SUPPLIER CODE OF CONDUCT

This supplier code of conduct (referred to as the "Code") aims to formalize the expectations of the Eramet group (« Eramet ») regarding sustainable development and ethics with respect to its suppliers, and is therefore an extension of its CSR[1] roadmap Act for Positive Mining and its Ethics Charter**.**

In the Code, **Eramet details its requirements and sets the objective of applying best practices in terms of responsible procurement**, in accordance with its commitments, particularly within the framework of local or regional relationships with its suppliers (hereinafter the "Suppliers").

Given the contribution of the Procurement function to its value creation and sustainable economic performance, **Eramet strongly encourages its Suppliers to engage in an active collaboration approach, with the aim of identifying and supporting areas for improvement in the mechanisms they implement in all areas related to CSR.**

Suppliers are not authorized to act on behalf of and/or for Eramet in an improper manner.

In light of the above, the following chapters aim to summarize Eramet's requirements for its Suppliers in three (3) main areas: **(i) human rights and working conditions; (ii) the environment; and (iii) business ethics.**

Compliance with these requirements will be a determining criterion for Eramet in the evaluation, selection, and the development of a lasting business relationships with its suppliers.

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[1] Corporate social responsibility

1. Human Rights and Working Conditions

→ Human Rights

In accordance with its Ethics Charter, Eramet is mindful of ensuring that its business partners, including Suppliers, have ethical concerns compatible with its own and that this criterion is important in establishing contractual relationships with them. The Group's Human Rights Policy, considering that all its business partners, including Suppliers, must share the same principles and values, aims for Eramet to be part of a value chain that respects human rights.

As such, Eramet expects its Suppliers to respect human rights as recognized by the Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights and Economic, Social, and Cultural Rights, the fundamental conventions of the ILO, and any other applicable international, national, and local regulations, as well as the principles detailed in its Human Rights Policy.

→ Health and safety

Eramet has adopted a Health Policy and a Safety Policy. Eramet expects its Suppliers to adhere to standards equivalent to its own, and in particular to provide their employees with a working environment that complies with applicable health and safety standards and ensures control over the health impacts of their activities on local populations. Subcontractors of Eramet operating on-site are also required to comply with the Group's Safety Code.

→ Labor law

Eramet requires its Suppliers to comply, wherever they operate, with all applicable local legal provisions regarding labor law, particularly those concerning legal working hours and minimum wage.

In particular, Eramet expects its Suppliers to:

- Prohibit forced labor,
- Prohibit the employment of children or individuals who do not meet the minimum working age,
- Prohibit indecent working conditions (working hours, salary payments, etc.),
- Prohibit discrimination, violence, and harassment,
- Protect and respect local communities.

2. Environment

Eramet, as part of its Responsible Procurement Policy and Environment Policy, expects its Suppliers to manage the impacts of their activities and ensure that their practices are in strict compliance with all applicable environmental regulations. It is recommended that they draw inspiration from international best practices in these areas, particularly by implementing an environmental management system.

→ Energy and environmental impact

Eramet requests that its suppliers implement actions to improve their energy efficiency and reduce their environmental impacts.

→ Natural Resources and Biodiversity

Eramet requests that its Suppliers optimize their use of natural resources and water, and limit their impact on biodiversity and water resources.

→ Emissions and Waste Management

Eramet asks its Suppliers to control emissions and discharges associated with their activities, including those related to the production and management of waste. Eramet encourages initiatives aimed at minimizing waste production as much as possible, particularly hazardous waste, and implementing all forms of reuse and recycling.

→ Decarbonization

Eramet has made the decarbonization of its activities a major priority and is asking its suppliers to implement actions aimed at reducing their carbon impact.

→ Products Regulations

Eramet asks its Suppliers to comply with the regulations in force regarding products and market access (e.g., the REACH regulation in Europe) and places the utmost importance on the knowledge and control of the toxicological impacts of the products it uses.

3. Business ethics

Under its Ethics Charter, Eramet has made commitments to promote exemplary behaviour under all circumstances. These principles are as follows:

→ Fight against Corruption

Eramet, under its Anti-corruption policy, enforces zero tolerance and condemns all forms of corruption. Eramet requires its Suppliers to uphold a similar level of commitment. Suppliers must under no circumstances, directly or indirectly, promise, offer, receive, authorize, or solicit anything of value to or from any person in order to obtain or attempt to obtain an undue advantage.

In the context of business relationships (outside Eramet), Suppliers are required to adopt a reasonable approach regarding gifts and invitations, whether offered or received.

Eramet's continued relationships with its Suppliers will be conditioned upon compliance with applicable legal provisions concerning corruption and money laundering in the countries in which they operate.

→ Absence of conflict of interest

Eramet prohibits situations of conflict of interest involving its employees with actors in its supply chain. External interests, activities, and influences must never take precedence over the interests of the business relationship with Eramet.

Suppliers are required to disclose to Eramet (via Ethic Line or to a person not involved in the conflict of interest) any personal relationship they may have with Eramet or one of the Group's companies, (i) before starting negotiations, and (ii) that may arise during their business relationship.

→ International economic sanctions and export control rules

Suppliers are expected to strictly comply with standards regarding export control as well as applicable international sanctions.

→ Compliance with Competition Rules

Suppliers are expected to comply with the applicable competition regulations. They must never collude or agree to set or control prices, or attempt to influence the outcome of a contract award with the Eramet group.

→ Respect of confidentiality and patent rights

Eramet considers the respect of confidentiality and patent rights one of its main priorities. The information that Suppliers communicate to the Group will be treated with due respect and used only for authorized purposes. Eramet expects its Suppliers to make the same commitments.

→ Respect for the protection of personal data

Suppliers are expected to strictly comply with applicable regulations regarding the protection of personal data, both in relation to Eramet and within their own organization.

Suppliers must take the necessary measures to enable Eramet to collect and process any personal data of their representatives, employees, and subcontractors that may be contained in communications, documents, and deliverables exchanged as part of negotiations, monitoring of execution, audits, investigations, and verifications concerning their business relationships with Eramet.

→ Product traceability and conflict minerals

Eramet asks its suppliers to ensure the non-controversial origin of the materials and products (processed or unprocessed) delivered to Eramet and their proper traceability, particularly regarding raw materials.

Eramet has developed its own conflict minerals due diligence program, based on OECD recommendations[1]. As part of this program and for all suppliers of minerals referred to as “conflict minerals” (gold, tin, tungsten, tantalum), Eramet requires these mineral suppliers to source exclusively from value chains using smelters or refineries deemed compliant[2].

[1] http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf

[2] Compliant with the RMI assurance process (RMAP). For more information : http://www.responsiblemineralsinitiative.org/about/faq/downstream/what-does-%E2%80%9Ccfsp-compliant%E2%80%9D-mean/

4. Whistleblowing platform

The Eramet Ethic Line alert mechanism (https://ethicline.eramet.com/) allows internal and external stakeholders, such as our Suppliers, to report any incident related to a potential violation of human rights, business ethics standards, or environmental standards within Eramet's supply chain.

This alert system is deployed in all countries where the Group operates and helps strengthen confidentiality, protect whistleblowers, and ensure anonymity.

5. Commitment of Suppliers and Subcontractors

Through the implementation of supplier relationship management, Eramet's Procurement function may verify that the above principles and rules are taken into account and, if necessary, may take all appropriate measures following these verifications.

As part of its commitment to responsible business conduct, Eramet reserves the right to carry out specific audits or evaluations of its Suppliers to verify the compliance of implemented practices with the principles outlined in its reference documents. These audits, which may be conducted directly by Eramet or by an appointed third party, aim to ensure adherence to commitments made, particularly regarding integrity, anti-fraud and anti-corruption measures, prevention of conflicts of interest, and, more broadly, compliance with applicable ethical standards, human rights, working conditions, and environmental norms as referred to in this document.

Eramet is required to address reports, notably via Ethic Line, that may question the practices of its Suppliers and their employees. In this context, Eramet commits to evaluating the reported facts and, if necessary, will request the Supplier to conduct an internal investigation or assist in Eramet's investigation.

The Supplier commits to cooperating transparently with any audit or investigation conducted by Eramet. They must provide, within reasonable timeframes, all useful documents, information, and evidence, make themselves available for interviews organized remotely or in person, and refrain from any action or omission aimed at delaying or obstructing the proper conduct of the audit or investigation.

By adhering to the principles of this Code of Conduct, the Suppliers and subcontractors of the Eramet group commit to supporting Eramet in deploying its CSR roadmap and implementing the necessary measures to comply with it. Eramet, convinced of the merits of these measures to improve its overall performance as well as that of its suppliers, is aware of the efforts that some of them will need to make to comply with the provisions of this Code. In this context, Eramet is ready to support Suppliers who commit to a continuous improvement process.

Eramet also expects its Suppliers to make their best efforts to extend equivalent provisions to their own value chain.

Eramet reserves the right to stop the business relationship with Suppliers who do not observe the provisions of this Code (regarding respect for Human Rights and working conditions, Environment, and Business Ethics), who do not propose an improvement plan, or who fail to adhere to it.

The signatory declares to be an employee and/or legal representative of the supplier and to have full knowledge of the entirety of the Eramet Group's code of conduct. The signatory commits the responsibility of the company they represent for any violation or failure to adhere to the principles and obligations stated therein.

Company Name	Last name, first name and title of the signing officer	Date	Signature

CONFLICT MINERALS POLICY

This policy formalizes the Eramet group (« Eramet ») commitments toward conflict minerals procurement and its willingness to achieve and monitor a completely "conflict-free" minerals supply-chain. It comes in addition to the other CSR and Ethical due diligences that are conducted by Eramet.

As defined by section 1502 of the Dodd Frank Wall Street Reform and Consumer act[1], "Conflict Minerals" refers to specific minerals, also known as the "3TG's" (Tin, Tantalum, Tungsten and Gold), originating from or being transported through the Democratic Republic of the Congo (DRC) and its nine adjoining countries, and which may be directly or indirectly financing armed groups engaged in conflicts resulting in serious social and environmental abuses.

This conflict minerals policy may see its perimeter extended to other regions and countries if the European union or any other applicable jurisdiction decides to update its conflicts area and high-risk area definition or provide a list of such areas.

In line with its human right policy and its supplier code of conduct, Eramet fully supports the intent of the Dodd Frank act and the European Union Regulation 2017/821[1] to eliminate the social and environmental harm brought by the use of Conflict Minerals and any funding that supports armed groups in the DRC region.

This policy is systematically shared with our prospects and suppliers of conflicts minerals to inform them of our requirements and expectations on the matter.

1. Commitments

→ Eramet Commitments

Eramet does not directly source 3TG from mines, smelters or refiners, nevertheless we are working toward ensuring to all our stakeholders that all the 3TG used in our production processes come from conflict-free sources and did not support or fund conflicts within the Democratic Republic of Congo or its adjoining countries.

Therefore, we are committed to:

- Identifying and listing all our Tin, Tantalum, Tungsten, and gold suppliers to target and monitor our efforts accordingly.
- Requesting these suppliers to work towards ensuring that any 3TG supplied to Eramet originates from Conflict Free Sources. To comply with our request of conflict-free sources, suppliers will be required to:
    - Complete the latest version of the Conflict Minerals Reporting Template (CMRT) proposed by the Responsible Minerals initiative[3] ("RMI") for the datasheets: Declaration, Smelter List (if applicable) and Product List.
    - Pass this reporting requirement through their own supply chain to determine the source of the minerals, at least up to the smelter or refiner.
    - Supply from smelters or refiners validated as conformant under the Responsible Minerals Assurance Process ("RMAP"), proposed by RMI.
- Suspending or terminating engagement with suppliers after failed attempts at mitigation, remediation or non-conformance with Eramet policy.
- Contributing to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of 3TG based in the covered countries.
- Collaborating with third party on cross-industry efforts, such as RMI, to support responsible and conflict-free 3TG supply chains

2. Measures

→ Five-Step Program

To respect its commitments and identify, prevent, mitigate and, when appropriate, remediate risks associated with 3TGs, Eramet developed and integrated the Five-Step program for Risk-Based Due Diligence in the Mineral Supply Chain, recommended by the OECD[4].

→ Due diligence program

The development of Eramet's due diligence program, based on OECD recommendations, has led to the implementation of the following documents and tools to manage our supply chain in line with our commitments:

- Step 1: Establish strong company management systems.
  - Eramet Conflict Minerals policy
  - Eramet Supplier code of conduct
  - Eramet whistleblowing platform
- Step 2: Identify and assess the risks associated with the supply chain.
- Step 3: Design and implement a strategy to respond to identified risks.
- Step 4: Conduct independent audits on the due diligence practices of refineries/smelters.
  - Eramet conflict minerals due diligence procedure.
- Step 5: Report annually on Supply Chain due diligence.
  - Eramet Conflict Minerals annual report

[3] http://www.responsiblemineralsinitiative.org
[4] http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf