSR topics including human rights.

## croix-rouge française

On February 24, 2022, the conflict in Ukraine began.

**The challenges associated with this conflict are immense:**

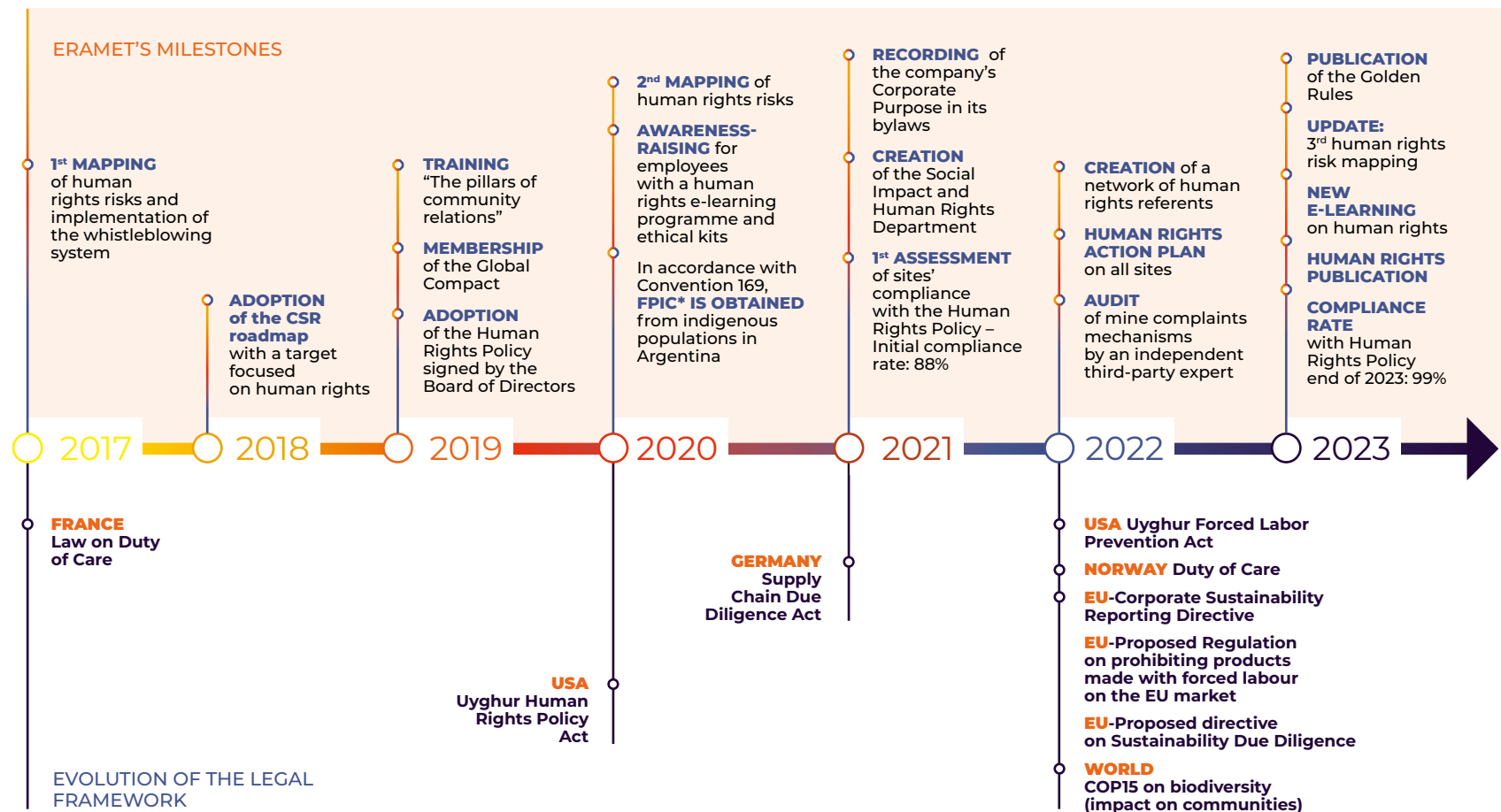
- 18 million people are or will be in need of humanitarian assistance
- More than 14.5 million people have been displaced by the conflict – over a third of the population

On 1 March 2022, the French Red Cross launched an appeal for donations from companies and individuals.

**Eramet has chosen to assist the French Red Cross in the context of the emergency in Ukraine through:**

- **A total of €1 million in financial support**

Thanks to this support, 2.2 million people have benefited from humanitarian assistance, and 188,280 people fleeing Ukraine have been cared for by the French Red Cross in France.



\* Free, Prior and Informed Consent (FPIC) Consent based on: engagement that is free from external manipulation, coercion and intimidation; notification, sufficiently in advance of commencement of any activities, that consent will be sought; full disclosure of information regarding all aspects of a proposed project or activity in a manner that is accessible and understandable to the people whose consent is being sought; acknowledgment that the people whose consent is being sought can approve or reject a project or activity, and that the entities seeking consent will abide by the decision. Source: IRMA Standard for Responsible Mining IRMA-STD-001 June 2018, Glossary of Terms p.189. IRMA\_STANDARD\_v.1.0\_FINAL\_2018-1.pdf

# The 2018-2023 CSR Roadmap

## A driver of human rights

Eramet strives to support the implementation of the SDGs through its human rights approach.

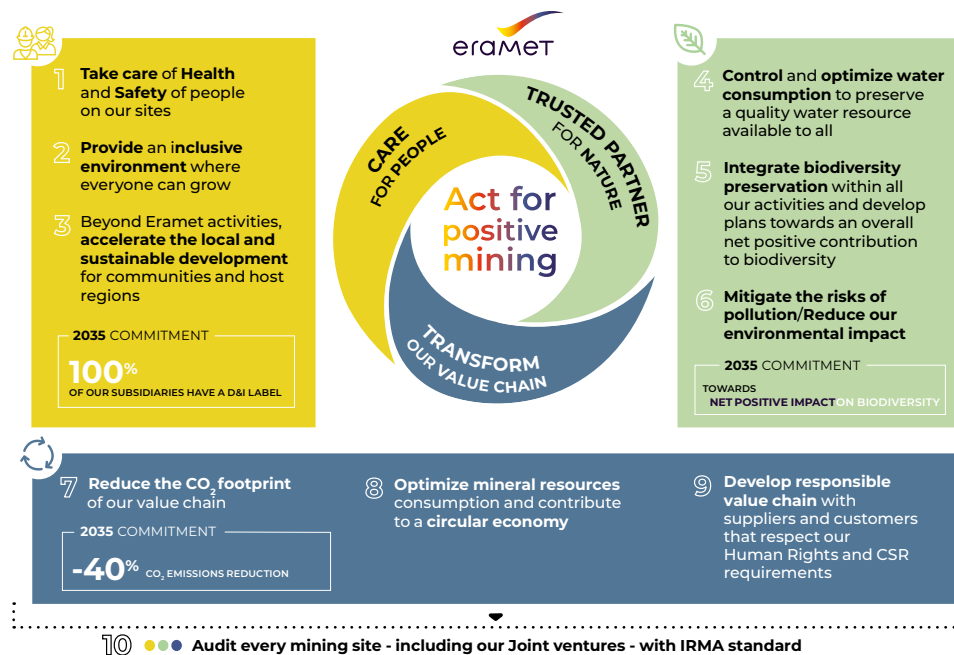
The CSR Roadmap 2018-2023, made of 13 objectives, dedicated a specific objective to human rights. **Objective 8 aims for the Group to set the standard in human rights in the Group's field of activity. To assess achievements, Eramet has chosen the UNGP Reporting Framework (Shift-Mazars), targeting "Mature" level in 2023.** The Reporting Framework provides a concise set of questions to guide companies through the process of reporting on human rights. Reporting is graded as Negligible, Basic, Improving, Established, Mature or Leading. Objective 8 served as a booster to improve the human rights approach for the whole Group.



# Starting in 2024

# CSR Roadmap

The new CSR Roadmap, “Act for positive mining”, features ten objectives to reach by 2026 and by 2035. It will help to improve Eramet’s approach to human rights through three pillars: **Care for people, Trusted partner for nature, Transform our value chain.**



Objective 10 is the cornerstone of the new roadmap’s three pillars; indeed, the IRMA standard represents the crossroads between taking good care of people, preserving nature and transforming the Group’s value chain.

## FOCUS ON OBJECTIVE 9 OF THE CSR ROADMAP ACT FOR POSITIVE MINING

**Develop responsible value chains with suppliers and produces that respect the Group’s CSR requirements, including human rights.** Before reaching the end consumer, the metals we produce must be processed in a sustainable value chain. As a mining company, the sustainability of the economic activity is scrutinised and is intricately linked to that of Eramet’s suppliers and customers. Being a responsible company starts with setting an example in the Group’s own scope of operations through the commitment to the IRMA standard, the most rigorous in the mining sector. It then means striving to enforce the corporate duty of care to ensure that upstream and downstream partners share the same CSR or ethical standards as those the Group is committed to, while contributing, when needed, to their awareness and continuous improvement.

### KEY FIGURES

**90%** of our suppliers rated at-risk assessed on their CSR practices by Ecovadis in 2026

**100%** of our customers assessed yearly on their compliance with our CSR or ethical commitments

**100%** of new sales and purchasing team members trained on ethics every year



**FOCUS ON OBJECTIVE 3  
WITH ERAMET BEYOND  
FOR CONTRIBUTIVE IMPACT,  
ERAMET AIMS TO CONTRIBUTE  
TO THE REDUCTION OF INEQUALITIES**

As well as support for local economic diversification and environmental resilience to climate change, the Eramet Beyond Programme supports projects that help to reduce inequalities linked to education and gender.

From 2022 to 2026, Eramet is committed to supporting **745 female entrepreneurs in Africa (Gabon and Senegal)** with the Femmes d’Avenir (Women of the Future) programme to reinforce their capacity building. In the new CSR Roadmap, Eramet has decided to support **500 young people, 50% of whom come from local communities and 50% are girls**, to benefit from qualifying training and to develop programs on **Gender-Based Violence** in the countries where Eramet operates.



# Engaging with stakeholders

Engagement with stakeholders is a key step in implementing the human rights framework within the Group. Eramet welcomes open dialogue and collaboration within and outside the Group in order to try and always do better when it comes to respecting human rights.

## HOW IS THE HUMAN RIGHTS APPROACH COMMUNICATED TO STAKEHOLDERS?

Internal and external stakeholders are regularly informed of the human rights approach in a manner that is tailored to them.

### FOR INTERNAL STAKEHOLDERS

#### ►Employees

##### Induction for newcomers

The Charter, policies and other key documents are communicated to employees through three main tools: the company website, the Eramet Management System (EMS), which is the Group's internal framework of procedures, and the Eramet Production System (EPS), which is the Group's operational set of rules and processes. Presentations of key documents are given for every new arrival into the company as well as induction days where the Social Impact and Human Rights Director presents the Group's human rights framework to new recruits. The most effective communication is done throughout the year through policy displays, videos on all the Group's screens on major topics and regular communication campaigns.

#### E-learning program: Understanding and integrating human rights into business

Since 2020, Eramet has offered an e-learning called "Understanding and integrating human rights into business" to ensure that Group employees have a better grasp of the notion of human rights, understand its challenges for businesses and identify risks as well as vigilance best practices. This training was first assigned to target priority employees selected for their positions and responsibilities: at year-end 2022, more than 500 employees from Top Management, Human Resources, HSE, CSR and Communities, Procurement, Security, and Ethics had taken this course. This e-learning programme was updated in 2023 to reach a wider audience (over 6,000 people) and is now available in four languages (English, French, Spanish and Norwegian).



#### Regular awareness-raising on specific topics

Some events are also effective means of raising awareness among employees and contractors on site. To mark Human Rights Day and Anti-Corruption Day in 2022, on-site events were organised on these topics. More than 700 people from across the Group received training and were included an information campaign in Argentina, Gabon, Senegal and Norway. This campaign involved poster displays on the Human Rights Policy, a video from the Executive Committee on the Human Rights Policy and sticker handouts to promote Integrity Line. Special training sessions are also regularly organised to tackle discrimination (e.g. on "non-discriminatory hiring"), promote diversity and inclusion within the Group (e.g. "All Together" for the Top 120 and "Diversity & Inclusion, what's it all about" to raise awareness among employees) or fight against gender-based violence in Gabon, New Caledonia and Argentina. ●●●



## EQUAL OPPORTUNITIES, DIVERSITY & INCLUSION

Eramet's commitment to equal opportunities, diversity and inclusion (D&I) was reaffirmed in the Group's Ethics Charter update and the new CSR Roadmap. These fundamental principles are implemented through an ongoing effort that runs from the Group's recruitment strategy to its approach to career development and advancement.

For Eramet, creating an inclusive and respectful workplace for all is the key to driving cultural and social change in the mining and metallurgy industry. With more than 10,000 employees in 20 countries, the Group's success depends on diversity and inclusion to foster responsible transformation, performance, and growth.

Eramet believes that that providing a work environment based on mutual respect, promoting differences and valuing everyone's abilities are essential to embody the purpose of 'living well together' and to create a better sense of community.

In 2022, a new D&I roadmap was drawn up, focusing mainly on including women, young people, and people with disabilities. Thanks to dialogue, HR incentives, and dedicated training, the Group was able to increase women's inclusion in management positions: women now represent 22% of the Eramet Leadership Team (the Group's top 100 managers worldwide) and 25.7% of management teams for operations activities on site.

In 2023, to reinforce this commitment, a mandatory D&I training programme was put in place for the Eramet Leadership Team. It included topics such as awareness-raising on inclusive leadership, ethical management, stereotypes and unconscious bias and healthy cooperation. Several D&I webinars, open to all Group employees, were also held to address new D&I topics such as the inclusion of LGBT+ (Lesbian, Gay, Bisexual, Transgender) people, interculturality and keys to working in a multicultural context with the aim of raising awareness of the benefits of D&I in the workplace.



#### ►Employee representatives

After being involved in drafting the Human Rights Policy, employee representatives are regularly informed on the rollout of the human rights approach during their work sessions.

### FOR EXTERNAL STAKEHOLDERS

#### ►Business partners (contractors, suppliers, customers)

Due to the issues associated with the Group's businesses, stakeholders have strong expectations regarding human rights and social performance. Eramet is committed to working towards a responsible value chain, which aims to favour business partners offering products or services that respect environmental and social criteria while maintaining a high level of competitiveness.

- **Suppliers<sup>(1)</sup>** are made aware of the ways in which respect for human rights should inform their decisions and actions by signing the **Code of Conduct** (based on the Know Your Supplier procedure threshold) and the **Ethics Charter**. The **Know Your Supplier** procedure and the **Know Your Customer** procedure ensure that when relevant tenders are launched, CSR criteria including human rights must be considered in the final weighting. Under both procedures, a committee is established to implement them, namely the Responsible Sales Committee and the Responsible Procurement Committee.

- **Customers** are increasingly concerned about the origin of the products they buy, and more and more sensitive to environmental and social issues. In response to these demands, Eramet launched **EraTrace in 2023**. With this online traceability platform, the Group is increasing its transparency to customers throughout its entire product value chain. For every order placed, customers will be able to access a **product passport** and consult information on the manufacturing process and CSR performance linked to their purchases. Place, date, extraction location, carbon footprint and water consumption are specified for each product delivery. This has initially been implemented at GCO and is ongoing for other sites<sup>(2)</sup>.

#### ►Communities

The Group's commitments to the rights and possible impacts on communities are discussed through regular consultations and meetings (see the section on stakeholder engagement for more information). Because communities are diverse, means of communication can be adapted to their local realities and contexts.

#### ►Investors

As a publicly listed company, Eramet is accountable to its investors. The Group maintains a two-way dialogue with them to share its progress, seek feedback and inform them about the sustainability strategy and reporting. Questions on human rights are regularly raised by the

investors and regular calls are organised with internal Group experts to discuss Eramet's human rights approach.

#### ►Experts

Eramet regularly attends meetings where best practices from the private sector are shared with human rights experts, for example within the Global Compact in France and Argentina, and also participates in roundtables with experts, such as the roundtable on human rights risk mapping during the ninth Anti-Corruption and CSR Conference in Paris in October 2023.

In 2023, the Office of the United Nations High Commissioner for Human Rights (OHCHR), as part of the Responsible Business Conduct for Latin America and the Caribbean Project (RBC LAC

Project), contacted experts from Eramet to participate in a human rights due diligence project specifically designed for companies, business associations and labour unions of the extractive sector in Latin America. Since 2022, Eramet has also participated in Alliance 8.7, a global partnership for the eradication of child and forced labour.

#### ►Civil society

Besides the one-on-one relationships Eramet shares with NGOs regarding its approach to human rights, the Group shares its commitments and responds to any allegations involving human rights through the Business & Human Rights Resource Center platform. ● ● ●



“Our customers ask us more and more about the origin of our raw materials, and the production conditions of the metals they buy from us.

At the same time, the legislative framework for metal traceability is becoming clearer. With EraTrace, we wanted to anticipate these obligations and be proactive, to demonstrate to our customers that we can provide reliable information on the origin of our products and their CSR performance.”

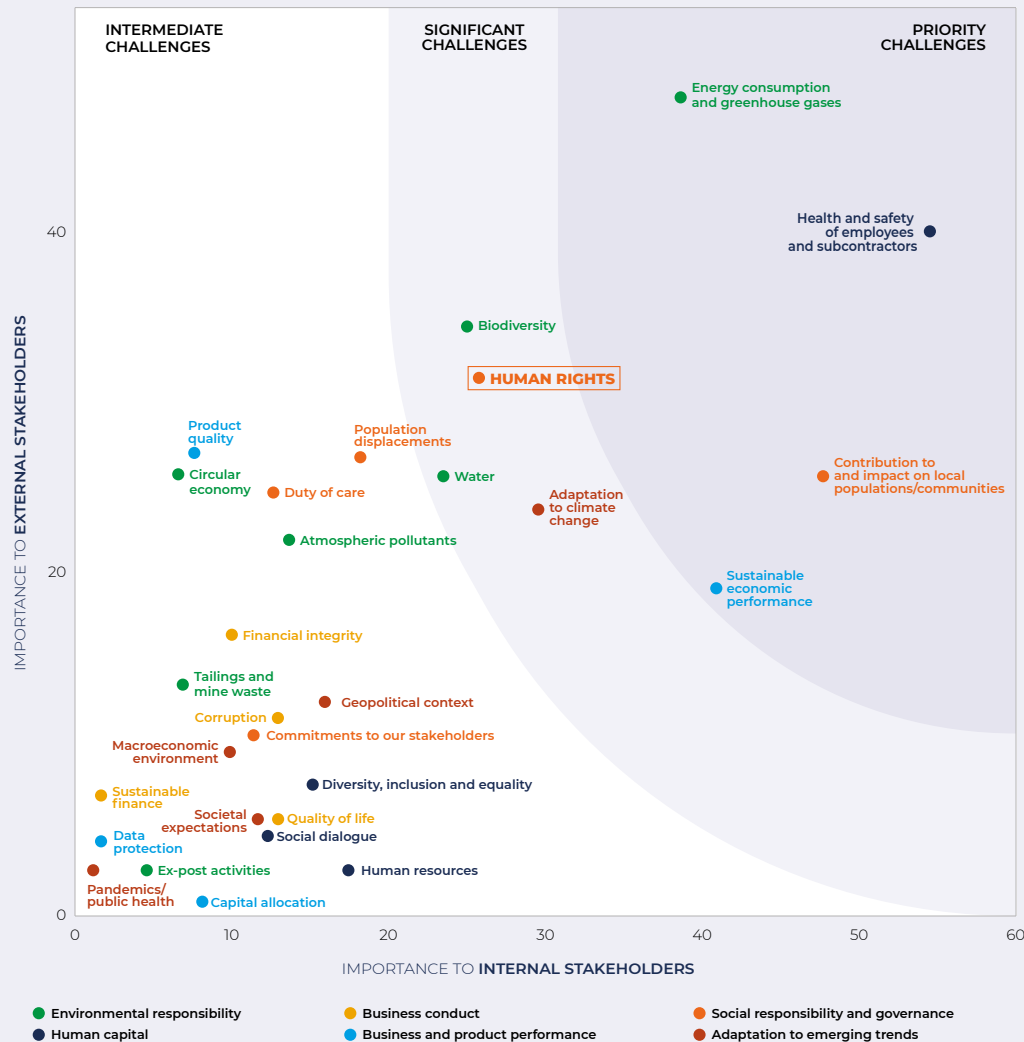
**ELODIE MORIN**

Commercial Excellence manager

<sup>(1)</sup> Within Eramet, the term 'supplier' is understood to mean all types of suppliers and contractors.

<sup>(2)</sup> For more information, go to the Focus Supply Chain on p. 49.

## MATERIALITY MATRIX (2022)



PRIORITY CHALLENGES (chosen by 30% or more of respondents)  
SIGNIFICANT CHALLENGES (chosen by 25-30% of respondents)

INTERMEDIATE CHALLENGES (chosen by 25% or fewer of respondents, including the top intermediate challenges chosen by 15-25% of respondents)

## HOW ARE STAKEHOLDERS' VOICES CONSIDERED?

Eramet regularly asks its stakeholders about ESG issues and opens dialogue on their expectations in terms of corporate social responsibility. In 2022, Eramet updated its **materiality matrix**, which was originally drawn up in 2019. **Over 600 stakeholders** within and outside the company (compared with around 400 in 2019) were asked to rank 29 issues in order of importance to them. The selected panel comprised Group directors, managers and site directors and employee representatives from inside the Group, and customers, suppliers, public authorities, NGOs, civil society associations, professional associations, banks, investors and shareholders, partners, journalists, ratings agencies and researchers and universities from outside the Group. This materiality matrix demonstrates that **human rights are considered a priority challenge** for external stakeholders and bolsters the Group's commitment to continue to improve its approach in this matter.

## INTERNAL STAKEHOLDERS

## ► Employees

In line with the extensive transformation program launched in 2017, the Group launched a new **engagement survey** in September 2021 for all its employees worldwide to allow them to express themselves on 12 key areas, including work and decision-making processes, organisational transformation, their relationship with their direct supervisor, agility and innovation. More than

6,300 employees took advantage of this opportunity and responded to the survey. The engagement rate for this survey across the entire Group was 70%, an increase of 3% since the last survey in 2018. In 2022, the Group developed and implemented action plans, both at Group and local level, to improve the areas identified as critical in the engagement survey. The "Pulse" engagement survey was carried out in June 2023 to take a snapshot of employees' views through 15 questions on the Group's strategy, safety, CSR, ethics and well-being in the workplace.

The survey engagement rate continues to increase and is now at 76%. ●●●

**When responding to a survey in preparation for the new CSR Roadmap, young employees from different sites (including Paris, Norway and Gabon) considered respect for human rights to be a priority topic for the Group.**

● ● ●

The survey shows that the Group's main assets a better understanding of the Group's strategy since 2021, an overall improvement in employment commitment and rising levels of pride, motivation and recommendation. Areas of improvement such as improvement of well being in the workplace have been integrated into ongoing action plans.

#### ►Employee representatives

With the creation of the **Eramet Global Forum** in 2023, the Group has become the first mining company to set up a worldwide representative body for employees. With 80% of Eramet's workforce located outside France, it is important to establish an organisation that reflects the diversity of operations. It has two ambitions, the first of which is

to create an open dialogue that respects local cultures, so that employees can express their views on Eramet's strategy, CSR commitments and development projects. The second is to negotiate agreements in areas that directly affect employees, such as social protection, quality of life at work, parenthood, diversity and inclusion.

#### EXTERNAL STAKEHOLDERS

##### ►Communities

Whether it concerns the roll-out of operations, the environmental and social management measures or the contributive programmes, Eramet and its subsidiaries make sure they develop meaningful engagement with nearby populations that are affected by its activities.



“Through its ability to create mechanisms that benefit all our employees, the Eramet Global Forum perfectly embodies our CSR commitments and helps to give a central place to the issues of career development, fairness, diversity and inclusion and social protection. It also demonstrates our desire to innovate in social terms, since it is a proactive approach based on collective bargaining on a transnational scale – a first for a mining group.”

**MIREILLE RANDESTA**

Director of Group Social Relations HRBP Oceania

#### STAKEHOLDER ENGAGEMENT WITH COMMUNITIES

Eramet's standards require that information be made available to stakeholders in a culturally appropriate way as follows:

##### ►Providing relevant and understandable

**information** on topics of interest for local stakeholders is the basis of meaningful engagement. Periodic information meetings are the preferred way for sites to communicate with local populations. The information shared includes a description of the site's activities and developments as well as the environmental and social risks or impacts that they might generate and are a concern for populations, including local employment, dust emissions, effluents in the water, noise and vibration and biodiversity protection. Consultation is a two-way engagement with communities, making it possible to gather the opinions, expectations or concerns of local residents so that they can be taken into account in the company's decisions.

##### ►Ensuring that **the dialogue is culturally appropriate, which means adapted to local cultural norms, in terms of methods, language and format in particular, making information easily understandable by local communities.**

The sites are also working on ensuring that **vulnerable people are identified and involved in the discussions to ensure an inclusive engagement.** This global approach is adapted by each subsidiary according to its specific challenges.

##### ►As part of Eramet's Key Standard on Community Relations, each production site has developed a tailored “Stakeholder Engagement Plan” outlining key processes to structure the dialogue. The plans list the key local stakeholder groups that need to be involved, the particular topics of interest to be addressed and the format and frequency of exchanges.

##### ►Stakeholder engagement is not a one-off activity but an ongoing process, extending through the whole lifecycle of operations.

- The first interactions take place at the very beginning of exploration activities, during which the basis for a respectful relationship is set.
- During project development, engagement activities are an integral part of Environmental and Social Impact Assessments, developed as part of the permitting and financing process. Consultations are instrumental in the process of identifying and avoiding potential negative impacts of activities, as well as optimising the positive contribution the operations can bring to areas.
- During construction phases, routine meetings and informal relations are more intensive to keep communities informed about project progress and ensure any issues can be addressed quickly. During operations, regular exchanges continue to be organised up to the closure phase, which is prepared in association with stakeholders so their expectations and priorities for the post-closure phase are taken into account.

Communities can raise issues through the Integrity Line whistleblowing system but they also have a **local grievance mechanism available to them on all sites.** The mechanism is handled by the on-site community relations teams, who regularly advertise this process and the complaints handling mechanism to the communities during dialogue sessions.

Ensuring that communities feel free to raise issues, are included in decision making and are consulted and informed is an integral part of respecting their human rights.





Sample of answers from a survey of employee representatives, local experts on topics related to human rights, Corporate experts on topics related to human rights (111 people) conducted between 2 November and 10 November 2023.



# PART.3

## SALIENT HUMAN RIGHTS RISKS

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School built by GCO  
in Senegal for resettled  
communities.

# Identifying salient human rights issues

Since the adoption of the 2017 Duty of Care law in France, Eramet has conducted three successive human rights risk mappings with the support of independent experts (in 2017, 2020 and 2023). In 2023, to remain in line with international standards on human rights (e.g. United Nations Guiding Principles – UNGPs) and the French Duty of Care law, Eramet conducted a more detailed human rights risk mapping than previous exercises. All risks are now specified with appropriate granularity and strong action plans.

## A GROUP-LEVEL MAPPING OF HUMAN RIGHTS RISKS AND SITE-LEVEL MAPPINGS OF HUMAN RIGHTS RISKS

### PROCESS

The 2023 human rights risk mapping was a 6-month endeavour that included site-level mappings on top of the Group-level mapping. It encompassed the whole Group: France, the USA, Norway, Gabon, Senegal, Argentina, Indonesia and New Caledonia. A bottom-up approach was taken, where site-level risks were identified first, and then partly fed into the identification of the Group risks. For this purpose, interviews were conducted at site level with both internal and external stakeholders, most often in the local language. **The result is a site-by-site mapping of human rights risks, all sites received its own lists of risks and definitions, as well as its own criticality and prioritisation matrixes and a Group-level matrix, also with its own criticality and prioritisation matrixes.**

### ASSESSMENT

Following Deloitte methodology and in accordance with the UNGPs, risks were measured according to scale, scope, probability and the degree of irremediability. These criteria and their level of granularity were aligned with the Group risk assessment methodology through an interview with Eramet's Control, Audit and Risks Department, to ensure consistency throughout the risk exercises and their integration into Eramet's company-wide risk management framework. In addition, certain subsidiaries conducted their own Human Rights Impact Assessments (HRIA). For instance, in July 2023, GCO conducted an HRIA, which also included a prioritisation matrix.

The focus on people and on the degree of irremediability is one key aspect of a human

### THE LESSONS LEARNED

The main lesson learned from implementing the human rights action plan was the importance of collective work. Through the human rights risk mapping, the work with the Human Rights Committee and the continued support given and received by other key departments, it was made clear that, when it comes to human rights, there is a need to work alongside other departments, such as the Security Department, the Human Resources Department and the Procurement Department. Including the human rights expert in the CSR audits conducted by the internal audit team in 2023 allowed for a strong understanding of the stakes and concerns in terms of human rights and community relations but also for a better grasp of the risks.

The same goes for work with the different Group entities. Through dialogue with the key experts on site, the Human Rights team is able to understand the local contexts and existing challenges and this ultimately allowed for the work to be more effective and better adapted to the realities of the field and to include sites in their own development of the human rights framework.

Human rights are a Group effort.





right risk assessment. Indeed, the UNGPs framework insists on the need for companies to first avoid, then limit and lastly remediate human rights violations with appropriate actions. Hence, if a human rights abuse occurs, the extent to which the victim can return to its previous situation is paramount in assessing the impact of the violation.

### STAKEHOLDERS

The assessment relied on the relevant documentation provided by Eramet's stakeholders (e.g., previous risk mappings, materiality assessment results, policies, risk management procedures, organisational charts, etc.) but also on insights gathered from various experts through interviews. Moreover, at site level, key functions (e.g. HR, Legal and Procurement) and external stakeholders (e.g., suppliers, subcontractors, members of local communities, local authorities

and union representatives) participated in the risk mapping exercise. In total, more than **95 interviews were carried out with internal stakeholders and around 30 with external stakeholders.**

The **Group's Human Rights Committee** was an effective forum for peer debate and discussion on the potential risks identified. Stakeholders were identified through internal scoping of the people who could potentially be impacted by the Group's activities. Similarly, international standards like those of IFC, IRMA or the European Corporate Sustainability Reporting Directive give a clear framework of who the company's stakeholders are.

This new mapping highlighted not only risks that Eramet was already aware of but also new risks and challenges for the Group, allowing the Group to continue to improve its practices and understanding of its challenges.

### CONTINUOUS ASSESSMENT

Outside of the risk mappings, monitoring of human rights issues raised via Integrity Line allows the Social Impact and Human Rights Department and the Ethics and Compliance Department to identify new trends and risks.

Similarly, the internal audit team shares the results of their audits on issues linked to human rights to relevant departments to make their experts aware of the findings and any new challenges.

The Audit Department works with the Social Impact and Human Rights Department on two levels:

- ▶ before an audit to identify risks or issues that the experts may already have on their radar and investigate more in depth,
- ▶ through the use of expert auditors that go into the field with them, offering support and expertise on the topics on the audit.



“The Risk Management Department studies risks first and foremost through the prism of their impacts on the company, while the Social Impact and Human Rights Department offers a vision of the risks that the company places on people, both internally and externally. In both cases, our approaches are integrated and shared by bringing to the table various experts (Security, Human Resources, Safety, etc.) as well as colleagues who are in the operational entities.”

**STEPHANIE CANINO**

Director, Risk Management Department

### MAIN RESULTS OF THE 2023 HUMAN RIGHTS RISK MAPPING

Over the course of the risk mapping exercise, the criticality matrix showed Eramet had no major gross risks identified before carrying out the prioritisation analysis.

At the Group level, the main risks identified are:



- Since the previous risk mapping, certain risks have been reduced due to the safeguards put in place. This is the case for discrimination, shipping activities and the security risk toward the local population.
- On the issue of modern slavery risks (child labour and forced labour), the risk is not directly borne by the Group. On sites, child labour and forced labour have not been identified as salient risks due to the mitigation measures in place.
- While the Group criticality matrix shows that Eramet has no major risks identified, the Group prioritisation matrix shows that Eramet has to act on nine salient risks as a priority. These risks were of six main types: psychosocial risks, safety, impacts on indigenous people, cumulative impacts on local communities, gender-based violence and human rights violations in the supply chain (see the template below with the main existing mitigation measures and stakeholder engagement).
- The aim of this exercise was to reinforce Eramet's commitment to the French Duty of Care law on human rights and to make the Group more robust on this subject.



# Eramet's salient risks

What are salient human rights issues? The United Nations Reporting Framework states that “a company’s salient human rights issues are those human rights that are at risk of the most severe negative impact through its activities or business relationships.”

## WHAT TO FOCUS ON?

**MOST SEVERE:** meaning those impacts that would be greatest in terms of **their scale:** the gravity of the impact on the human right(s); and/or **their scope:** the number of individuals that are or could be affected; and/or **their remediability:** the ease with which those impacted could be restored to their prior enjoyment of the right(s).

**POTENTIAL:** meaning those impacts that have some **likelihood** of occurring in the future, recognising that these are often, though not limited to, those impacts that have occurred in the past.

**NEGATIVE:** placing the focus on the **avoidance of harm to human rights** rather than unrelated initiatives to support or promote human rights.

**IMPACTS ON HUMAN RIGHTS:** placing the focus on risk to people, rather than on risk to the business.



## SAFETY FOR WORKERS AND EXTERNAL STAKEHOLDERS

Risks due to activities that can lead to severe injuries for the workers involved, such as work at height, mechanical equipment or vehicles (cars or trains). Some of these activities can also lead to a risk to communities living around the sites.



Our safety performance has improved immensely in the past five years and we continue to work hard to become the mining operator that most values safety, respect, accountability, collaboration, innovation and integrity.”

**FRÉDÉRIC CAMUSET**  
Eramet Safety and Prevention Director



## IMPACT ON INDIGENOUS PEOPLES

Risks linked to activities that can have impacts on indigenous peoples in locations where operations are in close proximity to indigenous communities.



## PSYCHOSOCIAL RISKS

Risks linked to stress and burn out, harassment, conflict or external factors such as threats, assaults etc.



## GENDER-BASED VIOLENCE

Risks of differences in treatment, discrimination or sexual harassment on the basis of one's gender.



To drive cultural and social change in the mining and metallurgy industry, an inclusive workplace free of discrimination, sexual harassment and bullying is essential. We believe that through dialogue, awareness and training programmes, we will be able to foster a work environment that respects all people regardless of our differences and abilities. At Eramet, everyone should be welcome, feel safe and have equal opportunities to achieve their full potential.”

**EMMANUELLE CAMPO**  
Head of Diversity & Inclusion, Eramet



## CUMULATIVE IMPACTS ON LOCAL COMMUNITIES

Risks linked to areas with a high density of industrial plants and other industrial facilities, which can trigger cumulative environmental impacts on water (quality, quantity), biodiversity (decrease) or erosion, as well as societal impacts such as loss of land and loss of livelihood, traffic-related issues, worsened air quality or public order disturbance.



## HUMAN RIGHTS VIOLATIONS IN THE SUPPLY CHAIN

Risks of violation of human rights (such as safety or modern slavery) across the supply chain due to its size and sometimes at-risk procurement segments (for example, specific materials or specific countries).



Wherever the Group operates, procurement teams and their local and international supplier partners work to comply with Eramet’s ethical and responsibility standards. Eramet strives to be a part of a sustainable and responsible value chain.”

**ALEXIS NICOLET**  
Group Procurement Director



# Eramet's salient risk management


**Cause:** Eramet causes an adverse human rights impact when its activities (including omissions) would be sufficient, in and of themselves, to result in that impact.




**Contribute to:** Eramet contributes to an adverse human rights impact when its activities (including omissions) participate but would not be sufficient, in and of themselves, to result in that impact.


**Linked to:** Eramet is directly linked to an adverse human rights impact when it has established a relationship for mutual commercial benefit with an entity, and, in performing activities within the scope of that relationship, the entity materially increases the risk of the impact.

**Source :** Debevoise Business Integrity Group in collaboration with Enodo Rights, Practical Definitions of Cause, Contribute, and Directly Linked to Inform Business Respect for Human Rights Discussion Draft February 9, 2017, Practical Definitions of Cause, Contribute, and Directly Linked to

Inform Business Respect for Human Rights - Business & Human Rights Resource Centre ([business-humanrights.org](https://business-humanrights.org))

SALIENT RISK	ERAMET'S RELATIONSHIP WITH THE RISK	RELEVANT ERAMET STANDARDS	MAIN EXISTING MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT
 <p><b>SAFETY</b></p>	Cause	<p>Safety Policy</p> <p>Key Standard on Essential Safety Requirements</p> <p>Key Standard on Safety Management</p> <p>Key Standard on Respect for Human Rights</p> <p>Key Standard on CSR</p> <p>Key Standard on Industrial Risk Management</p> <p>Key Standard on Relations with Host Communities</p> <p>Procedure on Accident and safety incident reporting</p> <p>Procedure on Cause analysis following safety event</p> <p>Procedure on Fatigue detection</p> <p>Procedure on Managing contractors</p> <p>Procedure on Road risk prevention</p> <p>Procedure on Chemical risk prevention and hazardous product management</p> <p>Communities Golden Rules</p> <p>Human Rights Golden Rules</p>	<ul style="list-style-type: none"> <li>- Zero-accident approach</li> <li>- Prevention plans and safety induction for external people on site</li> <li>- Personal protective equipment</li> <li>- Regular awareness campaigns for employees, contractors and local communities</li> <li>- International Safety Day</li> <li>- Safety teams on each site with coordination at the Group level</li> <li>- Regular internal assessments of compliance with Group Standards</li> <li>- TF2 total accident target in CSR Roadmap</li> <li>- Incentive bonus on this target for managers</li> <li>- Root causes and safety report</li> <li>- Each severe accident explained to the Board of Directors by the site manager</li> <li>- Safety Champions: reward implemented at site and Group level to identify best practices and recognise individuals and teams.</li> <li>- A system of sanctions is implemented (managers included) when rules are not complied with voluntarily.</li> <li>- Tools (such as OSPAT to track tiredness in machine operators or the Take 5 initiative, a self-assessment of one's ability to complete a task safely)</li> <li>- Integrity Line (available to employees and suppliers)</li> <li>- Training and compliance with safety rules is part of subcontractors' working conditions. Verification of compliance by subcontractors is part of the role and responsibility of principals and field supervisors.</li> <li>- Disciplinary measures</li> </ul>

SALIENT RISK	ERAMET'S RELATIONSHIP WITH THE RISK	RELEVANT ERAMET STANDARDS	MAIN EXISTING MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT
 <b>IMPACTS ON INDIGENOUS PEOPLES</b>	Cause	Ethics Charter Human Rights Policy Key Standard on Respect for Human Rights Key Standard on CSR  Human Rights Golden Rules Communities Golden Rules	<ul style="list-style-type: none"> <li>- At the early stages of the project, organisation of environmental and social impact studies in new areas of operation</li> <li>- Process of constant consultation and discussion with members of the communities</li> <li>- Implementation of Free, Prior and Informed Consent agreements</li> <li>- Training of Community Relations teams on Fundamental Standards related to impacts on communities</li> <li>- Grievance mechanism available for communities on sites</li> </ul> For more information, please see the Indigenous People Focus
 <b>PSYCHOSOCIAL RISKS</b>	Cause	Ethics Charter Health Policy Human Rights Policy  Key Standard on the Application of health fundamentals Key Standard on Psychosocial risks Key Standard on Respect for Human Rights Key Standard on CSR  Human Rights Golden Rules	<ul style="list-style-type: none"> <li>- Special dedicated network of advisors on sexual harassment and sexist behaviour at each site. The members of this network are trained to take and process statements and testimonies of sexual harassment and gender-based violence</li> <li>- Integrity Line (available to employees and suppliers)</li> <li>- In France: listening and support areas (on-site psychologists or psychological helplines), training of Prevention Officers, training of managers on this issue, etc.</li> <li>- On certain sites, creation of a psychological helpline, awareness campaigns and KPIs</li> <li>- Disciplinary measures</li> </ul>
 <b>GENDER-BASED VIOLENCE</b>	Contributes to	Ethics Charter Human Rights Policy Human Resources Management Policy  Key Standard on Respect for Human Rights Key Standard on CSR  Human Rights Golden Rules	<ul style="list-style-type: none"> <li>- Special dedicated network for sexual harassment and sexist behaviour at each site. The members of this network are trained, in person, to take and process statements and testimonies of sexual harassment and gender-based violence</li> <li>- The "All Together" mandatory awareness-raising program on diversity and inclusion designed for the Group's senior managers</li> <li>- Webinars organised by the Diversity and Inclusion Department as well as training carried out at site level by the human resources departments</li> <li>- Themed events such as International Women's Day, International Diversity Day and International Human Rights Day</li> <li>- Webinars on equality and male and female experiences in the workplace by the internal company network WoMen@Eramet, with the help of external experts.</li> <li>- Integrity Line (available to all stakeholders)</li> <li>- Disciplinary measures</li> </ul>

SALIENT RISK	ERAMET'S RELATIONSHIP WITH THE RISK	RELEVANT ERAMET STANDARDS	MAIN EXISTING MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT
 <p><b>CUMULATIVE IMPACTS ON LOCAL COMMUNITIES</b></p>	Contribute to	<p>Human Rights Policy</p> <p>Key Standard on Relations with Host Communities</p> <p>Communities Golden Rules</p>	<p>Although this risk is difficult to mitigate as it depends on joint action with other companies, Eramet carries out:</p> <ul style="list-style-type: none"> <li>- Regular dialogue sessions with the communities and their representatives to discuss any possible impacts</li> <li>- Regular communication on the complaints/grievance mechanisms in place and how they work</li> <li>- Analysis and mitigation of this risk with local authorities</li> <li>- Example of site action: Comilog Dunkerque is located in an industrial area near the port of Dunkirk – the zone houses a lot of plants and factories from various companies. The plant participates in the Permanent Secretariat for the Prevention of Pollution and Industrial Risks (S3PI) and as such is a member of several commissions where companies discuss their possible impacts on the local communities outside the industrial zone. This body is created by decree and comprises representatives of associations (such as environmental NGOs or neighbours' associations), local authorities, industry, trade unions and the State. It is a forum for dialogue and consultation on all issues relating to industry and the industrial area's environment, quality of life and public health.</li> </ul>
 <p><b>HUMAN RIGHTS VIOLATIONS IN THE SUPPLY CHAIN</b></p>	Are linked to	<p>Ethics Charter</p> <p>Supplier Code of Conduct</p> <p>Responsible Procurement Policy</p> <p>Human Rights Policy</p> <p>Know Your Supplier Procedure</p> <p>Know your Customer Procedure</p>	<ul style="list-style-type: none"> <li>- Internal tool for procurement management</li> <li>- Key documents shared with suppliers and all interested stakeholders (such as Supplier Code of Conduct, Ethics Charter)</li> <li>- Specific ESG criteria taken into account during tenders</li> <li>- Tools (Know Your Supplier procedure and Responsible Procurement Committee to frame the procurement process, ethics screening, etc.)</li> </ul> <p>For more information, please see the Supply Chain Focus.</p>

**SINCE THE 2023 MAPPING, EACH HUMAN RIGHTS ISSUE HAS BEEN LINKED TO A SPECIFIC ACTION PLAN**

Designing the action plans took the form of a meeting between the Social Impact & Human Rights team and the future action pilot of the sites in question, firstly to identify existing action plans on specific topics. Subsequently, for new salient human rights issues or new contexts, the human rights team presented actions based on the recommendations made by the outside party in charge of the assessment. As the action pilot usually knows the realities of the field well, this results in a more operational action plan with realistic actions and deadlines.

The action pilots (either on site or at Group level when certain actions require Group-level remedies) are identified according to their expertise and departments. These plans were built in full compliance with future IRMA requirements.

A specific working group was formed to design the action plan on supply chain-related risks and will be working on an action plan from 2023 onwards.



# Addressing allegations

Since 2020, the Group's Sustainability and Engagement teams have been monitoring allegations in the mining sector and especially those linked to Eramet. In the mining sector, from 2021 to 2023, human rights controversies and allegations mainly concern impacts on local communities and employees.

DIRECT ALLEGATIONS AGAINST ERAMET ARE TREATED RAPIDLY BY THE GROUP, WITH A RANGE OF TEAMS INVOLVED, SUCH AS THE SOCIAL IMPACT & HUMAN RIGHTS DEPARTMENT WITH THE SUPPORT OF THE ESG PERFORMANCE TEAM, THE COMMUNICATION DEPARTMENT AND SOME INTERNAL EXPERTS.

## STATUS OF MAIN CONTROVERSIES IN ERAMET SINCE 2021

### Ongoing

►No

### ►Ongoing

A controversy is considered Ongoing if the company has not implemented remediation steps to satisfy the claims of affected stakeholders.

### Partially Concluded

►Communities and  
Indigenous People  
(PT Weda Bay Nickel)

### ►Partially Concluded

A controversy is considered Partially Concluded if there is reasonable evidence that the company has taken action towards the remediation of the relevant issue, while some concerns and disputes over the original claims may still be ongoing.

### Concluded

►Resettlement (GCO)  
►Discrimination  
(Comilog)

### ►Concluded

A controversy is considered Concluded if the resolution actions are implemented and the company does not face any pending legal action or ongoing criticism over the controversy.



Business & Human Rights  
Resource Centre

For each controversy, Eramet is careful to respond publicly to allegations. Therefore, the Group mainly uses the Business and Human Rights Resource Centre (BHRRC) online platform to share its public statements, as it works with a global network of advocates in civil society, business, governments and the media to advance human rights in business and eradicate abuses. Eramet has a response rate of 100%.

For more information, go to the BHRRC Eramet page: [www.business-humanrights.org/en/companies/eramet/](https://www.business-humanrights.org/en/companies/eramet/)

# Remediation

## when human rights are affected

### EMPLOYEES

When risks become realities and people have been affected, the Group is responsible for remediation and must take all necessary measures to restore the status quo. There are various ways of raising complaints or concerns:

- People can contact their manager, so that the matter can be dealt with quickly.
- People can turn to the management team with expertise in the subject matter.
- People can also turn to the networks set up within the Group, such as the sexual harassment and sexist behaviour network.
- Finally, people can turn to the Group's whistleblowing system, which is open to all stakeholders and accessible 24/7 from the Group's website and intranet. This system is also accessible through telephone numbers available for 22 countries.

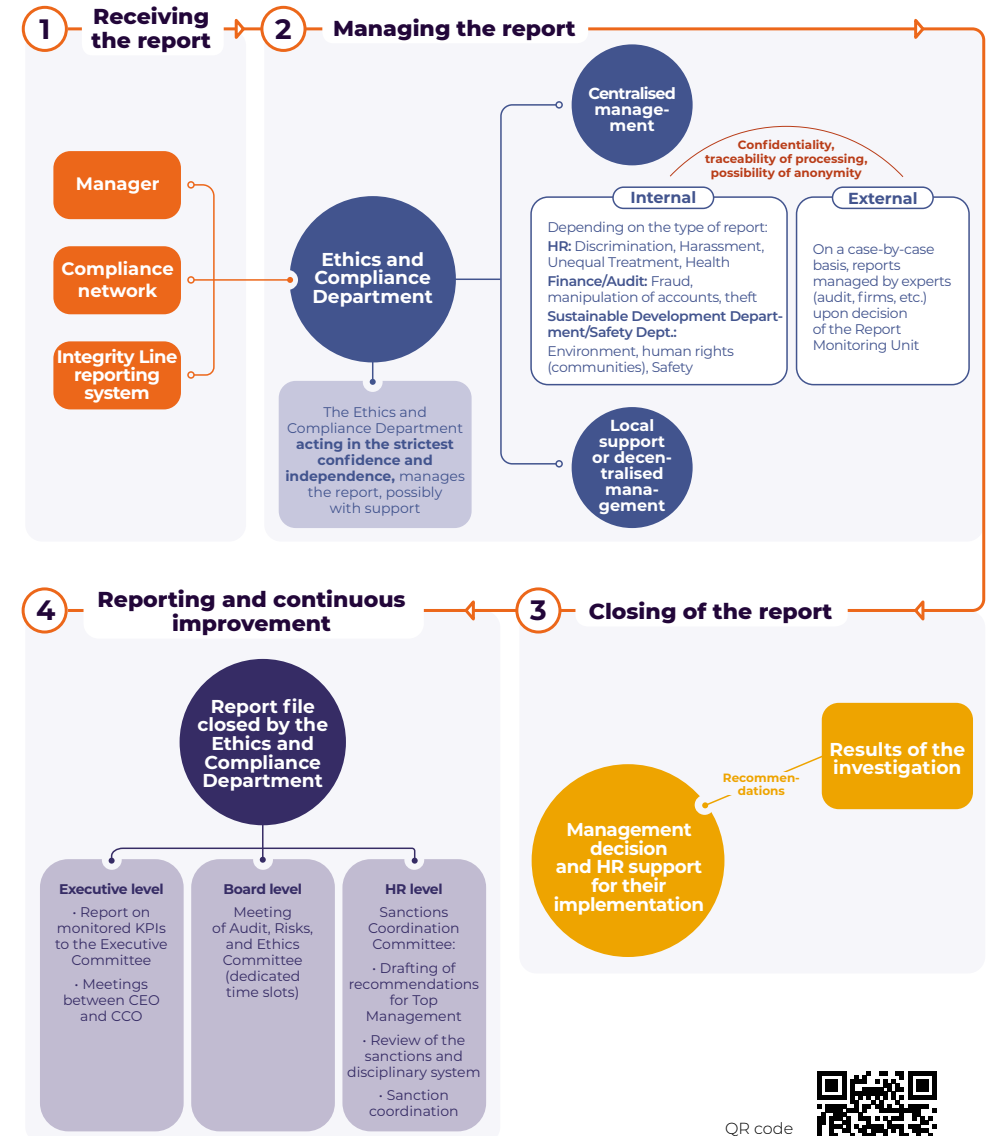
The whistleblowing system is mentioned in the Ethics Charter. In order to ensure the efficiency of the whistleblowing system, a study of confidence in the system was carried out in 2021 and 2022. In the same vein, the Mood survey highlighted the level of confidence in the system. ●●●

### INTEGRITY LINE

This whistleblowing system is available in all 22 countries where the Group operates, in 13 languages. It enforces the protection of the whistleblower as defined under applicable law. It ensures the confidentiality of reports submitted by all whistleblowers as well as anonymity when opted in. If you are a victim of or witness to non-ethical behaviour, such as discrimination, harassment, fraud, bribery or human rights violations, let us know by clicking [HERE](#).



### STAGES OF THE WHISTLEBLOWING SYSTEM



QR code leading to the whistleblowing system





### COMMUNITIES: LAND ACQUISITION AND RESETTLEMENT

The activities of some Group mining sites require the acquisition of land from communities that reside or carry out economic activities (agricultural or commercial) in the area. To avoid causing human rights violations (property rights or the right to an adequate standard of living in these communities), the Group refers to the principles set out in the Performance Standards of the International Finance Corporation (World Bank Group), applicable to these relocation activities. For each of these operations, resettlement action plans are automatically drawn up with the affected parties prior to the displacement. These plans include joint work to define the compensation matrix for compensated assets, the resettlement location and schedule and measures to restore livelihoods. In accordance with the “mitigation hierarchy” of impacts, populations are only displaced as a last resort, when all avoidance measures have been taken. The sites concerned have therefore set up dedicated teams to engage with affected communities and local authorities, carry out censuses and inventories and negotiate entitlement rights and compensation packages.



#### RESTORATION OF LIVELIHOODS IN SENEGAL

Since the start of its operations, GCO has supported the restoration of the livelihoods of the 920 people displaced in 2016 and 2019 from the hamlets of the villages of Foth and Diogo.

This support covers the 11 economic interest groups (EIGs) created between 2015 and 2019, bringing together over 1,000 people. A women's EIG made up of 62 women from two hamlets displaced at the end of 2021 was also created and supported in 2022. In 2022, GCO also relocated 1,000 people from the village of Diourmel and its hamlets. As with previous displacements, these new homes provide access to water and solar power and thus help to improve living conditions for these people. The resettlement site in the village of Diourmel has a mosque, a health centre, a primary school and a Koranic school, as well as a market. It is served by an access road that links it to the secondary road leading to Lompoul. Lastly, the consultations and census have begun for the displacements scheduled for 2023 and 2024 in the hamlets of the villages of Thiakhmat and Lompoul-sur-Mer. Economic displacements were also carried out in 2022, with more than 660 farmers compensated for their crops. This compensation is overseen by the departmental commission for surveying and evaluating maintenance expenses (Commission départementale de recensement et d'évaluation des impenses), involving representatives from Senegalese government technical services. A closing audit and the perception survey for resettlement are ongoing in 2023.

#### KEY FIGURES

GCO - Between  
2020 and 2022:

**437** relocated  
people across all  
mining sites

**665** people were  
compensated (physical  
and economic  
displacement)

**369** hectares were  
compensated



#### RESETTLEMENT IN GABON

In connection with the operation on the edges of the historic Bangombé plateau, households currently living in this area will have to be resettled. The resettlement concerns around 2,000 people currently divided between two districts of Moanda: Lekolo 2 and Leyima. Inventories and socioeconomic surveys were carried out and the relocation plan was finalised with stakeholders and approved during a public hearing held in July 2022, which was attended by nearly 400 people. Comilog, with the support of INSUCO, the company's third-party expert, followed the principles set out in the Performance Standards of the International Finance Corporation (World Bank Group). The construction, which will eventually feature more than 400 homes to resettle and commercial areas, is completed. The people have been involved throughout the project since 2020, regularly informed of the site's progress through the two Local Monitoring Committees.

- For the mine extension project, which affects crops on the edges of the new neighbouring Okouma plateau, in 2022, Comilog completed the compensation process for crops on plots of land belonging to nearly 230 people, begun in 2020. These communities are now being monitored to restore their livelihoods after this economic displacement.
- Preparations for the relocation of the dwellings of the people living near the Moanda station also progressed in 2022. These are the villages of Mondzeze and Mikouagna, located close to the Moanda Industrial Complex operated by Comilog. The resettlement site was completed in 2022, and work has begun to ensure that the site is serviced so that the 40 households concerned can move in by 2023.

**COMILOG**

On Wednesday 11 July 2023, farmers living near the Okouma mine operated by Comilog received monetary compensation for their fruit trees, in application of the memorandum of understanding signed between the two parties two months before. Cheques and contracts were presented to the 65 beneficiaries in the presence of the prefect of the Lébombi-Léyou department, the mayor of the Mounana commune, the president of the departmental council and members of the committee. The beneficiaries' assets were valued in accordance with World Bank requirements. The terms and conditions of this compensation measure take account of the relevant standards.

**KEY FIGURES**

Agricultural crop  
compensation  
by cheque  
in July 2023

**65**  
people including  
21 women

**REPARATION**

Reparation is the last resort in the mitigation hierarchy, compensation for unavoidable residual impacts that may occur despite existing impact management measures (e.g., road accidents, pollution, etc.). The most important aspect in this case is to ensure transparency in the process and open communication with communities as well as a robust grievance mechanism that respects the UNGPs in terms of key requirements such as equity, availability etc. Depending on the type of impact on communities, the remediation can either be made in kind or financially.

When accidental property damage occurs, sites will do their utmost to remedy the situation, returning it to its previous state. For example, in Eramet Norway, the washing of manganese finished product can sometimes raise dust that settles on neighbouring houses and cars when the winds blow a certain way. The plants then arrange for the cars to be cleaned to help the affected neighbours. Similarly, when this type of remediation is not possible, financial compensation will be put in place.





# PART.4

## SITE BY SITE APPROACH

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## GABON/COMILOG

5,031 DIRECT JOBS\*

5,000 ESTIMATED INDIRECT JOBS\*

### SALIENT RISKS

Security of employees, harassment, safety of communities, human rights in the value chain, safety of employees and communities (industrial accidents)

\* Direct jobs represent subsidiaries and permanent subcontractors on site

\*\* In-country off-site supply chain jobs



**LÉOD PAUL BATOLO**  
CEO of Comilog SA,  
Gabon

"Human rights are fundamental rights. Diversity and inclusion make us stronger. Together we will always move forward."

**Companies must ensure that their employees understand their legal obligations and are committed to due process.**

### CONTEXT

Everyone has unconscious biases that could lead to discrimination. Human resources and recruitment professionals are widely aware of the risk of discrimination but this is not always the case for managers in other departments.

### ERAMET'S ACTION

In order to open the floor and break down biases, Comilog's Human Ressources Department has set up a 'Recruiting without discrimination' training programme for all employees, which is mandatory for all managers, to help prevent this risk at all levels of the company. At Comilog, 98% of employees are Gabonese, and a great diversity of ethnic groups work at the company. Indeed, as mining processes require international expertise, 16 different nationalities with very different cultures, including Indians, Brazilians, South

Africans, Europeans, North Africans and West Africans, are part of Comilog's team.

The training programme highlights that certain questions cannot be asked, such as questions about marital status, the desire to have children and trade union membership. The purpose of these training programmes is to create a forum to exchange ideas and opinions. A debate is opened at the beginning of the training on the definition of discrimination. Each participant gives their definitions of the issue. Following this, a common definition is adopted. In fact, the definition is generally very similar to the one used in the French and European legislative corpus. Examples of grounds listed are origin, gender, age, sexual orientation and political, philosophical or religious beliefs.

Certain subjects raise questions, in particular that of sexual orientation. An exchange on biases and prejudices allows people to take into account the local culture and to ensure that all employees are free from discrimination in their workplace. The training programmes use concrete examples designed to be culturally appropriate.

# Recruiting without discrimination

The idea is to put oneself in the shoes of the communities and to understand their reality. There can be cultural challenges, for example when it comes to nepotism, which is not tolerated and is a topic to which the Group pays particular attention, but which could be explained by the limited availability of job offers in Gabon and the importance of family values, solidarity and mutual aid in Gabonese society. It is important to note that respecting all cultures is also essential. When it comes to discrimination based on gender, the presence of female employees is well accepted at Comilog Gabon. Nevertheless, to mitigate the risks, training focuses on the prevention of all forms of sexism such as harassment.

The training goes beyond recruitment and hiring, highlighting that discrimination is also unacceptable in matters of promotion, acceptance onto a development course or salary reviews. Giving managers non-discrimination training is a best practice that has been adopted by other Group subsidiaries.

The only acceptable grounds for discrimination is competence!



## GABON/SETRAG

**3,736 DIRECT JOBS\***

**13 ESTIMATED INDIRECT JOBS\***

### SALIENT RISKS

Accommodation, safety in supply chain,  
safety on train lines

\* Direct jobs represent subsidiaries and  
permanent subcontractors on site

\*\* In-country off-site supply chain jobs

# Raising awareness for greater safety

## CONTEXT

With a railway covering more than six hundred kilometres, passing through 24 train stations, track safety is a constant priority for Setrag.

## ERAMET'S ACTION

To ensure the safety of communities living around the tracks, SETRAG has put in place several safeguards.

## CONSTRUCTION

Walls and footbridges have been built with the aim of protecting populations from passing trains: more than eight kilometres of protective walls were installed in 2019 and 2020 in Owendo and Ntoun.

To allow pedestrians to cross the line safely, three footbridges have already been built: at Owendo station, along the Owendo part of the track and in Lastourville, and more are yet to be installed.

Likewise, six level crossings were secured and in Owendo, the traffic lights at the 'Setrag crossroads' were renovated. Furthermore, in Owendo, a ramp for people with reduced mobility is being built and buffer zones between the markets and the track have also been put in place. In 2023, 2,021 metres of walls were built along with two new footbridges.

## AWARENESS CAMPAIGNS

A major campaign to raise awareness of railway risks was also carried out among populations and schools located along the line. Between 2021 and 2022, around 17,484 school students were involved in awareness-raising campaigns along the track. In 2023, 28,068 people have participated in the awareness campaign so far. In addition, the sustainable development team has designed a range of equipment to raise awareness. During the campaigns, the equipment is handed out in the form of kits after each session. The kits include several items such as kitchen aprons, bread bags, notebooks, pens, T-shirts and polo shirts.



**CHRISTIAN MAGNI**  
CEO of SETRAG, Gabon



SETRAG contributes to the well-being of populations and its employees by putting all aspects of safety at the core of its projects and operations.

In line with our purpose, we continue to play an active role in improving the lives of not only of our colleagues but also of the local communities living near railways.

We are involving the communities in this, just like we involve our employees, by raising awareness of the risks related to rail, particularly among children. This is how we are contributing to a better and safer environment."

## NEVER COMPETE AGAINST THE TRAIN







## SENEGAL/GCO

ABOUT 1,880 DIRECT JOBS\*

ABOUT 1,500 ESTIMATED INDIRECT JOBS\*

### SALIENT RISKS

Health and safety of communities, contractors' working conditions, contractors' accommodation

\* Direct jobs represent subsidiaries and permanent subcontractors on site

\*\* In-country off-site supply chain jobs



**GUILLAUME KUREK**  
CEO of GCO, Senegal

"A company's culture is built in a given environment. It must consider the habits and customs of host communities, and immerse itself in them where this can support its performance and bring its values to life. Having the wise and benevolent advice of local 'wise people' is a discreet but powerful support to team cohesion."



# Adopting culturally appropriate conflict resolution methods

## CONTEXT

Conflict management in a multicultural environment can be a delicate matter. Adopting culturally appropriate conflict resolution methods may prove necessary.

## ERAMET'S ACTION

The internal Committee of the Wise (in French "Comité des Sages") was put in place in 2015 to resolve conflicts in accordance with West African customs. It does not have a formal existence like the Managers' Committee ("Amical des Cadres") or the Women's Committee ("Amical des femmes") which are based on statutes. This committee acts as a mediator, not as an institution of the company to respect procedural rules, but as an entity representing the legitimacy of the wise or the oldest – similar to what happens under the palaver tree.

To create this forum, GCO chose a number of people who were considered to be 'wise', in accordance with Senegalese customs, to be members of the Committee. Members present a certain level of experience and a reputation for impartiality. They deal with different types of conflicts, which may relate to disagreement between management and delegates over union demands or allegations of discrimination.

They intervene outside of any formal framework such as inquiries from management, human resources directors, staff representatives, etc. Usually, a formal framework calls for a formal response. However, the Committee will become aware of a situation informally (a person can ask for them, or they can self-address from their own observation) and respond to it in a culturally appropriate way.

The Committee of the Wise can't take a disciplinary approach. Instead, they may recommend asking for forgiveness, as this is important in West African culture. The main purpose is to end the conflict.

A dialogue is maintained between the Committee of the Wise and management to share concerns and observations on various topics. Their work is facilitated and legitimised by management.

No minutes are written. This is what validates the customary approach to the process and allows all stakeholders to feel safe speaking up without the risk of reprisals.

Overall, the regular meetings contribute to a peaceful social climate.



## Focus

# Acting for Responsible Mining

The group's objective is for all mines to be IRMA-assessed by 2027.



GCO dredge,  
Senegal

In its constant desire to continuously improve and become a reference in its field of activity, Eramet has chosen the Initiative for Responsible Mining Assurance (IRMA) Standard to drive a transformation to further integrate sustainability in its core operations.

Published in 2018, the IRMA Standard allows for an objective and independent assessment in terms of responsible mining (relations with communities,

environmental protection, human rights, governance etc.) to certify mines and ensure materials are responsibly sourced.

The Standard defines best practices built on existing international standards such as IFC standards, ILO conventions and the UNGPs and encompasses expectations and risks for all stakeholders (host countries and communities, customers, end consumers, employees and investors). Its unique equal-stakeholder governance (NGOs, organised labour, buyers, affected communities, representatives of the financial sector, mining companies) gives the initiative strong legitimacy: it guarantees the high standards and the transparency of the mine certification process<sup>(1)</sup>. This makes **IRMA the most representative of society's**

IRMA's vision is of a world where the mining industry respects human rights and the aspirations of affected communities, provides safe, healthy, and supportive workplaces, minimises harm to the environment and leaves a positive legacy.”

— IRMA

**expectations, as well as the most stringent responsible mining standard.**

For Eramet, the goal of complying with IRMA requirements on human rights topics has cemented the drive to implement the human rights framework through the action plans. IRMA's human rights topics cover a large scope including human rights due diligence, community and stakeholder engagement, complaints and grievance mechanisms and access to remedy, free, prior and informed consent, resettlement for Indigenous People, fair labour and terms of work, occupational and community health and safety, cultural heritage and more generally the protection of the environment (water management, greenhouse gas emissions, managing mine waste). ●●●

<sup>(1)</sup> Learn more about Eramet's goal and IRMA 2023-05-10-Eramet-PK-IRMA-April\_2023.pdf

## FOCUS

### Acting for Responsible Mining



While the challenge is real and the road seems long, this initiative is also encouraging the Group to work in a more efficient and collaborative way across different key departments, in order to avoid silos and improve exchanges and teamwork within the Group.

As a central commitment for Eramet's mining operations, IRMA is included in the new CSR Roadmap Act for Positive Mining. Indeed, Objective 10 of the roadmap is to **"audit every mining site including our joint ventures following IRMA standards"**.

The commitment to audit all the Group's sites according to the IRMA framework by 2027 will establish Eramet as a leader on the path to responsible mining. So far, four Eramet sites have carried out self-assessments (Thio & Tiebaghi (SLN) in 2021, GCO and Eramine in 2022) and one initial external audit was launched in the GCO mine in Senegal in the second half of 2023.



**"The security of our operations must always be understood with the security of the people living around them. There cannot be one without the other."**

**ALEXANDRE SUMEIRE**  
Group Security Director

#### VOLUNTARY PRINCIPLES ON SECURITY AND HUMAN RIGHTS (VPSHR)

In 2022, a third party audited the compliance of the Group's mining site security systems with the **Voluntary Principles on Security and Human Rights**. The operations in the Libreville port were part of this study: in this case, an agreement was signed between Comilog and the Gabonese army to provide security in an area known for piracy issues. The security departments of both the Group and Comilog implemented safeguards to prevent the risk of adverse security impacts on communities. The public and private security forces working for the project are trained on the Voluntary Principles on Security and Human Rights (VPSHR)<sup>(1)</sup> and the use of force with an emphasis on the fact that they are operating in the context of a private service (in contrast to a sovereign operation), which is subject to different procedures.



<sup>(1)</sup> The Voluntary Principles on Security and Human Rights, 2000, languages available: English, Arabic, Chinese, French, Spanish [https://www.voluntaryprinciples.org/wp-content/uploads/2021/11/The-Voluntary-Principles\\_English.pdf](https://www.voluntaryprinciples.org/wp-content/uploads/2021/11/The-Voluntary-Principles_English.pdf)



## ARGENTINA/ERAMINE

331 DIRECT JOBS\*

3,210 ESTIMATED INDIRECT JOBS\*

### SALIENT RISKS

Safety of communities due to traffic, human rights in the value chain

\* Direct jobs represent subsidiaries and permanent subcontractors on site

\*\* In-country off-site supply chain jobs



**ALEJANDRO MORO**  
CEO of Eramine, Argentina



At Eramine, our strategy has people at its foundation. From there, promoting and complying with human rights policies, within both our management and our value chain, is the way to embody that commitment with our internal and external communities, showing that responsible mining is possible."

# Preserving cultural heritage

## CONTEXT

To avoid any negative impacts on cultural heritage, mining operators take precautionary measures. These measures were taken during preliminary works for the Centenario project, even though, with its remote location, Eramine's activities made finding an archaeological site unlikely.

## ERAMET'S ACTION

When arrows were discovered around the Centenario project, Eramine stopped its activity immediately and followed the Archaeological and Paleontological Site Identification

and Reporting Procedure's guidelines. This procedure applies to the personnel of Eramine, as well as to all contractors' personnel working on the Centenario Project. The site coordinates were logged and a photographic record was taken. Expert archaeologists were called and barriers were installed around the site. Experts established the survey and archaeological recovery mechanism and certified the steps to take to continue with activities in the area. Groups of archaeologists were always put on the front line before machinery.

The photos taken and information gathered were reported to the authority of the Dirección Provincial de Antropología. Samples were also transmitted. The authority took charge of the arrows, sending them to the Juan Martín Leguizamón museum, before allowing Eramine to resume the work. Overall, in the larger context of the Centenario Lithium project, the environmental impact report was updated with the support of a multidisciplinary team, including professional archaeologists, and other experts in collaboration with the authorities, who approved the assessment.



Protecting cultural heritage is part of the Group's Golden Rules for human rights and community relations.





**3,392 DIRECT JOBS\***

**6,000 ESTIMATED INDIRECT JOBS\***

#### SALIENT RISKS

Diversity and inclusion, psychosocial risks, employee safety and the value chain

\* Direct jobs represent subsidiaries and permanent subcontractors on site

\*\* In-country off-site supply chain jobs



**JÉRÔME FABRE**

CEO of SLN, New Caledonia

“For years, the development of tools and processes such as the 4 community relations offices, the introduction of a free phone number for our communities, the deployment of a complaints management process, themed public meetings, meetings within tribes as close as possible to the communities, institutional and associative partnerships, and skills support for community projects, are all local approaches that have been deployed, standardized and audited to improve our mutual understanding strengthen our reciprocal acceptance and lead to a greater respect for human rights.”



# A place for community dialogue

## CONTEXT

Ensuring good relationships between local communities and the Group is essential for Eramet. As a partner present on the island for more than a century, SLN has a duty and mission to be a proactive and understanding neighbour.

## ERAMET'S ACTION

**SLN strengthened its CSR approach with “Offices of Communities”.**

An initial stakeholder mapping was carried out in 2016, which explored communities' perceptions and expectations of SLN. In 2019, community offices were set up in Koné and Houailou, in the North Province, and Thio, in the South Province, with dedicated teams to handle community relations. The decision was made to base these offices near the existing administrative buildings to be closer to the communities.

The goal of these offices was to build a forum and create a place of exchange and interaction with the population.

They were designed as the best place to talk about site activities and careers in mining, and to listen to the needs and grievances of communities as part of their local development. Site visits are also organised to present SLN activities and ensure more transparency.

Local community dialogue does not always ensure the continuation of operating licences, the Poum site had to close in 2023. Nonetheless, SLN always strives to improve practices and be a neighbour that lives up to its standards.

Even in historically complex areas, open and equal dialogue with communities is a way for the Group to act as a responsible partner in its interactions with all stakeholders.

**Local communities offices to build a forum and create a place of exchange**

## KEY FIGURES

In 2022, the average weekly frequentation rate for Koné (covering the area from Nepoui to Koumac/Poum) was 4.7 meetings and 12.5 people received at the office; for Houailou (covering the Poro/Houailou and Kouaoua area) it was 2.4 meetings, gathering around 14.6 people in this timeframe; for Thio (covering the Thio, Tontouta and Poya/Nepoui area) there were 3.8 meetings on average with 30.9 people received; and finally, for the South area (Nouméa and the south), there were 3.4 meetings and an average of 21.4 people.



## Focus

# Respecting indigenous peoples and local communities' traditions and cultures

Through its human rights policy, Eramet is committed to respecting and protecting the traditions and cultures of indigenous communities in the countries where the Group operates. Social studies are routinely conducted to gain an understanding of the populations' living conditions in the vicinity of the mining concessions and to develop appropriate community engagement plans and community development projects. Eramet's activities in Argentina, Indonesia and New Caledonia are carried out alongside indigenous and tribal peoples.

### UNDERSTANDING THE ISSUE

There is no official definition of Indigenous People at the international level.

However, criteria have been developed by international organisations, notably the UN system body, such as:

- ▶ "Self-identification as indigenous peoples at the individual level and accepted by the community as their member
- ▶ Historical continuity with pre-colonial and/or pre-settler societies
- ▶ Strong link to territories and surrounding natural resources
- ▶ Distinct social, economic, or political systems
- ▶ Distinct language, culture, and beliefs
- ▶ Form non-dominant groups of society
- ▶ Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities."<sup>(1)</sup>

ILO Convention 169 on Indigenous and Tribal Peoples states that it applies to:

- ▶ Tribal peoples in independent countries whose social, cultural and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions, or by special laws or regulations
- ▶ Peoples in independent countries who are regarded as indigenous on account of their descent from the populations which inhabited the country, or a geographical region to which the country belongs, at the time of conquest or colonisation or the establishment of present state boundaries and who, irrespective of their legal status, retain some or all of their own social, economic, cultural and political institutions.
- ▶ Self-identification as indigenous or tribal shall be regarded as a fundamental criterion for determining the groups to which the provisions of this Convention apply.

Alongside recognition of businesses' responsibility to respect human rights, the International Finance Corporation (IFC) Performance Standards (Standard 7: four criteria), the Equator Principles and the Initiative for Responsible Mining Assurance (IRMA) require Free, Prior and Informed Consent (FPIC) from indigenous people in several circumstances.

In accordance with these documents, when the mining operations have an impact on the rights or interests of indigenous people, the operators must obtain their Free, Prior and Informed Consent (FPIC). Specifically, FPIC means: ●●●



<sup>(1)</sup> United Nations Permanent Forum on Indigenous Issues, Who are indigenous peoples, Microsoft Word - Factsheet-identity1.doc ([www.un.org/en/](http://www.un.org/en/))

## Focus

# Respecting indigenous peoples and local communities' traditions and cultures



- **Free** - people are able to freely make decisions without coercion, intimidation, punishment or manipulation.<sup>(1)</sup>
- **Prior** - sufficient time is allocated for people to be involved in the decision-making process, at the early stages of a development or investment plan and before key project decisions are made and impacts occur.
- **Informed** - people are fully informed about the project and its potential impacts and benefits. The information must be accessible, clear, consistent, accurate and transparent, delivered in the local language and in a culturally appropriate format.
- **Consent** - there are effective processes for affected indigenous peoples to approve or withhold their consent, consistent with their customary decision-making processes, and their decisions are respected and upheld. Indigenous peoples and local communities must be able to participate through their own freely chosen representatives, while ensuring the greatest possible participation of youth, women, the elderly, and people with disabilities.

FPIC is more than just a process of consultation. It is a negotiated process involving all interested parties, the aim of which is to allow indigenous peoples to be involved in decision-making about future developments affecting them and ultimately, to give or withhold their consent.

Chapter 2.2 of the IRMA standards, on Free, Prior and Informed Consent (FPIC), provides for situations in which there is an overlap with national laws. "The State always holds the primary duty to protect indigenous peoples' rights. Nothing in this chapter is intended to reduce the primary responsibility of the State to consult with indigenous peoples in order to obtain their FPIC and protect their rights. However, IRMA recognises that in the absence of national laws, or in the exercise of their right to self-determination, some indigenous peoples may wish to engage with companies without State involvement".

## ERAMET'S LOCAL CONTEXTS

In Argentina, the legal context provides a framework for companies to respect Indigenous People's rights in accordance with international standards. Free, prior and informed consent is legally protected, and the status of indigenous communities is recognised at the State level.

The Constitution of the Argentine Nation, reformed in 1994, incorporates human rights treaties with a rank of constitutional hierarchy in its article 75, paragraph 22. And in paragraph 17 thereof "recognises the ethnic and cultural pre-existence of Argentine indigenous peoples; guarantees respect for their identity and the right to bilingual and intercultural education; recognises the legal status of their communities and the community possession and ownership of the lands they traditionally occupy, and regulates the delivery of other lands suitable and sufficient for human development;

and ensures their participation in the management of their natural resources and other interests that affect them."

Argentina has signed ILO Convention 169 and set up a framework on the recognition and protection of its indigenous communities. Law 23.302 passed by the Argentinian Congress, in 1985, recognises these communities as descending "from populations that inhabited the national territory at the time of the conquest or colonisation" with the main objective to guarantee access to land, respect the communities' culture in teaching plans and in the protection of their health, so that they can participate fully in the social, economic and cultural life of the Nation, respecting their own values and to preserve their cultural heritage.

The Constitution of the Province of Salta, where Eramine is located, recognises the ethnic and cultural pre-existence of the indigenous peoples residing in the territory of Salta. Furthermore, Salta's provincial law on the development of its indigenous peoples states in article 17 that "The adjudication of definitive ownership of lands, whether in their current settlement or in cases involving a transfer, shall be done with the free and express consent of the indigenous population involved." Finally, the Ministry of Social Development and Ministry of Infrastructure adopted a resolution in 2022 to approve the Protocol for free, prior and informed consent with the purpose to set out the FPIC process in the region of Salta. ● ● ●



Communities living close to Eramine in Argentina

<sup>(1)</sup> [www.ohchr.org/sites/default/files/Documents/Issues/Peoples/FreePriorandInformedConsent.pdf](http://www.ohchr.org/sites/default/files/Documents/Issues/Peoples/FreePriorandInformedConsent.pdf)

## Focus

# Respecting indigenous peoples and local communities' traditions and cultures



**New Caledonia** is a French overseas territory with special status. France voted in favour of the non-binding United Nations Declaration on the Rights of Indigenous Peoples. France has not ratified ILO Convention 169. The Nouméa Accord of 5 May 1998, and the Organic Law of 19 March 1999, established the Customary Senate and the Customary Councils as institutions of New Caledonia. The referendum law of 9 November 1988 recognised eight Customary Areas, each represented by a Council. Customary Councils can be consulted on all issues relating to Kanak identity. While the Caledonian Mining Code does not require an FPIC as such, it does require the consultation of the relevant customary authorities for the granting of mining authorisations.

**Indonesia** also voted in favour of the United Nations Declaration on the Rights of Indigenous Peoples. However, it has not ratified ILO Convention 169. The Indonesian Constitution recognises the concept of indigenous people as Masyarakat Hukum Adat (Customary Law Community). Several laws apply to them such as the Agrarian Law of 1960 (and more recent laws on land ownership), which states that a community can be recognised as long as it does not interfere with the national interest; and the Forestry Law of 1999 (since forests administratively cover almost all of Indonesia, this law is central to land rights). The criteria are traditional institutions and leaders, having clearly mapped land, still following customary laws/mechanisms and continuing to use forests for timber and non-timber resources. Recognition must be established by regulation of the local government (Province or District), following deliberations by the local parliament.

Lastly, this status gives communities the right to control land use, but does not explicitly require FPIC. Few communities sought this status and obtained it. ●●●

## ERAMINE

The members of the Kolla Community living in Salta Province are considered indigenous people, by the State, in accordance with the criteria of international standards. In the development of any mining project, it is important to first interpret the context in which the project will be developed. This is why, since the beginning, Eramet started the process of understanding and including the local context. As stated by Dionisia Rodríguez Alcácer, the Community Leader, "the relationship the community has with Eramet dates back to approximately 2010 when the first exploration teams were introduced through different assemblies with the community. They were able to fully explain what work they were undertaking."



The community and the mining company are growing together."

**Dionisia Rodríguez Alcácer**

Eramine organised a community assembly with the participation of representatives of the Ministry of Mining and Energy, as is usual. It was held in Santa Rosa de los Pastos Grandes, on 18 February 2020, to complete the FPIC process in line with ILO Convention 169, and was another milestone in the relationship

with the communities in Eramine's area of influence. The company's teams emphasised that because the partnership with the communities had come a long way since the beginning of the project. Later, in May 2022, the indigenous people community reaffirmed their support during the Quarterly Assembly.





## Focus

# Respecting indigenous peoples and local communities' traditions and cultures

### SLN

For each mining authorisation, the customary authorities are involved in the consultation process. Moreover, SLN has signed agreements with the tribes or with their upper level (district) on a case-by-case basis. However, following a lengthy blockage of the Kouaoua site in 2018 due to business-related issues and intergenerational conflict among the indigenous populations, SLN has decided to bolster its dialogue and commit to further formalising its dialogue process with the customary authorities, guardians and defenders of Kanak identity. Since then, SLN has set up a voluntary customary consultation mechanism. In 2022, a letter of intent was signed with the Ajië Arho customary area and a mapping exercise was conducted to identify people to be consulted and informed. This agreement between SLN and the Ajië Arho customary area brings together four municipalities (Moindou, Bourail, Houailou and Poya). It was designed

to require SLN to obtain prior, free and informed consent from the populations impacted by the operations, but it is important to note that the relationship goes beyond a simple agreement – SLN listens to and involves the host communities in a genuine participatory process. This cooperation aims to inform and consult the customary authorities in the area, as far upstream as possible, about prospecting, drilling, mining and mining rehabilitation projects, especially so in the case of site closures. The Ajië Aro customary area is currently deploying a system with the local customary authorities to facilitate societal acceptance – which must be free, prior and informed – by the impacted populations. The company's goal is to make it a model of good practice for all the customary areas where SLN operates.



As representative of the Kanak Community, I had the opportunity to participate in the 12<sup>th</sup> Session of the Expert Mechanism on the Rights of Indigenous People before the United Nation's Human Rights Council in 2023. It offered an opportunity to provide thematic expertise to the Council based on information from the field and current issues in New Caledonia, voice indigenous concerns at the international level, better understand the rights and uses of existing human rights mechanisms and work on improved cooperation with UN agencies.”

**Yolène Koteureu**  
Community manager for SLN



### WEDA BAY NICKEL

Since the beginning of the project, PT Weda Bay Nickel has been committed to the highest standards for responsible mining, especially toward communities. While being a minority shareholder in the PT Weda Bay Nickel company, Eramet is committed to respecting the human rights of populations around all its mining sites. Social studies are routinely conducted to help understand communities and to develop appropriate community engagement plans. The Tobelo people, also called O Hongana Manywa or Tobelo Dalam, are nomadic tribes living in the interior forests of Halmahera. The potential impacts of mining activities on this community have been a constant concern for Eramet. Several studies have been conducted to better understand them. Some of them regularly visit the Weda Bay camp located in the forest. PT Weda Bay Nickel has developed a relationship of trust with those living within the mining concession. An awareness programme has been in place since 2010 for employees and subcontractors, asking them to limit interactions with the community. It is estimated that the total population across all of Halmahera Island is about 3,000. The result of the 2023 field study, performed by Syaiful Madjid, an independent anthropologist from Khairun

University, Ternate (Indonesia), and a guide, confirms that a group of nine individuals resides within the concession; furthermore, all the groups investigated by the study are in contact with local communities and no tribes impacted by the mine live in complete isolation. The results of this study will enable PT Weda Bay Nickel to design and implement, where necessary, appropriate mitigation measures and to improve its engagement with these communities. In compliance with Indonesian law, the permitting process for PT Weda Bay Nickel mining activities has included extensive consultation with local communities. The company is currently formalising the engagement with that group in accordance with international IRMA standards. Respecting all communities and their cultural heritage has been central to the preparation of the work since exploration started. Following the Weda Bay's decision in December 2022, PT Weda Bay Nickel committed to engage in the IRMA process. A specific action plan is dedicated to respecting the traditions and culture of local communities. The consultation process with the group living within the concession is ongoing, building on the continued relationship developed over the past year.





## INDONESIA/ WEDA BAY NICKEL

**10 103 DIRECT PT WEDA BAY NICKEL JOBS**  
(on-site employees and subcontractors)  
including 1 314 PT Weda Bay Nickel employees

### SALIENT RISKS

Human rights in the value chain, impacts on indigenous people, environmental impacts and impacts linked to population influx

# Weda Bay Nickel

## Keeping employees safe: an essential task

### CONTEXT

Mining activities present a number of safety risks for employees (such as high altitudes and driving). Eramet is therefore ensuring mitigation measures are implemented as a priority to provide workers with safe working conditions.

### ERAMET'S ACTION

Eramet works in Indonesia with its partner Tingshan, extracting nickel at the Weda Bay mine in the IWIP Industrial Park. Weda Bay Nickel is Eramet Group's largest mining site, employing over 10,000 people. The site's activities involve transporting ore: 500 trucks are on the road every day,

so ensuring the safest possible driving conditions is essential.

Following an accident, an action plan was created with the majority partner on the project, PT IWIP, to solidify prevention measures. These included a standard road design (road width, road protection, central divider and speed control along the road: speed cameras, penalties, speed bumps). All trucks were equipped with a Rollover Protection System (ROPS). Regarding the risk of fatigue and related accidents, the OSPAT system for detecting fatigue at the start of a shift (tests, etc.) prevents drivers

with unsatisfactory results from taking the wheel, relocating them to rest rooms.

The results have been optimal and all these measures have improved road quality, reduced risks and prevented all serious accidents.

Since April 2021, there have been no severe accidents and Weda Bay Nickel's accident frequency rate is zero, compared to the ICM (International Council on Mining and Metals) average of 2.6.

Weda Bay Nickel won two safety awards from the Indonesian Ministry of Mines, 3<sup>rd</sup> prize in 2022 and 2<sup>nd</sup> prize in 2023.



**ROBERTO RODRÍGUEZ VALLEDOR**  
Vice President Mining PT Weda Bay Nickel, Indonesia



Safety in Weda Bay is the path to performance. For every task, at any

level, safety is at the heart of what we all do.

Despite a rapid expansion, it's possible to have a 12,000-person operation with 3.5 million person-hours per month without accident and we are proof."



## NORWAY/ENO

724 DIRECT JOBS\*

1,104 ESTIMATED INDIRECT JOBS\*

### SALIENT RISKS

Safety of employees, health and safety in the value chain

\* Direct jobs represent subsidiaries and permanent subcontractors on site

\*\* In-country off-site supply chain jobs



### ROGER WESTGARD

CEO of Eramet Norway, Norway

"Building trust is an essential part of our CSR strategy. We organize yearly meetings with our neighbors to inform about our environmental performance and present our ongoing projects. This also provides an occasion to foster a good dialogue, understand how we are viewed and get valuable input from the local community."



# Minimising the environmental impact on neighbours

### CONTEXT

Proactive environmental risk management is crucial to ensure the right to a healthy environment and the right to health of the communities living around a plant.

### ERAMET'S ACTION

Eramet Norway's environmental strategy includes important environmental investments and stakeholder engagement. The site is committed to being a good neighbour through transparent dialogue with communities and a constant drive to improve its practices. One of ENO's environmental milestones was the improvement of the mercury treatment plant in 2020.

The first step is to master the monitoring of its emissions. Continuous monitoring was already in place in previous existing facilities, but results revealed emissions variations. A new upgrade aimed to stabilise and lower mercury emissions to preserve the environment and human health.

A new facility and new processes, based on activated carbon adsorbent technology, were put in place after an internal task force reached out to different suppliers to assess which carbon absorber technology was the best suited to ENO's process.

**The updates allowed ENO to improve its impacts through more stable**

**states of operations, lower chemical consumption, less exposure for operators and lower heavy metal emissions, including mercury and others. It is also expected to produce less waste than the previous facility.**

**The internal taskforce (ICG)** brings together several of the Group's sites and enables its members to capitalise on each other's techniques and best practices: for example, benchmarking filtration and air emission reduction equipment and automatically detecting dust plumes via a network of cameras directed at the chimneys and linked to software, which is currently being deployed.

## Focus

# Human rights in the value chain

“According to the International Labour Organization (ILO), more than 450 million people work in supply chain-related jobs. While complex global supply chains can offer important opportunities for economic and social development, they often present serious human rights risks.”<sup>(1)</sup>

### HUMAN RIGHTS DUE DILIGENCE IN UPSTREAM PORTIONS OF ERAMET'S VALUE CHAIN

Eramet's strategy for ensuring compliance with its standards in the upstream part of its value chain is based on the company's “Know Your Supplier procedure”. This procedure evaluates CSR performance and supplier ethics. It requires that any subsidiary wishing to initiate or maintain a commercial relationship with a supplier must register it in the Group's Supplier Relationship Management (SRM) tool and work with the Group Procurement Department and the CSR Procurement Manager to manage the CSR and ethical prerequisites of their prospects and suppliers.

The aspects covered by measures to identify, assess, and limit CSR and ethical risks are:

- ▶ Human rights and fundamental freedoms, health and safety
- ▶ Environmental protection
- ▶ Business ethics and the fight against corruption
- ▶ Sustainable procurement

All these aspects are considered for the final weighting.

To identify high-risk contractors, prior to signing contracts or during the life of the contract, Eramet follows:

- ▶ the **non-financial assessment** (EcoVadis), which measures the sustainability management system of potential contractors using criteria focused on four key performance areas (environment, labour & human rights, ethics and sustainable procurement),
- ▶ the **research conducted on high-risk countries**,
- ▶ and through ad hoc actions such as a **procurement risk mapping solution**.

These are key elements that help the company to identify which stakeholders (contractors, suppliers, etc.) to engage with in relation to each salient issue and when and how to do so.

The **Responsible Procurement Committee** is the governance body for the evaluation of CSR supplier performance. The committee brings together the Group's Procurement Director, the Group's Director of Ethics and Compliance, the CSR Procurement Manager, the Human Rights Officer (with the aim of providing a clearer and more precise view of the nature of the risks and the possible means of remediation), the CSR team representative, representatives from the Group Legal Department and the Safety Director.

The Responsible Procurement Committee leads the implementation of this CSR and supplier ethics evaluation procedure, monitors the results, takes corrective measures if necessary and analyses the results of the CSR and supplier ethics performance evaluations. The Committee meets every trimester or for ad hoc sessions when needed.

It is also worth noting that third-party assessment tools enable the Group to take into account all issues (including safety, ethics, environment, social impact and human rights).

Under the “**Know Your Supplier procedure**”, the CSR Procurement manager consults the Responsible Procurement Committee providing they identify potential issues, including via:

- ▶ an ethical screening
- ▶ internal tools, if necessary,
- ▶ and any other sources (public communication, news, etc.) raising potential human rights risks. e.g. suspicion arise on supplier's practices.

The definition of the action plan must be aligned by the Responsible Procurement Committee. This will be reviewed on a case-by-case basis. ●●●



<sup>(1)</sup> Source: HRW, Human Rights in Supply Chains, 2016



## FOCUS

### Human rights in the value chain



If salient issues are identified once the business relationship has started with the supplier, then the Responsible Procurement Committee will review it and take a decision as per the aforementioned process.

The **Supplier Code of Conduct**, which refers to the Ethics Charter and Human Rights Policy, is intended to outline Eramet's commitments to and expectations of the supplier in terms of sustainable development and ethics. It is divided into three chapters: Human rights and working conditions, environment and business ethics. All at-risk suppliers must sign it or share theirs (which must be aligned with Eramet's expectations on various criteria including human rights). If none of these



Preventing corrupt practices and promoting integrity is a key principle of our ethics charter.

Indeed, corruption erodes democracy, trust in institutions, the rule of law and the realisation and enjoyment of human rights. It's also a key obstacle to eradicating poverty. We act for positive mining and as such we aim to implement better business practices in every country where we operate."

**ARNAUD DOUVILLE**  
Chief Compliance Officer

conditions are met, arbitration must take place on a case-by-case basis.

Moreover, the commitment made by third parties to comply with the Code enables Eramet to make the elements included in it contractually binding.

Eramet is committed to ruling out any contractual relations with suppliers that are known not to comply with regulations in terms of forced labour, child labour, minimum working age, discrimination or violence or which are complicit in terms of violations in these areas.

To mitigate potential issues, Eramet is working towards:

- ▶ Having 100% of its suppliers (eligible for ethical screening) managed as per the internal Know Your Supplier procedure.
- ▶ Evaluating 90% of at-risk suppliers (as defined in the Eramet CSR roadmap) on their CSR practices by 2026.

Furthermore, dedicated training is provided for suppliers or contractors identified as likely to represent a risk. In Gabon, for example, suppliers' days were organised for SETRAG and COMILOG, providing training for nearly 300 suppliers.

In Argentina, training was also provided on the subject of gender-based violence for contractors working on site.

Finally, ethical clauses are included in contracts with third parties likely to represent a risk in terms of anti-corruption and human rights in the broadest sense. ● ● ●

### PRIORITIES ON AN EQUAL FOOTING

The French Sapin 2 law requires Eramet to carry out an assessment of its at-risk third parties. Eramet has chosen to include human rights issues (charges, labour law, health and safety, etc.) in its third-party assessment criteria. As a result, on the risk scale used for the

company's third parties, a third party that has been convicted of or charged with human rights violations will present the same risk as a third party that has been convicted of or is likely to have committed breaches of probity. The issues are addressed on an equal footing.





## Focus

### Human rights in the value chain



#### HUMAN RIGHTS DUE DILIGENCE IN DOWNSTREAM PORTIONS OF ERAMET'S VALUE CHAIN

As per the upstream part, regarding the downstream portions of Eramet's value chain, the **Responsible Sales Committee** is in charge of human rights due diligence and implementing the **Know Your Customer procedure**.

The Responsible Sales Committee meets at least quarterly or when convened by the Sales Department.

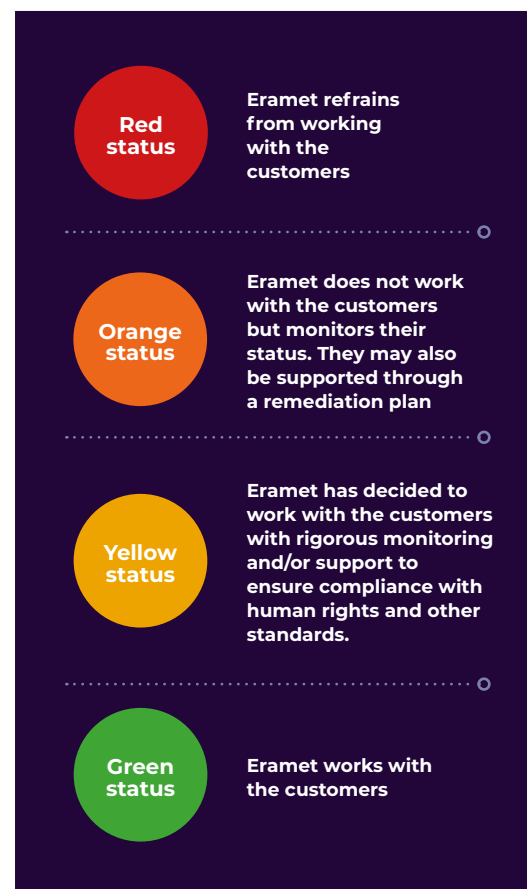
It includes the Ethics and Compliance department, the Legal Department, the Human Rights department, the CSR department and the Sales Department.

It has several responsibilities. Among other missions, it decides if Eramet should enter into business or not with a customer when complex information concerning that customer has been reported through Eramet's screening tool managed by an independent expert.

All elements found on a customer are brought to the attention of the committee, which must reach a decision on whether to continue or start business with the customer. If no agreement is reached during the Committee, the decision is sent to the Chief Operating Officer.

The Committee is invested with different powers such as to refuse a customer, add a specific clause to a contract or launch an audit to gather more information on the customer.

All customers or potential customers are then assigned one of four statuses:



EraTrace platform launched in September 2023

Overall, the Responsible Sales Committee monitors third parties considered to be at risk and follows up the action remediation plan, shares best practices in terms of Responsible Sales and informs participants of key regulatory updates.

#### ERATRACE PLATFORM

In September 2023, Eramet launched the EraTrace platform. For every order placed, customers will be able to access a product passport and consult information on the manufacturing process and CSR performance linked to their purchases. Place, date, extraction location, carbon footprint and water consumption are specified for each product delivery.



## FRANCE/ ERAMET IDEAS, TRAPPES

164 DIRECT JOBS\*

### SALIENT RISKS

Health of employees, industrial incident

\* Direct jobs represent subsidiaries and permanent subcontractors on site



**SARAH BELAIR**  
Human Rights Referent  
and Director SEQUOIAS



Even if we genuinely improved on the subject, I dream of the day when an employee will be able to talk about their spouse of the same sex and that it will not be a subject."

# Improving practices on diversity and inclusion

## CONTEXT

The Ethics Charter of the Group states that Eramet fights against all forms of discrimination, regardless of their basis, including gender, gender identity or sexual orientation. Diversity and inclusion are essential topics for the Group, all over the world, to ensure everyone feels welcome and included as they are.

## ERAMET'S ACTION

Since 2021, a diversity and inclusion working group was set up to address several themes. In June 2023, during the Diversity Day,

a special session in France on the LGBT+ theme was organized in collaboration with the organization Autre Cercle, a leading French association in terms of LGBT+ inclusion and diversity in the workplace. All employees were invited to attend. Anonymous testimonials from employees were read and revealed the reality of members of the LGBT+ community: certain people felt compelled to hide a part of their identity, to avoid certain pronouns and worry about which words to use (my spouse, my wife, my husband, his, her...).

The Group is aware of the realities of people living in countries where human rights violations of members of the LGBT+ community still exist and recognizes the limits of certain actions. Eramet has planned to continue to raise awareness on LGBT+ issues. While homosexuality might be illegal in certain places, it is important to remember that any type of discrimination or harassment based on rumors, prejudices or aspects of private life are prohibited in the workplace.

In 2023, Eramet became a member company of l'Autre Cercle.



Created in 1997, *Autre Cercle* is the French leading non-profit organization for LGBTQIA+ inclusion in the workplace in France. *Autre Cercle* is present all over France with their 10 branches and collaborates with more than 400 volunteers. Our volunteers are professionals from various backgrounds who share our vision and goals. They can contribute in our activities as simple members or as active volunteers. Since 1997, They supported employers from the private, public, and non-profit sectors to create more inclusive work environments for LGBTQIA+ people. Since 2013, *Autre Cercle* deployed the LGBTQIA+ commitment Charter, signed by more than 280 organizations covering around 2,5 millions of employees. The charter is a voluntary commitment that expresses the support of organizations to our values and actions. By signing the charter, organizations commit themselves to respect LGBTQIA+ people within their structure, as well as within their stakeholders.



**USA, MARIETTA**

**221 DIRECT JOBS\***

**SALIENT RISKS**

Employee health and safety

*\* Direct jobs represent subsidiaries and permanent subcontractors on site*



**MARC MOUNIER-VEHIER**  
CEO of Eramet Marietta,  
USA

"At Eramet Marietta, we actively strive to be a welcoming company for everyone. Providing equal employment opportunities is not just a goal, but a principle that guides all of us in our daily decisions."



# Strengthening governance on non- discrimination

**CONTEXT**

Everyone has the right to work free from discrimination. This principle is a cornerstone of good working conditions. As with all golden rules, this is a principle that everyone must follow.

**ERAMET'S ACTION**

Eramet Marietta has put in place an internal statement to ensure that recruitment, hiring, training, promotion and other terms and conditions of employment are free of all discrimination and that employees have equal employment opportunities. This statement highlights the company's responsibility to respect the right not to face discrimination on the basis of race, colour, religion, sex, national origin, age or disability with respect to all decisions

and changes in employees' working lives. The document also follows up with clear guidelines on what to do and how to act if this principle is not respected as well as naming the people responsible for ensuring it is implemented. More than a simple statement, this commitment highlights the real process involved to ensure it is respected.

In an ever-changing world and global group such as Eramet, initiatives like this statement is a best practice that shows the company's commitment to non-discrimination. The decision to make this statement and communicate it to all employees emphasises the site's position on this topic and its drive to ensure the best working conditions for its teams.

**This initiative highlights the company's responsibility to respect the right not to face discrimination**



## Focus

# Protecting everyone's environment

The right to a healthy environment encompasses the rights to food, clean air and water, health, culture and even protecting the right to life.

The Group and other stakeholders have obligations and responsibilities under both international environmental law and international human rights law to:

- ▶ Ensure environmental preservation in light of Eramet's activities (biodiversity habitat loss or degradation, water resources etc.)
- ▶ Prevent Eramet's negative impacts on human rights
- ▶ Ensure that actions implemented for environmental preservation are "equitable, non-retrogressive, non-discriminatory and sustainable"<sup>(1)</sup>.

As mentioned earlier, the IRMA standard covers aspects such as water, biodiversity and mine waste management. Because Eramet has undertaken to have all its mining sites audited by 2027, it will be an excellent opportunity to strengthen Eramet's work on these subjects.

Eramet is committed to integrating environmental issues into the design of industrial and mining projects at the highest possible level. Dedicated teams at Group

level and on all sites manage these issues. In addition to strict compliance with the laws and regulations applicable to its activities, Eramet is also committed to the voluntary and continuous reduction of the Group's environmental footprint.

**Managing the impact on biodiversity** is an integral part of mining activity. Mining is a temporary activity (over a few decades) with a significant impact on the environment (fauna, flora, water and air). Eramet's strategy is to understand the environment to assess its impact. This characterisation of biodiversity is built through mapping of plant formations and inventories of species (flora and fauna), ecosystems and ecosystem services. Eramet is committed to adapting its projects by implementing an Avoid-Reduce-Compensate approach. Moreover, formalised impact studies are submitted to the relevant authorities prior to any new or extended operations.

Some zones are excluded and are "no go zones for Eramet", such as World Heritage sites, areas on a State's official Tentative List for inscription on the World Heritage List, IUCN protected area management categories I to III and core



areas of UNESCO biosphere reserves. The use of deep-sea tailings and the practice of seabed mining are also excluded.

**Impacts on biodiversity have already led to the partial or total abandonment of a mining project.** For instance, in Moanda (Gabon), Eramet decided to preserve the integrity of the gallery forests due to their rich flora and fauna (presence of large mammals) which led to around 15% of the Okouma deposit's resources being frozen. Furthermore, **Eramet conducts systematic studies on the impact of its mining activities** in order to offset them and prepare for the rehabilitation of mined sites right from the start of the cycle.

As part of the CSR Roadmap, Eramet will renew its commitment to the **Act4Nature International Initiative**, Eramet's objectives are validated by a steering committee including NGOs, scientists and professional associations. ●●●

*Cameras identifying animals living close to zones of operations*

<sup>(1)</sup> Source: UNEP, Human Rights and Biodiversity: Key Messages, 2021 Human Rights and Biodiversity: Key Messages | UNEP - UN Environment Programme



## Focus

### Protecting everyone's environment

Respecting the environment involves, among other things, respecting the land, the air and water resources, but also requires consideration of the stakes related to climate change, as they are all interdependent.



#### PROTECTING THE AIR

##### AIR MONITORING BY ENO IN ERAMET NORWAY

Sensors were installed at Sauda, combined with a continuous camera to detect dust clouds. Today, an online interface detects anomalies that were previously monitored by a person reviewing the video recordings. The aim is to determine the cause of the dust clouds and to then analyse them, in order to prevent future events and reduce the impact on air quality. Other monitors allow the site to keep track of fine dust and dust deposition in the vicinity of the plant.

#### PROTECTING WATER RESOURCES

##### DRINKING WATER SUPPLY WORKS BY SLN IN NEW CALEDONIA

SLN and the Poupou town council have set up a programme to provide access to drinking water in the commune of Poupou. The inhabitants did not have sufficient and suitable boreholes and had problems with the quality of the water available. Under an agreement signed in 2020, drinking water was provided to the community through the transfer of boreholes located on SLN's mining estate. More specifically, over a three-year period, SLN, Sonarep and the town council have put in place a drinking water supply works plan. As a result, two boreholes were transferred to the town hall by SLN and one borehole near the mining operation was transferred from the town to SLN. This therefore prevents the risk of negative impacts on the quality of people's water.



One of our first responsibilities as a company is to ensure the preservation of a healthy environment for our employees and the communities living around our sites. This is why Eramet is constantly working to assess its potential adverse impacts and to implement actions designed to prevent and reduce them."

**Christine Deneriaz – Environment Director**

#### PROTECTING THE LAND

##### REVEGETATION OF A MINING SITE BY GCO IN SENEGAL

Eight years after launching its mine, GCO has returned 85 hectares of revegetated former mining land to the Senegalese Department of Water and Forests – a first for the country. In 2014, GCO (Grande Côte Operations) began its activities in Senegal.

This was a technical challenge, with a mobile mine and concentration plant as well as a mineral separation plant; a human challenge, involving skills transfer and the development of local knowledge; and a societal challenge, with the rehabilitation of the dunes after the resource had been developed, the relocation of displaced villages and the management of water resources. The landscape alteration caused by these operations is not irreversible: GCO is proving this by revegetating the sand dunes in the wake of its mining activities. This commitment is included both in the contract between the company and the Senegalese government and in Eramet's 2018-2023 CSR Roadmap, through its 12<sup>th</sup> objective: "Preserve water resources and accelerate the rehabilitation of our mining sites, promoting biodiversity."

Revegetation was also an opportunity to stimulate local economic development: five local Economic Interest Groups (EIGs), bringing together approximately 200 people, are working with GCO on the entire revegetation process. The species replanted are chosen mainly for their economic value (filao, cashew). By 2025, approximately 950 hectares will be gradually and continuously returned in equal or better condition than the land's original state.



Returning rehabilitated land is an important moment that demonstrates that the commitments made by mining companies in terms of environmental management, more generally, and in terms of rehabilitation, within the framework of the Mining Code, can and must be respected."

**Oumar SARR —  
Minister of Mines  
and Geology of  
Senegal**



# PART.5

## APPENDICES

Tracking Performance	57
Human rights KPIs	59
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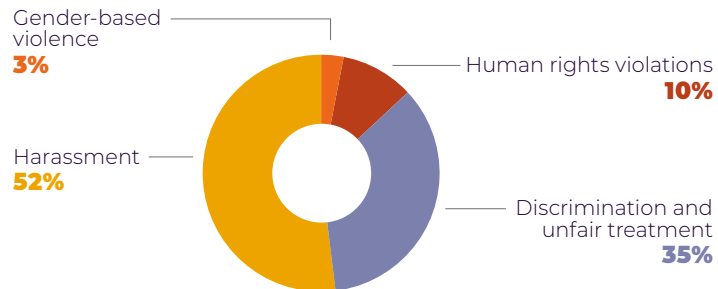


Centenario workers,  
Eramine Argentina

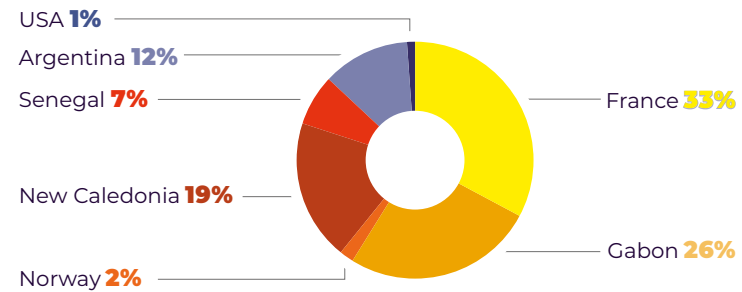
# Tracking performance

## MAJOR TRENDS IN CLAIMS ON SALIENT RISKS IN HUMAN RIGHTS FROM INTEGRITY LINE

CLAIMS RAISED BY REPORTERS  
FROM JUNE 2020 TO DECEMBER 2023



LOCATIONS OF CLAIMS RAISED BY REPORTERS  
FROM JUNE 2020 TO DECEMBER 2023

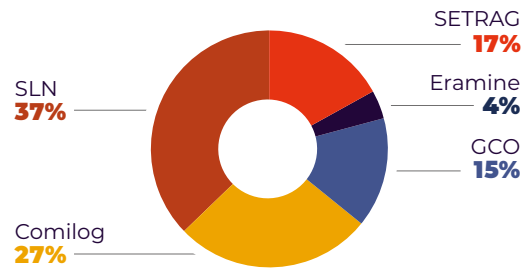


## TYPES OF GRIEVANCES FROM 2020 TO 2022



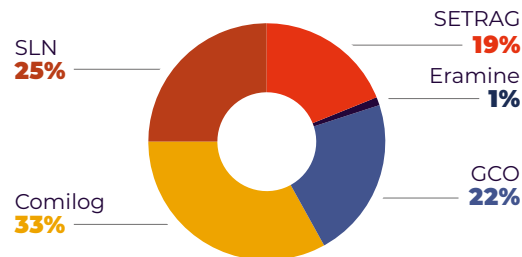
## TRENDS IN COMMUNITY GRIEVANCES (2020-2022)

MINE COMMUNITY COMPLAINTS 2020



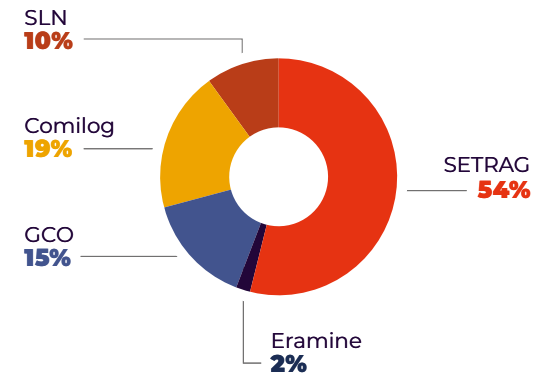
The main topics of these complaints were: impact on property, noise, dust and compensation claims.

MINE COMMUNITY COMPLAINTS 2021

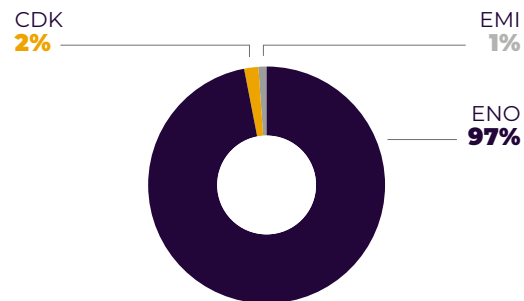


The main topics of these complaints were: compensation, resettlement and nuisances (noise and dust).

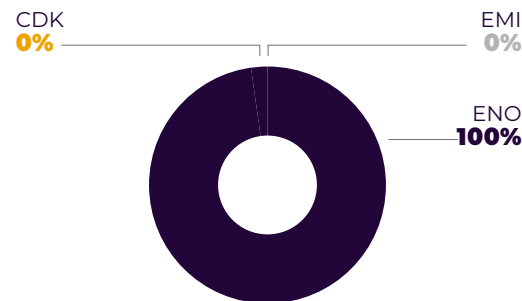
MINE COMMUNITY COMPLAINTS 2022



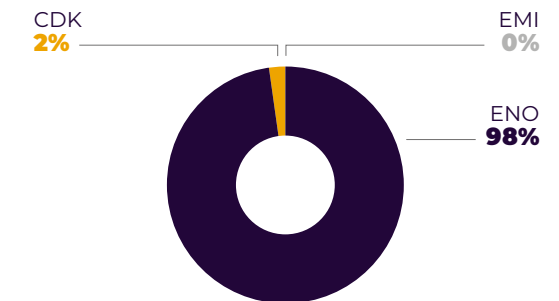
PLANT COMMUNITY COMPLAINTS 2020



PLANT COMMUNITY COMPLAINTS 2021



PLANT COMMUNITY COMPLAINTS 2022



\* Comilog Dunkerque is located in an industrial area and Eramet Marietta is located outside of the city area.

The main topics of these complaints were noise and dust.



# Human rights KPIs

OWN WORKFORCE									
	Mines					Plants			
Own workforce - Data for 2020-2022	Comilog	Eramine	Setrag	SLN	GCO	ENO	CDK	EMI	Comments
<b>Child labour</b>									
Number of people between 16 and 18	0	0	0	0	0	23	0	0	
Assigned positions	NA	NA	NA	NA	NA	Apprentices for a period of 2-2 1/2 years	NA	NA	
<b>Forced labour</b>									
% of employees covered by a written contract	100%	100%	100%	100%	100%	100%	100%	100%	
<b>Training courses on discrimination</b>									
% pass rate for internal Diversity & Inclusion training started in 2022	26%	62%	87%	24%	92%	45%	44%	86%	
<b>Freedom of association</b>									
Number of facilities/meeting rooms made available for employee representatives	2 <sup>(1)</sup>	3	1	39	1	3 <sup>(2)</sup>	5	0 <sup>(3)</sup>	<sup>(1)</sup> One in Moanda and one in Owendo <sup>(2)</sup> One for each plant <sup>(3)</sup> Facilities are located outside of the workplace
Number of agreements signed with representatives	3	1	2	60	3	6 <sup>(4)</sup>	9	1	<sup>(4)</sup> One with each union on annual wage along with several other ad hoc agreements on different topics
<b>Working hours</b>									
Average hours worked per week (most often depending on shift arrangements, specific positions such as safety, rail, administration, etc.)	40hrs~43hrs	~40hrs <sup>(5)</sup>	40hrs~43hrs	~39hrs-43hrs	40hrs	33.6hrs~37.5hrs	33.6hrs~35hrs	40hrs	<sup>(5)</sup> Average for a 10 days on/10 days off roster



OWN WORKFORCE									
	Mines					Plants			
ACCOMMODATION									
Minimum square metres for one person	~ 45 m²	9 m² <sup>(6)</sup>	98 m²	9 m²	8,073 m²	NA <sup>(7)</sup>	NA	NA	<sup>(6)</sup> 9 m² could be for one person or two. <sup>(7)</sup> Apartments and a house are sometimes used as transitional accommodation for individuals moving to the plants for a new position in cases where that entails relocation
Number of toilets, washbasins and showers for 6 people	2	~3-4 <sup>(8)</sup>	1 <sup>(9)</sup>	1	6 <sup>(10)</sup>	NA	NA	NA	<sup>(8)</sup> Depending on the type of room (can be 1 bathroom for 2 rooms or 18 showers, 4 WCs and 6 sinks for 20 beds) <sup>(9)</sup> For 5 people <sup>(10)</sup> Individual rooms
Types of rest or leisure rooms or health services available	1 hospital (accessible to all employees and their dependents) and 1 association that groups together several sports and leisure activities, including a fitness room, cinema, library, etc.	1 recreation room, 1 gym, 1 medical centre, 1 ambulance available on the Centenario site	1 large indoor sports hall, 1 basketball court and 1 medical centre with an average of over 1,000 consultations per month	Terrace and garden for leisure. The bases are located near or in a village and are therefore close to a restaurant/ bar/ supermarket	1 games room, 1 gym, 1 football pitch, 1 basketball/ tennis court	NA	NA	NA	

AFFECTED COMMUNITIES									
	Mines					Plants			
NEGATIVE IMPACTS ON COMMUNITIES									
Affected Communities Data for 2020-2022	Comilog	Eramine	Setrag	SLN	GCO	ENO	CDK	EMI	Comments
Number of human rights studies/HSE impact studies	7	30	22	1	2	1	1	1	
Number of exchanges/dialogues with communities at operational level	80	170	138	630	324 <sup>(m)</sup>	100	9	6	<sup>(m)</sup> A few exceptional meetings in 2020 not included due to the COVID-19 pandemic
Indigenous populations: Number of consultations - people consulted, consent obtained	NA	1	NA	2,564	NA	NA	NA	NA	





VALUE CHAIN		
Value chain - Data for 2020-2022	Global	Comments
% of suppliers assessed as at risk from an ESG point of view	1.5% <sup>(12)</sup>	<sup>(12)</sup> 127 suppliers out of more than 8000 in total
Minimum weighting of CSR criteria (including human rights) in calls for tender (as set out in the Know Your Supplier procedure)	5%	
% of procurement and sales staff trained in human rights	70%	
% of procurement and sales staff trained on CSR Ethics procedure	30%	

SECURITY		
Security - Data for 2020-2022	Global	Comments
Number of security studies carried out	6 <sup>(13)</sup>	<sup>(13)</sup> Assessments of the security systems in place on mining sites and their compliance with international standards
Number of security guards trained on Voluntary Principles on Security and Human Rights	43 <sup>(14)</sup>	<sup>(14)</sup> Training began in 2022

# Concordance table

INDICATOR			PAGES	INDICATOR			PAGES
A.1	A.1	What does the company say publicly about its commitment to respect human rights?	p. 3, 4, 7-8	B.2	B.2	Determination of salient issues: Describe how the salient human rights issues were determined, including any input from stakeholders.	p. 25-26
A.1	A.1.1	How has the public commitment been developed?	p. 8	B.3	B.3	Choice of focal geographies: If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.	p. 25-26
A.1	A.1.2	Whose human rights does the public commitment address?	p. 8	B.4	B.4	Additional severe impacts: Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed.	NA, p. 25-26
A.1	A.1.3	How is the public commitment disseminated?	p. 8, 10, 19-20	C.1	C.1	Does the company have any specific policies that address its salient human rights issues and, if so, what are they?	p. 8-9, 10, 12-13, 14-15
A.2	A.2	How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?	p. 7, 10, 12, 39-40, 49-51, 54-55	C.1	C.1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	p. 8-9, 10, 12-13, 14-15
A.2	A.2.1	How is day-to-day responsibility for human rights performance organised within the company, and why?	p. 12-13	C.2	C.2	What is the company's approach to engagement with stakeholders in relation to each salient human rights issue?	p. 19-22, 28-30
A.2	A.2.2	What kinds of human rights issues are discussed by senior management and by the Board, and why?	p. 12-13	C.2	C.2.1	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	p. 25-26
A.2	A.2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	p. 19-22, 32, 35-55	C.2	C.2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	p. 19-22, 25-26
A.2	A.2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	p. 19-22, 49-51	C.2	C.2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	p. 19-22, 25-26
A.2	A.2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	p. 25, 49-51	C.3	C.3	How does the company identify any changes in the nature of each salient human rights issue over time?	p. 25-26
B.1	B.1	Statement of salient issues: State the salient human rights issues associated with the company's activities and business relationships during the reporting period.	p. 27, 28-30				





INDICATOR			PAGES
C.3	C.3.1	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	p. 27-30, 57-58
C.3	C.3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	p. 31
C.4	C.4	How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?	p. 30
C.6	C.6.1	Through what means can the company receive complaints or concerns related to each salient issue?	p. 19-22, 32-34
C.6	C.6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	p. 32-34
C.6	C.6.3	How does the company process complaints and assess the effectiveness of outcomes?	p. 32-34
C.6	C.6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	p. 57-61

INDICATOR			PAGES
C.6	C.6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	p. 32-34
C.4	C.4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues involved in finding and implementing solutions?	p. 12-13, 21-22, 25-26
C.4	C.4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	p. 12-13, 51-53
C.4	C.4.3	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	p. 28-30
C.5	C.5	How does the company know if its efforts to address each salient human rights issue are effective in practice?	p. 16, 17, 28-30, 32-34, 59-61
C.6	C.6	How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?	p. 32-34



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