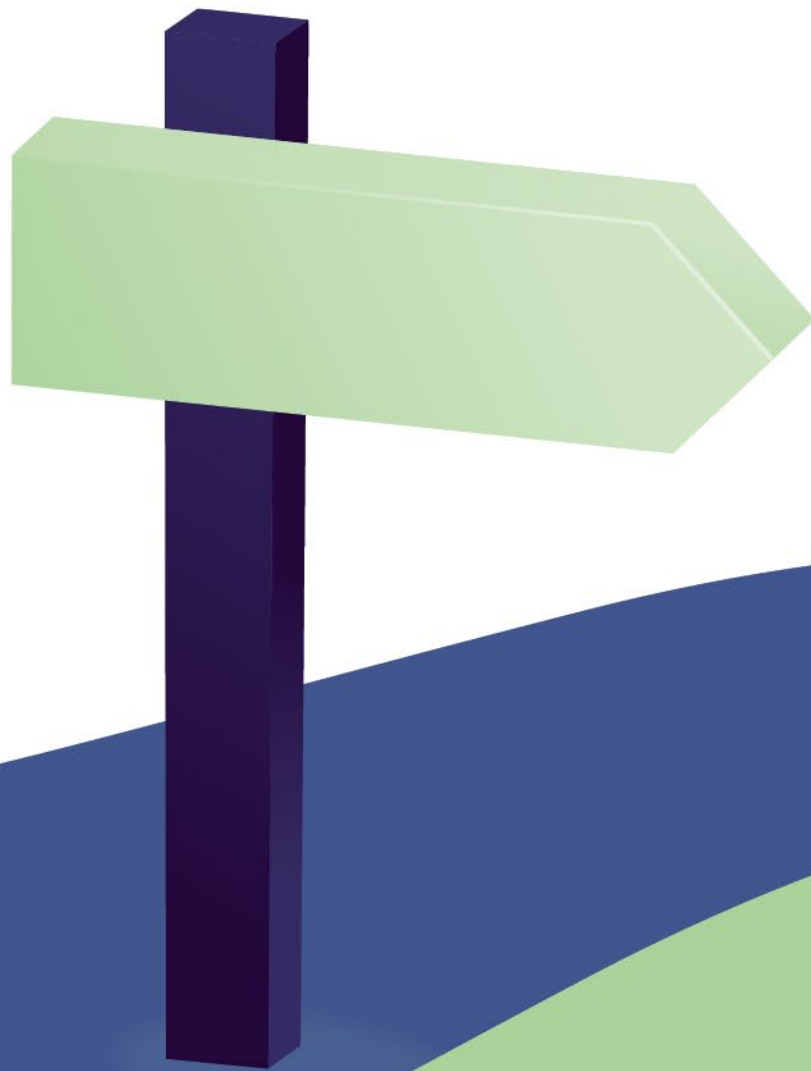


September 2023

POLICY

Responsible Lobbying





OUR LONG-TERM OBJECTIVES

The Eramet Group commits to implementing responsible interest representation.

In line with the Group's raison d'être and the United Nations' Sustainable Development Goals (SDGs), the Eramet Group places the Corporate Responsibility approach at the heart of its development strategy.

Lobbying refers to any influence or information action initiated by a Group interest representative to a public official, in France or worldwide, aimed at influencing a public decision. The purpose of lobbying is to defend the Group's interests and to provide public decision-makers with technical expertise on the consequences and practical scope of current or proposed legislation.

The present policy complements the Eramet Group's Ethics Charter, the Human Rights Policy, the Environmental Responsibility Policy, the Anti-Corruption Policy, and the Purchasing Policy.

It applies to all those who carry out interest representation activities with public decision-makers on behalf of Eramet, whether they are employees, or third parties appointed by the Group.

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

Christel BORIES	Laetitia BRUN	Virginie de CHASSEY	Simon HENOCHSBERG	Charles NOUEL	Geoff STREETON	Guillaume VERCAEMER
Chairman and interim CEO	Executive Vice-President Human Resources	Chief Sustainability and External Affairs Officer	Chief Financial 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 Responsible Lobbying Policy (Responsible Interest Representation), the Eramet Group commits to:

→ **Respect**

- The institutional rules governing lobbying practices and business relations and apply the most demanding international standards such as those of the OECD, ILO (International Labour Organisation), Global Compact, IRMA.
- National regulations and/or codes of ethics, in particular the French law of 9 December 2016 on transparency, the fight against corruption and the modernisation of economic life.

→ **Communicate:**

Up-to-date, objective and verifiable information, providing public officials and authorities, in their areas of competence, with appropriate expertise based on reliable information without seeking to obtain information or decisions in a dishonest manner or by exerting any pressure.

→ **Publish:**

- The list of the main associations and federations in which Eramet is a member and/or in which it is active, as well as the criteria governing these relationships, to ensure transparency and clarity. If Eramet's public positions and those held by a professional association of which it is a member differ, Eramet's position shall prevail.
- Eramet's interest representation activities on the dedicated platforms, particularly in France that of the High Authority for Transparency and Public Life and that of the European Union's transparency register, as well as the corresponding budgets allocated to interest representation by its human resources and those of the main professional associations and federations of which Eramet is a member.

→ **Ensure:**

- That the people in charge of interest representation have the skills needed to perform their duties, receive the necessary guidance and benefit from regular training in their field of action.
- That its employees comply with the principles of this Policy, the Ethics Charter, the Human Rights Policy, the Environmental Responsibility Policy, the Anti-Corruption Policy and the Purchasing Policy, and to submit them to any service providers.

In accordance with the Group's Ethics Charter, Eramet maintains complete political neutrality in the countries in which it does business.

When the Group contracts with public, state, or local authorities to help finance development projects, it refrains from making any contribution or providing any services to public office holders, political parties, or organisations. The Group respects the right of its employees to engage individually in local political and civic life, provided that employees clearly separate their personal political activities from their work in the Group.

2. IMPLEMENTATION METHODS

To deploy its Responsible Lobbying Policy, Eramet implements the following means:

→ **Setting up a dedicated organisation:**

- Interest representation activities are placed under the responsibility of the Corporate Affairs & Partnerships Director.
- The Corporate Affairs & Partnerships Management coordinates interest representation activities - and related training if necessary - together with the Group's country correspondents.
- The Eramet Corporate Affairs & Partnerships Management is responsible for deployment and respect for responsible interest representation commitments throughout the Eramet Group.