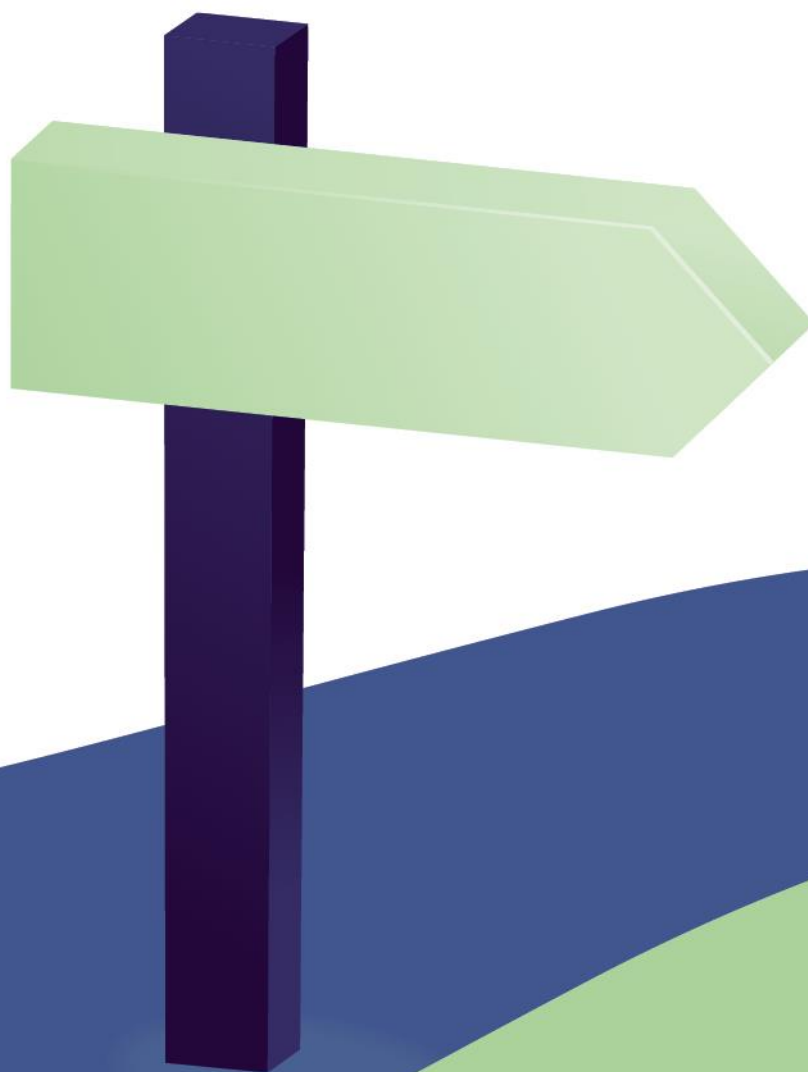


September 2023

POLICY

Anticorruption





OUR LONG-TERM OBJECTIVES

Fighting corruption is everyone's business.

At Eramet, we ensure that our company conducts its business ethically, sustainably, and responsibly in all the countries in which it operates. As a result, corruption of any form is never tolerated.

A Compliance Programme has been deployed to support this ethical approach, consisting of an Ethics Charter (fundamental text), associated policies, as well as a dedicated organisation (Ethics and Compliance Department, Local Ethics & Compliance Officers and Ethics & Compliance Ambassadors) and a whistleblowing system designed to receive alerts, together with an Anti-Corruption Guide, in compliance with the provisions of the "Sapin 2" Law.

Numerous national and international anticorruption regulations have been adopted, applicable to all companies regardless of their line of business or location. The competent authorities have demonstrated a strong position in the fight against corruption, and strong cross-border judicial cooperation has developed, making both companies and individuals liable, with the risk of severe penalties for all.

This Policy and the associated Guide describe the main principles in the fight against corruption and influence peddling. They are intended to support Group employees in their day-to-day activities.

By adopting this Policy, we are reaffirming our zero tolerance of corruption or any other practices that are contrary to business ethics. This Policy and this Guide apply to all employees of the Group and its subsidiaries and to all those who act alongside us, in our name or on our behalf.

We count on you to respect and promote this Policy, so that together, we act ethically, sustainably, and responsibly.

C. BORIES A. Le MIGNAN N. CARRE C. NOUEL G. VERCAEMER V. De CHASSEY G. STRETON

1. ERAMET GROUP COMMITMENTS

As part of its Anticorruption Policy, the Eramet Group expects its Employees to:

- **Defend, Respect and Promote** our ethical values and rise Eramet as a company recognised for its integrity.
- **Apply** the zero-tolerance policy regarding corruption or any other practices that are contrary to business ethics.
- **Contribute to strengthening** the trust our customers, partners, and external stakeholders place in us.
- **Protect** the company, its assets and all its employees, and above all themselves.
- **Fully comply** with the Anticorruption Policy and Guide and all internal rules, policies and dedicated procedures put in place by the Group.

Each manager has the responsibility to ensure each of their employees are given the means to respect these commitments.

As part of its Anticorruption Policy, the Eramet Group commits to:

- **Inform** business partners of our zero-tolerance policy on corruption, ensure they are aware of and comply with our Anticorruption Guide.
- **Refuse** to work with partners who do not comply with the rules in force.

Eramet Group companies may be held liable for the behaviour of their commercial partners (business providers, intermediaries, suppliers, etc.), given the development of strong cross-border judicial cooperation, thereby incurring the liability of both companies and individuals, with the risk of severe penalties for all.

2. IN CASE OF DOUBT

- **Consult** the Anticorruption guide on the appropriate course of action.
- **Getting help:** Should you need help with a situation that you feel is contrary to the Ethics Charter and/or if you have any lingering doubts, you can contact your line manager at any time. He/she will be able to enlighten you on the nature of the behaviour and guide you on the action to be taken in view of the nature of the facts.

Should you feel uncomfortable discussing the matter with him/her, or if you have not received an appropriate response, alert your Ethics Compliance Officer, whose contact details are available to all employees of the Group and its subsidiaries on the Group intranet.

- **Reporting an alert:** Should you be unable to report your concerns via these two channels (Line Manager and Ethics and Compliance Officer), you can use the whistleblowing system and contact Ethics & Compliance Management directly at the following address: [EOS Integrity Line](#).

Eramet will not tolerate any form of retaliation against a person who reports an act of corruption in good faith and in a disinterested manner.

3. IMPLEMENTATION METHODS

Ethics & Compliance Department is the guarantor of this Policy. It is responsible for implementing it and reviewing it to consider internal and external changes.

Eramet uses the following resources to implement its Anticorruption Policy:

- **Deployment** of a Compliance Programme, including an **Ethics Charter** (fundamental text) and **associated policies**.
- **Setting** up a dedicated organisation (Ethics and Compliance Management, Ethics Compliance Officers, and Ethics Compliance Ambassadors).
- **Implementation** of a whistleblowing system designed to receive alerts, along with an Anticorruption Guide, in compliance with the provisions of the "Sapin 2" Law. This is [EOS Integrity Line](#).
- **Compliance** with national and international anticorruption regulations applicable to all companies, whatever their line of business or location.

The implementation of this Anticorruption Policy is based on the commitment of the Group's management and employees.