



**IMERYS MINERALS LIMITED, IMERYS ALUMINATES LIMITED, IMERYS PCC UK LIMITED, IMERYS BRITISH LITHIUM**

## **MODERN SLAVERY STATEMENT**

As the world's leading supplier of mineral based speciality solutions for the industry, Imerys offers high value-added and functional solutions to a wide range of industries and fast growing markets, including solutions for green mobility and sustainable energy, sustainable construction and natural solutions for consumer goods.

The Group draws on its understanding of applications, technological knowledge and expertise in material science to deliver solutions by beneficiating its mineral resources, synthetic minerals and formulations. Imerys' solutions contribute essential properties to customers' products and their performance, including heat resistance, hardness, conductivity, opacity, durability, purity, lightness, filtration, absorption and water repellency.

Imerys respects the world in which it operates. Imerys is committed to playing a role in society, beyond meeting its obligations to the countries and communities in which it does business. Imerys aims to foster positive changes and unlock better futures.

## **LABOUR PRACTICES AND WORKING CONDITIONS**

In 2016, Imerys became a signatory member of the United Nations Global Compact (UNGC) and has committed to supporting and basing its business approach on the 10 Principles of the UNGC derived from the Universal Declaration of Human Rights.

The Group Code of Business Conduct and Ethics (the "Code") spells out the fundamental principles and shared commitments to ethical behaviour, including respect of human rights and labour practices. The Code applies to all Imerys employees, including those of its subsidiaries, as well as Imerys' business partners. Managers at Imerys have a particular responsibility to ensure its daily application because of their roles and responsibilities with regard to Group operations. The Code is available on Imerys' website.

Imerys is fully committed to taking effective measures to end discrimination and to eradicate child labour and forced labour.

Compliance with the Code and policies on human rights and labour practices, including preventing child labour and forced labour, is included within due diligence assessment for new projects and new business relations (mergers, acquisitions, joint ventures) and within the scope of internal auditing missions for the Group existing activities. Policies on prohibition of forced labour and child labour have been in place since 2009. They were last reviewed and updated respectively in December 2023 and January 2024.

## CODE OF BUSINESS CONDUCT AND ETHICS

The Imerys Code of Business Conduct and Ethics) summarises the principles of ethical behaviour the Group expects from all its employees, suppliers, and other partners. It also embeds Imerys' Purpose Vision and Values. The umbrella principles set forth in the Code are supported by a series of policies and procedures applying to both the general conduct of Imerys and the individual conduct of each employee. The subjects covered by the Code include, but are not limited to, compliance with laws and regulations, protection of the environment and human rights, relations with local communities and trade unions, health and safety, diversity, equity and inclusion, confidentiality, prevention of fraud, corruption, insider trading, and conflicts of interest, lobbying activities, non retaliation for good faith reporting, protection of the Group's assets, fair competition, transparency, and integrity.

The Code is a "living document", reviewed and updated annually, under the supervision of the Ethics Committee, in order to take into account internal and external changes and developments in applicable international regulations. The Code, introduced by the Group CEO, and translated into 21 languages, applies to all Imerys employees, Imerys controlled joint ventures and partners with whom Imerys does business.

## RESPONSIBLE PURCHASING

Imerys believes that high standards in all environmental, social and governance areas are essential for all of its business operations across the globe. Imerys expects its suppliers to adhere to the same principles as elaborated within the Group Code and Sustainability Charter. It launched in 2018 its Supplier Environmental, Social and Governments Standards (Supplier ESG Standards), based on its Code and Sustainability Charter (available on Imerys' website) and aligned with Imerys' SustainAgility ambition. The Supplier ESG Standards, which must be acknowledged and complied with, are applicable to all suppliers and form an important part of the Group Purchasing policy since 2018.

### *Health and safety standards*

More specifically, with regards to health and safety, the suppliers are required to:

- Comply with all applicable occupational health and safety regulations;
- Implement a health and safety management system in line with recognised international standards;
- Comply with applicable Imerys occupational health and safety policies and procedures for any works being undertaken by suppliers on Imerys sites;
- Identified, assessed and mitigated all health and safety hazards to as low as reasonably practicable;
- Take the necessary actions to prevent accidents, work related injuries and occupational illnesses;
- Ensure that all workers exposed to specific health and safety hazards received effective and appropriate training;
- Provide the workers under supplier's responsibility with the appropriate personal protective equipment.

### *Human right-related supplier standards*

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 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.

## **RISK MANAGEMENT PROCESS**

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 (including forced labour and child labour), 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”*). In 2023 and 2024, the duty of care risk mapping methodology was revised and the risk map was updated. More information is available in the Imerys’ Universal Registration Document on Imerys’ website.

## **ASSESSMENT AND MAIN CONTROLS**

The Group 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 and Group subsidiaries assessments and main controls*

The Group assesses human rights, health and safety and environmental risks identified as a result of the duty of care risk mapping. This assessment includes identification, analysis and ranking processes. The duty of care risk map indicates that potential risks include health and safety, environment, climate change and some specific human rights topics. The 2023 and 2024 updates are in line with past risk maps. To mitigate and prevent these risks, Imerys implements high standards and strict rules relating human rights, health and safety and the environment (amongst other themes) in all Group operations across the globe. These standards and rules are expressed in the Imerys Code of Business Conduct and Ethics and in the Sustainability Charter, completed by policies and procedures. This framework defines clear requirements for all Group 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 Group policies and procedures are the responsibility of all business and support functions. The effectiveness of these control measures is regularly assessed as part of the Duty of Care risk mapping process. 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.

## *Imerys Suppliers Assessments*

Based on the Duty of Care risk mapping process described previously, the Group 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 forced labour or child 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. At the individual Supplier level, the Group regularly assesses its Suppliers at the onboarding stage and throughout the business relationship, focusing on most-at-risk and strategic Suppliers.

The individual Supplier assessment process comprises:

- The assessment of Suppliers at the onboarding stage. The process is defined in the Group purchasing policy. It includes a Suppliers’ compliance due diligence procedure to decide whether or not to enter or to renew a business relationship with a Supplier. The procedure takes into account the duty of care risk mapping and Supplier’s sustainability rating (e.g. Ecovadis score). This procedure has been applied to the existing most-at-risk Suppliers above a certain spend.
- The assessment of Imerys’ Supplier panel above a certain spend through a sustainability rating scheme (e.g. Ecovadis). The Group Sustainable Purchasing Director is in charge of designing and monitoring the deployment of this process.

At the end of 2024, 70% of Group Suppliers by spend have been assessed. These assessments cover over 1699 Suppliers and represent all categories of Suppliers, including over 98% of raw material Suppliers by spend.

## *Imerys Suppliers risk prevention and mitigation measures*

The Group implements prevention and mitigation measures, in particular:

- Suppliers are required to acknowledge and comply with the Group Imerys Supplier ESG Standards and the Supplier EHS Policy; Suppliers are excluded from contracting if they cannot achieve minimum ESG (environment, social, including occupational health and safety) requirements as outlined in our ESG Supplier Standards;
- In case of doubt on compliance with Imerys Supplier ESG Standards, Imerys may verify the alignment of Suppliers with the Supplier ESG Standards through the use of self-declaration, self-assessments or assessments by Imerys teams;
- 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 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 Supplier, without any liability towards the Supplier;

- The Group conducts audits focusing on Suppliers ranked as 'most-at-risk' based on the Group risk mapping and assessment process described above. In specific cases the Group may conduct additional due diligence or specialised external third-party audits prior to or after contract award;
- Imerys buyers are trained on key aspects of the responsible purchasing programme to support its implementation, recognise risks and develop mitigation actions. 70% of buyers were trained on sustainability topics in 2024.

Within the most-at-risk category of raw material Suppliers, the purchasing organisation has launched an audit programme with both internal and external auditors. Internal auditors have been trained and completed SA8000 Social Accountability Auditing training. External third party audits are conducted by certified auditors against SA8000 Standard.

In 2024, two new audits were carried out on targeted most-at-risk suppliers, in addition to the five others already carried out in 2023.

## **REMEDIATION MEASURES**

If despite the controls listed above, there is a suspicion of any incident of forced labour or child labour, Imerys shall take immediate action to investigate the situation and correct it at the earliest possible moment. In particular, if a child is found working directly or indirectly for Imerys, an immediate, strong and fair remediation system to end the situation without putting the child at risk is implemented.

In 2024, Imerys has not identified any incidents of forced labour or child labour in its operations or supply chain. It therefore did not need to take any measures to remediate an incident of forced labour or child labour.

## **ALERT SYSTEM AND PROTECTION OF WHISTLEBLOWERS**

Enabling stakeholders, both 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. The Group's "Speak up!" system enables reporting via internal channels, via the employee's manager, human resources or other functions, or directly via a dedicated digital platform [Speak Up!](#). The Group's digital alert system, operated by an independent qualified third party and open to all employees and external parties, can be used to report any suspected violations of the Group Code. Reports can be made either by telephone or via the Speak up! web platform. Both telephone and web platform reporting are available in main Imerys languages 24 hours per day, seven days a week.

Based on the facts presented in preliminary reports, the Group assigns an investigative team of trained and experienced in-house professionals in the relevant fields to conduct the investigation, supported by external experts where appropriate. The investigation team collects and reviews documents, conducts interviews, and performs any other tasks necessary to reach 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.

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. 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](http://www.imerys.com). The policy covers all geographies where the Group operates, all of its activities and all violations or possible violations the Group Code, policies and procedures or applicable laws and regulations. Communication and awareness-raising campaigns on the Speak up! system are conducted within the Group and information is accessible externally on the Group website.

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.

## **MONITORING AND EVALUATION OF THE EFFECTIVENESS OF CONTROL MEASURES**

Verification of compliance with the Group Code and other Group policies and procedures is conducted through various internal assessment processes at both local and Group level. Such processes are led by different functions within the Group organisation, including but not limited to Legal, Sustainability, Health and Safety, Mining and Resources Planning and Internal Control as described in the Universal Registration Document.

Statement approved by the Directors of Imerys Minerals Limited

**Imerys Minerals Limited - financial year ended on 31st December 2024**