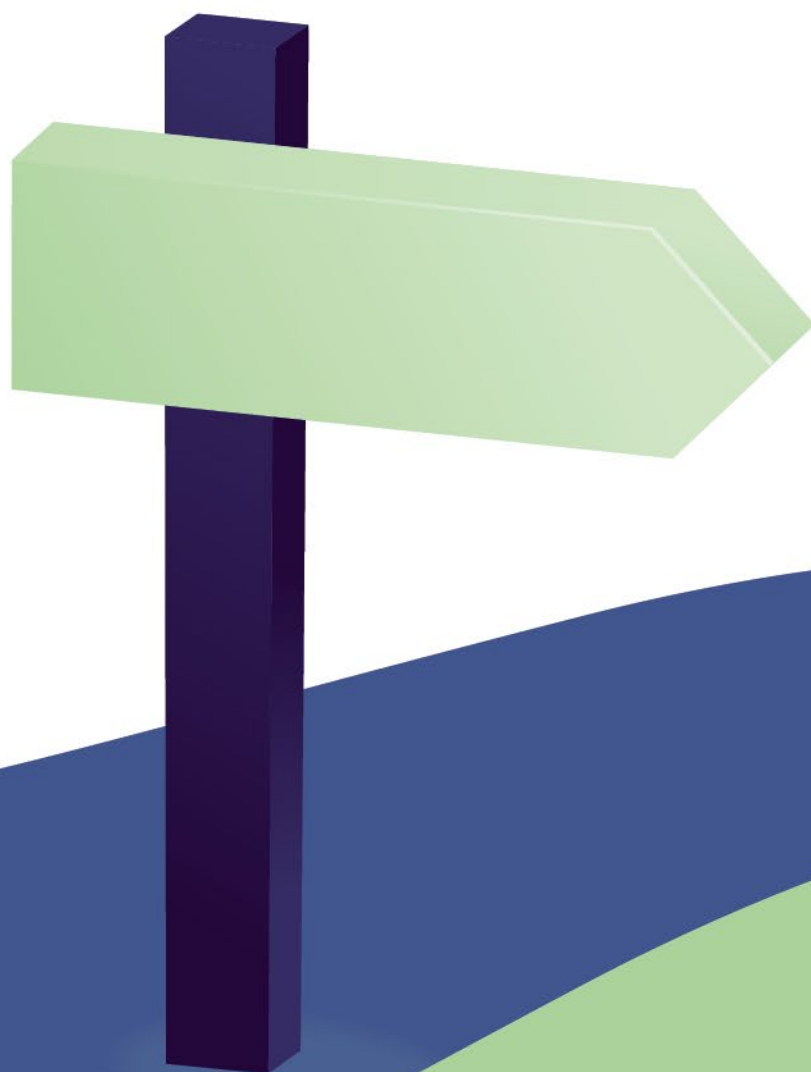


*September 2023*

# POLICY

## Tax





## OUR LONG-TERM OBJECTIVES

The main mission of the Eramet Group's Tax function is to serve the Group's entities.

This function must lead to:

- Securing and streamlining the Group's tax system in the context of current and exceptional operations.
- Establishing tax consistency within the Group through reciprocal exchanges of information between the tax function and the accounting, legal and operational departments on current operations and various projects.
- Harmonising the Group's transfer pricing policy.

The Tax function provides the same quality of expertise and demonstrates the same availability to each Group entity that requests it, regardless of its geographical distance from head office and regardless of the Group's level of shareholding, within the limits of Eramet's interests.

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

<b>Christel BORIES</b>	<b>Laetitia BRUN</b>	<b>Virginie de CHASSEY</b>	<b>Simon HENOCHSBERG</b>	<b>Charles NOUEL</b>	<b>Geoff STREETON</b>	<b>Guillaume VERCAEMER</b>
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 Tax Policy, the Eramet Group undertakes to:

## EXCOM and Board of Directors

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- **Provide the Tax function** with the resources and expertise it needs to ensure the tax security of the Group's operations.
- **Promote** tax practices respectful of local tax regulations.
- **Cooperate** with the tax or customs authorities during verification or control procedures.

## Each Employee

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Each employee, and particularly the main managers of departments or entities, undertakes to:

- **Systematically communicate and as quickly as possible** the main tax documents (as requested by the local tax authorities) to the Tax Department: tax return and related declarations, local transfer pricing documentation, etc.
- Keep the Tax Department **informed without delay** of any verification or control procedure initiated by the tax or customs authorities, as well as of any notices of adjustment.
- Strictly **respect** the confidentiality of internal memos and notes relating to tax matters.

**It is the responsibility of each manager to ensure they provide all their staff with the resources they need to meet these commitments.**

## 2. IMPLEMENTATION METHODS

The Group Tax Department is the guarantor of this Policy. It is responsible for revising the Policy to take account of internal and external evolutions.

For the subsidiaries, recourse to the Tax function is made directly through the Group Tax Department. At head office, the Tax Department is contacted by the heads of the various departments.

Furthermore, regular meetings are held between the Group Tax Department and the Finance Departments of the entities/BUs to discuss major issues.

In addition, the Group's Tax and Legal Departments work closely together, sharing information and providing mutual operational support.

Eramet uses the following resources to implement its Tax Policy:

- **Provide** entities with a wide field of intervention in the field of taxation: advice, assistance, control, tax watch.
- **Define and harmonise the transfer pricing policy of the group and its various entities and ensure compliance with the various documentary and reporting obligations and provide entities with Group transfer pricing documentation.**
- **Ensure the monitoring** of accounting verifications, adjustments and tax disputes, and provide assistance in these procedures.
- Monitor changes in tax laws and regulations in France and in the main countries where the Group operates and disseminate the necessary tax information to the Group's entities.
- **If necessary, use external support** to ensure the best possible service for entities and greater availability, depending on the scale, technical nature, complexity and local specificities of certain operations and projects carried out. These needs are assessed on a case-by-case basis.

Compliance with tax principles and rules is integrated into the control, inspection, and audit processes.