

# MINERAL SOLUTIONS FOR A CHANGING WORLD

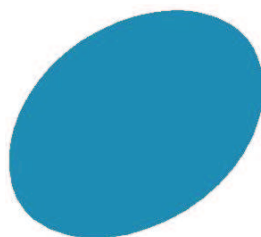


**2015 SUSTAINABLE DEVELOPMENT REPORT**



**IMERYS**  
TRANSFORM TO PERFORM

*The environmental, social and societal information contained in this report are identical to the relevant sections of the Group's registration document. This information has been verified by the independent third party appointed by the Group. The nature of the verification work and related findings are detailed in Section 5.7 of the Group's 2015 Annual Registration Document. It is also presented in Section 7.1 of this Sustainable Development Report for easier reading.*



# SUSTAINABLE DEVELOPMENT

## Editorial Message

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## Editorial Message

G4-1

Sustainable Development (SD) is an integral part of the Imerys growth strategy. Our actions are structured according to a three-year plan and we are proud to have achieved 90% of the 2015 objectives arising from this plan. We traditionally organize our activities into three domains: social, environmental and governance. We are pleased to present in this report the detailed actions that Imerys' teams conducted in these three directions.

On the social aspect, a particular effort was granted in favor of education offered not only to our employees but also to those community people living close to our operations. Our internal contest on sustainable development has been popular with 98 projects submitted in 2015, of which 51 were devoted to the social domain. The safety results were below our expectations this year. The situation led us to organize 10 summits between September and December to train 200 of the Group's top managers to strengthen their capacity to mobilize everyone, and then contribute to the indispensable permanent effort to ensure the safety of workforce.

On the environmental aspect, the improvement of the environmental management systems continued with a new obligation for an annual self-assessment on environmental compliance within the sites. The Group's energy efficiency and carbon efficiency (consumption and emissions per production unit) continued to progress by 1.3% and 1.5% respectively.

On the governance aspect, to comply with new regulations, we were committed to collect and publish our data on payments to governments from our mining assets.

We will constantly pursue our effort towards more transparency, corporate responsibility, and social, environmental and societal performances. For us, they have primordial importance and are inseparable from the Group's operational and financial performances.

We hope that this report will provide useful information to all stakeholders and further proof that Imerys is a responsible company and a trustworthy partner.

Thierry Salmona  
Vice President Innovation, Research,  
Technology & Business Support

Scan the code to navigate the Imerys  
Sustainable Development update on  
[www.imerys.com](http://www.imerys.com)



# 1 STRATEGY, COMMITMENT AND IMPLEMENTATION

## 1.1 STRATEGY DEVELOPMENT AND MATERIAL ISSUES ANALYSIS

G4-2 / G4-20 / G4-21 / G4-23 / G4-26 / G4-27 / G4-34 / G4-35 / G4-36 / G4-37 / G4-42 / G4-45 / G4-46 / G4-48  
/ MM8 / MM9

Sustainable Development (SD) is undertaken in three components at Imerys: social responsibility, environmental stewardship, corporate governance and business ethics. The Group's international scale and mineral-based business give it a unique stakeholder profile consisting of employees, contractors, communities, suppliers and customers.

Every three years, the Group reviews and develops its SD strategy. The processes involve four layers of leadership: SD Working Groups, SD Steering Committee, Executive Committee, and Audit and Strategic Committees at the Board Level.

The SD Working Groups are made up of internal functional leaders and relevant experts who represent the diverse business activities and geographic zones. The Group SD Manager sits in each of the working groups to facilitate the discussion, presenting the global mega-trends and the top priorities, as well as the conclusions from the Group's Risk Committee. For more information, [see section 4.1.1 of the 2015 Registration Document](#). The SD Working Groups create an initial document of opinions and recommendations. The final draft is submitted to the Group SD Steering Committee for review and approval. The Group SD Steering Committee is comprised of three members of the Executive Committee (Group General Counsel, Vice-President Innovation, Research, Technology and Business Support, and Vice-President of Human Resources), five corporate function leaders (EHS/SD, Industrial Management, Investor Relations and Communications) and two senior leaders from the operations. After approval by the SD Steering Committee, the final proposal is submitted to the Executive Committee for validation. After validation by the Executive Committee, the strategy is presented to the Audit and Strategic Committees of the Board of Directors for their review.

The external stakeholder engagement during the processes is provided in different ways: analytical reports by reputational research institutes or associations, benchmark studies with industrial peers, requests from key customers, and local stakeholder engagement forums when applicable.

The most recent three-year planning process was completed at the end of 2014. 10 high priority axes covering the relevant important material issues were identified in three domains: social, environmental, governance.

- The social domain includes four high priority axes: safety and health, human resources, communities, and human rights. Certain social issues are relevant to the mining/materials sector but are of low relevance or exemption to Imerys such as the following:
  - most of "naturally occurring minerals" are exempt from regulatory registration of new substances in different regions. Such exemption significantly reduces the effects of these regulations on Imerys. Depending on the minerals, product stewardship issues are concerned to the corresponding business rather than the whole Group;
  - Imerys has neither operations involved in Conflict Minerals, nor "operating sites where artisanal and small-scale mining (ASM) take place on, or adjacent to, the site". In 2015, Imerys did not initiate any new resettlement projects.
- The environmental domain includes four high priority axes: environmental management systems (EMS), resources efficiency, biodiversity and green innovation. Certain environmental issues are relevant to the mining/materials sector but are of low relevance or low priority to Imerys such as the following:
  - Imerys processes non-metal minerals almost entirely without drainage or residue problems related to dangerous or toxic substances (Imerys has one site, Glomel in France, with an acid rock drainage issue that has been thoroughly investigated and treated);
  - Imerys has had no new material issues related to soil and groundwater remediation or site decontamination reported in the last five years;
  - Imerys has not identified any significant concerns regarding polychlorinated biphenyls (PCBs), ozone-depleting substances (ODSs), volatile organic compounds (VOCs) or persistent organic pollutants (POPs).
- The governance domain includes two high priority axes: corporate governance, business code of conduct and ethics.



## 1.2 SUSTAINABLE DEVELOPMENT CHARTER AND POLICIES

G4-15 / G4-47 / G4-56

The Group SD Charter was revamped in 2014 to incorporate the results of the three-year planning process. After review by the four layers of leadership described above, the Charter was endorsed by the Chairman and Chief Executive Officer in May of 2014.

Under the umbrella of the SD Charter, the Group has established a set of comprehensive policies (see the table below), procedures

and protocols. Those documents are grouped together in the "Blue Book" and accessible on the Imerys Intranet. For more information, [see section 4.2.1 the 2015 Registration Document](#). The SD Charter and some of the relevant SD policies are also publicized on the Imerys website.

### Imerys SD Related Policies<sup>(1)</sup>

Social and Environment		Governance
Diversity Charter	Health and Safety Charter	Internal Charter of the Board of Directors
Recruitment Policy	EHS <sup>(2)</sup> Umbrella Policy	Code of Business Conduct and Ethics
Industrial Engagement Policy	EHS <sup>(2)</sup> Audit Policy	Corporate Governance Policy
Compensation Policy	Safety Data Sheet Policy	Risk Management Policy
Employee Engagement Policy	Geology and Mine Planning Policy	Anti-fraud and Anti-bribery Policy
SD Protocol - Child Labor		Anti-Trust Policy
SD Protocol - Forced Labor		Internal Control Policy

(1) See the Imerys SD Charter and detailed information of relevant policies and procedures on [www.imerys.com](http://www.imerys.com).

(2) "EHS" means Environment, Health and Safety.

Each of Imerys' operations, including production sites, administrative offices and R&D centers, is responsible for allocating necessary resources to implement these global policies, procedures and protocols. In order to ensure that high standards of responsibility and accountability are being maintained, the Group drives continuous improvement through the following periodic reviews:

- the Group EHS Audit team conducts internal audits of compliance with EHS regulatory requirements, the implementation of the Group's EHS/SD protocols, the robustness of environmental management systems and the reporting of SD data. As of December 2015, the Group EHS Audit Team consisted of approximately 22 EHS specialists and nine geology & geotechnical experts from corporate services and operations. The team conducts approximately

30 audits per year. Operations are integrated into the audit program based on risk criteria. The Executive Committee regularly reviews the critical audit findings and associated corrective actions;

- the Internal Audit and Control Department conducts risk-based audits at the selected operations on overall compliance, management controls and implementation of the Group's policies ;
- independent third-parties are commissioned to conduct an annual audit on financial and sustainability data. Ernst & Young verified the Group's 2015 SD data as an independent expert and issued its assurance report.

For more information, [see section 7.1 of the present Report](#).

## 1.3 PLANNING AND IMPLEMENTATION

G4-37 / G4-47 / G4-51

At the end of 2014, the Group finalized its three-year plan 2015-2017. The annual SD objectives are drafted according to the three-year plan by the heads of each function and submitted to the Executive Committee for their approval. The business divisions integrate the Group's annual objectives and have freedom to further develop their own.

The annual SD objectives are an element of the annual performance reviews and incentives of both Executive Management and function leaders. For example, safety has been incorporated into the performance review and bonus schemes of most of the senior managers with operational roles.

The Group has established a set of key performance indicators (KPIs) in alignment with Global Reporting Initiative (GRI) guidelines (G4)<sup>(1)</sup>. These data help the Group measure and monitor SD implementation and performance throughout the different levels of the organization.

For more information, [see section 6 of the present Report and the "SD Reporting Methodologies" on \[www.imerys.com\]\(http://www.imerys.com\)](#).

(1) The GRI is an independent institution whose mission is to develop and disseminate globally applicable Sustainability Reporting Guidelines; started in 1971, it is an official collaborating center of the United Nations Environment Program. GRI fully transited its guidelines to G4 by the end of 2015.

## 1.4 STAKEHOLDER ENGAGEMENT

**G4-16 / G4-24 / G4-25 / G4-26 / G4-27 / G4-56**

When developing its strategy, policies and practices on sustainability, Imerys is actively involved in established trade associations and maintains dialogues with public authorities, rating agencies, socially responsible investors, non-governmental organizations (NGOs), customers and suppliers. It acts in accordance with local legislation and implements its Code of Business Conduct and Ethics to promote transparency and integrity during its interactions with concerned parties in relevant sectors.

### 1.4.1 PROFESSIONAL ASSOCIATIONS

Imerys is an active member of the Industrial Minerals Associations for Europe and North America (IMA-Europe and IMA-NA), Minéraux Industriels France (MIF) and the trade associations representing large French companies (e.g., AFEP). The Group also participates in relevant sectorial associations at the level of business divisions and pertinent chambers of commerce in different countries. Through these associations, Imerys works with the European Union, the public authorities and relevant groups of stakeholders to encourage SD initiatives in the industrial minerals sector. Coordinated by IMA-Europe, Imerys has involved into the development of the "Industrial Minerals Sector 2050 Roadmap". This roadmap was launched in September 2014 and outlines the industrial minerals sector's response to the European Commission "Roadmap for moving to a competitive, low carbon economy in 2050" and the "Flagship initiative for a resource-efficient Europe". In addition, the Group participated in dialogue on the revision of the Energy Efficiency Directive in 2015.

Imerys has actively supported and participated in the initiatives of European Minerals Days (EMD) organized by IMA-Europe and the North America Minerals Day (NAMD) organized by IMA-NA. In 2015, approximately 25 Imerys operations took part in the EMD and NAMD with well-organized activities to engage the public and raise global awareness on the sector's SD efforts.

### 1.4.2 CORPORATE SPONSORSHIP

Imerys has redefined its corporate sponsorship strategy in early 2015 and chosen education and photography as the key areas of commitment.

In the area of education, the Group supports and develops initiatives in favor of both its workforce and the people in the surrounding communities. In particular, Imerys is committed in fight against illiteracy, education of women and girls, and support to young adults to enhance their employability. Collaboration has begun in Brazil, China, India, South Africa, as well as in Europe and the United States.

- Among its workforce, Imerys pays special attention to the basic skills development of the lower-skilled employees and

contractors. In 2015, Imerys Ceramics India started to provide basic reading and writing classes to its contractors who could not attend schools when they were younger. It aims to help them better understand the work instructions and improve their employability;

- To help the local communities, Imerys, directly or together with local partners, deploys literacy and numeracy classes, supports school construction and renovation, donates school supplies and equipment. For more information, [see examples in section 3.3 of the present Report](#).

The Group also proposes to its employees to participate in the various initiatives as volunteers when feasible. The employees in the Paris (France) region thus can voluntarily commit in the Alliance for Education and Telemaque Institute to provide support to students from disadvantaged backgrounds or at risk of dropping out. Imerys continues to contribute to the "Dan Germiquet Fund", that it has been created in April 2014 together with the Germiquet family and the National School of Geology in Nancy (ENSG) of France, to help talented students in financial insecurity to pursue their studies in geosciences. This fund is a lasting tribute to Dan Germiquet, the long-time Imerys chief geologist who died in the Paris-Limoges train accident in 2013.

In the area of photography, Imerys aims to promote access to culture and diversity. The Group concluded the partnership with the RMN-Grand Palais (Paris) on their photographic exhibitions starting from 2016. Every year pictures of Imerys sites and the surrounding communities are taken by professional or amateur photographers to immortalize the Group social initiatives, minerals and the people who transform them. In 2015,

- a contest was organized in Pará of Brazil involving more than 140 amateur and professional photographers. Approximately 40 of them were invited to visit the communities surrounding the Imerys site in Barcarena and take pictures of the people engaging in their everyday life. The winning photographs were shown in exhibitions in Brazil and Argentina;
- an exhibition of photographs from the last three-year SD Challenge winning projects was also organized in the Paris headquarter.

### 1.4.3 CUSTOMERS AND SUPPLIERS

Imerys and its subsidiaries participate in an active dialogue with their customers via SD questionnaires and surveys. In addition, more than 10 subsidiaries have registered on the platforms of Ecovadis or Sedex in order to provide regular feedback to the customers in a consistent manner. The Group is currently in the process of defining a guidance document specifying minimum standards for suppliers on social and environmental issues.



## 2 2015 PERFORMANCE

Imerys monitors and measures its SD performance at both the macro- and micro-levels. The Group's annual SD objectives reflect the macro-level performance. These objectives are reviewed by the SD Steering Committee on a quarterly basis. The Group's extra-financial KPIs reflect the micro-level performance at the site level (*see a summary in section 7.2 of the present Report*).

Several analytical reports are developed to present these results for business review including a monthly safety report, a monthly headcount report, a quarterly energy report, and a quarterly environmental report.

### 2.1 CORPORATE COORDINATED MEASURES

The table below shows the macro-level achievements of the 2015 Group SD objectives, as well as those of 2016.

Axes	2015 Objectives	2015 Performance	2016 Objectives
<b>Social/Societal<sup>(1)</sup></b>			
<b>Safety and Health</b>	<ul style="list-style-type: none"> <li>LTA Rate<sup>(2)</sup>: &lt; 0.85 for employees and contractors (excluding the impact of sites of S&amp;B)</li> </ul>	1.31 including S&B 1.10 excluding S&B	<ul style="list-style-type: none"> <li>LTA Rate: ≤ 1.0 for employees and contractors</li> </ul>
	<ul style="list-style-type: none"> <li>Take 5<sup>(3)</sup> Amplification: each business division further integrates Take 5 into the day-to-day operations by launching a new program of their own making</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Launch safety summits to functional leaders to drive safety leadership</li> </ul>
	<ul style="list-style-type: none"> <li>Refresh training to each Senior Site Manager on Imerys Safety System</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Revamp Imerys Safety University with integration of safety leadership concepts of "safety summits"</li> </ul>
	<ul style="list-style-type: none"> <li>Launch an awareness training initiative on key industrial hygiene subjects</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Rejuvenate the Group's Industrial Hygiene (IH) Club and improve IH auditing approach</li> </ul>
<b>Human Resources</b>	<ul style="list-style-type: none"> <li>Take advantage of the "Graduates Program" to re-establish Diversity objectives and start rolling out a first series of measures</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Roll out a new series of measures on Diversity</li> </ul>
	<ul style="list-style-type: none"> <li>Renew the "Women's Mentoring Program", after having analyzed the "pros and cons" of the current one</li> </ul>	100% Achieved	
	<ul style="list-style-type: none"> <li>Have a Corporate initiative for people with disabilities</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Sign a SD Charter with the European Works Council, embedding the three objectives: Diversity, Literacy, Benefits</li> </ul>
	<ul style="list-style-type: none"> <li>Lead at least two training initiatives linked to safety or operational excellence for least skilled workforce in each of the countries with headcount above 600 employees</li> </ul>	57% Achieved	<ul style="list-style-type: none"> <li>Lead at least two training initiatives in basic skills (literacy, numeracy) for least skilled workforces in each of the countries with headcount above 300 employees</li> </ul>
	<ul style="list-style-type: none"> <li>Take advantage of the appointment of an EMEA<sup>(4)</sup> Manager to re-establish Benefits objectives and start rolling out a first series of measures</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Roll out a new series of measures on Benefits</li> </ul>
	<ul style="list-style-type: none"> <li>In countries/areas identified as dangerous, establish concrete Group guidelines for travellers, expatriate employees and local employees, including the determination of what is a "dangerous country/area"</li> </ul>	100% Achieved	

<b>Communities</b>	<ul style="list-style-type: none"> <li>Reinforce compliance with the Community Relations Protocol<sup>(5)</sup> via an annual self-appraisal query</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Conduct desktop review for quality improvement of the community relations plans at 5% of the Group's mining operations</li> </ul>
	<ul style="list-style-type: none"> <li>Launch a three-year micro-business incubation initiative at one pilot operation from each business group</li> </ul>	80% Achieved	<ul style="list-style-type: none"> <li>Implement the micro-business incubation initiatives (continuation)</li> </ul>
	<ul style="list-style-type: none"> <li>Add 10 projects contributing local social and/or economic development</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Add 10 projects contributing local social and/or economic development</li> </ul>
<b>Human Rights and Supplier Engagement</b>	<ul style="list-style-type: none"> <li>If more than 2.5% of the divisional spend is coming from a supplier's manufacturing facility in one of the "countries of concern"<sup>(6)</sup>, supplier to confirm compliance with the ILO<sup>(7)</sup> Conventions on Child Labor and Forced Labor</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Request confirmation of minimum social and environmental standards from suppliers of more than two million Euros of each division's spend</li> </ul>
	<ul style="list-style-type: none"> <li>Define a supply chain safety and environmental engagement policy and roll-out training to the purchasing network</li> </ul>	Not Achieved	
<b>Environment</b>			
<b>EMS</b>	<ul style="list-style-type: none"> <li>Conduct EMS audit at 20 most critical operations focusing on "compliance" pillar (desktop unless onsite scheduled per risk matrix)</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Conduct desktop review on quality and "materiality" of 10% of the objectives defined in the EMS Scorecard</li> </ul>
	<ul style="list-style-type: none"> <li>Initiate annual self-evaluation of environmental compliance at each operation</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Create criteria for identifying the priority sites with respect to dust emissions and program for supporting same</li> </ul>
<b>Resources Efficiency</b>	<ul style="list-style-type: none"> <li>Imerys Industrial Improvement (I-Cube) Program<sup>(8)</sup> adoption: on 20% operations</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Imerys Industrial Improvement (I-Cube) Program adoption: on 40% operations</li> </ul>
	<ul style="list-style-type: none"> <li>Energy Efficiency: 6% improvement on the 2014 baseline by the end of 2017</li> </ul>	On-going	<ul style="list-style-type: none"> <li>Energy Efficiency: 6% improvement on the 2014 baseline by the end of 2017 (continuation)</li> </ul>
	<ul style="list-style-type: none"> <li>Carbon Efficiency: 6% improvement on the 2014 baseline by the end of 2017</li> </ul>	On-going	<ul style="list-style-type: none"> <li>Carbon Efficiency: 6% improvement on the 2014 baseline by the end of 2017 (Continuation)</li> </ul>
	<ul style="list-style-type: none"> <li>Set up water management plans at the largest water withdrawal operations (&gt; one million m<sup>3</sup> in 2014)</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Publicize two internal best practices on recycling / reuse / reduction</li> </ul>
<b>Biodiversity</b>	<ul style="list-style-type: none"> <li>Biodiversity management plans at 30% of sites identified in, or adjacent to areas of High Biodiversity Value<sup>(9)</sup></li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Biodiversity management plans at 100% of sites identified inside areas of High Biodiversity Value</li> </ul>
	<ul style="list-style-type: none"> <li>Publicize two internal best practices on biodiversity conservation</li> </ul>	100% Achieved	
<b>Green Innovation</b>	<ul style="list-style-type: none"> <li>Environmentally friendly products and processes: five per year</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Environmentally friendly products and processes: five per year</li> </ul>
	<ul style="list-style-type: none"> <li>Quantify in the Innovation pipeline the percentage of projects with a benefit for environment</li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>25% of projects in the Group's innovation pipeline with a benefit for environment</li> </ul>
			<ul style="list-style-type: none"> <li>Quantify in the innovation pipeline the percentage of projects with a benefit on recycling</li> </ul>
<b>Governance<sup>(10)</sup></b>			
<b>Corporate Governance</b>	<ul style="list-style-type: none"> <li>Implement new financial transparency obligations for undertakings active in the extractive industry<sup>(11)</sup></li> </ul>	100% Achieved	<ul style="list-style-type: none"> <li>Review and amend the internal rules of the Board to reflect changes in the AFEP-MEDEF code applicable to French listed companies</li> </ul>



<b>Ethics and Business Conduct</b>	▪ Revamp the Group anti-trust policy and implement adequate compliance training	80% Achieved	▪ Targeted audits on compliance topics organized by both Group Internal Audit control and Legal departments: code of conduct, anti-bribery, anti-trust
	▪ Issue a policy for compliance with the international sanctions against certain countries and implement the corresponding training programs	100% Achieved	▪ Issue a Group personal data protection policy
	▪ Rollout compliance training programs regarding new or refreshed 2014 policies	90% Achieved	▪ Roll-out: complete the implementation of the Group anti-bribery policy on intermediaries, review findings of internal audit regarding compliance issues, and extend the scope of compliance training programs in the Group

(1) The "Societal" information of "Grenelle II" is covered in both the Social and Governance aspects of this Registration Document.

(2) The lost-time accident rate is calculated per million work hours worked including both employees' and contractors' work hours.

(3) "Take 5" is a proactive pre-task risk assessment and reduction.

(4) "EMEA" means Europe, Middle East and Africa.

(5) Community relations protocol compliance is required for each operation. The formalization of community relations plans starts from the most sensitive sites based upon an internal risk assessment.

(6) The list of "Countries of Concern" as defined in FTSE4Good Inclusion Criteria is drawn up and reviewed periodically in light of human rights developments including reports from Freedom House, Human Rights Watch and Amnesty International.

(7) "ILO" means International Labor Organization.

(8) The Imerys Industrial Improvement (I-Cube) Program was launched in the first half of 2014 and aims to transform the Group's industrial performance into a competitive advantage.

(9) The Global Reporting Initiative (GRI) suggests that companies should identify the sites located in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. Imerys uses the World Database for Protected Areas (WDPA), Natura2000 and other reliable public resources to conduct risk mapping regarding areas of High Biodiversity Value. The WDPA is a joint project of UNEP and IUCN, produced by UNEP-WCMC and the IUCN World Commission on Protected Areas working with governments and collaborating NGOs.

(10) More detailed corporate governance related information is addressed in the chapter 3 and chapter 4 of the 2015 Registration Document.

(11) Refers to the European Transparency Directive Amendment 2013/50/EU which has been transposed into the French Law LOI n° 2014-1662 by 30 December 2014. This law requires all public companies active in the extractive industry to prepare a report annually on payments made to governments in the countries in which they operate.

## 2.2 PERFORMANCE RECOGNIZED BY RATING AGENCIES

Imerys' SD performance is being evaluated by leading environmental, social and governance (ESG) research and rating agencies. The Group remains as a constituent of the following socially responsible investment indexes in 2015:

- **FTSE4Good Index Series:** belonged to FTSE Russell and designed to objectively measure the performance of companies demonstrating strong ESG practices. "FTSE Russell" is a trading name of FTSE International Limited and Frank Russell Company. Companies included in the FTSE4Good Index Series must meet the stringent index inclusion rules and be reviewed semi-annually;
- **Euronext Vigeo Europe 120 and Eurozone 120:** created by the partnership of Euronext and Vigeo EIRIS and are updated every six months. Vigeo EIRIS is an ESG research agency of high reputation established by a combination of Vigeo and EIRIS in late 2015. The two indexes are composed of the 120 highest-ranking listed companies as evaluated by the agency in terms of their corporate responsibility performance in the European countries and Euro zone respectively;
- **ETHIBEL Sustainability Index Excellence Europe:** created by Forum Ethibel and is composed of 200 companies belonging to the Ethibel Register based on a best-in-class approach combined with ethical exclusion criteria. Forum ETHIBEL is an independent association for socially responsible investing;
- **Gaia Index:** created by Ethifinance in 2009 in partnership with IDMidCaps. This index is composed of the 70 best companies selected on ESG criteria within a pool of 230 French companies;
- **MSCI Global Sustainability Index Series:** the indexes are created by Morgan Stanley Capital International Group (MSCI) to provide exposure to companies that have high ESG performance. The indexes use company ESG ratings provided by MSCI with in-house research expertise on an annual basis;
- **STOXX® Global ESG Leaders Index:** the index offers a representation of the leading global companies in terms of ESG criteria, based on the analysis by Sustainalytics. It is belonged to Deutsche Börse Group and reviewed on an annual basis.

## 3 SOCIAL RESPONSIBILITY

### 3.1 SAFETY AND HEALTH

#### G4-DMA / G4-LA8

Safety and health are core values for all Imerys operations worldwide. Furthermore, the Group considers respect for safety and health standards to be a condition of employment at Imerys, and recognizes that a proactive safety and health culture can only be developed through partnership among management, employees, contractors, visitors and the communities in which we operate. On April 28, 2011, the CEO signed the Health and Safety Charter on his first official day in office (*see the "Safety and Health Charter" on [www.imerys.com](http://www.imerys.com)*). An EHS Umbrella Policy further clarifies organization, roles and responsibilities, communication, metrics and competency requirements.

Health and safety topics are also clearly stated in the publicly reported collective bargaining agreements with trade union organizations (approximately 69% of Imerys employees covered), as well as individual labor agreements. Most of the Group's operations have established formal safety teams and/or committees composed both of management and worker representative(s) to drive improvement using a systematic approach. However, the Group does not yet report the percentage of the total workforce represented in formal joint management-worker health and safety committees (G4-LA5) because it has been unable to consolidate the quantitative data due to the diversity of the programs in place in over 50 countries.

#### 3.1.1 SAFETY

#### G4-DMA / G4-LA6

The Group's programs on safety improvement are organized into the Imerys Safety System (ISS). The ISS consists of three pillars: compliance, continuous improvement and communication/training.

**Compliance:** Safety compliance requirements for each Imerys operation include not only local laws and regulations, but also compliance with the Group's EHS policies, procedures and protocols. Each year, the Group EHS Audit Team conducts periodic compliance audits at approximately 15% of the operations and evaluates the need for revision of the safety protocols periodically to incorporate new industrial standards for safety as they evolve. In 2015, an additional safety protocol for forklift safety was issued, increasing the total number of safety protocols to 18. Since 2006, the safety protocols corresponding to the six areas with the highest potential for causing severe accidents have been the focus of a training, communication and accountability campaign called the "Serious Six" program.

**Continuous Improvement:** the following are the main elements of the continuous improvement pillar of the ISS:

- all levels of the Group review "Safety Metrics" every month. These reviews are integrated into business meetings and performance reviews conducted by a variety of staff members

from site managers to top executives. The Executive Committee reviews safety results (including major incidents and critical audit findings) on a monthly basis. The Board of Directors and the Strategic Committee review them during the periodic examination of financial results;

- a "Safety Culture Improvement Team" (SCIT) conducts events at "Most Help Needed" facilities to promote a proactive health and safety culture within Imerys. The SCIT defines corrective measures in partnership with the targeted sites and tracks the corrective actions to completion. In 2015, 16 SCIT events were completed in addition to the Group EHS audits;
- "Safety Alerts" are issued whenever a serious incident occurs to share lessons learned and root causes in order to avoid injuries at other Imerys operations. In 2015, approximately 15 safety alerts were delivered to the Imerys operations;
- Imerys considers "behavior-based safety" (BBS) to be essential in developing an effective safety culture. To communicate this expectation to the operations, each site manager is required via a centralized database to confirm that he or she has conducted at least one behavior-based observation per month. In addition, each supervisor is required to complete at least one safety visit per month in his or her area of responsibility. A significant number of Imerys operations are also implementing specialized BBS programs;
- "Take 5" was launched in January 2014 as a best practice initiative to drive safety awareness to all employees. This initiative consists of thinking through each task, identifying the risks of the task, evaluating these risks, taking appropriate corrective actions and doing the job safely. In 2015, each business division amplified its "Take 5" implementation in a manner of its own making. More than 80 best practices were submitted to the "Take 5 Challenge" for sharing and competition. These best practices were the subject of a "Take 5 Tuesday" communication campaign featuring a different practice each week throughout the fourth quarter of 2015.

**Communication/Training:** the Group's safety communication and training tools include the Imerys Safety University (ISU), monthly web seminars, a high impact video/poster series, computer-based training modules on key initiatives, safety toolbox meetings and the Group welcome sessions. The Imerys Safety University (ISU) was designed to strengthen the site managers' understanding of a "safety culture". The curriculum includes training modules on risk assessment, employee coaching, root cause analysis, and behavior-based safety. Every Senior Site Manager is required to take part in an ISU session within 12 months of his or her assignment. Today, the ISU is offered not only to site managers but also to supervisors and other managers. In 2015, nine ISUs were organized on four continents with approximately 320 participants in total.



In 2015, a safety learning path was added to IM-Pulse, the Imerys learning digital solution. Fully part of the newly-appointed site managers and EHS managers induction, this training introduces the key principles and tools of the Imerys Safety journey. The training modules on the ISS and the Serious Six are also available in various languages on the Group EHS Intranet which is accessible to all employees.

**Metrics:** Imerys analyses its safety performance on a monthly basis using indicators for lost-time accidents, accidents without lost time. In 2015, a "life-changing injury" indicator was added to track those serious injuries with permanent impact to the victim, such as amputation and disability. "Near-miss" programs are also encouraged by the Group and are currently in place at all or almost of the operations. In recognition that its contractors are an integral part of the safety process, Imerys includes its contractor when tracking its performance.

The table below gives the fatalities, life-changing injuries, accident frequency and severity rates in the Group for the past three years.

	2015	2014	2013
<b>Number of fatalities</b>			
▪ Imerys employees	1	1	0
▪ Other employees <sup>(1)</sup>	0	0	1
<b>Number of life-changing injuries</b>			
▪ Imerys employees	2	1	3
▪ Other employees	2	2	2
<b>Frequency rate<sup>(2)</sup></b>			
▪ Imerys employees	1.27	1.05	1.36
▪ Other employees	1.40	0.70	1.20
▪ Combined rate <sup>(3)</sup>	1.31	0.95	1.31
<b>Severity rate<sup>(4)</sup></b>			
▪ Imerys employees	0.11	0.07	0.08
▪ Other employees	0.06	0.04	0.05
▪ Combined rate	0.10	0.06	0.07

(1) Employees of a company under contract with Imerys, in charge of a specific operation on site or providing a service.

(2) Frequency rate: (number of lost time accidents x 1,000,000)/number of hours worked.

(3) The combined rate is with both employees and other employees (contractors).

(4) Severity rate: (number of lost days x 1,000)/number of hours worked.

The safety data of S&B sites have been integrated since March 2015. As of December 2015, the combined lost-time accident rate was 1.31 with S&B, and 1.10 without S&B, which represented a 16% increase compared to that of 2014 at a constant perimeter. One employee fatality occurred in September. The results reflected both the challenges of external growth and the opportunities for improvement in the Group's existing system.

Having identified a negative tendency mid-year, the Executive Committee requested formation of a Safety Improvement Task Force composed of 13 senior operational leaders representing each of the business groups. The task force brainstormed and deliberated priorities in the third quarter and presented a set of conclusions to Executive Committee in October 2015. As the first step of the improvement plan, 10 "Safety Summits" were conducted between November 2015 and January 2016 involving the Top 200 operational leaders in the Group. On the "Safety Summits", those top operational leaders have been trained to improve safety leadership under their responsibilities.

Imerys continues to present the "Millionaires Safety Award" to the best-performing operations, acknowledge their compliance with four criteria: a) working over one million hours without a lost-time

injury, b) having no work-related fatalities over the past five years, c) 100% completion of the monthly "Serious Six" self-audits, and d) zero open "Red" EHS audit findings. As of December 31, 2015, 18 operations are members of the "Millionaire Club".

### 3.1.2 HEALTH

#### G4-DMA / G4-LA7

Imerys recognizes workplace health as a high priority for the Group's employees and contractors. Specific issues in mineral mining and processing activities include dust, noise and vibration. Limited quantities of chemicals are also used during industrial processes and in the laboratories for quality assurance and R&D. Some specific jobs may also involve lifting or repetitive tasks with potential ergonomic problems. Imerys has defined five protocols to manage the key exposures. The Group's EHS Function provides training on the five protocols and systematically checks on compliance with both the protocols and applicable regulations through the Group's EHS Audit program.

Most of the Group's European operations participate in the European Social Dialogue Agreement (SDA) on "workers' health protection through the good handling and use of crystalline silica and products containing it" and have reported on specific aspects of their implementation through participation in a program organized by NEPSI<sup>(1)</sup>. The fourth round of NEPSI reporting was closed on March 14, 2014, and the corresponding results were published in September 2014. The 2014 Report<sup>(2)</sup> indicates that 93% of potentially exposed workers are covered by risk assessments. The report also indicates that workers covered by exposure monitoring slightly increased since the last reporting in 2012. Imerys operations will continue to participate in the reporting, while improving risk assessments for potentially exposed employees and implementing appropriate control measures.

The "Industrial Hygiene Club" coordinated by the Group EHS function shares good practices with the operations on monitoring, risk evaluation, and engineering controls for occupational health

issues such as respirable crystalline silica, noise & vibration, and ergonomics. In 2015, the Group industrial hygiene professionals revamped the "Dust Monitoring Strategy at the Workplace" and the "Occupational Noise Management Program". Two technical guidance documents on sound surveying and noise exposure monitoring were also published. The subjects of dust management and ergonomics have also been integrated into the assessment and improvement processes of the Imerys Industrial Improvement (I-Cube) Program. Furthermore, in 2015, the training on occupational health has been improved by creating new computer-based training modules.

Occupational illnesses are tracked as a monthly reporting KPI in the central SD data management system. In 2015, 13 occupational illnesses were reported in total. 10 of these cases were linked to ergonomic issues. The other three were related to long-term exposure to noise and dust. Alternative jobs and appropriate medical treatment were provided for each case.

## 3.2 HUMAN RESOURCES

The Human Resources (HR) Department's mission is to enable the Group to have the people needed for its development, and to ensure that its organization evolves in an effective and coordinated manner.

It develops and implements general principles to processes in line with Imerys' decentralized management philosophy and in compliance with the relevant national legislation. To improve its processes, the Group regularly updates its HR policies.

Human Resources professionals are responsible in their business for the entire function and report to the business line manager. To ensure processes are consistent and common principles are applied, they also report on a functional basis to the Group Human Resources Department. The function is also coordinated nationally in the major countries where the Group operates, and globally across major functions (Research & Development, Marketing & Commercial, Mines & Industries, and Finance).

### 3.2.1 HUMAN RESOURCES PRINCIPLES & MAIN AREAS OF ACTION

**G4-13 / G4-42 / G4-51 / G4-52 / G4-EC3 / G4-LA1**

Human Resources policies are centered on the following principles:

- share rules that provide structure and enable Human Resources teams to ensure their work is optimal and consistent;
- meet its employees' expectations, particularly in working conditions and safety, benefits and professional development;
- provide managers with management principles that comply with the Group's ethic, especially in terms of diversity, behavior, standards, social dialogue and respect for other people.

The Group is also committed to complying with legislation in force in the countries where it operates, particularly in terms of health and safety, non-discrimination, privacy, child labor, compensation and working hours.

In 2015, the project "Talent Road Map" was launched to improve Human Resources processes especially in terms of development and in this way to better support the Group's growth ambitions: recruitment, employer branding, internal mobility, training, and management of university graduates.

The processes behind these principles apply to a number of key areas, including:

- **recruitment:** more than 30 experienced managers joined Imerys in 2015.

In order to contribute to the preparation of future managers of the Group, Imerys welcomed in 2015, 25 graduates from different nationalities into the program of international development "Graduates";

- **development:** promote access to vacancies for employees of the Group. In this way, Imerys set up common tools and processes for all activities and functions, including annual performance reviews (PAD) and succession plans (OPR) for its key managers.

The managerial model of the Group, "Leadership Behaviors" was redefined and will be deployed in 2016 in order to become the reference of the Group for the assessment of employees' potential contributions and their performance.

Internal mobility and promotions are top priorities for Human Resources teams and specialized Committees who meet regularly on the issue. In 2015, more than 50 new career moves took place amongst the 250 senior managers that make up the Group's executive management teams.

Following the acquisition of S&B Group, more than 1,600 employees across 22 countries have joined the Group. The integration of these new employees translated into new career opportunities and allowed for more mobility and internal promotions, especially for the division of Performance Additives for Metallurgy that was newly created;

(1) NEPSI: European network comprised of employees and associations of European companies that have signed the European agreement.

(2) It refers to the "2014 Report on the Application of the Agreement" released on the NEPSI website in November 2014.



- **training:** enable every employee to develop his or her talents and foster the sharing of best practices.

Imerys Learning Center (ILC), the training program of the Group, provided approximately 9,300 hours of training from 40 modules throughout the year. ILC plans and deploys fundamental programs for the Group - geology, finance, management, project management, and industrial marketing performance improvement. In addition, a new session of the training program reserved for high potential managers in partnership with INSEAD was held in 2015.

In 2015, "IM-Pulse", an e-learning platform, was deployed with more than 1,000 employees. The customized learning paths emphasize professional efficiency, diversity, management and safety.

In order to strengthen the efforts of the Group in terms of safety, a program on manager engagement for safety was initiated and at the highest level of the Group continuing forward in 2016;

- **compensation and benefits:** roll out coordinated, competitive systems that take into account both the results of the business for which employees work and their individual performance.

Annual salary reviews are closely coordinated by the Human Resources Department. While local competitiveness is favored, Imerys targets a coherent and shared approach. While local competitiveness is critical, the base salary review is based on rigorous financial discipline and is supported by sectorial and regional studies. In addition, the entities of different countries in which the Group operates increasingly align their practices of remuneration on the best international standards.

In 2015, the Group performed a study on 44 countries, covering two thirds of employees, to evaluate the social security of employees and initiated action plans to ensure the implementation of competitive employee benefits plans across all countries where it operates.

In the United Kingdom, the freeze of the defined benefit retirement plan was finalized. The Group Pension Committee has undertaken in the UK and USA especially, an effort to optimize the financial management of plan assets to fund these liabilities;

- employee relations: build constructive relations with its employees and their representatives in accordance with local regulations:

- the European Works Council (EWC) covers all employees in 21 countries: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom. Its 15-member employee delegation holds an annual plenary session. The EWC's five officers meet at least twice a year;
- the need to improve the efficiency of the Group's activities may lead to internal restructuring plans and job cuts. In such situations, the Group's policy is to give priority to finding in-house placement solutions for employees concerned and to set up retraining programs and support measures to help them find a job or carry out a personal project;
- **internal communication:** provide all employees with information that can help them understand the Group's strategy, environment and activities, build their sense of membership and highlight the Group's values to help strengthen its identity:
  - the intranet site is the first source of information of the Group. Employees can find information on latest news (via the online letter "Headlines"), the transversal programs (e.g., operational excellence program), job offers, appointments, acquisitions, practical tools, and access to other themed sites (e.g., safety);
  - a "paper" magazine is also circulated to all employees of the Group, highlighting for example the annual internal winners of contests on the best projects in sustainable development;
  - on-boarding seminars "Welcome Sessions" are regularly organized for new managers. These meetings, already in place in Europe, USA, China, India and Brazil have been expanded into South-East Asia in 2015;
  - the internal social network "Chatter" continues to be deployed with the creation of specialized professional communities;
  - Human Resources Reporting: covers the entire scope of the Group and includes highly detailed indicators (translated into five languages) concerning monthly workforce by country, contract type and activity, professional training, disability, age and seniority, etc.

### 3.2.2 KEY PERFORMANCE INDICATORS

G4-9 / G4-10 / G4-11 / G4-13 / G4-EC3 / G4-DMA / G4-LA1 / G4-LA6 / G4-LA9 / G4-LA10 / G4-LA12 / MM4

#### Employment

	2015	2014	Variance 2014/2015
Registered employees	16,130	14,900	+8%
▪ of which permanent employees	15,356	14,179	+8%
▪ of which temporary employees	774	721	+7%
Fixed-term & sub-contractor contracts	3,553	3,237	+10%
<b>Total employee headcount as at December 31</b>	<b>19,683</b>	<b>18,137</b>	<b>+9%</b>

The increase of the Group headcount is mainly due to:

- the acquisition of S&B Group, integrated in the business group Filtration & Performance Additives (1,640 employees);
- the acquisition of the Precipitated Carbonates Calcium (PCC) business of Solvay, integrated in the Carbonates division (189 employees);
- the acquisition of Matisco, integrated in the division Clay Roof Tiles (73 employees);
- the restructuring of the Division for Oilfield Solutions after the market collapse of ceramic proppant in the USA (109 employees).

### Headcount by Business Group

	2015	As a % of total headcount 2015	2014
Energy Solutions & Specialties	4,870	30%	4,958
Filtration & Performance Additives	3,925	24%	2,518
Ceramic Materials	4,278	27%	4,269
High Resistance Minerals	2,728	17%	2,841
Holding	329	2%	314
<b>Total</b>	<b>16,130</b>	<b>100%</b>	<b>14,900</b>

As a result of the integration of the S&B Group, the headcount of the business group Filtration & Performance Additives now represents a quarter of the total headcount.

### Headcount by geographical zone

	2015	As a % of total headcount 2015	2014
Western Europe	7,181	45%	6,239
▪ of which France	2,664	17%	2,559
USA / Canada	2,609	16%	2,603
Emerging countries	6,131	38%	5,851
Others (Japan / Australia)	209	1%	207
<b>Total</b>	<b>16,130</b>	<b>100%</b>	<b>14,900</b>

The acquisitions throughout the year have increased the headcount in Western Europe, mainly in Germany, Greece and on a smaller scale France.

### Headcount by job family

	2015	As a % of total headcount 2015	2014
Operations - Production - Manufacturing	10,588	66%	9,832
Logistics - Purchasing	729	4%	623
Research & Development - Geology	709	4%	672
Sales & Marketing	1,533	10%	1,396
Support Functions & Administration	2,571	16%	2,377
<b>Total</b>	<b>16,130</b>	<b>100%</b>	<b>14,900</b>

The distribution of the Group headcount by job family gradually increased in 2015.



### Employee moves

	2015	2014
Net variation of permanent employees (excluding M&A and divestitures)	(679)	(919)
▪ External recruitments	1,109	1,176
▪ Redundancies (economical & non economical)	(969)	(1,118)
▪ Voluntary termination, retirement & other	(819)	(977)
Turnover	5.5%	6.7%
Net variation of permanent employees (excluding M&A and divestitures)	31	143
Mergers/Acquisitions - Divestitures	1,878	(129)
<b>Variation of Registered Headcount</b>	<b>1,230</b>	<b>(905)</b>

The turnover above is based on the number of voluntary termination, retirement, and other termination in the year, and the average headcount for the year for permanent employees. It reduced in 2015.

More than 320 internal moves created opportunities in the Group, of which 50 jobs in senior management teams in operational and functional roles.

### Diversity

#### Gender diversity

	2015	2014	Variance 2014/2015
Percentage of women in the Group	17.0%	16.7%	+2%
Percentage of women in management	15.2%	15.0%	+1%

The proportion of women in the total headcount in the Group and in senior management teams increased slightly in 2015. It is still low in the "workers" category (6.2% in 2015).

#### Disability

	2015	2014
Number of employees with a disability	220	198
Percentage of registered headcount with disability	1.4%	1.3%

Europe (where legislation favors the reporting and facilitates the integration of disabled employees) shows the highest number of declared cases (162, 2.3% of Western Europe headcount).

#### Age and seniority

	2015	2014
<b>Percentage of permanent headcount by age bracket</b>		
Less than 30 years	11%	12%
From 30 to 39 years	25%	26%
From 40 to 49 years	30%	29%
From 50 to 54 years	16%	16%
More than 55 years	18%	17%
<b>Percentage of permanent headcount by seniority</b>		
Less than 10 years	48%	49%
More than 10 years	52%	51%
▪ of which more than 20 years	27%	26%

In emerging countries, half of employees of the Group are less than 40 years old. In the rest of the world, this proportion is one third.

## Industrial and Social Relations

Rate of absenteeism by geographical zone	2015	2014
Western Europe	4.38%	3.91%
USA / Canada	1.16%	1.48%
Emerging countries	2.18%	2.98%
Others (Japan / Australia)	2.00%	2.10%
<b>Group</b>	<b>2.78%</b>	<b>2.88%</b>

In 2015, 352 hours (1,063 in 2014) were lost due to strikes.

In each country, the Group respects the regulatory requirements and implements "best practices" in matters of workforce management. The implementation of related human resources policies and the identified risks have been integrated in the scope of internal audits.

A survey performed at the end of 2015 covering most of the headcount of the Group has shown that 69% of Imerys employees are covered by a collaborative bargaining agreement on themes like workforce management, working hours or compensation and benefits.

## Training

	2015	2014	Variance 2014/2015
Number of trained employees	12,332	10,208	+21%
Number of training hours by year	260,941	221,426	+18%
<b>Number of hours by category of program</b>			
▪ Environment, Health & Safety	125,282	113,873	+10%
▪ Technical skills	103,160	78,586	+31%
▪ Management	32,499	28,967	+12%

The number of trained employees has increased significantly in 2015: more than three quarters of employees in the Group have benefited from at least one training program in the year. In fact, the number of training programs of technical and management skills was introduced as a part of a program to strengthen operational excellence.

## 3.3 COMMUNITY RELATIONS

The communities in which Imerys operates include a diverse group of property owners and users, local business owners, local employees and their families, schools and charities, administrative authorities, indigenous or ethnic communities, and relevant non-governmental organizations. The Group's management structure based on locally empowered operations is, therefore, ideal for dealing with community relations. The flexibility of this structure enables each operation to adapt to the values and local constraints of the host communities. In its "Community Relations" protocol, Imerys formally delegates responsibility for community relations to the most senior employee in charge of managing each facility. The protocol requires that each site establish priorities by a stakeholder mapping, define pertinent action plans, and conduct periodic management reviews. Available in seven languages, the protocol also encourages constructive dialogue with stakeholders and requires an appropriate response to every stakeholder complaint.

### G4-EC1 / G4-EC7 / G4-EC8 / G4-DMA / G4-SO1 / MM5

To support the operations in administering the Community Relations Protocol, a Community Relations Toolbox is available on the Group's Intranet. 73% of the Group's operations have formalized the site-specific community relation plans (vs. 45% in 2014). The Group EHS Audit team verifies the implementation of the Community Relations protocol and provides recommendations for improvement during its regular EHS compliance audits.

The Group's operations have developed numerous projects to address local community needs. In total 631 projects have been parts of the SD Challenge program in the last 11 years, and nearly one-third of these projects have been related to community relations. In the 2015 SD Challenge, 51 out of the 98 projects were regarding community relations:

- 20 projects contributed to local economic or social development. A micro-business incubation (MBI) program was also launched in late 2015 which included a guideline on how to foster entrepreneurship and incubate small businesses among the neighboring communities;



- 18 projects supported training and education. Those projects covered the following priority axes: basic skills development (literacy and numeracy), young adults' professional integration, and women's and girls' education. These initiatives are aligned with the Group sponsorship strategy. For more information, [see section 1.4.2 of the present Report](#).

Furthermore, the operations' local community relations plans also include public health initiatives when relevant. For example, since 2004, Imerys South Africa has developed a unique, participation based approach to managing HIV/AIDS issues, and in 2015 this approach was extended to include both HIV/AIDS and Wellness.

The following table presents some examples of the best practices in 2015.

Best practice projects for communities in 2015			
Project Name	Business Group	Country	Description
Community Training	Energy Solutions & Specialties (ESS)	Mexico	Imerys set up a program offering training for the community to acquire new skill-sets. It brought benefits to the individuals concerned in terms of employability in the community.
Delivering Clean Water to Low-Income Families	Filtration & Performance Additives (F&PA)	India	A real business case combining the division's core assets and knowledge to deliver low cost household water treatment and storage systems in developing countries, responds to a significant market need.
Improving Orphans' Living Conditions	Filtration & Performance Additives (F&PA)	China	Employee volunteers contributed to improve the learning environment and living conditions of the orphans at the TMI Children's Hope House (a local orphanage).
Hospital boat 'Luz na Amazônia' (Light in the Amazon)	Ceramic Materials (CM)	Brazil	Partnership in this unique program has undoubtedly impacted the lives of many for the better, with the team on the boat having provided essential medical services often taken for granted.
Project Dignity	High Resistance Minerals (HRM)	Republic of South Africa	In partnership with a non-governmental organization, Imerys provides sanitary pads to economically disadvantaged school girls around one of its sites to enable them to complete their schooling with dignity.
Minerals Day Activities	All	Worldwide	Approximately 25 Imerys operations joined the 2015 edition of EMD or NAMD, support or organize excellent minerals day activities with communities, such as Treasure Hunt at Milos Operation in Greece (F&PA), The Marble Festival at Marble Hill in the United States (ESS), Imerys Day at Capim in Brazil (CM), and Open Day at Glomel in France (HRM).

Since 2009, a database of approximately 60 best practice case studies has been developed. This database is available to all employees on the Group's Intranet. Some of the best practices have also been compiled into a short documentary film available to all stakeholders on the Imerys website and the "Imerys Replay" on YouTube.

For more information, [see https://www.youtube.com/user/ImerysReplay](https://www.youtube.com/user/ImerysReplay).

## 3.4 HUMAN RIGHTS

**G4-56 / G4-57 / G4-58 / G4-LA12 / G4-LA14 / G4-LA15 / G4-LA16 / G4-DMA / G4-HR1 / G4-HR6 / G4-HR10 / G4-PR5**

The Group states in the SD Charter and the Code of Business Conduct and Ethics that it supports the Universal Declaration of Human Rights and strives for compliance with relevant ILO's conventions. The Group's General Counsel is in charge of implementation of related Group policies and compliance programs; the Group Vice-President of Human Resources takes leadership in ensuring compliance with ILO standards; the Vice-President of Innovation, Research, Technology and Business Support is responsible for integrating the compliance needs into the purchasing activities and the supply chain. The Group Internal Audit and Control Department and the Group EHS Function integrate this compliance review into their auditing programs. The

reporting and follow-up process of potential human rights concern is included in the Code of Business Conduct and Ethics.

For more information, [see section 5.1 of the present Report](#).

The Group does not have a whistle-blowing hotline but has clear "no-blame" rules that respect privacy and confidentiality. In 2015, no relative incident was reported or identified by the internal auditing programs.

The specific policies and progress in the areas of freedom of association, diversity, child labor and forced labor are presented as below:

- **Freedom of association and right to collective bargaining:** in the Employee Relations Policy, the Group states its commitment to adhering to applicable laws and regulations regarding the freedom of association and the right to join trade unions and enter into collective bargaining agreements. Imerys believes that such laws and regulations reflect the fundamental concepts set forth in the ILO's Conventions 87, 98 and 135. The Imerys Code of Business Conduct and Ethics also recognizes the right to freedom of association and the right to collective bargaining. The system in place to ensure implementation of these commitments is the network of human resource professionals throughout the Group's operations. As of the end of 2015, the coverage of employees by collective bargaining agreements (CBAs) remains steady at approximately 69%. These CBAs commonly include subjects such as health and safety, work organization and working hours, training, compensation and benefits, and equal opportunities.
- **Diversity, non-discrimination and equal opportunities:** the Group's Diversity Charter outlines its commitment to achieving greater diversity, as well as its commitment to anti-discrimination and equal opportunities. Diversity plans have been set up in most of the major countries since 2013. There were 20 different nationalities in the Imerys headquarters in Paris at the end of 2015. The Group rolled out a series of measures (e.g., diverse mix in the new "Graduates Program") and renewed its women's mentoring program in 2015. Several projects to support inclusion of people with disabilities were also implemented this year. For example, the operation in Greece supported the Myrtillo Social Co-operative Enterprise that operates a cafe hiring staff from vulnerable

social groups; while the Paris head office signed a paper recycling service with a social enterprise employing people with disabilities. As of 2015, the Group itself has 220 employees with disabilities.

For more information, [see section 3.2 of the present Report](#).

- **Child labor and forced labor:** Imerys integrates child labor and forced labor issues into its due diligence assessment for new projects and its internal auditing for existing activities. Protocols on prohibition of child labor and forced labor have been in place since 2009, and these protocols are the basis for the internal auditing activities. In 2015, each of the Group's divisions was required to determine if more than 2.5% of their spend was on goods produced from in one of the "Countries of Concern" as defined in the FTSE4Good Inclusion Criteria<sup>(1)</sup>. If there was a positive determination, the division was required to obtain written confirmation from the supplier that it is in compliance with the ILO Conventions on Child Labor and Forced Labor. Five suppliers have been identified and all have provided their written confirmation of compliance.

Imerys also recognizes the importance of the rights of indigenous people's (G4-MM5). For instance, Imerys has several operations located in South Africa and Zimbabwe. Imerys South Africa Pty LTD (ISA) is compliant with the Broad-Based Black Economic Empowerment (B-BBEE) legislation. The ISA's B-BBEE Scorecard is currently rated at Level Three, which means compliance with all of the acceptable criteria for the seven pillars: ownership, management control, employment equity, skills development, preferential procurement, enterprise development and socio-economic development.

### 3.5 PRODUCT STEWARDSHIP

Imerys is committed to providing the highest quality products to its customers as well as other end users of its products. The compliance with pertinent regulations and standards on product stewardship are managed by the business divisions in different markets. The Group also has a material safety data sheet (SDS) policy and coordinates the technical support when necessary. For products manufactured in (or imported into) Europe, the Group complies with the European Directive on "Regulation, Evaluation and Authorization of Chemicals" (REACH). Under REACH, "naturally occurring minerals" are exempt from registration, and this exemption significantly reduces the effects of these regulations on Imerys and its customers. The Group has,

#### G4-DMA / G4-EN27 / G4-PR1 / G4-PR3

nonetheless, registered several products that do not fall under this exemption. The substances marketed in Europe by Imerys operations have undergone additional risk studies pursuant to the implementation of the GHS/CLP<sup>(2)</sup> Regulations. As a result of these studies, a few substances were classified as "hazardous", and appropriate notification was given to the European Chemicals Agency (ECHA).

As of the end of 2015, approximately 84% of Imerys operations were certified to the ISO 9001 Quality Management System. In Brazil, a new web-based SDS (Safety Data Sheet) publication tool has been deployed for more than 150 products to compliance with the Global Harmonization System (GHS) requirements.

(1) The list of "Countries of Concern" as defined in FTSE4Good Inclusion Criteria (2014) is drawn up and reviewed periodically in the light of human rights developments using a variety of sources, including country data and reports of Freedom House, Human Rights Watch and Amnesty International.

(2) GHS/CLP: Globally Harmonized System/Classification, Labeling and Packaging of chemicals.



## 4 ENVIRONMENTAL STEWARDSHIP

### 4.1 ENVIRONMENTAL MANAGEMENT SYSTEMS

G4-DMA

Imerys requires each operation to have an effective Environmental Management System (EMS), enabling them to identify and establish controls for significant environmental risks. The mandatory EMS requirements for all activities are covered by a Group-specific environmental protocol, which includes the eight pillars and embraces the core elements of the international standards of representative, training, emergency procedures, and auditing.

Imerys introduced this protocol to all of its operations through a self-appraisal procedure beginning in 2010 to institute EMS at 100% of its operations<sup>(1)</sup>. A self-appraisal EMS scorecard is being presented to Executive Management on a quarterly basis. This scorecard gives top management a snapshot of the environmental risks (highest priority aspects / impacts) and the annual objectives and targets in progress to control these operational risks. The table opposite gives a summary of the environmental priorities with control measures that Imerys operations presented in the EMS scorecards in 2015.

In 2015, a requirement for an annual assessment of environmental compliance was added to the EMS protocol. Therefore each operation was required to perform a self-assessment of its environmental compliance and report out the status when completed. A desktop review by an independent third-party consultancy was also conducted for the 20 critical operations. Furthermore, the Group initiated a broad project to ensure that compliance documents for lands, permits and permissions (LPP) are securely stored and easily accessible at the Group level, which covering the environmental compliance files.

The Group has also structured an internal environmental incident reporting process and a database which requires reporting of five

Environmental Priorities (2015)	% of Sites Relevant
Air Emissions	31%
Energy & Greenhouse Gas (GHG)	14%
Waste	13%
Water Consumption	12%
Noise & Vibration	8%
Effluent	7%
Biodiversity & Land Rehabilitation	5%
Hazardous Substances	4%
Regulatory Permitting	3%
Mineral Efficiency	1%
Others	2%
<b>Total</b>	<b>100% (253)</b>

different types of issues, including any non-routine inspection, investigation or notice of noncompliance from an environmental regulatory agency.

To confirm regulatory compliance and conformity with the Group's protocols, Imerys operations are audited at regular intervals. In 2015, 34 Group EHS Audits were accomplished. A summary of critical audit findings and pertinent environmental incidents is presented quarterly to the Executive Committee.

In addition to the mandatory EMS requirements, the Group encourages ISO14001 and EMAS certification. The total ISO14001 or EMAS certified operations increased to 42% (vs. 38% in 2014).

The table below gives the number of Imerys operations with an EMS.

Number of operations	2015	2014	2013
ISO 14001 or EMAS certified operations	106	81	81
Operations with Imerys 8-pillar EMS	147	131	148
Total (ISO 14001/EMAS and Imerys 8-pillar EMS)	253	212	229
<b>Operations required to establish an EMS</b>	<b>253</b>	<b>212</b>	<b>229</b>

### 4.2 RESOURCES MANAGEMENT

#### 4.2.1 MINERALS RESOURCES EFFICIENCY

G4-DMA / G4-EN1 / G4-EN2

Imerys processes 19 industrial minerals from its own mineral reserves and sources approximately 10 other minerals. The

Group strives to improve yields and reduce waste using the following approaches:

<sup>(1)</sup> Newly-acquired or constructed operations are expected to establish a fundamental EMS within 12 months of acquisition or commissioning.

- **establishing and maintaining effective management of mineral resources:** in 2015, the Group Mining and Geology Department defined a Geology and Mine Planning Policy. The principles of this Policy are supported by a series of existing Geology and Mine Planning Procedures and Protocols. Each mining operation is required to have a Life of Mine Plan (LOM Plan) and create a detailed Five Year Mine Plan. This formalized approach enables the Group to better extract and use its mineral resources, and reduce risks of unplanned variability in tonnage, quality or cost. As of December 2015, all of the active mining operations have established their LOM Plans according to the Policy and related procedure. Approximately 96% of the LOM plans have passed the Group Geology and Mining Department's review. For more information, [see section 1.3 of the 2015 Registration Document](#);
- **optimizing raw materials utilization through sound industrial management:** since 2014, the Imerys Industrial Improvement program "I-Cube" has been advancing the Group's objective to transform industrial performance into a competitive advantage. This program has developed a network of experts and "champions", and created a series of

standardized technical and functional documents to maximize good practice sharing between sites. During the implementation of this program, minerals/materials recovery ratios are tracked as a standard operational KPI and opportunities for improving raw materials efficiency are regularly identified. As of the end of 2015, the "I-Cube" program had been deployed to approximately 50 key operations accounting for more than 50% of the Group's turnover. For more information, [see section 1.2.3 of the 2015 Registration Document](#);

- **seeking opportunities to recycle and/or reuse low-grade materials and tailings:** technological improvements and newly developed applications make it possible to transform low-grade materials, tailings and wastes into marketable resources. Numerous projects have been initiated by the Imerys operations to recycle and/or reuse the existing low-grade materials and tailings and successfully generate new sales. For instance, in 2015, the United Kingdom Kaolin operation started to recover discarded materials by dredging from its Parkandillick Pit which yielded more than 620 kT of final product.

The industrial minerals industry also works in partnership with downstream industries on processes to increase recyclability. In 2013, the Industrial Minerals Association studied publicly available data on recycling and concluded that a total of 40% to 50% of all minerals consumed in Europe are recycled in the form of glass, paper, plastic and concrete. The following are some relevant aspects of the study published in May 2013<sup>(1)</sup>.

Mineral	Silica	Lime	Feldspar	Talc	Calcium Carbonate	Kaolin and Clay
Recycling Rate	73%	68%	60%	58%	50%	49%

The Group plans to continue its innovation efforts to increase the recyclability of its industrial products throughout the product life cycle.

For more information, [see section 1.8 of the 2015 Registration Document](#).

## 4.2.2 ENERGY EFFICIENCY

Imerys has significant operational energy demand, especially in its mineral transformation processes which use thermal technologies (heating, drying, sintering and calcining) and its quarrying activities which use heavy equipment (drilling, excavating, milling and transporting). The Group is committed to employing low-carbon and renewable energy sources when feasible in order to improve energy efficiency and reduce greenhouse gas (GHG) emissions.

The Group energy initiatives are driven collaboratively by several functions: Industrial Management, Geology and Mining, EHS, and Purchasing. The Group Industrial Management and Geology and Mining departments help operations identify opportunities and provide support as needed to improve efficiency at both mining and process sites. A delegated Group Energy Manager in the Industrial Management department keeps monitoring the progresses of key energy-related projects. Projects with significant capital expenditure are reviewed at the Group level to ensure the investment is aligned with Imerys energy strategy.

### G4-DMA / G4-EN3 / G4-EN5 / G4-EN6 / G4-EN7

The levers of the Group's energy efficiency optimization mainly include:

- **analyzing the evolution of energy consumption and identifying the priorities for improvement:** the Group tracks monthly energy and production data and began integrating energy efficiency into the quarterly business review of divisions in 2014. A Group Energy Report is now delivered to the core internal stakeholders on a quarterly basis, including the Executive Committee. This report summarizes the Group's energy statistics, developments in the energy efficiency of each business division, and the interpretation of both favorable and unfavorable variations. The variance analysis enables the business to monitor related trends, identify potential areas for improvement and define prompt action plans. Energy efficiency and improvement plans were developed in 2015 at 11 key plants accounting for more than 30% of the Group's total energy consumption. For more information, [see the energy reporting and analysis standards in the "SD Reporting Methodologies" on \*www.imerys.com\*](#);

(1) The IMA-Europe Recycling Sheets, <http://www.ima-europe.eu/content/ima-recycling-sheets-full>.



- **improving energy management and practices with the “I-Cube” Program:** the standardized technical and functional documents of the “I-Cube” Program provide “maturity matrixes” to identify opportunities for improvement on production, maintenance, quality, and logistics. The community of industrial experts has also built good practices into those documents to share their knowledge and experiences on energy use in utilities, operating heavy mobile equipment, and anti-idling of equipment in the mine. On-site diagnosis, expert training with champions, and web seminars are used to communicate this systemic approach. In 2015, 50 sites developed action plans covering energy management during the implementation of the “I-Cube” program;
- **seeking a shift from fossil fuels to cleaner, renewable or low-carbon emission energy sources when feasible:** the

Group continues to optimize its energy resources with cleaner (gas), renewable (biomass), or low-carbon emission (solar) energy resources when feasible. In 2015, two biomass projects were implemented in France (Refractory Minerals) and Brazil (Carbonates Division) respectively; also one operation (Monolithic Refractory) in India shifted more than 50% of the power supply to a local solar power station;

- **encouraging accreditation under ISO 50001:** the Group encourages its operations to formalize their energy management systematically with reference to the ISO 50001 standard. As of 2015, the following operations have obtained ISO 50001 accreditation: two Tableware operations in Germany, one Fused Minerals operation in Germany, one Carbonates operation in Sweden, and two Talc operations in Austria.

The sites of S&B, acquired in March 2015, have been fully integrated into the Group's energy reporting including the complete data from the 2015 calendar year. The Group's total energy consumption and breakdown by energy sources are as follows.

	2015	2014	2013
<b>Total energy consumption<sup>(1)</sup> (terajoules, TJ)</b>	<b>32,870</b>	<b>34,859</b>	<b>34,615</b>
Electricity (net) and steam	29.3%	28.4%	30.3%
Natural gas	45.2%	47.2%	45.3%
Other fossil fuels	22.2%	21.6%	20.7%
Biomass	3.3%	2.8%	3.6%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

(1) Several Imerys sites use Combined Heat and Power (CHP) facilities. Excess electricity from these facilities is sometimes sold on the national grid. The total energy consumption does not count the resold electricity.

The energy consumption variance between 2015 and 2014 is presented below.

<b>Breakdown of Variation by factor (2015 vs. 2014)<sup>(1)</sup></b>	<b>Perimeter</b>	<b>Volume</b>	<b>Product</b>	<b>Reporting Entity</b>	<b>Efficiency</b>	<b>Total</b>
Variation (TJ, + increasing, - decreasing)	+ 831	- 284	+ 239	- 2,390	- 399	- 2,003

(1) See details of the energy efficiency analysis standards in the “Reporting Methodologies” in the 2015 Sustainable Development Report.

Between 2015 and 2014, the annual total energy consumption decreased 2,003 TJ (Tera Joules) taking into account each variation factor's effect. At a constant perimeter, the overall energy efficiency improved by 1.3% vs. 2014. The present SD three-year plan (2015-2017) includes the following energy efficiency objective: 6% improvement by 2017 from base year 2014<sup>(1)</sup>. In 2015, the energy efficiency was improving. However this improvement needs to be accelerated. The deployment of the existing projects, in particularly on the key sites, and the “I-Cube” program are underway to improve the Group's performance against the objective.

Contribution of diverse energy sources in global consumption is comparable to that of previous years. The major energy-

consuming operations were not subject to change from one source of energy to another, except the outsourced use of a significant quantity of steam in the main Kaolin unit in Brazil. This steam, previously produced from heavy oil, has come mainly from biomass since 2015. This induced an increase from 2.8 to 3.3% of the biomass part in the global energy mix.

Renewable energy sources (essentially hydropower and wind power) are also being employed in the electrical power grid and indirectly supplied to some of the Imerys operations. Imerys contributes to the development of renewable energies in partnership with other companies such as the integrated photovoltaic solutions with Imerys roof tiles and land leasing for solar parks or wind farms.

(1) This new goal is consistent with the sectorial commitment made in IMA-Europe 2050 Roadmap. IMA-Europe launched this Roadmap in September 2014 which included a sector commitment: specific energy consumption reduced by half by 2050.

## 4.3 AIR EMISSIONS

### 4.3.1 CARBON EMISSIONS AND CLIMATE CHANGE

#### G4-DMA / G4-EC2 / G4-EN15 / G4-EN16 / G4-EN17 / G4-EN18 / G4-EN19

Thermal energy is the major source of GHG emissions for the Group (61% of total). Indirect emissions from the consumption of electricity in production are the second largest source (39% of total). Some of the processes used in the Imerys operations cause CO<sub>2</sub> emissions themselves (9% of total) (e.g., decarbonation of raw materials). Finally, the CO<sub>2</sub> emissions from the use of biomass, directly or indirectly, represented 3.3% of the total.

Approximately 29% of the total energy consumed by Imerys operations is derived from the electrical power grid. The reduction in direct CO<sub>2</sub> emissions achieved by the Group is largely attributable to initiatives to optimize energy sources and use renewable energy.

The table below provides the Group's CO<sub>2</sub> emissions and carbon efficiency.

(thousands of tons, kt)	2015	2014	2013
Scope 1 CO <sub>2</sub> emissions	1,659	1,785	1,705
Scope 2 CO <sub>2</sub> emissions	1,047	1,030	1,080
Total CO <sub>2</sub> emissions (Scope 1 and Scope 2)	2,706	2,815	2,785
Energy (excluding biomass)	87.5%	87.5%	88.0%
Processes	9.2%	9.3%	7.9%
Biomass	3.3%	3.2%	4.1%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

The carbon emission variance between 2015 and 2014 is presented below:

Breakdown of Variation by factor (2015 vs. 2014) <sup>(1)</sup>	Perimeter	Volume	Reporting Entity	Efficiency	Total
Variation (kt, + increasing, - decreasing)	+ 85	- 24	- 106	- 39	- 84

*(1) See details of the carbon efficiency analysis standards in the "Reporting Methodologies" in the 2015 Sustainable Development Report.*

Between 2015 and 2014, the annual total Scope 1 and Scope 2 CO<sub>2</sub> emissions decreased by 84 kt. At a constant perimeter, the overall carbon efficiency improved by 1.5% (vs. 2014) corresponding to 39 kt of CO<sub>2</sub> emissions saved. The average emission factor of thermal energy remained steady as 57.3 tCO<sub>2</sub>/TJ, which was very close to the factor of the lowest emission fossil energy source (natural gas), 56 tCO<sub>2</sub>/TJ. A new carbon efficiency objective has been included in the three-year SD plan (2015-2017): 6% improvement by 2017 from base year 2014.

17 Imerys industrial sites take part in the European Union Emission Trading Scheme (EU-ETS), and one site in the California Cap-and-Trade (CCT). In 2015, these operations were

still below their allocated amounts. However, as the allocated amounts will be reduced over the period, the Group may need to purchase credits in the future. This will not associate any material financial risk.

Since 2006, Imerys has participated in the climate change program of the Carbon Disclosure Project (CDP). In addition to Scope 1 and Scope 2 emissions, increasing attention has been paid to the relevant Scope 3 emissions, especially the indirect emissions generated by fuel use in Imerys' contracted activities and Imerys' travel activities. Pilot data on these two aspects has been incorporated in the CDP submittal since 2013.



Imerys remains at Level B on the CDP performance band<sup>(1)</sup>. The CDP rating results in the past three years are listed as below.

Carbon Disclosure Project Rating <sup>(1)</sup>	2015	2014	2013
Disclosure Score	97	79	88
Performance Band	B	B	B

(1) The rating is from the CDP reports and score of year Y is the analysis with the data of year Y-1.

Working with CDP and the trade associations, the Group maintains access to information regarding any changes to climate-related regulations and disclosure expectations. The Group tracks several indicators related to energy efficiency and waste reduction, as well as indicators related to innovation and new green product development. Climate change is also integrated into formal, recurrent processes to analyze the Group's main risks. An increase in the number and intensity of extreme weather events such as hurricanes, tornados, or floods related to climate change could affect the Group's units (production stoppages, damage, etc.). So far Imerys has considered the

potential impact of this risk to be managed in different geographic zones where the Group's facilities are located. Imerys does not have major production units in the regions that are particularly prone to these extreme events.

Imerys has been actively engaged in communication with its customers regarding the carbon footprint of its products. The increase in demand for low carbon products offers the Group new business opportunities because minerals are a naturally low-carbon alternative.

For more information, [see section 4.7 of the present Report](#).

### 4.3.2 NO<sub>x</sub> AND SO<sub>2</sub>

#### G4-DMA / G4-EN21

Several of the Group's mineral conversion processes use calcination which emits nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>). Imerys publishes below an estimate of its SO<sub>2</sub> and NO<sub>x</sub> emissions, applying specific conversion factors to each source of consumed fuel. The "process" SO<sub>2</sub> emissions are attributable to a small number of sulfur-containing minerals. The sulfur liberated from these minerals during thermal processing is included in the reporting scope.

(tons)	2015	2014	2013
Sulfur dioxide (SO <sub>2</sub> ) <sup>(1)</sup>	3,796	3,947	4,577
Nitrogen oxide (NO <sub>x</sub> )	5,999	5,822	6,042

(1) Including process SO<sub>2</sub> emissions since 2012.

The evolution of SO<sub>2</sub> and NO<sub>x</sub> emissions at a constant perimeter is favorable due to the reduction of total energy consumption and the improvement in industrial processes. The total SO<sub>2</sub> and NO<sub>x</sub> emissions in 2015 remained at low levels and varied slightly from 2014.

## 4.4 WATER SCARCITY AND EFFICIENCY

#### G4- DMA / G4-EN8 / G4-EN9 / G4-EN10

Imerys processes minerals with relatively minor impacts to surface water and groundwater. The Group's mining operations extract groundwater to maintain the quarries when removing ore located below the water table. The Group's mining operations also use water for dust control. A small number of the Group's processing facilities use water for wet-processing and cooling. In some cases, water is delivered in Imerys products as slurries, and finally, a small amount of water is used in the Imerys operations for cleaning and sanitary purposes.

In its accounting and disclosure, Imerys classifies water withdrawals according to source including groundwater (54%),

surface water (29%) and water suppliers (10%). The Group has opted not to include water moved from one zone to another without being used by the operation (e.g. water pumped to keep quarries in good working order), since the quality of this water is not affected by the Group's activities. In addition to water withdrawals customarily reported by industrial users, Imerys also reports the amount of water recycled by its operations in order to encourage improvement in water recycling rates. Group-level water disclosure will be gradually improved by focusing on water efficiency at operations in areas of water scarcity and large quantity water users.

(1) The performance scores are expressed as bands (A, A-, B, C, D, and E). Band "B" means "Integration of climate change recognized as priority for strategy, not all initiatives fully established".

The following are the trends in water withdrawals for the past three years.

	2015	2014	2013
<b>Total water withdrawals (millions of liters) of which:</b>	<b>40,062</b>	<b>36,128</b>	<b>41,626</b>
Water obtained from water suppliers	10.4%	10.8%	10.5%
Water withdrawn from ground water	53.5%	55.4%	49.4%
Water withdrawn from surface water	28.8%	24.3%	23.4%
Water obtained from other sources <sup>(1)</sup>	7.3% <sup>(2)</sup>	9.5%	16.7%
Water withdrawn / turnover (liters/€)	9.8	9.8	11.3

(1) Some Imerys operations may obtain water from sources other than those listed above. For example, an operation may collect rainwater or obtain water from customers. The term "water obtained from other sources" refers to this type of water.

(2) In 2015, approximately 70% of "water obtained from other sources" is from the customers because the Imerys operations serve the customers' paper mills and shared their utilities.

Imerys withdrew 40.1 million cubic meters of water in 2015. The water withdrawal rate per Euro of turnover was 9.8 liters/€. The Group's total water withdrawal increased by 10.9% from 2014 mainly due to the integration of S&B sites.

The Top 10 water users in the Group (mainly in Kaolin and Fused Minerals divisions) comprised more than 61% of the total annual

water withdrawal. At the end of 2015, the operations withdrawing more than one million cubic meters of water (based on 2014 data) have put site-level water management plans in place. The plans include a description of current water use, water balance analysis, water accounting, water risk assessment and pertinent action planning to manage high priority water issues.

The table below gives the Imerys water profile by region according to an analysis made using the WBCSD's Global Water Tool (GWT)<sup>(1)</sup> as December 31, 2015.

Region/Percentage of water withdrawal in each geographic region	Low <0.2	Medium 0.2-0.4	Stress 0.4-1.0	Scarce >1.0	No Data	Total (millions of liters)
Asia Pacific	61.0%	0.7%	2.1%	35.7%	0.6%	4,061
Europe, Middle East and Africa	86.3%	6.0%	0.0%	0.0%	7.7%	13,569
North America	89.7%	1.7%	1.2%	7.5%	0.0%	16,478
South America	100%	0.0%	0.0%	0.0%	0.0%	5,954
<b>Percentage of total water withdrawal</b>	<b>87.1%</b>	<b>2.8%</b>	<b>0.7%</b>	<b>6.7%</b>	<b>2.7%</b>	<b>40,062</b>
<b>Number of total operations</b>	<b>212</b>	<b>14</b>	<b>5</b>	<b>19<sup>(1)</sup></b>	<b>10</b>	<b>260<sup>(2)</sup></b>

(1) The distribution of the 19 operations by region is as follows: six in Asia Pacific, five in EMEA, eight in North America.

(2) The number of total operations includes those sites divested or closed during the reporting period.

The Group has 19 operations located in areas of water scarcity. The aggregated water withdrawal of these operations accounts for approximately 6.8% of the Group's total 2015 withdrawal. The Group conducts an annual overall risk assessment and assists the concerned operations to establish site-level water management plans (WMPs) as an additional component of the site environmental management system. WMPs include a description of current water use, water balance analysis, water accounting, water (regulatory/physical/reputational) risk assessment and pertinent action planning to manage high priority water issues. As of December 2015, 16 out of the 19 have established their water management plans except three S&B sites.

A preliminary study of the Group's large quantity water users was completed in the second half of 2013. This study showed that the Top 10 water users in the Group (mainly in Kaolin and Fused Minerals divisions) comprised more than 56% of the total annual water withdrawal. Since 2014, the Group began encouraging the top water users to improve water efficiency with WMPs. At the end of 2015, nine operations withdrawing more than one million cubic meters of water (based on 2014 data) had put site level WMPs in place.

(1) The World Business Council for Sustainable Development (WBCSD) provides companies with an assessment tool for their risks relating to the quality and quantity of their water supply.



The table below presents trends in water recycling for the past three years. The total recycled water<sup>(1)</sup> was approximately 40,487 million liters in 2015. The recycled water rate remains steady at 0.50.

	2015	2014	2013
Total water recycled (millions of liters)	40,487	31,954	32,950
Number of sites reporting recycled water	68	55	54
Recycled water rate <sup>(1)</sup>	0.50	0.47	0.44

(1) Recycled water rate: total recycled water / (total water withdrawal + total recycled water)

## 4.5 WASTE, OVERBURDEN AND MINERAL SOLIDS

G4-DMA / G4-EN23 / MM3

Imerys processes minerals using methods that are primarily mechanical (e.g., crushing, milling, and grinding) and physical (e.g., density separation, magnetic separation, and sizing). The Group's activities therefore generate relatively small quantities of both sanitary and industrial wastes. All waste streams in the Imerys operations are required to be identified and characterized sufficiently to determine the applicability of local regulations and to manage relevant risks. Normally, waste management and statutory obligations on collection, storage, labeling, transportation and disposal are addressed in each site's EMS.

Overburden and unused mineral solids (e.g., tailings, off-specification materials, etc.) are usually stored on or near

production areas at the quarries since they may be useful in the future when technological progress is made or new market opportunities arise. Overburden and unused minerals are also used in many cases as backfilling or re-profiling materials in post-mining restoration work. For these reasons, the overburden and tailings are not recorded as "waste" by Imerys. Off-specification materials from the processing operations which are placed back in the Imerys quarries are counted as waste only when subject to regulatory requirements. Since 2013, as part of the measurement for minerals efficiency, the Group Mining and Geology Department began tracking the overburden and tailings generated from each quarry operation from the Group level.

The table below shows the trends of industrial waste generation and recycling for the past three years.

	2015	2014	2013
<b>Total industrial waste (tons) of which:</b>	<b>203,706</b>	<b>281,654</b>	<b>264,270</b>
Non-recycled hazardous industrial waste	1,486	1,739	920
Recycled hazardous industrial waste	1,964	1,434	1,919
Non-recycled non-hazardous industrial waste	81,713	150,631	125,104
Recycled non-hazardous industrial waste	118,543	127,850	136,327
Industrial waste generation / turnover (kg/€)	0.05	0.08	0.07

The Group's activities generated 204 kt of industrial waste in 2015. 98.3% of this waste was non-hazardous. The industrial waste generation rate per Euro of turnover was 0.05 kg/€ in 2015. The intensity of waste generation has remained at a relatively low level for several years. Without S&B, the industrial waste generated in 2015 (195,876 tons) significantly decreased by 30% vs. 2014 mainly due to the variation of production activity at the Imerys Oilfield Solutions division. The Top 10 largest waste producers in the Group represented 48% of the Group's total waste.

Regarding hazardous waste generation, the non-recycled portion of this waste decreased by 253 tons from 2014 to 2015; while the recycled portion of this waste increased by 530 tons. The increase of recycled hazardous waste was mainly due to a 360-ton oil water mixture at a site of Graphite and Carbon division in Belgium which was recycled.

Regarding waste recycling, 59.2% of the total industrial waste was recycled (vs. 45.9% in 2014); and 56.9% of the hazardous waste was recycled (vs. 45.2% in 2014). Approximately 96% of the recycled non-hazardous industrial waste of the Clay Roof Tiles division was off-specification tile, which was nearly 55% (65,142 tons) of the corresponding total volume of the Group. Those tiles are categorized as non-hazardous in the site environmental permits and permitted to be reused in its quarries during restoration.

New actions to reduce waste and increase recycling are identified continuously during the implementation process of the "I-Cube" program.

For more information, [see the example in section 4.2.1 of the present Report](#).

(1) The environmental reporting protocol includes the definition of "recycled water" and with a clarification in 2014 that the cooling water supplied by third-party facilities (e.g., a customer's paper mill) and circulated back in a close loop should not be counted as recycled water by Imerys operations.

## 4.6 BIODIVERSITY AND REHABILITATION

### G4-DMA / G4-DMA / G4-EN11 / G4-EN12 / G4-EN13 / G4-EN14 / MM1 / MM2 / MM10

Both active and closed quarries offer many opportunities for biodiversity by revitalizing natural habitats and protecting endangered species. Imerys is committed to respecting the ecosystems surrounding its operations and preserving biodiversity throughout the life of mine.

During the mining operation and until mine closure, the rehabilitation project is integrated into mine planning. The Group has a "Post Mining Rehabilitation" protocol that requires every mining site to describe the rehabilitation methods that will be applied during the site's operation and at the time of its closure. Prior to developing a new mine, the protocol requires each Imerys operation to conduct an environmental impact review. The environmental impact review includes a baseline assessment of existing environmental conditions, including biodiversity. In many countries, such an environmental impact assessment is statutorily required and must be discussed with the public and filed with the governmental authorities. Rehabilitation is also integrated into the Life of Mine Plan and reviewed by the Group Mining and Geology Department.

To align with the GRI reporting guidelines for the mining sector, the Group developed an internal reference for establishing a site-

specific biodiversity management plan (BMP) in 2013. This internal reference indicates that such a plan will be considered to be established when it is based on the best available information, includes site specific objectives and expected actions.

The Group EHS function has developed a structured methodology for assessing biodiversity risk in the operations. This methodology calculates the proximity between internationally recognized area of high biodiversity value (e.g., Natura 2000, and the World Database for Protected Areas) and Imerys' mining operations using Google Earth. This analysis is updated every two years to capture new information on protected areas and newly acquired quarries. The last update was made in November 2015 with integration of the S&B sites.

As of the end of 2015, 35 of the Group's 140 mining operations (both active and inactive) are near or inside an area of High Biodiversity Value. The IUCN (International Union for Conservation of Nature) Categories for the 35 sites are listed in the following table (updated in Nov-2015).

IUCN Category <sup>(1)</sup>	Description	No. of concerned sites
Ia	Strict Nature Reserve	0
Ib	Wilderness Area	0
II	National Park	1
III	Natural Monument or Feature	0
IV	Habitat/Species Management Area	1
V	Protected Landscape/Seascape	9
VI	Protected area with sustainable use of natural resources	2
Non-IUCN	Regional directives (habitats directive, birds directive, etc.), MAB-UNESCO Biosphere reserves	22
<b>Total</b>		<b>35</b>

(1) Refer to IUCN Guidelines for Applying Protected Area Management Categories (2008).

The Group is gradually assisting those sites to formalize their biodiversity management plans (BMP). In 2015, an additional two operations formalized their BMPs, increases the percentage of sites with a BMP to approximately 29%. The two sites in proximity to IUCN II and IV protected areas have also setup the site-specific BMPs.

To align with European Union regulatory requirements, the Group initiated two land use indicators in 2012 involving all of the Group's 53 quarries in Western Europe. The indicators quantify the surface disturbed by the Group's mining activities, as well as rehabilitated surface. In 2015, the total disturbed surface area of the 53 mining activities was 2,187 hectares, and the total rehabilitated area of those sites was 1,197 hectares.

A number of Imerys operations have led successful biodiversity cases. For example, the Imerys Refractory Minerals Glomel (France) operation signed a convention in 2015 to allow local associations to conduct a biodiversity survey in the area and define potential action to foster the settlement of important species. The Imerys Bentonite & Perlite Intermediates Milos operation (Greece) also created a Plant Micro-Reserve in 2015 to support restoring the quarries with 100 percent indigenous plant species to protect the rich biodiversity of Milos Island. Following the Group's objectives, the practices at three other sites in Austria, Brazil and Malaysia have also been publicized on the website.

For more information, [consult www.imerys.com](http://www.imerys.com).



## 4.7 INNOVATION

G4-EC8

Driving growth through process and product innovation is an essential part of the Imerys business strategy.

Process innovation increases the use efficiency of minerals or other resources, in particular enhancing the possibilities of reuse or recycling. The Monolithic Refractories division (Calderys) has been recycling materials reclaimed from the furnaces at its customers' sites (e.g., steel plants, cement plants, and glass plants). In the past, these materials were discarded as industrial waste by the customers. With the modification of Calderys' industrial and supply chain processes, these materials are now being recycled in large quantities to create new finished products.

Product innovation enables Imerys to serve its customers seeking environmentally friendly solutions. Imerys defines an environmentally friendly product as a product meeting one of the following criteria:

- **high efficiency:** a product reducing consumption of resources in the customer's process. For example, ImerVin Efficace is a higher density filter aid for wine that reduces wastes and increases filtration capacity;

- **eco-friendly alternative:** a product replacing existing solutions that are potentially harmful to human health or the environment. For example, Imercare™ Sheersilk is a natural mineral-based product to replace synthetic organics in bath and shower gels, shampoos, cosmetics, toothpaste, etc.;
- **positive footprint:** a product increasing recyclability or reducing overall environmental impact during a product's life cycle. For example, RO 40C (HiCal) is a new product manufactured for asphalt-based roof shingle from a third party certified post-industrial waste material.

At the end of each year, the Group's innovation network conducts a self-appraisal to determine the number of new products meeting the above criteria. In 2015, 18 out of 90 new products had environmental benefits meeting the criteria. After quantifying the existing information, the Group expects to have 25% projects with a benefit for environment in the innovation pipeline at the end of 2016.

For more information, [see section 1.8 of the 2015 Registration Document](#).

## 4.8 ENVIRONMENTAL REGULATORY COMPLIANCE

G4-DMA / G4-EN29

Environmental regulatory compliance issues are regularly assessed and managed as part of each operation's environmental management system. For more information, [see section 4.1 of the present Report](#).

Environmental-related prosecutions and penalties are also tracked with the SD data reporting system. The two tables below give a summary of those prosecutions and penalties for the past three years.

Number of prosecutions	2015	2014	2013
Total	13	9	20

Amount of fines (in €)	2015	2014	2013
Total	68,224	29,554	139,078

The main portion of the fines in 2015 were the result of two penalties (€58,400 in total): one was linked to a filing for an air permit in the United States, one was linked to an improper material storage in Greece, and the other was linked to the final closure of a waste disposal case identified in 2015 in Italy. These issues have been fully addressed by corrective actions.

## 5 GOVERNANCE AND BUSINESS BEHAVIORS

Sound governance is considered to be the cornerstone of the Group's management commitments. Striving to go beyond compliance with applicable laws and regulations, Imerys endeavors to conduct its activities ethically and transparently worldwide while preserving the best interests of its stakeholders.

### 5.1 CORPORATE GOVERNANCE

G4-51

With regard to corporate governance, Imerys follows the recommendations of the AFEF-MEDEF Corporate Governance Code applicable to French listed companies.

For more information regarding corporate governance (such as compositions of board of directors and executive management, compensation of senior management, and stock option), [see chapter 3 of the 2015 Registration Document](#); for more information regarding risk management and internal control, [see chapter 4 of the 2015 Registration Document](#).

### 5.2 COMPLIANCE AND BUSINESS ETHICS

G4-34 / G4-41 / G4-42 / G4-49 / G4-56 / G4-57 / G4-58 / G4-SO4 / G4-SO9

Imerys Code of Business Conduct and Ethics ("the Code") summarizes the principles of ethical behavior the Group expects from all of its employees (especially managers), contractors, suppliers, and other partners. The Code is designed to encourage everyone in his or her daily work to adopt an attitude that complies with local legislation and abides by the principles of accountability, integrity, and fairness. The umbrella principles set forth in the Code are supported by a series of policies and protocols applying to both the general conduct of Imerys and the individual conduct of each employee. The subjects covered by the Code include compliance with laws and regulations, protection of environment and human rights, relations with local communities and trade unions, workplace safety and health, diversity and equality, confidentiality, prevention of fraud or corruption, insider trading, conflicts of interest, protection of the Group's assets, fair competition, transparency, and integrity. The Code and the related policies and protocols are regularly reviewed and updated in order to take into account changes and developments in applicable international regulations, as well as best practices implemented by groups that are comparable to Imerys. In this context, the Code and the Anti-trust Policy were updated in 2015 to reflect the most recent developments and to enhance internal risk management. The Code and the policies are referenced in [section 1.2 of the present Report](#) and also published on the Group Intranet or internet which is accessible by all employees.

The enforcement of the Code and the relevant policies and protocols is supported with appropriate organization and review, training and communication, reporting, and control:

- **organization and review:** the Group's General Counsel is acting as Ethics and Compliance Officer for the Group. He is also assisted in this function by an Anti-trust and Compliance Legal Manager. For Brazil, India, China and South Africa, country Chairmen or coordinators have been appointed to ensure fulfillment locally of the Group's commitments. The Internal Control and Audit Department

conducts periodic reviews under the Code and other Group policies and protocols. The auditing results are presented half-yearly to the Executive Committee and, at the Board level, to the Audit Committee. In addition, the objectives and scope of the Group's general compliance program are regularly updated and a summary of its status, progress and results is presented every year to the Audit Committee as part of its annual review of the Group's main risks;

- **training and communication:** the Code is presented at in-house seminars (including Welcome Sessions organized to new joiners) and regularly featured in articles in Imerys News. On-site or online training sessions focusing on anti-fraud and anti-bribery, but also anti-trust and international trade restrictions, are regularly organized throughout the group by the members of Imerys' legal team, with the assistance from time to time of outside legal experts. In addition, compliance online training is regularly followed by all employees in the United States and at least once by all the other main managers and employees of the Group. In 2015, the available training tools cover the refreshed modules of the revamped Code and new policies;
- **reporting and control:** Imerys has established a simplified reporting process and clear "no-blaming" rules that empower its directors, officers or employees to report promptly to their board, manager or a representative of the Human Resources, Legal or Internal Audit Functions if they receive information or otherwise develop a good faith belief that a violation of the Code has occurred or is occurring. Material reported violations shall undergo prompt root cause investigations by Imerys. The Group Internal Audit and Control Director, the Vice-President of Human Resources and the Group General Counsel are informed of any reported violation. In 2015, several fraud cases were reported but without material financial impacts. Remedial actions have been taken for internal control.



The Code also requires that the Group respects high standard of transparency and integrity when engaging in public policy development through well-established and reputable trade

associations. The involvement with trade associations and the integration of social and environmental factors along the supply chain are described in [section 1.4 of the present Report](#).

## 5.3. TRANSPARENCY IN PAYMENTS TO GOVERNMENTS

### G4-EC1

In accordance with provisions of new article L. 225-102-3 of the French Code of Commerce, the Board of Directors approved on 11 February 2016 the terms of its report on payments greater than or equal to 100,000 Euros made in favor of governmental authorities by Group entities conducting activities in exploration,

prospecting, discovery, development or extraction of minerals. This report will be filled with the French Register of Commerce and available on the website of the Company ([www.imerys.com](http://www.imerys.com)) as per the conditions prescribed by the Law.

## 6 REPORTING METHODOLOGIES

G4-18 / G4-19 / G4-20 / G4-21 / G4-33

The content of the present chapter reflects broad consultation with both business divisions and corporate functions of the Group. The implementation of SD programs and projects has extensively engaged both internal and external stakeholders. The expectations of stakeholders have been incorporated into the development processes and relevant policies described in [section 1 of the present Report](#).

Imerys endeavors to align with the best practices of sustainability reporting for compliance with the French "Grenelle II" Law and the "core options" of the Global Reporting Initiative (GRI) G4 Guidelines. The SD key performance indicators are defined in accordance with the GRI standards and denoted in [section 7.2 of the present Report](#) or immediately following the non-quantitative disclosure in the relevant sections. The G4 disclosure references are also summarized in [section 7.4 of the present Report](#) and

marked at the beginning of each section. In addition, several other indicators have been tracked to reflect the "Grenelle II" framework and special stakeholder interests (e.g., EMS). The reason for any omission is clarified in the corresponding paragraphs of each aspect. The correlation table for each of the 42 elements of "Grenelle II" is presented in [section 7.3 of the present Report](#).

The Group's SD reporting covers all of the activities over which it exerts operational control. There are four protocols and pertinent guidelines of frequently asked question (FAQ) published at the Group level to regulate the collection and collation of human resources, health and safety, environmental and energy data from the Group's operations. The following is a list of reporting items, as well as their frequency, scope and collection systems.

Items	Frequency	Scope	System	Remarks
Human Resources	Monthly	All	Enablon	Contractors not managed by Imerys and performing non-core business tasks excluded; monthly headcount report
Health and Safety	Monthly	All	Symphony	Details of injury or illness were tracked with internal incident logs; monthly safety report
Energy, Emissions and Production	Monthly	All	Symphony	In accordance with the GHG Protocol with several minor exceptions; quarterly energy report
Other Environmental Data (compliance, EMS, water, waste)	Quarterly	All	Symphony	Commercial activities, sales and administrative offices, and projects on customers' sites excluded; quarterly environmental report
Land Use	Annually	Mines in Western Europe	Symphony	Underground mines excluded
Mine Safety Incident	When needed	All	Incident Logs	Monthly summary to Comex
Environmental Incidents	When needed	All	Incident Logs	Quarterly summary to Comex

The Group has also structured the processes for data consolidation and quality control to ensure the reliability and auditability of the reporting, including several layers of internal verifications. Under the new regulatory obligations stemming from the "Grenelle II" Law, the Group retains a third-party to verify its

sustainability reporting and compliance status. Ernst & Young provided the verification services for the 2015 reporting and issued the report in [section 7.1 of the present Report](#).

For more information, [consult www.imerys.com](http://www.imerys.com).



## 7 ATTESTATION AND CORRELATION TABLES

G4-32

### 7.1 ATTESTATION OF COMPLETENESS AND LIMITED ASSURANCE REPORT OF ONE OF THE STATUTORY AUDITORS

**ERNST & YOUNG et Associés****INDEPENDENT VERIFIER'S REPORT ON CONSOLIDATED SOCIAL, ENVIRONMENTAL AND SOCIETAL INFORMATION PRESENTED IN THE MANAGEMENT REPORT**

*This is a free translation into English of the original report issued in the French language and it is provided solely for the convenience of English speaking users. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.*

Year ended on December 31, 2015

To the Shareholders,

In our quality as an independent verifier accredited by the COFRAC<sup>(1)</sup>, under the number 3-1050 and as a member of the network of one of the Statutory Auditors of Imerys, we present our report on the consolidated social, environmental and societal information established for the year ended on 31 December 2015, presented in chapter 5 of the management report, hereafter referred to as the "CSR Information"<sup>(2)</sup>, pursuant to the provisions of the article L. 225-102-1 of the French Commercial Code (Code de commerce).

#### Responsibility of the Company

It is the responsibility of the Executive Board to establish a management report including CSR Information referred to in the article R. 225-105-1 of the French Commercial Code (Code de commerce), in accordance with the environment, energy, emissions and production, health and safety and human resources reporting protocols used by the Company (hereafter referred to as the "Criteria"), and of which a summary is included in the introduction of chapter 5.7 in the management report, and available on request at the Company's headquarters.

#### Independence and quality control

Our independence is defined by regulatory requirements, the Code of Ethics of our profession as well as the provisions in the article L. 822-11 of the French Commercial Code (Code de commerce). In addition, we have implemented a quality control system, including documented policies and procedures to ensure compliance with ethical standards, professional standards and applicable laws and regulations.

#### Responsibility of the independent verifier

It is our role, based on our work:

- to attest whether the required CSR Information is present in the management report or, in the case of its omission, that an appropriate explanation has been provided, in accordance with the third paragraph of R. 225-105 of the French Commercial Code (Code de commerce) (Attestation of presence of CSR Information);
- to express a limited assurance conclusion, that the CSR Information, overall, is fairly presented, in all material aspects, in accordance with the Criteria;

Our verification work was undertaken by a team of 4 people between October 2015 and the date of the signature of our report for an estimated duration of twenty weeks.

We conducted the work described below in accordance with the professional standards applicable in France and the Order of May 13, 2013 determining the conditions under which an independent third-party verifier conducts its mission, and in relation to the opinion of fairness and the reasonable assurance report, in accordance with the international standard ISAE 3000<sup>(3)</sup>.

#### 1. Attestation of presence of CSR Information

We obtained an understanding of the Company's CSR issues, based on interviews with the management of relevant functions, a presentation of the Company's strategy on sustainable development based on the social and environmental consequences linked to the activities of the Company and its societal commitments, as well as, where appropriate, resulting actions or programs.

We have compared the information presented in the management report with the list as provided for in the article R. 225-105-1 of the French Commercial Code (Code de commerce).

In the absence of certain consolidated information, we have verified that the explanations were provided in accordance with the provisions in article R. 225-105-1 paragraph 3, of the French Commercial Code (Code de commerce).

(1) Scope available at [www.cofrac.fr](http://www.cofrac.fr).

(2) CSR: Corporate Social Responsibility. In this Report, CSR is equivalent to Sustainable Development (SD).

(3) ISAE 3000 – Assurance engagements other than audits or reviews of historical information

We verified that the information covers the consolidated perimeter, namely the entity and its subsidiaries, as aligned with the meaning of the article L. 233-1 and the entities which it controls, as aligned with the meaning of the article L. 233-3 of the French Commercial Code (Code de commerce) with the limitations specified in the Methodological Note detailed in chapter 5.7 “of the management report.

Based on this work, and given the limitations mentioned above, we confirm the presence in the management report of the required CSR information.

## 2. Limited assurance on CSR Information

### Nature and scope of the work

We undertook about ten interviews with people responsible for the preparation of the CSR Information in the Sustainable Development and Environment Division and Human Resources Division, in charge of the data collection process and, if applicable, the people responsible for internal control processes and risk management, in order to:

- assess the suitability of the Criteria for reporting, in relation to their relevance, completeness, reliability, neutrality, and understandability, taking into consideration, if relevant, industry standards;
- verify the implementation of the process for the collection, compilation, processing and control for completeness and consistency of the CSR Information and identify the procedures for internal control and risk management related to the preparation of the CSR Information.

We determined the nature and extent of our tests and inspections based on the nature and importance of the CSR Information, in relation to the characteristics of the Company, its social and environmental issues, its strategy in relation to sustainable development and industry best practices.

For the CSR Information which we considered the most important<sup>(1)</sup>:

- at the level of the consolidated entity, we consulted documentary sources and conducted interviews to corroborate the qualitative information (organization, policies, actions, etc.), we implemented analytical procedures on the quantitative information and verified, on a test basis, the calculations and the compilation of the information, and also verified their coherence and consistency with the other information presented in the management report;
- at the level of the representative selection of entities that we selected<sup>(2)</sup>, based on their activity, their contribution to the consolidated indicators, their location and a risk analysis, we undertook interviews to verify the correct application of the procedures and undertook detailed tests on the basis of samples, consisting in verifying the calculations made and linking them with supporting documentation. The sample selected therefore represented about 10% of the total workforce and between 8% and 29% of the environmental quantitative information<sup>(3)</sup>.

For the other consolidated CSR information, we assessed their consistency in relation to our knowledge of the Company.

Finally, we assessed the relevance of the explanations provided, if appropriate, in the partial or total absence of certain information. We consider that the sample methods and sizes of the samples that we considered by exercising our professional judgment allow us to express a limited assurance conclusion; an assurance of a higher level would have required more extensive verification work. Due to the necessary use of sampling techniques and other limitations inherent in the functioning of any information and internal control system, the risk of non-detection of a significant anomaly in the CSR Information cannot be entirely eliminated.

## Conclusion

Based on our work, we have not identified any significant misstatement that causes us to believe that the CSR Information, taken together, has not been fairly presented, in compliance with the Criteria.

Paris-La Défense, the 16th of March 2016

Independent Verifier

ERNST & YOUNG et Associés

*French original signed by:*

Christophe Schmeitzky  
Sustainable Development Partner

Bruno Perrin  
Partner

(1) *Environmental Information: Sites covered by an ISO14001 or EMAS certification, Total energy consumption and by source, CO2 emissions related to energy consumption, Process CO2 emissions, Quantity of hazardous and non-hazardous waste produced (minimization, recycling and disposal), Water Withdrawals; Social and Safety Information : Total headcount and breakdown (geographical, by branch, by category and by gender), Age pyramid and seniority, Turnover and personnel management (recruitments and departures), Training hours, Frequency and Severity rate of lost-time accidents, Occupational Illnesses.*

(2) *Imerys Fused Minerals Villach GmbH (Austria), Imerys Marble – Marble Hill (USA), Kaolin Sandersville (three sub-operations, USA), Imerys Refractory Minerals Clerac (France), PAM Milos Operations (10 sub-operations, Greece), PAM Oberhausen Stollberg (Germany), Imerys TC Saint Geours (France), Calderys India Refractories Ltd – Katni (India), Almercia SA de CV (Mexico), Imerys Graphite & Carbon – Bodio (Switzerland).*

(3) *Coverage of the main environmental indicators: water -29%, energy -17%, waste -8%. The waste coverage rate was justified with an on-site audit at Imerys TC Saint-Geours (France), as more than 30% of the 2015 total waste was off-specification tile of Imerys TC.*



## 7.2 SUMMARY OF KEY PERFORMANCE INDICATORS

G4-10

Category	KPIs	Unit	2015	2014	Perimeter	GRI Ref.
<b>Social</b>						
<b>Safety and Health</b>						
Fatalities	Fatalities - Imerys Employees	#	1	1	Group	G4-LA6
	Fatalities - Other Employees <sup>(1)</sup>	#	0	0	Group	G4-LA6
Life-changing injuries <sup>(2)</sup>	Life-changing injuries - Imerys Employees	#	2	1	Group	G4-LA6
	Life-changing injuries - Other Employees	#	2	2	Group	G4-LA6
Frequency rates <sup>(3)</sup>	Imerys employees	/	1.27	1.05	Group	G4-LA6
	Other employees	/	1.40	0.70	Group	G4-LA6
	Combined rate (employees and other employees)	/	1.31	0.95	Group	G4-LA6
Severity rates <sup>(4)</sup>	Imerys employees	/	0.11	0.07	Group	G4-LA6
	Other employees	/	0.06	0.04	Group	G4-LA6
	Combined rate (employees and other employees)	/	0.10	0.06	Group	G4-LA6
Occupational illnesses	Occupational illnesses with lost time	#	7	0	Group	G4-LA6
	Occupational illnesses without lost time	#	6	2	Group	G4-LA6
<b>Human Resources</b>						
Workforce	Year-to-end total headcount on payroll	#	16,130	14,900	Group	G4-10
	Permanent employees	#	15,356	14,179	Group	G4-10
	Fixed-term contract	#	774	721	Group	G4-10
	Employees by region - Western Europe	#	6,722	5,799	Region	G4-10
	Employees by region - Central Europe	#	1,569	1,409	Region	G4-10
	Employees by region - North America	#	2,957	2,895	Region	G4-10
	Employees by region - South America	#	1,304	1,290	Region	G4-10
	Employees by region - Asia Pacific	#	3,154	3,086	Region	G4-10
	Employees by region - Africa	#	424	421	Region	G4-10
	Employees by function - Operations/Production/Manufacturing	#	10,588	9,832	Group	G4-10
	Employees by function - Logistics/Purchasing	#	729	623	Group	G4-10
	Employees by function - R&D/Geology	#	709	672	Group	G4-10
	Employees by function - Sales and Marketing	#	1,533	1,396	Group	G4-10
	Employees by function - Support and Administration	#	2,571	2,377	Group	G4-10
Hiring and Labor Relations	New Hiring	#	1,109	1,176		G4-LA1
	Rate of employee turnover	%	5.5	6.7	Group	G4-LA1
	Working hours lost due to strikes	Hours	352	1,063	Group	-
	Absenteeism rate	%	2.78	2.88	Group	G4-LA6
	Number of educational projects to assist workforce members, their families, or community members regarding serious diseases	/	18	16	Group	G4-LA8 G4-LA10 G4-SO1
	Number of employees who received training at least once in the reporting year	#	12,332	10,208	Group	G4-LA9
	Training hours	Hours	260,941	221,426	Group	G4-LA9
Diversity	Total percentage of women employees	%	17	16.7	Group	G4-LA12
	Number of employees with disability	#	220	198	Group	G4-LA12
<b>Communities</b>						
	Percentage of sites with a formal action plan managing the impacts of operations on communities	%	73	45	Group	G4-SO1

Category	KPIs	Unit	2015	2014	Perimeter	GRI Ref.
<b>Human Rights, Customers and Supplier Engagement</b>						
Human Rights	Total number of incidents of discrimination	#	0	0	Group	G4-HR3
	Percentage of employees under collective bargaining agreement	%	69	75	Group	G4-HR4
	Number of reported human rights violation	#	0	0	Group	G4-R12
Others	Percentage of ISO 9001 or Quality Management System certified operations	%	84	80	Group	-
<b>Environmental</b>						
<b>Management Systems</b>						
EMS	Percentage of operations with EMS <sup>(5)</sup>	%	100	100	Group	-
	ISO 14001 or EMAS <sup>(6)</sup> certified operations	#	106	81	Group	-
	Operations with Imerys 8-pillar EMS	#	147	131	Group	-
Regulatory Inspection	Number of prosecutions	#	13	9	Group	G4-EN29
	Amount of fines	€	67,568	29,554	Group	G4-EN29
<b>Resources Efficiency</b>						
Energy	Total energy consumption	TJ	32,870	34,859	Group	G4-EN3
	Electricity (net) and steam	%	29.3	28.4	Group	G4-EN3
	Natural gas	%	45.2	47.2	Group	G4-EN3
	Other fossil fuels	%	22.2	21.6	Group	G4-EN3
	Biomass	%	3.3	2.8	Group	G4-EN3
	Energy efficiency (base 100 in 2014)	#	98.7	100	Group	G4-EN6
GHG emissions	Scope 1 CO <sub>2</sub> emissions	kt CO <sub>2e</sub>	1,659	1,785	Group	G4-EN15
	Scope 2 CO <sub>2</sub> emissions	kt CO <sub>2e</sub>	1,047	1,030	Group	G4-EN16
	Total CO <sub>2</sub> emissions	kt CO <sub>2e</sub>	2,706	2,815	Group	G4-EN18
	CO <sub>2</sub> emissions from Energy (without biomass)	%	87.5	87.5	Group	G4-EN18
	CO <sub>2</sub> emissions from Processes	%	9.2	9.3	Group	G4-EN18
	CO <sub>2</sub> emissions from Biomass	%	3.3	3.2	Group	G4-EN18
	Carbon efficiency (base 100 in 2014)	#	98.5	100	Group	G4-EN19
Other air emissions	Sulfur dioxide (SO <sub>2</sub> )	Tons	3,796	3,947	Group	G4-EN21
	Nitrogen oxide (NO <sub>x</sub> )	Tons	5,999	5,822	Group	G4-EN21
Water	Total water withdrawals	M liters	40,062	36,128	Group	G4-EN8
	Water obtained from water suppliers	%	10.4	10.8	Group	G4-EN8
	Water withdrawn from ground water	%	53.5	55.4	Group	G4-EN8
	Water withdrawn from surface water	%	28.8	24.3	Group	G4-EN8
	Water obtained from other sources	%	7.3	9.5	Group	G4-EN8
	Number of sites located in a water-scarcity area	#	19	16	Group	G4-EN9
	Total water recycled	M liters	40,487	31,954	Group	G4-EN10
	Sites with recycled water reported	#	68	55	Group	-
Waste	Total Industrial Waste produced	Tons	203,706	281,654	Group	G4-EN23
	Non-recycled hazardous industrial waste	Tons	1,486	1,739	Group	G4-EN23
	Recycled hazardous industrial waste	Tons	1,964	1,434	Group	G4-EN23
	Non-recycled non-hazardous industrial waste	Tons	81,713	150,631	Group	G4-EN23
	Recycled non-hazardous industrial waste	Tons	118,543	127,850	Group	G4-EN23
<b>Biodiversity</b>						
	Surfaces disturbed by the Group's mining activities	Hectares	2,187	1,926	Region <sup>(7)</sup>	G4-MM1
	Surfaces rehabilitated	Hectares	1,197	1027	Region <sup>(7)</sup>	G4-MM1
	Number of sites identified as located in or near a high biodiversity value area	#	35	31	Group	G4-EN11
	Number of sites with a biodiversity management plan in place	#	10	8	Group	G4-EN11



Category	KPIs	Unit	2015	2014	Perimeter	GRI Ref.
<b>Green Innovation</b>						
	Number of green innovation products	#	18	-	Group	G4-EN29
<b>Governance</b>						
Corporate	Percentage of independent board members	%	50.0	40.0	Group	-
Governance and Business Ethics	Percentage of women in the board members	%	37.5	26.7	Group	-
<p>(1) Employees of a company under contract with Imerys, in charge of a specific operation on site or providing a service.</p> <p>(2) A "life-changing injury" refers to a serious injury with permanent impact to the victim, such as amputation and disability.</p> <p>(3) Frequency rate: (number of lost time accidents x 1,000,000)/number of hours worked.</p> <p>(4) Severity rate: (number of lost days x 1,000)/number of hours worked.</p> <p>(5) EMS: Environmental Management System. The number of sites required for EMS reporting exclude those divested, closed, newly acquired or newly constructed during the reporting period.</p> <p>(6) EMAS: Eco Management and Audit Scheme (European Standard).</p> <p>(7) The two land use indicators are only applied to the open mining operations in Western Europe.</p>						

## 7.3 CORRELATION TABLE WITH THE ELEMENTS OF “GRENELLE II”

1) Social information		Section
<b>Employment</b>	Total headcount and breakdown by gender, age and geographical zone	3.2.2 - Key Performance Indicators, p. 10
	New hires and Redundancies	3.2.2 - Key Performance Indicators - Employee moves, p. 12
	Compensation and its evolution	3.2.1 - Human Resources - Human Resources Principles & Main Areas of Action, p. 9
<b>Work organization</b>	Organization of working time	3.2.1 - Human Resources - Human Resources Principles & Main Areas of Action, p. 9
	Absenteeism	3.2.2 - Key Performance Indicators - Industrial and Social Relations p. 13
<b>Social relations</b>	The organization of social dialogue, notably information and consultation procedures for personnel and negotiation with the latter	3.2.2 - Key Performance Indicators - Industrial and Social Relations, p. 13
	Outcome of collective agreements	3.1 - Safety and Health, p. 7 3.4 - Human Rights, p. 14
<b>Health and safety</b>	Health and safety conditions at work	3.1 - Safety and Health, p. 7
	Outcome of agreements signed with trade union organizations or personnel representatives regarding occupational health and safety	3.1 - Safety and Health, p. 7
	Workplace accidents, notably their frequency and severity, as well as occupational illnesses	3.1 - Safety and Health, p. 7
<b>Training</b>	Policies implemented regarding training	1.2 - SD Charter and Policies, p. 2 3.1 - Safety and Health, p. 7 3.2.1 - Human Resources Principles & Main Areas of Action, p. 9 4.1 - Environmental Management Systems, p. 16
	Total number of training hours	3.2.2 - Key Performance Indicators - Training, p. 13
<b>Equal treatment</b>	Measures promoting gender equality	3.2.2 - Key Performance Indicators - Diversity, p. 12
	Measures promoting the employment and integration of people with disabilities	3.2.2 - Key Performance Indicators - Diversity, p. 12 3.3 - Community Relations, p. 13
	Policy against discrimination	1.2 - SD Charter and Policies, p. 2 3.2.1 - Human Resources Principles & Main Areas of Action, p. 9 3.4 - Human Rights, p. 14
<b>Promotion and compliance with the provisions of the fundamental conventions of the International Labor Organization relative to</b>	Freedom of Association and the Effective Recognition of the Right to Collective Bargaining	3.2.2 - Key Performance Indicators - Industrial and Social Relations, p. 13 3.4 - Human Rights, p. 14
	Elimination of Discrimination in Respect of Employment and Occupation	3.2.2 - Key Performance Indicators - Industrial and Social Relations, p. 13 3.4 - Human Rights, p. 14
	Elimination of all Forms of Forced and Compulsory Labor	3.4 - Human Rights, p. 14
	Effective abolition of child labor	3.4 - Human Rights, p. 14



2) Environmental Information		Section
<b>General environmental policy</b>	Organization of the Company to take into account environmental concerns, and, where applicable, environment-related assessment or certification initiatives	1.2 - SD Charter and Policies, p. 2 4.1 - Environmental Management Systems, p. 16
	Training and information towards employees on environmental protection	4.1 - Environmental Management Systems, p. 16
	Means devoted to the prevention of environmental risks and pollution	4 - Environmental Stewardship, p. 16
	Amount of the provisions and guarantees for environment-related risks, provided that this information would not be likely to cause the Company serious damage within the framework of on-going litigation	6.1.3 - Note 23.2 Other provisions, p. 198 6.1.3 - Note 28 Commitments, p. 219 2015 Registration Document
<b>Pollution and waste management</b>	Production, reduction or compensation measures for emissions into the air, water or ground and that seriously affect the environment	1.1 - Strategy Development and Material Issues Analysis, p. 1 4.1 - Environmental Management Systems, p. 16 4.2.2 - Energy Efficiency, p. 17 4.3 - Air Emissions, p. 19 4.4 - Water Scarcity and Efficiency, p. 20
	Waste prevention, recycling and reduction measures	4.5 - Waste, Overburden and Mineral Solids, p. 22
	Consideration of adverse noise pollution and any other forms of pollution specific to an activity	1.1 - Strategy Development and Material Issues Analysis, p. 1 4.1 - Environmental Management Systems, p. 16
<b>Sustainable use of resources</b>	Water consumption and water procurement on the basis of local constraints	4.4 - Water Scarcity and Efficiency, p. 20
	Consumption of raw materials and the measures undertaken to improve the efficiency of their usage	4.2.1 - Minerals Efficiency, p. 16 4.2.2 - Energy Efficiency, p. 17 4.4 - Water Scarcity and Efficiency, p. 20 4.7 - Green Innovation, p. 24
	Energy consumption, measures undertaken to improve energy efficiency and the recourse to renewable energies	4.2.2 - Energy Efficiency, p. 17
	Land use	4.6 - Biodiversity and Rehabilitation, p. 23
<b>Climate change</b>	Greenhouse gas emissions	4.3.1 - Carbon Emissions and Climate Change, p. 19
	Adaptation to the consequences of climate change	4.3.1 - Carbon Emissions and Climate Change, p. 19
<b>Biodiversity protection</b>	Measures undertaken to preserve or develop biodiversity	4.6 - Biodiversity and Rehabilitation, p. 23

3) Societal Information		Section
<b>Territorial, economic and social impact of the Company's activity</b>	in terms of local employment and regional development	3.2.2 - Key Performance Indicators, p. 10 3.3 - Community Relations, p. 13
	on local and surrounding communities	3.3 - Community Relations, p. 13
<b>Relations maintained with individuals or organizations interested in the Company's activity, notably integration associations, education institutions, environmental defense associations, consumer associations, and neighboring residents</b>	Conditions of dialog with these individuals or organizations	1.4 - Stakeholder Engagement, p. 3 3.3 - Community Relations, p. 13
	Philanthropic or sponsorship actions	1.4.2 - Corporate Sponsorship, p. 3 3.3 - Community Relations, p. 13
<b>Subcontracting and suppliers</b>	Integration of social and environmental criteria in the purchasing policy	1.4.3 - Customers and Suppliers, p. 3 3.4 - Human Rights, p. 14
	Importance of subcontracting and integration of CSR in the relationships with suppliers and subcontractors	1.4.3 - Customers and Suppliers, p. 3 3.1 - Safety and Health, p. 7 3.4 - Human Rights, p. 14
<b>Fair operating practices</b>	Actions implemented to prevent any kind of corruption	5 - Governance and Business Behaviors, p. 25
	Measures implemented to promote consumer health and safety	1.4.3 - Customers and Suppliers, p. 3 3.5 - Product Stewardship, p. 15
<b>Other actions promoting human rights</b>		3.4 - Human Rights, p. 14
		3.3 - Community Relations, p. 13



### 7.4 CORRELATION TABLE WITH THE GRI STANDARDS

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<b>GENERAL STANDARD DISCLOSURES</b>				
<b>Strategy and Analysis</b>				
G4-1	Statement from the most senior decision-maker of the organization about the relevance of sustainability to the organization and the organization's strategy for addressing sustainability	p. II	-	
G4-2	Description of key impacts, risks, and opportunities	p. 1	p. 96, 111	
<b>Organizational Profile</b>				
G4-3	Company name	Cover page	Cover page	
G4-4	Primary brands, products, and services	-	p. 5	
G4-5	Location of the organization's headquarters	Cover page	Cover page	
G4-6	Countries where the organization operates	-	p. 6	
G4-7	Nature of ownership and legal form	-	p. 56, 244	
G4-8	Markets served	-	p. 5	
G4-9	Scale of the organization	-	p. 6, 8, 33	
G4-10	Employment by contract type, gender...	p.10, 11, 12	p.120, 121, 122	
G4-11	Percentage of total employees covered by collective bargaining agreements	p. 31	p.140	
G4-12	Organization's supply chain	p. 3	p.112	
G4-13	Significant changes during the reporting period	-	p. 7	
<b>Commitments to External Initiatives</b>				
G4-14	Position regarding the precautionary approach or principle	p.16	p.125	
G4-15	Externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses	p.16	p.125	
G4-16	Memberships of associations and national or international advocacy organizations in which the organization participates	p.6	p.116	
<b>Identified Material Aspect and Boundaries</b>				
G4-17	All entities included in the organization's consolidated financial statements	-	p. 8	
G4-18	Process for defining report content, Aspect Boundaries and GRI Principles	p.1, 27	p.110, 135	
G4-19	All the material Aspects identified in the process for defining report content	p.1, 27	p.110, 135	
G4-20	Aspect Boundary within the organization for each material Aspect	p.1	p.110	
G4-21	Aspect Boundary outside the organization for each material Aspect	p.1	p.110	
G4-22	Effect and explanation of any restatements provided in previous reports	-	-	Not relevant
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	p.1	p.110	
<b>Stakeholder Engagement</b>				
G4-24	List of stakeholder groups engaged by the organization	p.1, 3	p.110, 112	
G4-25	Basis for identification and selection of stakeholders	p.1, 3	p.110, 112	
G4-26	Organization's approach to stakeholder engagement	p.1, 3	p.110, 112	
G4-27	Stakeholders' concerns	p.1, 3	p.110, 112	

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<b>Report File</b>				
<b>G4-28</b>	Reporting period	2015	2015	
<b>G4-29</b>	Date of most recent previous report	2014	2014	
<b>G4-30</b>	Reporting cycle	Annual	Annual	
<b>G4-31</b>	Contact point for questions regarding the report or its contents	Cover page	Cover page	
<b>GRI Content Index</b>				
<b>G4-32</b>	"In accordance" option chosen, GRI content index, reference to the External Assurance Report	p. 28, 33, 36	p. 136, 142	
<b>Assurance</b>				
<b>G4-33</b>	External assurance	p. 28	p. 136	
<b>Governance</b>				
<b>Governance Structure and Composition</b>				
<b>G4-34</b>	Governance structure of the organization	-	p. 56	
<b>G4-35</b>	Process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees	p. 1	p. 110	
<b>G4-36</b>	Positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body	p. 1	p. 77, 110	
<b>G4-37</b>	Processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics	p. 1	p. 110	
<b>G4-38</b>	Composition of the highest governance body and its committees	-	p. 57	
<b>G4-39</b>	The Chair of the highest governance body is also an executive officer	-	p. 77	
<b>G4-40</b>	Nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	-	p. 73	
<b>G4-41</b>	Processes for the highest governance body to ensure conflicts of interest are avoided and managed	-	p. 69	
<b>Highest Governance Body's Role in Setting Purpose, Value, and Strategy</b>				
<b>G4-42</b>	Highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts	p. 1	p. 110	
<b>Highest Governance Competencies and Performance Evaluation</b>				
<b>G4-43</b>	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics	-	-	Not available
<b>G4-44</b>	Processes for evaluation of the highest governance body's performance with respect to governance of economic, environmental and social topics	p. 1	p. 110	
<b>Highest Governance Body's Role in Risk Management</b>				
<b>G4-45</b>	Highest governance body's role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body's role in the implementation of due diligence processes	p. 1	p. 110	
<b>G4-46</b>	Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics	p. 1	p. 110	
<b>G4-47</b>	Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics	p. 2	p. 17, 111	



## SUSTAINABLE DEVELOPMENT

### Attestation and correlation tables

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<i>Highest Governance Body's Role in Sustainability Reporting</i>				
<b>G4-48</b>	Highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered	p. 1	p. 110	
<i>Highest Governance Body's Role in Evaluating Economic, Environmental and Social Performance</i>				
<b>G4-49</b>	Process for communicating critical concerns to the highest governance body	p. 25	p. 134	
<b>G4-50</b>	Nature and total number of critical concerns that were communicated to the highest governance body and the mechanism(s) used to address and resolve them	p. 25	p. 134	
<i>Remuneration and Incentives</i>				
<b>G4-51</b>	Remuneration policies for the highest governance body and senior executives	-	p. 79	
<b>G4-52</b>	Process for determining remuneration	-	p. 73, 81	
<b>G4-53</b>	Positions and actions regarding stakeholders' views about remuneration	-	p. 73, 81	
<b>G4-54</b>	Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country	-	-	Not available
<b>G4-55</b>	Ratio of percentage increase in annual total compensation for the organization's highest-paid individual in each country of significant operations to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) in the same country	-	-	Not available
<i>Ethics and Integrity</i>				
<b>G4-56</b>	Organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics	p. 25	p. 103, 134	
<b>G4-57</b>	Internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines	p. 14, 25	p. 124, 134	
<b>G4-58</b>	Internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines	p. 14, 25	p. 124, 134	
<b>SPECIFIC STANDARD DISCLOSURES</b>				
<b>ECONOMY</b>				
<i>Economic Performance</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	p. 38	
<b>G4-EC1</b>	Direct economic value generated and distributed	-	p. 8	
<b>G4-EC2</b>	Financial implications and other risks and opportunities for the organization's activities due to climate change	-	p. 96	
<b>G4-EC3</b>	Coverage of the organization's defined benefit plan obligations	p. 9, 10	p. 118, 120	
<b>G4-EC4</b>	Financial assistance received from government	-	-	Not relevant
<i>Market Presence</i>				
<b>G4-EC5</b>	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation	-	-	Not available
<b>G4-EC6</b>	Proportion of senior management hired from the local community at significant locations of operation	-	-	Not available

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<b>Indirect Economic Impacts</b>				
<b>G4-EC7</b>	Development and impact of infrastructure investments and services supported	-	-	Not available
<b>G4-EC8</b>	Significant indirect economic impacts, including the extent of impacts	-	-	Not relevant
<b>Procurement Practices</b>				
<b>G4-EC9</b>	Proportion of spending on local suppliers at significant locations of operation	-	-	Not available
<b>ENVIRONMENT</b>				
<b>Material</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 16	p. 126	
<b>G4-EN1</b>	Materials used by weight or volume	-	p. 146	
<b>G4-EN2</b>	Percentage of materials used that are recycled input materials	p. 17	p. 126	
<b>Energy</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 17	p. 127	
<b>G4-EN3</b>	Energy consumption within the organization	p. 18	p. 127	
<b>G4-EN4</b>	Energy consumption outside of the organization	-	-	Not available
<b>G4-EN5</b>	Energy intensity	p. 18	p. 127	
<b>G4-EN6</b>	Reduction of energy consumption	p. 18	p. 127	
<b>G4-EN7</b>	Reductions in energy requirements of products and services	p. 18	p. 127	
<b>Water</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 20	p. 130	
<b>G4-EN8</b>	Total water withdrawal by source	p. 21	p. 130	
<b>G4-EN9</b>	Water sources significantly affected by withdrawal of water	p. 21	p. 130	
<b>G4-EN10</b>	Percentage and total volume of water recycled and reused	p. 21	p. 130	
<b>Biodiversity</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 23	p. 132	
<b>G4-EN11</b>	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	p. 23	p. 132	
<b>G4-EN12</b>	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	p. 23	p. 132	
<b>G4-EN13</b>	Habitats protected or restored	p. 23, 31	p. 132, 141	
<b>G4-EN14</b>	Total number of IUCN red list species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	-	-	Not available
<b>Emissions</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 19	p. 128	
<b>G4-EN15</b>	Direct greenhouse gas (GHG) emissions (scope 1)	p. 19	p. 128	
<b>G4-EN16</b>	Energy indirect greenhouse gas (GHG) emissions (scope 2)	p. 19	p. 128	
<b>G4-EN17</b>	Other indirect greenhouse gas (GHG) emissions (scope 3)	p. 19	p. 129	
<b>G4-EN18</b>	Greenhouse gas (GHG) emissions intensity	p. 19	p. 129	
<b>G4-EN19</b>	Reduction of greenhouse gas (GHG) emissions	p. 19	p. 129	
<b>G4-EN20</b>	Emissions of ozone-depleting substances (ODS)	p. 1	p. 110	
<b>G4-EN21</b>	NOx, SOx, and other significant air emissions	p. 20	p. 129	



## SUSTAINABLE DEVELOPMENT

### Attestation and correlation tables

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<b>Effluents and Waste</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 22	p. 131	
<b>G4-EN22</b>	Total water discharge by quality and destination	-	-	Not available
<b>G4-EN23</b>	Total weight of waste by type and disposal method	p. 22	p. 131	
<b>G4-EN24</b>	Total number and volume of significant spills	-	-	Not relevant
<b>G4-EN25</b>	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel convention annex I, II, III, and VIII, and percentage of transported waste shipped internationally	-	-	Not relevant
<b>G4-EN26</b>	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff	-	-	Not available
<b>Products and Services</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 125	
<b>G4-EN27</b>	Extent of impact mitigation of environmental impacts of products and services	p. 15	p. 125	
<b>G4-EN28</b>	Percentage of products sold and their packaging materials that are reclaimed by category	-	-	Not available
<b>Compliance</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 24	p. 134	
<b>G4-EN29</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	p. 24	p. 134	
<b>Transport</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	-	Not available
<b>G4-EN30</b>	Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce	-	-	Not relevant
<b>Overall</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	-	Not available
<b>G4-EN31</b>	Total environmental protection expenditures and investments by type	-	-	Not available
<b>Supplier Environmental Assessment</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	-	Not available
<b>G4-EN32</b>	Percentage of new suppliers that were screened using environmental criteria	-	-	Not available
<b>G4-EN33</b>	Significant actual and potential negative environmental impacts in the supply chain and actions taken	-	p. 97	
<b>Environmental Grievance Mechanisms</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 16	p. 125, 126	
<b>G4-EN34</b>	Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms	p. 24	p. 133	
<b>SOCIAL</b>				
<b>Labor Practices and Decent Work</b>				
<b>Employment</b>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9	p. 118	
<b>G4-LA1</b>	Total number and rates of new employee hires and employee turnover by age group, gender and region	p. 10	p. 120	
<b>G4-LA2</b>	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	p. 10	p. 104, 120	
<b>G4-LA3</b>	Return to work and retention rates after parental leave, by gender	-	-	Not available

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<i>Labor/Management Relations</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9, 10	p. 118, 119	
<b>G4-LA4</b>	Minimum notice periods regarding operational changes, including whether these are specified in collective agreements	-	-	Not available
<i>Occupational Health and Safety</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 7	p. 116	
<b>G4-LA5</b>	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	p. 7	p. 116	
<b>G4-LA6</b>	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender	p. 7	p. 116	
<b>G4-LA7</b>	Workers with high incidence or high risk of diseases related to their occupation	p. 8	p. 118	
<b>G4-LA8</b>	Health and safety topics covered in formal agreements with trade unions	p. 7	p. 116	
<i>Training and Education</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9	p. 118	
<b>G4-LA9</b>	Average hours of training per year per employee by gender, and by employee category	p. 13	p. 122	
<b>G4-LA10</b>	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	p. 10	p. 27, 57, 104, 119	
<b>G4-LA11</b>	Percentage of employees receiving regular performance and career development Reviews, by gender and by employee category	-	-	Not available
<i>Diversity and Equal Opportunity</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9	p. 118	
<b>G4-LA12</b>	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	p. 12, 14	p. 121, 123	
<i>Equal Remuneration for Women and Men</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9	p. 118	
<b>G4-LA13</b>	Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation	-	-	Not available
<i>Supplier Assessment for Labor Practices</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15, 25	p. 124, 134	
<b>G4-LA14</b>	Percentage of new suppliers that were screened using labor practices criteria	-	-	Not available
<b>G4-LA15</b>	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	-	-	Not relevant
<i>Labor Practices Grievance Mechanisms</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15, 25	p. 124, 134	
<b>G4-LA16</b>	Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms	-	-	Not relevant
<i>Human Rights</i>				
<i>Investment</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 14	p. 124	
<b>G4-HR1</b>	Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	-	-	Not available
<b>G4-HR2</b>	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	-	-	Not available



## SUSTAINABLE DEVELOPMENT

### Attestation and correlation tables

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<i>Non-discrimination</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 14	p. 124	
<b>G4-HR3</b>	Total number of incidents of discrimination and corrective actions taken	p. 31	p. 140	
<i>Freedom of Association and Collective Bargaining</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 124	
<b>G4-HR4</b>	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights	-	-	Not available
<i>Child Labor</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 2, 5, 15	p.111, 114, 124	
<b>G4-HR5</b>	Operations and suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor	-	-	Not relevant
<i>Forced or Compulsory Labor</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 2, 15	p. 111, 124	
<b>G4-HR6</b>	Operations and suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor	-	-	Not relevant
<i>Security Practices</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	-	Not relevant
<b>G4-HR7</b>	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations	-	-	Not relevant
<i>Indigenous Rights</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 124	
<b>G4-HR8</b>	Total number of incidents of violations involving rights of indigenous peoples and actions taken	-	-	Not relevant
<i>Assessment</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 124	
<b>G4-HR9</b>	Total number and percentage of operations that have been subject to human rights reviews or impact assessments	-	-	Not available
<i>Supplier Human Rights Assessment</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 3	-	
<b>G4-HR10</b>	Percentage of new suppliers that were screened using human rights criteria	-	-	Not available
<b>G4-HR11</b>	Significant actual and potential negative human rights impacts in the supply chain and actions taken	-	-	Not relevant
<i>Human Rights Grievance Mechanisms</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15, 25	p. 124, 134	
<b>G4-HR12</b>	Number of grievances about human rights impacts filed, addressed, and resolved through formal grievance mechanisms	p. 31	p. 140	
<i>Society</i>				
<i>Local Communities</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 13	p. 123	
<b>G4-SO1</b>	Percentage of operations with implemented local community engagement, impact assessments, and development programs	p. 13	p. 123	
<b>G4-SO2</b>	Operations with significant actual and potential negative impacts on local communities	-	-	Not available
<i>Anti-corruption</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-SO3</b>	Total number and percentage of operations assessed for risks related to corruption and the significant risks identified	p. 25	p. 134	
<b>G4-SO4</b>	Communication and training on anti-corruption policies and procedures	p. 25	p. 134	
<b>G4-SO5</b>	Confirmed incidents of corruption and actions taken	p. 25	p. 134	

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<i>Public Policy</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-SO6</b>	Total value of political contributions by country and recipient/beneficiary	-	-	Not relevant
<i>Anti-competitive Behavior</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-SO7</b>	Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes	-	-	Not available
<i>Compliance</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-SO8</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	p. 24	p. 133	
<i>Supplier Assessment for Impacts on Society</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 3	-	
<b>G4-SO9</b>	Percentage of new suppliers that were screened using criteria for impacts on society	-	-	Not available
<b>G4-SO10</b>	Significant actual and potential negative impacts on society in the supply chain and actions taken	-	-	Not available
<i>Grievance Mechanisms for Impacts on Society</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 13, 25	p. 123, 134	
<b>G4-SO11</b>	Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms	-	-	Not relevant
<i>Product Responsibility</i>				
<i>Customer Health and Safety</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 125	
<b>G4-PR1</b>	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	-	-	Not relevant
<b>G4-PR2</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes	-	-	Not available
<i>Product and Service Labeling</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 15	p. 125	
<b>G4-PR3</b>	Type of product and service information required by the organization's procedures for product and service information and labeling, and percentage of significant product and service categories subject to such information requirements	p. 15	p. 125	
<b>G4-PR4</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes	-	-	Not available
<b>G4-PR5</b>	Results of surveys measuring customer satisfaction	-	-	Not available
<i>Marketing Communications</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	-	p. 32	
<b>G4-PR6</b>	Sale of banned or disputed products	-	-	Not relevant
<b>G4-PR7</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes	-	-	Not relevant
<i>Customer Privacy</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-PR8</b>	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	-	-	Not relevant
<i>Compliance</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 25	p. 134	
<b>G4-PR9</b>	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	-	-	Not available



## SUSTAINABLE DEVELOPMENT

### Attestation and correlation tables

General Standard Disclosures	Title	In this Report	In the Registration Document	Not relevant or not available
<b>SPECIFIC STANDARD DISCLOSURES FOR THE MINING AND METALS SECTOR</b>				
<b>ENVIRONMENT</b>				
<i>Biodiversity</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 23	p. 132	
<b>MM1</b>	Amount of land (owned or leased, and managed for production activities or extractive use) disturbed or rehabilitated	p. 31	p. 141	
<b>MM2</b>	The number and percentage of total sites identified as requiring biodiversity management plans according to stated criteria, and the number (percentage) of those sites with plans in place	p. 23	p. 132	
<i>Effluents and Waste</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 22	p. 131	
<b>MM3</b>	Total amounts of overburden, rock, tailings, and sludge and their associated risks	p. 22	p. 131	
<b>SOCIAL</b>				
<i>Labor Practices and Decent Work</i>				
<i>Labor/Management Relations</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 9, 14	p. 118, 124	
<b>MM4</b>	Number of strikes and lock-outs exceeding one week's duration, by country	p. 30	p. 139	
<i>Human Rights</i>				
<i>Indigenous Rights</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 14	p. 124	
<b>MM5</b>	Total number of operations taking place in or adjacent to indigenous peoples' territories, and number and percentage of operations or sites where there are formal agreements with indigenous peoples' communities	p. 13	p. 124	
<i>Society</i>				
<i>Local Communities</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 13	p. 123	
<b>MM6</b>	Number and description of significant disputes relating to land use, customary rights of local communities and indigenous peoples	-	-	Not relevant
<b>MM7</b>	The extent to which grievance mechanisms were used to resolve disputes relating to land use, customary rights of local communities and indigenous peoples, and the outcomes	-	-	Not relevant
<i>Emergency Preparedness</i>				
<b>G4-DMA (No specific indicator)</b>	Existence, preparation and content of emergency plans to community understanding of risks	p. 16	p. 125	
<i>Artisanal and Small-scale Mining</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 1	p. 110	
<b>MM8</b>	Number (and percentage) of company operating sites where artisanal and small-scale mining (ASM) takes place on, or adjacent to, the site; the associated risks and the actions taken to manage and mitigate these risks	-	-	Not relevant
<i>Resettlement</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 1	-	
<b>MM9</b>	Sites where resettlements took place, the number of households resettled in each, and how their livelihoods were affected in the process	-	-	Not relevant
<i>Closure Planning</i>				
<b>G4-DMA</b>	Generic Disclosure on Management Approach	p. 17, 23	p. 126, 132	
<b>MM10</b>	Number and percentage of operations with closure plans	p. 17	p. 126	

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