

ERAMET's individual commitments to act4nature international

Company presentation

Eramet is one of the world's leading producers of manganese and nickel, used to improve steel properties, and of mineralized sands (titanium dioxide and zircon).

Eramet is also developing activities with high growth potential, such as lithium mining and recycling, which are set to play a key role in tomorrow's energy and mobility transition. The Group employs around 11,000 people in twenty countries through four mining sites in Gabon, Senegal, New Caledonia and Argentina, and processing units in France (1), Norway (3), the United States (1), Gabon and New Caledonia.

Determined to combine performance and responsibility, the Group's purpose is "to become a reference for the responsible transformation of the Earth's mineral resources for 'living well' together".

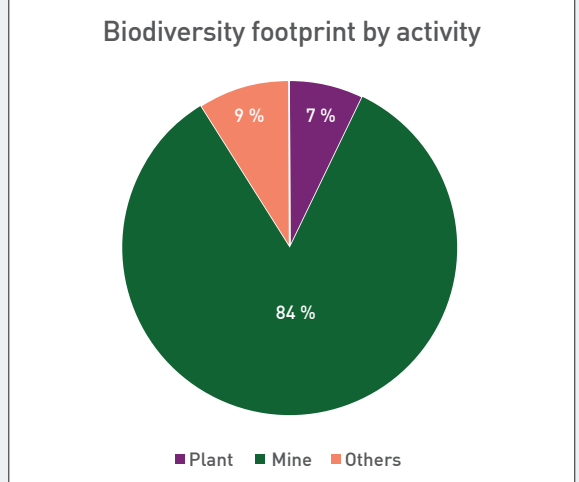
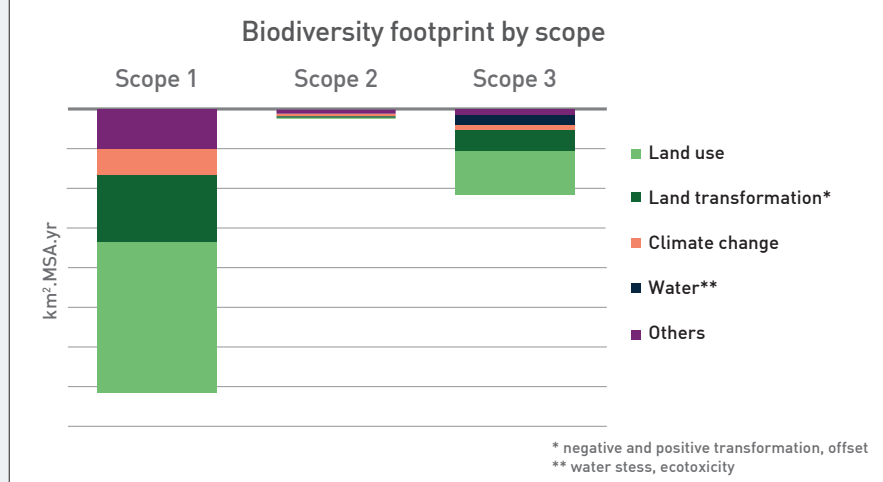
Materiality analysis

In 2023, the Group carried out its first double materiality exercise, identifying and rating the Impacts, Risks and Opportunities (IROs) of the main ESG issues¹⁾. Biodiversity and climate change are two priority topics, with high impact materiality and high financial materiality.

The exercise was completed²⁾ by an assessment of impacts and dependencies using the Biodiversity Risk Filter (BRF) tool provided by the WWF, as well as an assessment of the Group's biodiversity footprint covering scopes 1, 2 and 3-upstream in line with act4nature international's common commitments no. 2 and 3. Calculations were based on the Corporate Biodiversity Footprint (CBF) methodology developed by Iceberg databank and ICare, and on the STAR indicator.

Scope 1 of the biodiversity footprint concentrates the main impacts (75%), mainly due to mining (84%). These impacts are mainly due to the pressures of land transformation and land use³⁾ which contribute to habitat degradation. Greenhouse gas emissions are the second biggest contributor, followed to a lesser extent by water consumption.

Results for scopes 2 and 3 are less significant, although purchases in scope 3 (mainly industrial equipment, consumables and raw materials) emerge in the overall footprint.



Links with previous act4nature commitments

Eramet has included a review of its previous commitments in the 2022 and 2023 universal registration documents. The 2022 report is also available on the [act4nature international website](#).

The new commitments consider the lessons learned from the three risk, impact and dependency assessment exercises carried out in 2023. Those focus more closely on mining, which is the main contributor to the Group's biodiversity footprint. The implementation will cover the period 2024-2026.

Some previous commitments have been strengthened; they are indicated with an arrow ➡. For example, exclusion zones have been extended. Biodiversity action plans for our mining sites will have to be updated by the end of 2026 to comply with [International Finance Corporation \(IFC\) Performance Standard PS6 \[PS6\]](#).

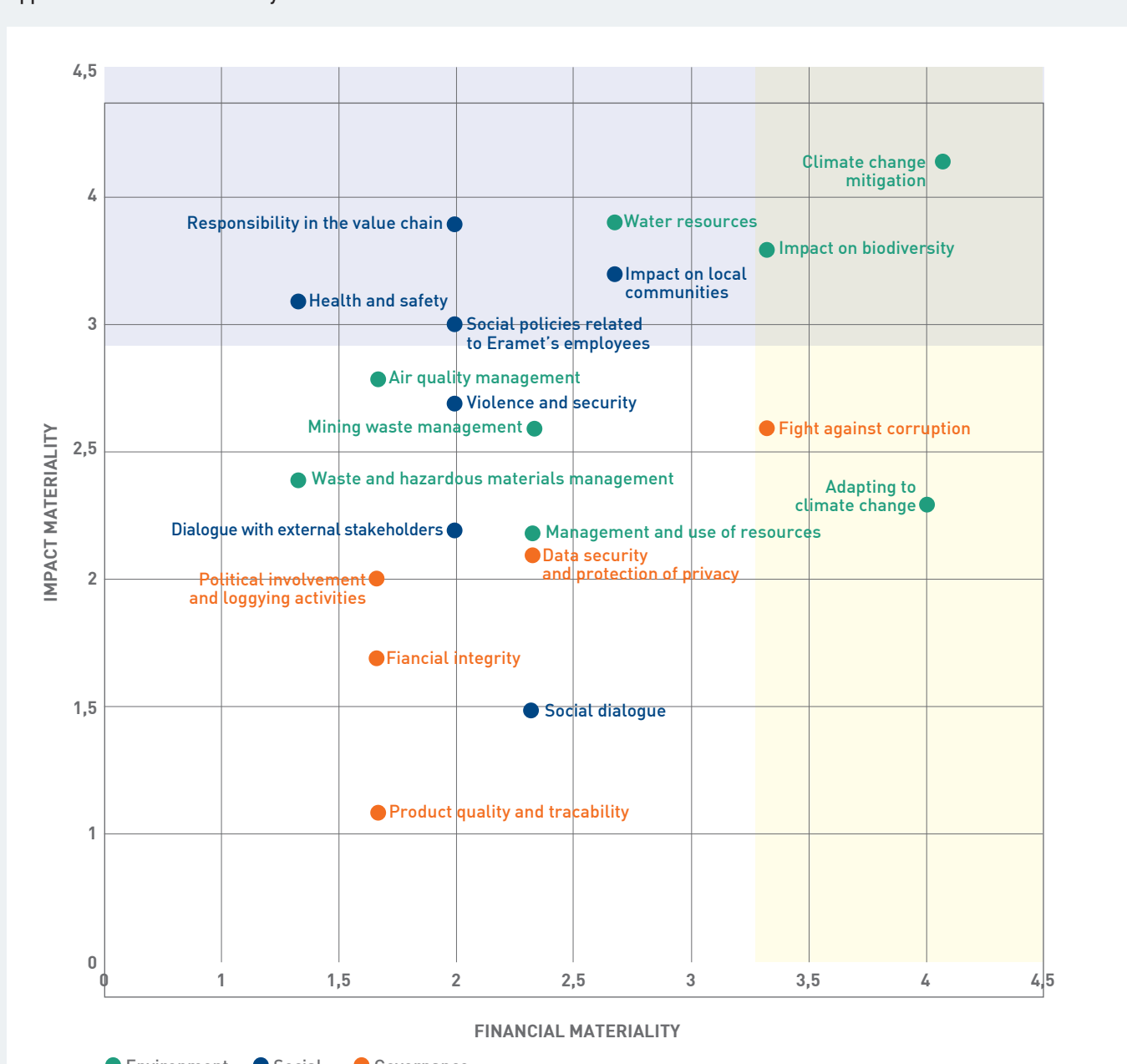
Many of our commitments are new, and the label **NEW** has been added. We introduce a new strategic axis with the contribution to the circular economy, the alignment of mining activities with international best practices (specified below) verified by independent bodies and the signature of a scientific partnership. We are extending the application of our Eramet standards to our minority joint ventures. New commitments have also been made in the areas of research, awareness-raising and training.

The Group's Climate commitments and additional environmental commitments (atmospheric emissions, water, etc.) that make up our [new CSR roadmap 2024-2026](#) are not all developed here, but are available on our [website](#).

Individual commitments

Link common commitments	Commitment	Description commitment SMART	Scope of activity	Indicator	Measurable target (SMART)	Deadline
Commitment 1 - Governance						
4 10	1.1 Biodiversity issues raised to the top management - Executive Committee	Review of act4nature international commitments by the Executive Committee once a year from 2024	Group	Y/N	Publication of annual results in the Universal Registration Document (URD)	From 2024
4 10	1.2 Biodiversity issues raised to the top management - CSR Steering Committee	CSR Steering Committee defines the CSR roadmap and monitors the fulfilment of the commitments on a quarterly basis. At least once a year, the progress on act4nature international commitments is presented and assessed by this committee	Group	Number of meetings	3 CSR Committee meetings / year	From 2024
4	1.3 NEW Management incentives	Inclusion of biodiversity performance in the variable compensation of managers (i.e. around 1.850 people) based on the results in the implementation of the CSR roadmap, including targets for soil transformation, climate change, pollution, water, and execution of biodiversity action plans	Group	% of managers	100% of managers	From 2024
Commitment 2 - Strategy						
4	2.1 NEW Contributing to the circular economy	Make viable a new technical and economic model for the industrial recycling of electric vehicle batteries in Europe, and produce second-generation metals to replace mining deposits.	Projects	Y/N	Design a recycling plant aiming an annual production of 5,000t of nickel, 1,000t of cobalt, and 5,000t of battery-grade lithium carbonate, which will initially have required the handling of more than 100 times as much ore and 2 gigaliters of brine	Late 2026
2 9 10	2.2 ➡ Alignment with international best practices for responsible mining	Deploy Eramet standards aligned with the Initiative for Responsible Mining Assurance (IRMA) standard ⁴⁾ and initiate independent audits to assess IRMA compliance at our mining sites	Mines	% of mining sites having launched a certification audit	100% of mining sites have launched a certification audit	Late 2026
1 9	2.3 NEW Launch of a scientific partnership	Set up scientific partnerships to improve the robustness of Eramet projects and support the development of the action plans	Group	Y/N	Scientific partnership established	Late 2024
Commitment 3 - Act on our impacts						
1 5 7	3.1 ➡ Bans	Eramet refrains from deep sea mining, deep sea tailings placement and exploration and mining activities in UNESCO World Heritage sites, UNESCO biosphere reserves and IUCN Ia, Ib, II and III protected areas. Other sensitive areas are managed under actions 3.2 and 3.3	Group	% of mine sites and exploration projects	100% of mining sites and exploration projects	From 2024
1 2 3 5	3.2 ➡ Integrate biodiversity considerations right from the feasibility stages of mining projects	Carry out environmental and social risk and impact assessment studies and develop associated management measures in line with IFC's performance standards for all new mining projects	Mines	% of mining projects	100% of mining projects	From 2024
1 5 9	3.3 ➡ Rehabilitate mining sites during and after operations according to a Group standard	Develop and implement an internal Standard dedicated to the rehabilitation of mining sites, including management of run-off water, topsoil, etc., which will be reviewed by the scientific partner	Mines	Ratio of rehabilitated area to cleared area	≥1 over 2024-2026 period	Late 2026
1 2 3 5 9	3.4 ➡ Apply the mitigation hierarchy at mining sites	Define and implement an internal Biodiversity Standard aligned with IFC PS6 "Biodiversity Conservation and Sustainable Management of Living Natural Resources"	Mines	Number of updated BAPs	Update of the four biodiversity action plans (BAP) in line with IFC PS6 at the four mining sites	Late 2026
1 2 5 10	3.5 ➡ Preserving water resources	Develop and implement formal water management plans at all sites ⁵⁾ Achieve reduction targets at sites in Senegal and Argentina Report annually to CDP Water Security	Group	% of sites with water management plan Performance targets CDP Water Security B score	100% of sites with a water management plan 60% recycling in Senegal and 20% reduction of water intensity in Argentina Annual reporting to CDP Water Security	Late 2026
4	3.6 NEW Acting on our minority JVs	Eramet is determined to get its minority joint ventures to apply the Group's rehabilitation and biodiversity standards	PT Weda Bay Nickel	Y/N	BAP updated according to Eramet standards IRMA audit launched	Late 2025 Late 2026
Commitment 4 - A Foundation for biodiversity⁷⁾						
1-2 3-5 6-7 8-9 10	4.1 ➡ A space for preservation and conservation	Manage and protect a 14,000 hectare reserve in the Haut Ogooué region of Gabon Welcome and rehabilitate protected species ⁸⁾	Group	Actual budget	Annual operating budget of 1 million euros	From 2024
1-2 3-5 6-7 8-9 10	4.2 NEW Research programs with scientific partners	Develop research and innovation programs to improve our expertise and practices in the reserve and in the mines	Group	No. of R&D programs	Three R&D programs contributing to the main objectives and targets of the Global Biodiversity Framework, beyond target 15	Late 2026
Commitment 5 - Raise awareness and train our internal and external stakeholders						
7 9	5.1 NEW Environmental education program	Develop educational content and roll it out to Gabonese secondary school students through the Foundation and an organization partner (WWF Gabon)	Gabon	No. of students	Launch of the 3G by Lékédi program and training for 1,200 students	Late 2026
1 7 8 10	5.2 NEW Foundation Biodiversity Day	Organize an annual day of meetings, sharing and conferences (internal and external stakeholders) on biodiversity at the Lékédi Park, with national and international speakers	Gabon extended to international speakers and guests	No. of days and theme	One day a year	From 2024
4 8	5.3 ➡ Training for biodiversity referents and managers	To have a trained biodiversity professional at each mine site Roll out biodiversity training programs	Mines Group	No. of meetings/year % of managers	Three annual meetings with site professionals compiling training and technical experience sharing 100% of managers (1.850 employees)	From 2024 Late 2026
4 8	5.4 ➡ Raising employee awareness	Organize a biodiversity event in each site	Group	% sites	100% of sites	Late 2025

Appendix 1 - Double materiality matrix



Appendix 2 - Assessment of impacts and dependencies

Impacts	[BRF] Level	Corrected level
Biodiversity pressures	High	Very high
Environmental factors	High	High
Socio-economic factors	Low	Low
Physical dependence	High	High
Regulatory and support services	Low	Low
Support Services - Mitigation	High	High
Reputational dependence	High	High

Legend

Level	Color
Very high	Dark Red
High	Red
Medium	Orange
Low	Yellow
Very low	Light Green

1 ESG: Environmental, social and governance criteria.
 2 The results are presented in section 5.2.8.2 of the [2023 Universal Registration Document](#).
 3 Land use is directly linked to the surface area covered by mining and industrial operations. Land transformation is specific to mining operations; it corresponds to the change in land use over the year, and takes into account land clearing (negative contribution) and rehabilitation (positive contribution) carried out over the period.
 4 Eramet has chosen the Initiative for Responsible Mining Assurance (IRMA) to assess the CSR performance of its operating sites. This international, objective and independent standard assesses the responsible performance of audited activities, according to the [most demanding criteria in the sector](#). The IRMA initiative was founded in 2006 and continues to be piloted by a coalition of six types of organizations: non-governmental organizations, companies buying minerals and metals for resale in other products, affected communities, mining companies and trade unions. [Eramet is one of the first companies](#) to adopt this ambitious standard. The assessment by an independent third party and the results are published to ensure transparency and dialogue with the different stakeholders.
 5 Performance Standard 1 establishes the importance of: (i) an integrated assessment to identify the environmental and social impacts, risks and opportunities of projects; (ii) effective community participation through disclosure about the project-related information and consultation with local communities on matters that directly affect them; and (iii) environmental and social performance management throughout the life of the project. Performance Standards 2 to 8 set out the objectives and requirements for avoiding, minimizing and, where residual impacts remain, compensating/offsetting for risks and impacts on workers, communities, environment and biodiversity.
 6 The management plan must include a complete water balance, optimization objectives and action plans.
 7 Activities are presented on the [Foundation's website](#).
 8 Mainly Gorilla and Chimpanzee orphans.