

2024 Universal Registration Document 2024

Explanatory note

April 2025

The sustainability report in compliance with the European CSRD directive that Eramet publishes in its 2024 Universal Registration Document sets a new standard for the Group in terms of transparency regarding the impact of its activities on society and the environment, as well as risk management.

This approach aligns with the Group's purpose - to become a reference for the responsible transformation of Earth's mineral resources for living well together - and demonstrates Eramet's commitment to achieving the highest levels of transparency with all its stakeholders.

This commitment is also reflected in the IRMA (Initiative for Responsible Mining Assurance) audit process, recognized as the most stringent standard for responsible mining, which Eramet has integrated into its Act for Positive Mining roadmap, with the commitment to deploy it across all its mining sites by 2026.

1. Context

The CSRD (Corporate Sustainability Reporting Directive) is the new regulation governing sustainability reports, imposing a transparency obligation on European companies.

The Group's first sustainability report published according to the CSRD regulation covers the reporting year 2024 and corresponds to Chapter 5 of the Universal Registration Document. It was designed in collaboration with auditors to produce a report that meets the CSRD requirements and faithfully reflects the Group's sustainability efforts.

Applicable to Eramet from 2024, the CSRD directive provides for three annual exercises to reach full compliance. Under this principle of progressive implementation, Eramet has included in its report a list of unavailable information for this first exercise, which are integrated in section 5.1.4.2 Publication of information related to specific circumstances of the sustainability report.

2. Double Materiality Analysis

In 2023, Eramet conducted its first Double Materiality Analysis to identify and rate Impacts, Risks, and Opportunities (IROs) of the main ESG issues.

The aim of the Double Materiality Analysis is to assess sustainability issues: it is neither a financial analysis nor an environmental or social assessment of the specific effects of projects or activities, but

rather a selection and prioritization of the most material sustainability issues generated and experienced by the company.

The results of the Double Materiality Analysis not only help structure action plans and report on their progress but also determine the material sustainability issues for which the publication of qualitative and/or quantitative information is required. For the reporting year 2024, Eramet has identified 20 sustainability issues as "material" and are presented more in detail in chapter [IRO-1].

3. Structure of the Sustainability Report

Eramet's sustainability report consists of chapters that follow the European sustainability reporting standards (ESRS), namely:

- **ESRS 2 - General Information:** Includes information on governance, double materiality, and key sustainability issues.
- **ESRS E1 to E5:** These sections address environmental issues such as climate change, pollution, water and marine resources, biodiversity and ecosystems, as well as resource use and circular economy.
- **ESRS S1 to S4:** Cover social aspects, including the company's workforce, value chain workers, affected communities, and consumers and end-users. For the latter chapter, Eramet publishes limited information as it is less material for the Group.
- **ESRS G1:** This section addresses business conduct, including anti-corruption, political influence and lobbying activities, and supplier relationship management.

Each ESRS follows a standard structure that includes the following sections:

- **Governance & Strategy:** Must contain all policies and standards related to the ESRS theme and link them to the overall strategy where relevant.
- **IRO Management:** Description of material Impacts, Risks, and Opportunities (IRO); actions and plans implemented.
- **Metrics and Targets:** Definition of measures and objectives to address identified sustainability issues, linked to the CSR roadmap.

Within each sub-chapter, the order of sections is imposed by the ESRS, which may lead to some redundancies in reading, mainly due to regulatory requirements. To limit these redundancies and ensure overall document coherence, the use of cross-references to reference chapters has been preferred

4. Specific Vocabulary

To standardize and facilitate the comparison of reports from different companies, the regulation requires the use of strict vocabulary and nomenclature in the titles of certain sections, which seems useful to contextualize to avoid any risk of misunderstanding.

Terms Used in the Report	Explanations / Definitions
"Impacts, Risks, and Opportunities (IRO)"	This concept is related to the Double Materiality Analysis, which identifies the impacts (impact materiality) that a company's activities generate on its environment and the risks and opportunities (financial materiality) that these issues represent for the company. Risks and opportunities under the CSRD are considered material if they exceed a specific materiality threshold.
"Potential vs. Actual Impacts" and "Positive vs. Negative Impacts"	The CSRD requires a clear differentiation of the types of impacts (actual or potential, negative or positive, short-term, medium-term, or long-term, voluntary or involuntary, and reversible or irreversible).
"Substances of Concern" and "Substances of Very High Concern"	<p>As part of its commitment to responsible value chain management and in compliance with the CSRD directive and ESRs standards, Eramet has undertaken an initial mapping of raw materials and products used in its plants. This approach prioritizes what is classified as Substances of Concern (SoC) and Substances of Very High Concern (SVHC), identified according to European regulatory frameworks.</p> <p>Aware of evolving regulatory expectations and best practices in non-financial reporting, the company plans to enrich this mapping in the coming years. A Substance of Concern (SoC) refers to any substance that may have negative effects on human health or the environment and is listed in Annex VI of the CLP Regulation (Classification, Labelling, and Packaging).</p> <p>From a regulatory perspective, Eramet's finished products contain Nickel (Ni), which meets the criteria for a Substance of Concern (SoC). However, the Nickel ore present in the Group's operations is not a Substance of Concern in itself, as it is a raw material embedded in a mineral matrix and not in an isolated chemical form.</p> <p>The product meeting the criteria for a "Substance of Very High Concern" used by Eramet is Coal Tar Pitch, an essential component of electrode pastes used in Eramet's silicomanganese, ferromanganese, and ferronickel production furnaces.</p> <p>Eramet is actively exploring alternatives, and tests have begun in Norway.</p>
"Affected Communities"	<p>The CSRD uses the designation "affected communities" for any person or group(s) living or working in the same region who have been - or are likely to be - affected, positively or negatively, by the activities of a reporting company or its upstream or downstream value chain. An affected community can be a community living near the company's activities (local community) or living at a certain distance. ESRs S3 chapter presents all the actions implemented by Eramet towards the communities impacted by its activities. The communities that may be impacted by Eramet's activities are:</p> <ul style="list-style-type: none"> • Communities located around mining sites and plants. • Communities located along roads, railways, ports and transshipment areas used for ore transport.

	<ul style="list-style-type: none"> • Indigenous communities in certain countries ; • Communities living around facilities along the value chain.
<p>"Severe Human Rights Impacts"</p>	<p>In this section, Eramet presents the tools available for reporting human rights incidents. No severe incidents contrary to the declarations of the International Labour Organization (ILO), the United Nations Guiding Principles, or those of the OECD were observed in 2024.</p>