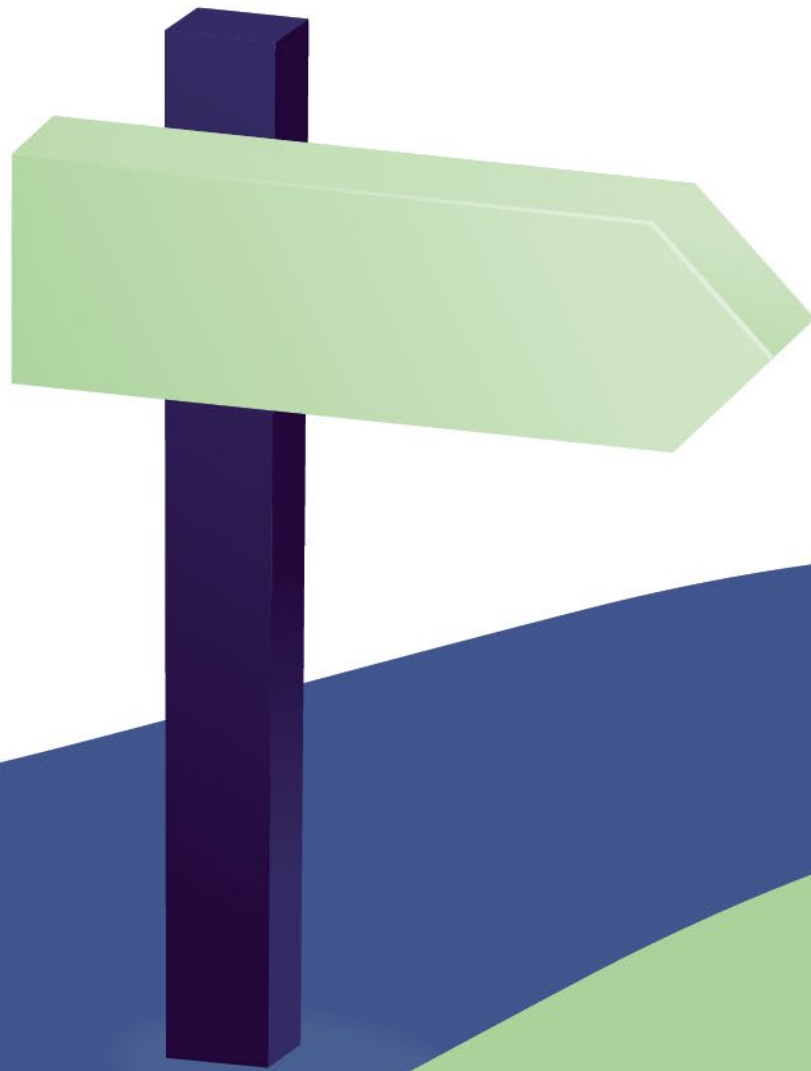


September 2023

POLICY

Environment





OUR LONG-TERM OBJECTIVES

In line with the United Nation's Sustainable Development Goals (SDGs), Eramet places Corporate Responsibility at the heart of its development strategy.

Aware of the potential impact of mining and metallurgical activities on the natural environment, Eramet considers it is its responsibility to implement all necessary means to preserve the environment and the health of populations.

Eramet's environmental policy pursues 3 objectives:

1. Implementing effective environmental management systems on all its sites, as well as in its transport and supply chain.
2. Taking the environmental dimension into account as early as possible in the design and development of industrial and mining projects, with reference to national regulations, Group policies, and international standards of the profession or investors/funders.
3. The supply of metals needed to achieve the energy transition and the development of activities that contribute to the growth of a more resource-efficient and circular economy model.

This document has been signed by the members of the Executive Committee of the Eramet Group:

Christel BORIES	Laetitia BRUN	Virginie de CHASSEY	Charles NOUEL	Geoff STREETON	Guillaume VERCAEMER
Chairman and interim CEO	Executive Vice- President Human Resources	Chief Sustainability and External Affairs Officer	Chief Operating Officer	Chief Development Officer, in charge of Strategy, Innovation and Business Development	Group General Counsel

1. ERAMET GROUP COMMITMENTS

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

- **Comply with regulations** on all its sites and furthermore, **with international reference standards**:
 - All our industrial and mining sites are ISO 14001 certified.
 - Additionally, Eramet undertakes to have all its mining sites audited by a third-party organisation certified to the IRMA Responsible Mining standard ¹.

- **Reduce the environmental impact** of its activities, particularly by:
 - Reducing its atmospheric emissions, by focusing on the sources most contributing to an impact, with an objective of integrating neighbouring communities concerns
 - On the specific subject of mining waste: the Group forbids to dump mining waste at sea (*deep-sea tailings placement*) and implements safe management of waste rock and tailings, in compliance with international GISTM standards.²

- **Act to preserve biodiversity: integrate biodiversity into all our activities and develop plans for an overall net positive contribution to biodiversity.** To this end, Eramet commits to:
 - Apply the "Avoid, Reduce, Compensate" attenuation sequence to all its mining projects:
 - Eramet particularly prohibits all mining and exploration activities in:
 - (1) World Heritage Sites and areas included on the official informative list of a State with sites nominated for inclusion in the World Heritage List,
 - (2) International Union for Conservation of Nature (IUCN) protected areas with management categories I-III,
 - (3) Central areas of UNESCO biosphere reserves.
 - Reduce impacts that cannot be avoided to reduce their duration, intensity and/or extent.
 - Rehabilitate areas affected by its activities as soon as possible, giving priority to the reintroduction of local species.
 - Compensate for significant residual impacts that could not be avoided or reduced.
 - Contribute to improve scientific knowledge of the territories in which the Group operates and share naturalist data with the scientific community.
 - Fund research, study, and conservation programmes, especially through its Lékédi Biodiversity Foundation (Gabon).

¹ Initiative for Responsible Mining Assurance

² Global Industry Standard on Tailings Management

- **Protect water resources. Control and optimise water consumption to maintain water quality accessible to all.** Eramet commits to minimising the impact of its activities on water resources and aquatic environments by activating several levers:
 - Constant improvement in monitoring its activities.
 - Optimising process water consumption and increasing recycling.
 - Continuous improvement of water management and treatment methods.
 - Implementation of reduction action plans on all its sensitive sites (large consumers or sites located in water stress areas).

- **Optimise the use of mineral resources and contribute to a circular economy.** Eramet promotes a more circular and resource-efficient economy by committing to:
 - For the Group's mining activities, optimal management, and valorisation of mining resources.
 - For its industrial sites to maximise recycled flows. Eramet aims to incorporate a proportion as high as possible of secondary raw materials in its inputs, to avoid consuming virgin raw materials, and to recycle as much of the waste generated by its activities as possible.
 - Wherever possible, include Eramet's industrial sites in territorial industrial ecology initiatives.
 - Develop new activities dedicated to recycling.

- **Fight against climate change.** Its commitments are set out in a policy dedicated to this crucial subject ("Energy and Climate Policy").

2. IMPLEMENTATION METHODS

The Environment Policy is translated into calculated and planned quantitative targets. To promote and ensure compliance with its commitments:

- Eramet communicates its Policy and carries out regular training sessions and awareness-raising actions for its employees and interested stakeholders, depending on their specific challenges.
- Eramet publicly reports on progress in this area through its annual extra-financial reporting.

To achieve this, Eramet relies on:

- A **network** of professionals that deploys Eramet's Environment Policy on each of the Group's sites, and a Corporate Environment Department that offers, implements, and monitors action plans and provides support and expertise to sites.
- **Internal standards and procedures** that incorporate international reference standards (IFC³, IRMA) and Eramet's environmental commitments.
- A **risk handling**, control and internal audit **process** and environmental audits to ensure compliance with the environment policy and internal standards.
- A **CSR roadmap and a more comprehensive section dedicated to the environment** that include quantified objectives (SMART objectives⁴).
- **Communication initiatives and training sessions** for employees and interested stakeholders, to present and explain the Group's environment policy and environmental action plans.
- **Mandatory reporting** for all industrial and mining sites, covering the main environmental performance indicators (CO₂, water, atmospheric emissions, biodiversity, waste, etc.) and environmental incidents. This data is included in our annual extra-financial reporting and is audited.

The implementation of this Environment Policy relies on the commitment of the Group's management and employees.

³ International Finance Corporation

⁴ specific, measurable, achievable, realistic and time-bound