

Modern Slavery Act Statement

Introduction from the Chairman

The Company and the wider group of which it is a part are committed to improving our practices to combat slavery and human trafficking.

Organisation's structure

TiZir Limited is a limited company incorporated in England & Wales. The ultimate parent entity of the Company is Eramet SA. Eramet SA is a limited company incorporated in France and is a leading global producer of alloying metals, particularly manganese and nickel and high-performance special steels and alloys, used in industries such as aerospace, power generation and tooling. The Eramet Group (which includes Eramet SA and TiZir Limited) employs approximately 13,000 people in 20 countries with a global turnover of €3,553m in 2020. Eramet SA is part of Euronext Paris Compartment A and is listed on the MSCI index.

Our business and our supply chains

TiZir Limited is a vertically integrated zircon and titanium business which owns the Grande Côte mineral sands mine in Senegal and the TiZir Titanium and Iron ilmenite upgrading facility in Norway.

Grande Côte Operations (GCO) (a subsidiary of TiZir Limited) is the Company's sole supplier of Zircon. The largest end-use of zircon is in the manufacturing of ceramic tiles, sanitary ware (such as toilets, baths and sinks) and tableware (such as plates and tea cups). GCO produces a high-quality Zircon product which the Company uses in high-end investment casting and sand casting, refractory bricks for steel and glass production and the production of zirconium metal which is used as a casing for heat exchangers, evaporators and reactor vessels.

GCO is also the Company's sole supplier of Titanium feedstocks. The TiZir Titanium and Iron ilmenite upgrading facility in Norway takes GCO ilmenite and separates the TiO₂ from less valuable minerals in the sand to create high-TiO₂ titanium slag and high purity pig iron.

Our policies on slavery and human trafficking

The Company is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Our Human Rights Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Adopted by the Eramet Group in 2019, the group's Human Rights Policy incorporates internationally recognised human rights into the commitments made by the Eramet Group on its salient issues and classified into three areas:

- respecting the Human Rights of employees, in order to guarantee a safe, healthy and respectful work environment;

- respecting the Human Rights of commercial partners (customers, suppliers, subcontractors and partners), in order to develop a responsible value chain;
- respecting the Human Rights of communities, by reducing impacts and striving to make a positive contribution.

The group Human Rights Policy, to which the Company and GCO is subject, is available at www.eramet.com.

Due diligence processes for slavery and human trafficking

As a responsible economic player, the Eramet Group has established a structure to address new challenges in the value chain. Two dedicated committees (The Responsible Purchasing Committee and The Responsible Sales Committee as detailed below), stemming from the Ethics Compliance Committee, meet on a quarterly basis to manage the responsible value chain approach, both upstream and downstream of [all of] the Eramet Group's operations [including those of its subsidiaries]. In particular, the Eramet Group's Responsible Value Chain approach covers all matters relating to CSR – in particular, corruption and influence peddling, the violation of human rights and fundamental freedoms, violation of the health and safety of individuals, damage to the environment, as well as the CSR and ethical situation of suppliers and subcontractors of these third parties.

The Responsible Purchasing Committee includes members of the Ethics and Compliance Department, the Sustainability and Corporate Engagement Department, the Legal Department and the Purchasing Department, including a Supplier Performance Coordinator, with specific responsibility for CSR matters.

The Responsible Sales Committee is made up of members of the Sales Department, the Legal Department, the Ethics and Compliance Department and the Sustainability and Corporate Engagement Department. The Committee oversees the gradual implementation of the Eramet Group's CSR and ethical commitments to customers, as set out in the Eramet Group's Ethics Charter.

Supplier adherence to our values

The Eramet Group believes that all of its commercial partners must share the same principles and values, and is committed to promoting internationally recognized Human Rights throughout its value chain. The Eramet Group actively communicates with its customers, suppliers, subcontractors and partners in order to inform them of the principles herein, which are wholly applicable to them, as well as establishing due diligence mechanisms for its partners and business relationships, in order to identify, prevent and mitigate any Human Rights violations that may arise.

To ensure all those in the Company's supply chain and contractors comply with our values we have in place a Suppliers Code of Conduct at a Group level, which sets out expectations with regard to suppliers, subcontractors and service providers primarily in three main areas: Human Rights and working conditions, environment and products, and good business practices. Further, our primary supplier GCO is subject to the Eramet Group's policies and Tizir Limited has placed a representative of the Company on the board of GCO to ensure compliance.

The Eramet Groups Suppliers' Code of Conduct is available at www.eramet.com.

Training

Employee awareness is critical for anchoring the Human Rights approach. Accordingly, the Eramet Group has developed an e-learning training, which certain employees (such as directors, purchasers and those in our CRS and Safety sectors) are required to undergo, to ensure that Group employees have a better grasp of the notion of Human Rights, understand its challenges for businesses and identify risks as well as vigilance best practices. Modern slavery, particularly as regards the issue of child labour, is addressed in this e-learning.

Each board member of the TiZir board of directors has undertaken e-learning training on Human Rights.

Our effectiveness in combating slavery and human trafficking

We currently use the training resource as a KPI in combating slavery and human trafficking, more specifically, the record of attendees to the training resource.

We do not intend to take any further steps or measures to review the effectiveness of the steps taken to ensure there is no slavery or human trafficking in our supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Eramet Group's slavery and human trafficking statement for the financial year ending 2021.

It was approved by the board on July, 7 2021.

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Charles NOUËL
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Chairman of the meeting