

## EITI International Secretariat's Final Assessment

### Company progress in meeting the Expectations for EITI supporting companies

<b>Company name</b>	ERAMET
<b>Sector</b>	Mining
<b>Headquarters</b>	Paris, France
<b>Type</b>	Public
<b>Date of submission to company (month/year)</b>	June 2023
Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes.	
<b>Does the company, directly or through a subsidiary (including joint-ventures) participate in a multi-stakeholder group?</b>	No
<b>If yes, indicate in which countries your company is participating in MSGs?</b>	N/A
<b>Secretariat comment</b>	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
<b>EXPECTATION 1</b>	Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles

EITI International Secretariat

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and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.	
<b>Does the company publish a statement of support for the EITI and the objective of the EITI Association?</b>	Yes
<b>URL for Statement Support</b>	<a href="https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti">https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti</a>
<b>Secretariat's assessment on Expectation 1</b>	Expectation met
<b>Secretariat comment</b>	Statement of support published on its website. See URL.
<b>EXPECTATION 2</b>	Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.
<b>Does the company publish a list of controlled subsidiaries?</b>	Yes
<b>URL for controlled list of subsidiaries</b>	Consolidated financial statements: <a href="https://www.eramet.com/sites/default/files/2023-02/Consolidated%20financial%20statements%20as%20at%2031%20December%202022.pdf">https://www.eramet.com/sites/default/files/2023-02/Consolidated%20financial%20statements%20as%20at%2031%20December%202022.pdf</a>
<b>EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.</b>	ARGENTINA, SENEGAL



<p><b>Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries?</b> Please see attachment on subsidiaries and complete the information, as requested.</p>	<p>Yes</p>
<p><b>Secretariat's assessment on Expectation 2</b></p>	<p>Expectation met</p>
<p><b>Secretariat comment</b></p>	<p>List of controlled subsidiaries published. See URL, p. 89.</p> <p>Company assessed as making disclosures in accordance with EITI Standard.</p>
<p><b>EXPECTATION 3</b></p> <p>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</p>	
<p><b>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates in the oil, gas and mining sectors?</b></p>	<p>Yes</p>
<p><b>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</b></p>	<p>2021 reporting on financial transparency of the Group: <a href="https://www.eramet.com/sites/default/files/2021-06/Reporting%202021%20on%20financial%20transparency%20of%20Eramet.pdf">https://www.eramet.com/sites/default/files/2021-06/Reporting%202021%20on%20financial%20transparency%20of%20Eramet.pdf</a></p>
<p><b>Are the disclosures disaggregated by project?</b></p>	<p>Yes</p>

<b>Secretariat's assessment on Expectation 3</b>	Expectation met
<b>Secretariat comment</b>	<p>Eramet discloses taxes and payments to governments in non-EITI implementing countries (France). See the 2021 reporting on financial transparency of the Group URL p. 5-9.</p> <p>The company discloses taxes and payments to governments disaggregated by project (Legal Entities). See above URL.</p> <p>The International Secretariat notes that the report includes the description of payments of the following types: Taxes levied on the income, production or profits, royalties and dividends among others.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
<b>EXPECTATION 4</b>	Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.
<b>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</b>	No



<b>If yes, which countries?</b>	N/A
<b>Does the company make disclosures in line with the EITI Standard/reporting guidelines?</b>	Not applicable
<b>URL for disclosure</b>	
<b>Secretariat's assessment on Expectation 4</b>	Expectation not applicable
<b>Secretariat comment</b>	Eramet does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
<b>EXPECTATION 5</b>	In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.
<b>Does the company disclose its audited financial statements?</b>	Yes
<b>URL audited financial statements</b>	<a href="https://www.eramet.com/sites/default/files/2023-02/Consolidated%20financial%20statements%20as%20at%2031%20December%202022.pdf">https://www.eramet.com/sites/default/files/2023-02/Consolidated%20financial%20statements%20as%20at%2031%20December%202022.pdf</a>

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<b>Secretariat's assessment on Expectation 5</b>	Expectation met
<b>Secretariat comment</b>	ERAMET discloses audited financial statements. See URL p.
<b>EXPECTATION 6</b>	Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.
<b>Does the company publish a statement of support for beneficial ownership transparency?</b>	No
<b>URL statement of support for beneficial ownership</b>	<a href="https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti">https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti</a>
<b>Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?</b>	Yes
<b>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</b>	Paris Stock Exchange Euronext
<b>URL to stock exchange</b>	<a href="https://www.eramet.com/en/investors/share-price">https://www.eramet.com/en/investors/share-price</a>

<p><b>URL for recent beneficial ownership disclosures</b></p>	<p>2021 Universal Registration Document: <a href="https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf">https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf</a></p>
<p><b>Secretariat's assessment on Expectation 6</b></p>	<p>Expectation partially met</p>
<p><b>Secretariat comment</b></p>	<p>Eramet does not publish a statement of support for beneficial ownership transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. Information about its major shareholders can be found in Eramet's "2021 Universal Registration Document". See URL, p. 412.</p>
<p><b>EXPECTATION 7</b></p> <p>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</p>	
<p><b>Does the company publish an anti-corruption policy?</b></p>	<p>Yes</p>

<p><b>URL to the policy</b></p>	<p>Anti-corruption policy: <a href="https://www.eramet.com/sites/default/files/inline-files/Eramet-Anticorruption%20Policy-English-2020_1.pdf">https://www.eramet.com/sites/default/files/inline-files/Eramet-Anticorruption%20Policy-English-2020_1.pdf</a></p> <p>Anti-corruption code of conduct: <a href="https://www.eramet.com/sites/default/files/inline-files/Eramet-Anti%20corruption%20Guide%20of%20conduct-English-2020_2.pdf">https://www.eramet.com/sites/default/files/inline-files/Eramet-Anti%20corruption%20Guide%20of%20conduct-English-2020_2.pdf</a></p> <p>Ethics Kit – Business Agents: <a href="https://www.eramet.com/sites/default/files/2020-12/Ethics%20Kit%20-%20Business%20agents.pdf">https://www.eramet.com/sites/default/files/2020-12/Ethics%20Kit%20-%20Business%20agents.pdf</a></p> <p>Supplier code of conduct: <a href="https://www.eramet.com/sites/default/files/2021-06/Eramet-Supplier-code-of-conduct-2021-1.pdf">https://www.eramet.com/sites/default/files/2021-06/Eramet-Supplier-code-of-conduct-2021-1.pdf</a></p> <p>Lasting commitments webpage: <a href="https://www.eramet.com/en/group/suppliers/lasting-commitments">https://www.eramet.com/en/group/suppliers/lasting-commitments</a></p> <p>Essentials CSR: <a href="https://www.eramet.com/sites/default/files/2021-09/Eramet-Brochure-Essentials-CSR-2020-August2021.pdf">https://www.eramet.com/sites/default/files/2021-09/Eramet-Brochure-Essentials-CSR-2020-August2021.pdf</a></p> <p>2021 Universal Registration Document: <a href="https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf">https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf</a></p>
<p><b>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</b></p>	<p>Yes</p>
<p><b>Secretariat's assessment on Expectation 7</b></p>	<p>Expectation met</p>



<p><b>Secretariat comment</b></p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>Eramet’s anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that Eramet sets out due diligence procedures in its various CSR/Ethic/Anti-corruption policies in relation to third parties. The Anti-Corruption Code of Conduct as well as the Ethics Charter describes risks related to facilitation payments, gifts and invitations, donations and sponsorships, conflict of interests, lobbying, etc. Section “2.8 Risk related to intermediaries, service providers, partners, agents or business providers” established due diligence and compliance with Eramet’s Supplier CSR/Ethics assessment of clients and commercial intermediaries. Similarly, section “2.9 The case of mergers and acquisitions” also acknowledges the risks of these processes as it indicated that due diligence shall be conducted on targeted companies. The company’s supplier code of conduct, in section 3 on business ethics, affirms that the company sets steps to assess the suppliers’ reliability and integrity. The system for assessing third parties is described in section 6.4.2 of its “2021 Universal Registration Document” (page 387).</p>
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<p><b>EXPECTATION 8</b></p>	<p>Publicly declare and publish support for governments’ efforts to publicly disclose contracts and licences that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licences in EITI implementing countries consistent with government procedures.</p>
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<b>Does the company publish a statement of support for contract transparency?</b>	Yes
<b>URL for statement of support for contract transparency</b>	<a href="https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti">https://www.eramet.com/en/csr/commitments/socially-responsible-commitments/eiti</a>
<b>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</b>	Yes
<b>Secretariat's assessment on Expectation 8</b>	Expectation met
<b>Secretariat comment</b>	<p>Eramet publishes a statement of support for governments' efforts to publicly disclose contracts and licences. See URL.</p> <p>Company assessed to contribute to the disclosure of contracts and licences in EITI implementing countries.</p>
<b>EXPECTATION 9</b>	<p>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</p>
<b>Does the company publish a commitment/policy on gender diversity?</b>	Yes
<b>Does the company disclose employment data disaggregated by gender?</b>	Yes

<p><b>URL for relevant information</b></p>	<p>Website: <a href="https://www.eramet.com/en/csr/objectives/an-organization-committed-to-people/publication-gender-equality-index">https://www.eramet.com/en/csr/objectives/an-organization-committed-to-people/publication-gender-equality-index</a></p> <p>Universal Registration Document: <a href="https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf">https://www.eramet.com/sites/default/files/2022-04/2022-04-Eramet%202021%20URD_0.pdf</a></p>
<p><b>Secretariat's assessment on Expectation 9</b></p>	<p>Expectation met</p>
<p><b>Secretariat comment</b></p>	<p>ERAMET publishes commitment and/or policy on gender diversity on its website. See URL.</p> <p>The company discloses employment data disaggregated by gender on its Universal Registration Document. See URL.</p>