MODERN SLAVERY REPORT 2025

This joint report (the "Report") is prepared on behalf of Imerys Canada Inc., Imerys Graphite & Carbon Canada Inc., Imerys Minerals Limited and their respective affiliates.

The Report outlines the actions taken by the Imerys Group, including these legal entities, to prevent and reduce the risk of modern slavery (forced labour, child labour, and human trafficking) in Imerys' business and supply chains in the year ended December 31, 2025. It is made pursuant to the *Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*, the *United Kingdom's Modern Slavery Act 2015* and the *California Transparency in Supply Chains Act of 2010 (SB 657)*.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

As the world's leading supplier of mineral-based specialty solutions for the industry, Imerys offers high value-added and functional solutions to a wide range of industries and fast-growing markets such as solutions for the energy transition and sustainable construction, as well as natural solutions for consumer goods. To support this, Imerys operates 153 industrial sites, including 71 mines, across 33 countries. In 2025, the Group employed 12,342 employees across 40 countries. The Group serves 23,000 customers in more than 145 countries, with 2025 revenues of €3,384 million distributed across Europe, the Middle East and Africa (48%), the Americas (33%), and Asia Pacific (19%). More information on Imerys is available on its website (imerys.com).

Imerys draws on its understanding of applications and its technological knowledge and expertise in material science to deliver innovative solutions by beneficiating its mineral resources or creating synthetic minerals and formulations. Imerys contributes essential properties to its customers' products and their performance, including heat resistance, hardness, conductivity, opacity, durability, purity, lightness, filtration, adsorption or water repellency. As an enabler of tomorrow, Imerys pursues ambitious targets in terms of Environment, Social and Governance (Sustainability) to achieve responsible growth over time.

Imerys respects the world in which it operates. It is committed to play a role in society, to meet its obligations to the countries and communities within which it does business, and to act as responsible environment stewards and thereby contribute to a long-term sustainable development.

Imerys sources various types of products and services, which are classified internally within the following purchasing categories: raw materials, mining, energy, transport, packaging, chemicals, industrial services and general services. Imerys' supply chain is global, with suppliers geographically distributed across Europe, the Middle East, Africa, the Americas, and Asia Pacific, reflecting the worldwide footprint of its 153 industrial sites.

CODE OF BUSINESS CONDUCT & ETHICS, POLICIES AND PROTOCOLS

Imerys respects internationally recognized human rights and standards, in particular the International Bill of Human Rights, the Guidelines of the Organization for Economic Co-operation and Development (OECD), the provisions of the fundamental conventions of the International Labor Organization (ILO) and the UN Guiding Principles on Business and Human Rights. Imerys conducts its business in a manner that respects the human rights and dignity of all people, including its employees, contractors and suppliers, and the communities where it operates. In

particular, Imerys is fully engaged to take effective measures to eradicate modern slavery, including forced labour, child labour and human trafficking.

This commitment is clearly stated in the **Imerys Code of Business Conduct and Ethics** (the "Code"), which summarizes the principles of ethical behaviour that Imerys expects from all of its employees, suppliers, and other partners. 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, health and safety, diversity, equity and inclusion, confidentiality, prevention of fraud, prevention of corruption, insider trading and conflicts of interest, protection of the Imerys' assets, fair competition, transparency and integrity. The Code is a "living document", regularly reviewed and updated under the supervision of the Imerys Ethics Committee, in order to take into account internal and external changes and developments in applicable international regulations. This Code, introduced by the Imerys CEO, and translated into 21 languages, applies to all Imerys employees, Imerys controlled joint ventures and partners with whom Imerys does business. It is available on Imerys' website.

Specific policies and procedures support the Group commitment to eradicate modern slavery. Protocols on Forced Labour and Child Labour have been in place at Imerys since 2009. They were last reviewed and updated respectively in December 2023 and January 2024. The Recruitment Policy, last updated in 2024, includes a requirement that recruitment fees incurred for external recruitment have to be fully covered by Imerys and never by the candidate. Working with a recruitment agency that asks the candidate to cover partially or fully the recruitment fees during the recruitment process is also prohibited. The Industrial Relations Policy, last updated in 2024, recognises 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 their freedom to join an organization of their choice to represent them in line with local legislation. In 2025, Imerys published a comprehensive **Human Rights Policy** (available on Imerys' website) that aligns with the principles of ethical behaviour set out in the Imerys Code. The policy outlines Imerys' commitment to respecting human rights throughout its operations and supply chain. This policy consolidates key elements of other policies and protocols in areas such as forced labour, child labour, working conditions, and freedom of association.

All Imerys employees can access the Code either on site or on the Group intranet and they receive regular communication and training. All Group policies and procedures are also available on the Imerys intranet.

Finally, as Imerys expects its suppliers to adhere to the same principles as those set out in its Code, it launched in 2018 its Supplier Environmental, Social and Governance Standards (Supplier ESG Standards), based on its Code and Sustainability Charter (available on Imerys' website) and aligned with Imerys' SustainAgility ambition. They are available in 23 languages. The Supplier ESG Standards, which must be acknowledged and complied with, are applicable to all suppliers and form an important part of Imerys' Purchasing Policy. With regards to human rights related matters, the suppliers are required to:

- Respect internationally proclaimed human rights of all employees, contractors, and third-party employees as well as the communities in which they live.
- Prevent child labour in full accordance with the ILO conventions including on the age limits and type of work permitted.
- Eliminate all forms of forced, compulsory labour and human trafficking in full accordance with the ILO conventions.
- Comply with any local legislation which applies to human rights.

RISK MAPPING AND DUE DILIGENCE PROCESS

Risk mapping

In accordance with its obligations under the French law on Duty of Care ("*Devoir de Vigilance*"), Imerys has established a Vigilance Plan (see Imerys' Universal Registration Document on Imerys' website). This plan includes a specific risk mapping process to identify, assess and prioritize, human rights, health, safety and environmental risks (including child labour, forced labour and human trafficking) within its operations and those of its subsidiaries, as well as those of its suppliers in different geographical areas ("duty of care risk mapping"). In 2023 and 2024, the duty of care risk mapping methodology was revised and the risk map was updated. In 2025, the risk map was not updated, in the absence of a triggering event. More information is available in the Imerys' Universal Registration Document on Imerys' website.

Risk assessment and controls

Imerys assesses its operations and the situation of its suppliers taking into account, *inter alia*, the duty of care risk maps developed through the risk management process.

Imerys operations

Imerys assesses human rights, health and safety and environmental risks identified in relation to its operations as a result of the duty of care risk mapping. The 2023 and 2024 updates are in line with past risk maps and indicate that potential risks include health and safety, environment, climate change and some specific human rights topics.

To mitigate and prevent these risks, Imerys implements high standards and strict rules in all Imerys operations across the globe. These are expressed in the Imerys Code and in the Sustainability Charter, completed by policies and procedures, including the forced labour and child labour protocols. This framework defines clear requirements for all Imerys operations:

- To prevent and reduce risks of forced labour in its operations, Imerys sites are all required to follow applicable local laws and regulations, prevailing labour relations and employment practices and international labour standards (including those regarding forced labour requirements). If local laws and regulations are less stringent, ILO standards shall prevail.
- 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.

Implementation of Imerys' policies and procedures are the responsibility of all business and support functions.

Imerys suppliers

Based on the duty of care risk mapping process described previously, Imerys has identified potential salient human rights, health, safety and environmental risks within its value chain. When mapping risks at group level in 2023, Imerys did not identify the risks of child labour and forced labour as part of the three salient types of risks. Following the assessment of each purchasing category, for all the human rights, health, safety and environmental scenarios

assessed, the “most-at-risk” supplier category is considered the raw material supplier category related to the supply of talc, bauxite and mica.

- **Supplier assessments & verifications**

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. This procedure has been applied to the existing most-at-risk suppliers above a certain spend.

In addition, Imerys’ supplier panel above a certain spend is assessed through a third party independent sustainability rating scheme (e.g. Ecovadis). Imerys utilizes and leverages EcoVadis as a key tool for evaluating the sustainability performance of its suppliers and to drive continuous improvement of the supply chain. At the end of 2025, 75% of Imerys suppliers by spend have been assessed. These assessments cover over 1600 suppliers and represent all categories of Suppliers.

Imerys implements prevention and mitigation measures that cover, *inter alia*, the risk of child labour, forced labour and human trafficking. In particular:

- suppliers are required to acknowledge and comply with the Imerys Supplier ESG Standards (the “Standards”) and the Supplier EHS Policy. Suppliers are excluded from contracting if they cannot achieve minimum ESG (environment, social (including occupational health and safety) and governance) requirements, as outlined in the Standards;
- in case of doubt on compliance with the Standards, Imerys may verify suppliers’ alignment with the Standards through the use of self-declaration, self-assessments, or assessments by Imerys teams;
- Imerys purchasing process are based on objective supplier selection criteria (including ESG performance) for contract awarding, with the goal of ensuring fair treatment and opportunity;
- Imerys is fully committed to support suppliers’ development and continuous improvement and has a supplier development process in place, which includes information and trainings for suppliers on how to build capacity and improve sustainability performance as well as access to sustainability benchmarks against peers;
- suppliers must be able to demonstrate that they can meet the minimum criteria and where any gaps are identified, through formal or informal assessments or audits, suppliers must be willing to develop and implement a corrective action plan within an agreed timeframe;
- in the case Imerys has a reasonable suspicion that a supplier is directly committing a serious violation of the Standards, or sourcing from any party committing a serious violation of the Standards, Imerys may suspend or terminate the relationship with the supplier, without any liability toward the supplier.

- **Supplier Audits**

Imerys conducts audits focusing on suppliers ranked as “most-at-risk” based on the Group risk mapping and assessment process described above. In specific cases Imerys may conduct additional due diligence or specialized external third-party audits prior to or after contract award. For high-risk raw materials where EcoVadis assessments are not yet available, independent on-site audits are conducted to gain a comprehensive understanding of operations and ensure alignment with Imerys sustainability standards.

Within the most-at-risk category of raw material suppliers, the purchasing organization has launched an audit program with both internal and external auditors. Internal auditors have been trained and completed SA8000 Social

Accountability[1] Auditing training. External third-party audits are conducted by certified auditors against SA8000 Standard. In 2025, seven new audits were carried out on targeted most-at-risk suppliers, in addition to the two audits carried out in 2024 and the five audits carried out in 2023.

- **Supplier certification**

By acknowledging and complying with Imerys Supplier ESG Standards, Imerys suppliers effectively certify that they comply with all applicable laws and regulations, in particular those relating to child labour, forced labour and human trafficking.

REMEDIATION AND INTERNAL ACCOUNTABILITY

If despite the controls listed above, there is a suspicion of any incident of child labour, forced labour or human trafficking in its operations or supply chain, Imerys takes immediate action to investigate the situation and correct it at the earliest possible moment.

In 2025, Imerys has not identified any incidents of child labour, forced labour or human trafficking in its operations. It therefore did not need to take any measures to remediate such incidents. In cases where potential incidents were suspected in its supply chain, Imerys ensured that corrective action plans were designed and that the suppliers concerned undertook to implement them in a timely manner to immediately mitigate the risk, remediate it and prevent its re-occurrence. Imerys monitors action plans to ensure their effective implementation, including through additional on-site audits.

Imerys maintains internal accountability standards and procedures for employees or contractors failing to meet Group standards.

AWARENESS AND TRAINING

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. The last refresher campaign took place in Q4 2025. On the Imerys learning platform, Connected employees can also access sustainability focused courses from the UN Global Compact Academy as well as Group organized training and awareness raising sessions on Human Rights based on the UN Guiding Principles. These sessions aim to support employees identify and address potential risks to human rights in their areas of responsibility.

In addition, Imerys buyers are trained on key aspects of the sustainable purchasing program to support its implementation, recognize risks and develop mitigation actions. 78% of buyers were trained on sustainability topics in 2025.

[1] The SA8000 Standard is an auditable certification standard that measures the performance of companies in eight areas of social accountability in the workplace: child labour, forced labour, health and safety, free association and collective bargaining, discrimination, disciplinary practices, working hours and compensation. https://sa-intl.org/programs/sa8000/.

MONITORING AND EVALUATION OF CONTROL MEASURES' EFFECTIVENESS (KPIs)

The verification of compliance with the Code and other policies and protocols 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, Mining and Resources Planning and Internal Audit & Control. More information is provided in Imerys Universal Registration Document.

In addition, the Group assesses its sustainability policies, actions and results annually through a comprehensive independent sustainability assessment, sharing the results with internal and external stakeholders.

To measure the effectiveness of Imerys' actions, Imerys maintains key performance indicators (KPIs) relevant to the prevention and mitigation of modern slavery risks. In particular, the Group monitors KPIs related to supplier assessments, supplier audits, workers and buyers training, severe human rights incidents and whistleblowing reports.

ALERT SYSTEM

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' "Speak up!" system enables reporting via internal channels, via the employee's manager, HR, or other functions, or directly via a dedicated digital platform Speak up!. 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. The fundamental elements of Imerys' alert system and the measures to protect whistleblowers are defined in the Group Whistleblowing Policy. This policy explains the alert system's governance (who establishes, manages and supervises the system), its main operational steps (how to report aligned violations or questionable conduct and how Imerys responds to a report) and its core principles to ensure confidentiality and protection of whistleblowers. 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. For more information on the Imerys Alert mechanism Speak up!, see www.imerys.com.

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.

ATTESTATION

Canada

The Report was approved pursuant to subparagraph 11(4)(b) of the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (the "Act") by the Board of Directors of Imerys Canada Inc.

In my capacity as a Director of Imerys Canada Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Imerys Canada Inc.

jim.murberger@imerys.com jim.murberger@imerys.com (May 27, 2026 13:31:17 EDT)

James MURBERGER, Director

Date: 05/27/2026

The Report was approved pursuant to subparagraph 11(4)(b) of the Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (the "Act") by the Board of Directors of Imerys Graphite & Carbon Canada Inc.

In my capacity as a Director of Imerys Graphite & Carbon Canada Inc., and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Imerys Graphite & Carbon Canada Inc.

florian.danthez@imerys.com florian.danthez@imerys.com (May 27, 2026 18:32:32 GMT+2)

Florian DANTHEZ, Director

Date: 05/27/2026

United Kingdom

This Statement was approved by the Board of Directors of Imerys Minerals Limited

Paul Welsh

Paul WELSH, Director

Date: 05/27/2026