IMERYS	Policy	**Version No**: 1
	Human rights	

Basic information

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1. Objectives

As stated in the Imerys Code of Business Conduct & Ethics (the "Code"), the Group is committed to uphold and promote human rights to the highest standards of ethical and responsible conduct in alignment with the following principles and guidelines:

- Universal Declaration of Human Rights
- ILO Fundamental Conventions
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Voluntary Principles on Security and Human Rights

This Group Human Rights Policy details the framework and operation of the Group's human rights initiatives, outlining the roles and responsibilities of all associates in promoting and respecting human rights within Imerys operations across the globe. It is one of the policies supporting Imerys' Vigilance Plan[1] (for more information please refer to Imerys Universal Registration Document).

2. Scope

This policy applies to all Imerys Group directors, officers and employees of Imerys SA and all the legal entities of the Imerys Group (exclusively or jointly controlled by Imerys SA, directly or indirectly) in all jurisdictions where the Group operates, without prejudice to the application of stricter local regulations.

3. Definitions

- **Child labor:** As defined by International Labour Conventions, Child Labour refers to:
  - The employment of a child worker (under 15), and
  - A situation in which a young worker (15 - 18) is exposed to hazardous or night work.
- **Child Worker:** a child worker is a worker under the age of 15 (or the minimum age outlined in national law, whichever higher).
- **Discrimination:** Discrimination refers to unequal treatment of persons based on specific personal characteristics of any kind including gender, age, nationality, religion, sexual orientation, marital, parental and family status, ethnicity, disabilities, political or trade union affiliation.
- **Forced labor:** Forced labor refers to all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.
- **Human Right:** A human right is a right to which all human beings are entitled. These rights are internationally defined, recognised, and identified in international conventions. For purposes of implementing this policy, a human right shall be one recognised by the International Bill of Human Rights, or as otherwise identified or described in this policy or its relevant Related Documents.
- **Indigenous Peoples:** As outlined in the IRMA[2] guidance tool, an official definition of "indigenous" has not been adopted by the UN system due to the diversity of the world's indigenous peoples. Instead, a modern and inclusive understanding of "indigenous" includes peoples who: identify themselves and are recognised and accepted by their community as indigenous; demonstrate historical continuity with pre-colonial and/or pre-settler societies; have strong links to territories and surrounding natural resources; have distinct social, economic or political systems; maintain distinct languages, cultures and beliefs; form non-dominant groups of society; and resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. In some regions, there may be a preference to use other terms such as: tribes, first peoples/nations, aboriginals, etc. All such terms fall within this modern understanding of "indigenous."
- **International Humanitarian Law:** international humanitarian law (IHL) specifically regulates situations of armed conflict, which is why this body of law is also known as "the law of armed conflict" or "the law of war".

[1] In accordance with article L. 225-102-1 of the French Commercial Code, Imerys' Vigilance Plan sets out the reasonable measures of vigilance put in place within the Group to identify risks of and prevent severe impacts on human rights, fundamental freedoms, health and safety and the environment resulting from the activities of the Group, including all Group subsidiaries as defined in point II of article L. 233-16 of the French Commercial Code, as well as the activities of subcontractors and suppliers, in France and abroad, with which Imerys has an established commercial relationship, where such activities are linked to this relationship.

[2] IRMA: International Responsible Mining Association.

Its fundamental premise is that even in times of armed conflict human dignity must be respected and protected.

- **Site:** A Site is any Imerys Group location, with industrial and/or administrative purposes.
- **Stakeholder:** A person or a group of people who are directly or indirectly affected by an operation, such as rights holders, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This includes Interested Parties as defined by ISO 14001:2015 and 9001:2015.
- **Young Worker:** young workers are persons under 18 years of age, but above the minimum working age, who are engaged in work.

4. Governance

Every Imerys employee has a key role to play in preventing and detecting human rights, health and safety risks related to Imerys' operations and its Suppliers in his/her daily work.

The Ethics Committee is accountable for the design and monitoring of the duty of care program, which encompasses human rights, fundamental freedoms and health and safety risks. It reports on an annual basis to the Board of Directors' Audit Committee.

The Group Chief Human Resources Officer, the Group Chief Sustainability Officer and the Group Health and Safety Vice President are responsible for the design and implementation of measures to identify and mitigate risks within their respective scope. They are supported by designated internal teams.

5. Commitments and requirements to respect human rights

Imerys conducts its business in a manner that respects the human rights, fundamental freedoms and health and safety of all people, including its employees, contractors and suppliers, and the communities where it operates. This commitment is clearly stated in the Imerys Code, which summarizes the principles of ethical behaviour Imerys expects from all of its employees, suppliers, and other partners in line with the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and other international frameworks mentioned in the Objectives/References chapter of this document.

The present section describes Imerys' commitments with respect to human rights, fundamental freedoms and health and safety in its operations and in its supply chain. These commitments must be upheld by its employees at all times. In addition, Imerys requires its suppliers to comply with any local legislation which applies to human rights, as well as aligning with the Group's Code of Business Conduct and Ethics.

The minimum requirements expected from its Suppliers with respect to human rights, fundamental freedoms, health and safety of people involved in Suppliers' operations are detailed in the Imerys Supplier ESG standards.

• Forced Labor

As a global employer and purchaser of goods and services, Imerys does not tolerate forced labor or any acts of modern slavery, which are unlawful and are a violation of fundamental human rights, in its operations and that of its Suppliers. Imerys upholds the International Labor Organization Standard on Forced Labor. Imerys contributes to the elimination of all forms of forced labor and takes adequate steps to ensure that forced labor does not exist in Imery's operations, as defined in the Group's Forced Labor Policy. The Group's Forced Labor Protocol articulates the fundamental elements of Imerys' approach to eliminate the risk of Forced Labor and defines the requirements

for the identification, management mitigation, prevention and monitoring of this topic across Group operations. If local laws and regulations are less stringent, ILO standards shall prevail.

- **Child Labor**

Based on major ILO child labor conventions (Nos 138 and 182) and the United Nations Convention on the Rights of the Child (CRC), Imerys is committed to protecting the rights of children and preventing, eliminating and remedying any instances of child labor in its operations and that of its suppliers. Child labor refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work. The Group's Child Labor Protocol articulates the fundamental elements of Imerys' approach to eliminate the risk of Child Labor and defines the requirements for the identification, management mitigation, prevention and monitoring of this topic across Group operations. In particular, to prevent and reduce risks of child labour in its operations, Imerys implements operational requirements during the recruitment process and throughout the period of employment. For instance, all applications submitted by candidates below 15 years old must be rejected and applications of young workers (between 15 (or the minimum working age if it is higher) and 18 years old) must be flagged in order to ensure that the position they will occupy is non-hazardous.

- **Working Conditions**

Labor rights: at Imerys, we see the protection of labor rights, including the provision of fair wages, compensation, benefits and reasonable working hours, not only as part of a commitment to human rights but critical to the creation of a motivated and dedicated workforce.
The Group provides fair working conditions for its employees including terms and conditions of employment, remuneration, working hours, resting time and holiday entitlements, complying with all applicable legislation.
Imerys recognizes the necessity of occasional overtime for emergencies or heavy workloads, yet mandates its rigorous management to safeguard employee health, safety, and performance. As a consequence, overtime is managed to minimize incidents, overtime abuse, loss of productivity, health and safety risks and other issues and to also ensure employees are consistently and correctly compensated in compliance with local regulations.

Imerys has a specific set of Group Compensation and Benefits internal Policies, which set out the Group's commitment and the responsibilities of management and staff. We constantly strive to build fair, transparent, and constructive relationships with our employees and their representatives. The Group partners with Trade Unions and Personnel Representatives through various communication channels (meetings, committees, councils, and roundtables) to ensure a safe, healthy, and informed work environment.

Imerys also regularly engages with workers' representatives on working conditions and other relevant topics, which are outlined in the Group Industrial Relations Policy.
Social protection: All Imerys employees in countries covered by the Global Management System benefit from social protection. Harmonized coverage is ensured at all levels across the Group, aligning not only with local regulations, but also with market practices.

Freedom of association and collective bargaining: these are fundamental and enabling human rights that make it possible to promote democracy, sound labor market governance and decent conditions at work. Imerys recognises and respects the right of its workers to join or not join a union and to participate or not participate in collective bargaining without interference or fear of retaliation, and as such they are free to join an organization of their choice to represent them in line with local legislation, as stated on Imerys' Industrial Relations Policy. Where national law substantially restricts workers organizations, Imerys does not restrict workers from developing

alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. Imerys does not seek to influence or control these mechanisms.

- **Equal treatment and opportunities for all**

Diversity, Equity & Inclusion: the Group has a zero tolerance approach against discrimination and harassment. According to its Diversity and Inclusion Charter, Imerys strives to recognise, accept and value differences as an asset, fostering an inclusive environment based on mutual respect and dignity. Imerys promotes a culture based on mutual respect and appreciation and develops programs at global and local levels. The Group respects the principle of non-discrimination and equal opportunity and works to eliminate any barriers or unconscious biases. Imerys is committed to being an equal opportunity employer. The Group seeks to appoint the best person to the job irrespective of gender, race, disability, ethnicity, religious belief or sexual orientation. General principles and operational guidelines for fair recruitment are outlined within the Group's Recruitment Policy. Imerys aims for equal pay opportunities for both women and men in equal or similar roles that require similar levels of education and experience. In practice, the Position Evaluation system, defined in the Group's Compensation & Benefits Policy, establishes the extent to which there is comparable worth between positions so that equal pay can be provided for work of equal value.

Human capital development: Imerys aims to provide continuous learning to improve the skills and competencies of all employees globally. Such a development opportunity is a continuing process for every employee at every level of the organization, and formal training is one key element amongst several development opportunities. The Group ensures that training is made available on a fair basis and allocated in a transparent manner, based on business requirements and personal needs. Imerys has a specific Group's Learning Policy which clarifies the Group's commitment and the responsibilities of management and staff. Each training is implemented and performed in accordance with the respective national laws, in particular with respect to labor law, anti-discrimination laws and data protection requirements.

- **Communities economic, social and cultural rights**

Community support & development: Imerys commits to building a legitimate "social licence to operate" by developing an industrial activity only if it gains and maintains broad community support. The Group sees this as an essential foundation for its business activity. Imerys therefore aims to enter into dialogue and engage with key stakeholders in a spirit of transparency and good faith at all stages of site activities. Imerys recognises that proactive, inclusive, accountable, and transparent stakeholder engagement is more likely to result in optimal outcomes for both communities and the Group. The Stakeholder Engagement, the Community Grievance Mechanism and the Donations Policies establish the process for addressing stakeholder and community relations management in connection with Imery's activities.

Security arrangements: Imerys commits to respect human rights in its efforts to maintain the safety and security of its assets. The Group will not provide support[3] to public or private security forces that have been credibly implicated in the infringement of human rights, breaches of international humanitarian law or the excessive use of force in alignment with the Voluntary Principles on Security and Human Rights and the best practices expressed in the UN Basic Principles on the Use of Force and Firearms.

[3] Support includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to non-state armed groups or public or private security forces; it does not include legally required forms of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate.

Free, Prior and Informed Consent (FPIC): Imerys respects indigenous people's rights, as set out in the United Nations Declaration on the Rights of Indigenous peoples. Imerys is committed to engage with potentially impacted communities, to address potential impacts related to Group operations, and to instill an open dialogue that supports the development of positive and constructive relationships with affected indigenous peoples in a culturally appropriate manner.

Resettlement: As stated in the International Finance Corporation's (IFC) Performance Standard 5 on Land Acquisition and Involuntary Resettlement, Imerys commits to avoid involuntary resettlement[4], and when that is not possible, equitably compensate affected persons and improve the livelihoods and standards of living of displaced persons. If resettlement has occurred, the site monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been me

- **Health and Safety**

As stated in the Health & Safety Charter, health and safety are core values at Imerys. The Group implements high standards of health and safety management to ensure that its employees, contractors and visitors are not injured while working on or visiting Imery's premises and to comply with relevant legislations. Through continuous improvement, the Group aims to achieve an injury free workplace. Detailed operational requirements are described in the Imerys Safety Management System policies.

- **Personal Data Protection (Privacy)**

As stated in the Imerys Personal Data Protection Policy, Imerys is committed to high standards of personal data protection and values the trust any employee and stakeholder places in the Group when sharing their personal data with us. Protecting the confidentiality, availability and integrity of personal data is an essential responsibility that Imerys takes seriously at all times. To respect this commitment, Imerys has developed and implements a personal data protection program which complies with the General Data Protection Regulation[5] ('GDPR').

6. Risk mapping, assessment and main controls

In accordance with its obligations under the French law on Duty of care ("Devoir de Vigilance"), Imerys has established a Vigilance Plan, which includes a specific risk mapping process to identify, assess and prioritize, human rights health, safety and environmental risks within its operations and those of its subsidiaries, as well as those of its suppliers in different geographical areas ("duty of care risk mapping").

Within its operations, to mitigate and prevent these risks, Imerys implements high standards and strict rules in all Imerys operations across the globe. These standards and rules are expressed in the Imerys Code and in the

[4] Resettlement is considered involuntary when people do not wish to move but do not have the legal right to refuse land acquisition that results in their displacement. According to the International Finance Corporation, "This occurs in cases of (i) lawful expropriation or temporary or permanent restrictions on land use and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with seller fail."

[5] The General Data Protection Regulation ('GDPR') is the toughest privacy and security law in the world. Though it was drafted and passed by the European Union (EU), it imposes obligations onto organizations anywhere, so long as they target or collect data related to people in the EU.

Sustainability Charter, completed by policies and procedures. These include the policies and procedures mentioned in section 5 of the present policy. This framework defines clear requirements for all Imerys operations.

At the individual supplier level, Imerys regularly assesses its suppliers at the onboarding stage and throughout the business relationship, focusing on most-at-risk and strategic suppliers. The assessment at the onboarding stage includes a compliance due diligence procedure to decide whether or not to enter or renew a business relationship. In addition, Imerys' supplier panel above a certain spend is assessed through a sustainability rating scheme

With respect to its suppliers, prevention and mitigation measures are implemented as part of the Group responsible purchasing program and include: requirement to acknowledge Imerys Supplier ESG Standards, verification of alignment with the standards in case of doubt on compliance, supporting suppliers in improving sustainability performance, auditing most at risk suppliers, and in the case of reasonable suspicion of serious violations of standards suspension or termination of commercial relationship.

If despite the controls listed above, there is a suspicion of any incident related to human rights, fundamental freedoms and health and safety, Imerys shall take immediate action to investigate the situation and correct it at the earliest possible moment.

7. Monitoring and evaluation of control measures' effectiveness

The verification of compliance with this Policy and related procedures is conducted through various internal assessment processes at both local and group level. Such processes are led by different functions within the Imerys organization, including but not limited to Human Resources, Legal, Sustainability, Health and Safety, and Internal Control.

The Group regularly evaluates the effectiveness of its control measures and undergoes an annual independent sustainability assessment to identify areas for improvement.

8. Reporting and investigating misconducts

Enabling stakeholders, internal and external, to safely voice concerns and having the infrastructure and support in place to hear and deal with those concerns is a cornerstone of good governance and is the core of Imerys' Code.

Imerys' has implemented a whistleblowing system, "Speak up!", which enables reporting via internal channels, via the employee's manager, HR, or other functions, or directly via a dedicated digital platform Speak up!. The fundamental elements of the whistleblowing system are defined in the **Group Whistleblowing Policy** accessible on www.imerys.com.

Imerys' digital alerts system, operated by an independent qualified third party and open to all employees and external parties enables the reporting of any suspected violations of the Code. Reports can be made either by telephone or via the Speak up! platform. Both telephone and web platform reporting are available in all main Imerys languages 24 hours per day, seven days per week.

Based on the facts presented in all preliminary reports, Imerys assigns an investigative team of trained and experienced in-house professionals in the relevant fields to conduct the investigation. The investigative team collects and reviews documents, conducts interviews, inspects locations and performs any other tasks necessary to come to a conclusion about the allegations in the report. Imerys encourages its employees and stakeholders to

share any information believed to represent a violation of the Code. Communication and awareness-raising campaigns on the Speak up! system are conducted to ensure that information on Speak up! is well known and that the information is visible externally on the Imerys Website. Accordingly, Imerys and its employees shall take no action in retaliation against any person for making a good faith report or participating in an investigation under the alert system policy.

The Imerys Community Grievance Mechanism is another system for external stakeholders to voice their concerns and grievances, including potential violations of the Imerys Code, directly at site level.

9. Awareness, Training & Update

Awareness and training are essential to effectively embed business ethics in employees' day-to-day activities. To ensure awareness of employees at all Imerys sites, a printed copy of the Code is available and posters promoting the Imerys alert system 'Speak Up!' are displayed at all sites. The onboarding program for new hires includes mandatory ethics and compliance training modules, covering the Code. Every year, Imerys deploys a mandatory refresher training campaign on the Code for all connected employees, who are asked to commit to the principles set out in the Code, including the respect of human rights.

The Group Human Rights-related policies are available to all Imerys's employees and communication and training is rolled-out through a range of communication and learning channels.

This policy is updated regularly.

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