

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	Orano Mining
Sector	Mining
Headquarters	Chatillon, France
Type	State Owned Enterprise (SOE)
Date of submission to company (month/year)	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.	
Does the company, directly or through a subsidiary (including joint-ventures) participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries your company is participating in MSGs?	NIGER
Secretariat comment	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
EXPECTATION 1	Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles

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and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.	
Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	https://cdn.orano.group/orano/docs/default-source/orano-doc/expertises/producteur-uranium/rapport-de-responsabilite%C3%A9-soci%C3%A9tal/orano_mining_rse_2022_en.pdf?sfvrsn=108833f4_10
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URL p. 7, 136 and 153.
EXPECTATION 2	
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.	
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	https://www.orano.group/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2021/orano-annual-activity-report-2021-online

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<p>EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.</p>	<p>KAZAKHSTAN, MONGOLIA, NIGER</p>
<p>Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 2</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>List of controlled subsidiaries published. See URL to "Annual Activity Report 2021" p. 27.</p> <p>Company assessed as making disclosures in accordance with EITI Standard.</p>
<p>EXPECTATION 3</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>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?</p>	<p>Yes</p>

<p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p>	<p>https://cdn.orano.group/orano/docs/default-source/orano-doc/groupe/publications-reference/rapport-sur-les-paiements-2021_eng.pdf?sfvrsn=c642a60e_6</p>
<p>Are the disclosures disaggregated by project?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 3</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Orano Mining discloses taxes and payments to governments in non-EITI implementing countries. See URL to “Report on Payments Made to Governments for the 2021 Financial Year”.</p> <p>The company disclose taxes and payments to governments disaggregated by project.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
<p>EXPECTATION 4</p> <p>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.</p>	
<p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p>	<p>No</p>

If yes, which countries?	N/A
Does the company make disclosures in line with the EITI Standard/reporting guidelines?	Not applicable
URL for disclosure	N/A
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	Orano Mining does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
EXPECTATION 5	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.
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	https://www.orano.group/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2021/orano-annual-activity-report-2021-online



Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Orano Mining discloses audited financial statements. See URL p.207.
EXPECTATION 6	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.
Does the company publish a statement of support for beneficial ownership transparency?	No
URL statement of support for beneficial ownership	https://cdn.orano.group/orano/docs/default-source/orano-doc/expertises/producteur-uranium/rapport-de-reponsabilit%C3%A9-soci%C3%A9tal/orano_mining_rse_2022_en.pdf?sfvrsn=108833f4_10
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	N/A Not applicable



URL to stock exchange	Not applicable
URL for recent beneficial ownership disclosures	https://www.orano.group/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2021/orano-annual-activity-report-2021-online
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>Orano Mining does not publish a statement of support for beneficial ownership transparency.</p> <p>The company discloses beneficial owners in line with EITI Standard. An overview of the current share of ownership and an organizational chart are included in Orano Mining's annual report. At note 22 "Equity" of the annual report page 280, the company indicates: "the capital of Orano SA has been held by the French State at approximately 90%, the CEA at 1 share, JNFL at 5%, and MHI at 5%." The company is majority owned by the French State. See URL to "Annual Activity Report 2021", pp. 24 and 27.</p> <p>**After assessments were finalized on 7 June 2023, Orano Mining published a statement of support for beneficial ownership transparency in line with Expectation 6, indicating that the company "supports beneficial ownership transparency and is committed to avoid partnering or contracting with companies assessed as high corruption risk that decline to identify their beneficial owners unless appropriate mitigation measures are implemented to reduce corruption risk as per our principles included in our Code of Ethics and business conduct." Page 30 and 150. URL: https://cdn.orano.group/orano/docs/default-source/orano-doc/expertises/producteur-uranium/rapport-de-re</p>

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	sponsabilit%C3%A9-soci%C3%A9tal/orano_mining_rse_2022_en.pdf?sfvrsn=108833f4_14
EXPECTATION 7	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.
Does the company publish an anti-corruption policy?	Yes

<p>URL to the policy</p>	<p>Our code of ethics and business conduct: https://cdn.orano.group/canada/docs/librariesprovider13/canada/resources/code-ethique-uk-2022.pdf?sfvrsn=5b90d9d2_3</p> <p>Corporate Social Responsibility Report 2022: https://cdn.orano.group/orano/docs/default-source/orano-doc/expertises/producteur-uranium/rapport-de-responsabilit%C3%A9-soci%C3%A9tal/orano_mining_rse_2022_en.pdf?sfvrsn=108833f4_10</p> <p>General Terms and Conditions of Purchase Orano: https://cdn.orano.group/orano/docs/default-source/orano-doc/groupe/page-fournisseurs/cdg-d'achats/general-terms-and-conditions-of-purchase-2018.pdf?sfvrsn=f62c69bd_16</p> <p>Supplier relations webpage: https://www.orano.group/en/group/suppliers-relations</p> <p>Annual Activity Report 2022: https://cdn.orano.group/orano/docs/default-source/orano-doc/finance/publications-financieres-et-reglementees/2022/orano_annual-activity-report_2022_online.pdf?sfvrsn=7a73aadd_12</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Yes</p>

<p>Secretariat’s assessment on Expectation 7</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>Orano Mining’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 according to its Annual Activity Report 2022, one of the pillars of the anti-corruption strategy is “third party assessment” (page 114). Orano’s Code of Ethics and Business Conduct states that “Depending on the risk level identified, third parties with which Orano has dealings undergo specific checks aiming to make sure of their integrity” (page 13). Orano’s General Terms and Conditions of Purchase document includes a section requiring the suppliers’ identity when doing business abroad (Section 15.2, page 25). The Annual Activity Report 2022 states the following: “Business relationships with third parties (clients, intermediaries, suppliers, service providers, consultants, etc.) may incur risks of corruption and influence peddling. In order to prevent these risks [...] the group carries out appropriate checks on the integrity of third parties with a view to establishing ethical and long-lasting partnerships” (page 117).</p>
<p>EXPECTATION 8</p> <p>Publicly declare and publish support for governments’ efforts to publicly disclose contracts and licenses 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 licenses in EITI implementing countries consistent with government procedures.</p>	

<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>Corporate Social Responsibility Report (CSR): https://cdn.orano.group/orano/docs/default-source/orano-doc/groupe/publications-reference/orano_mining_rse2021_en2ff4d413d2db4a4c98fd50cd35d59b9c.pdf?sfvrsn=8d892bba_14</p> <p>ICMM: https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 8</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Orano Mining publishes a statement of support for governments' efforts to publicly disclose contracts and licenses. See URL to "Corporate Social Responsibility Report", p. 153.</p> <p>The company is assessed to contribute to disclosure of contracts and licenses in EITI implementing countries.</p>

EXPECTATION 9

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.	
Does the company publish a commitment/policy on gender diversity?	Yes
Does the company disclose employment data disaggregated by gender?	Yes
URL for relevant information	https://cdn.orano.group/orano/docs/default-source/orano-doc/groupe/publications-reference/orano_mining_rse2021_en2ff4d413d2db4a4c98fd50cd35d59b9c.pdf?sfvrsn=8d892bba_14
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	<p>Orano Mining publishes policy on gender diversity in its 2022 sustainability report. See URL p.52 principle 3.8.</p> <p>The company discloses employment data disaggregated by gender in its 2022 sustainability report. See URL p.47-55 .</p>