

MINING SECTOR POLICY

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1. INTRODUCTION

In the frame of its Corporate Social Responsibility policy, and as a signatory of the Principles for Responsible Banking, the Group (as defined in 2.2 of this sector policy) intends to take into account the environmental, social (E&S) and governance issues associated with all its activities, to better control its impact and promote good practices, with an objective of continuous improvement.

The Group published E&S general principles which define the overall framework of its E&S risk management system for the responsible conduct of its banking and financial activities. Within this framework, transversal statements addressing issues common to all sectors have been developed, as well as sector policies where the Group looks more specifically into certain sectors identified as sensitive from an E&S standpoint and in which it plays an active role.

The Mining sector has been identified as one such sector.

The Group provides a range of banking and financial products and services to the Mining sector. Exploitation of natural resources plays a key role in supporting economic development in many countries, and in particular in developing and emerging ones. The Group recognizes the importance of the E&S risks and impacts associated with these activities. Mining may impact local communities and take place in remote locations, vulnerable environments, and countries with weak governance systems. In addition, the use in the economy of the extracted natural resource may have environmental impacts. On the other hand, mining activities are also set to play an important role in the energy transition as critical minerals will be needed to develop a low emission and digital economy.

The Group is willing to remain a value-adding partner to its clients in the Mining sector, while ensuring that such support is provided in a responsible and considered manner. This is why the Group aims for the highest E&S standards when considering the provision of banking and financial products and services to the Mining industry.

2. SCOPE

2.1. Geographical scope

This sector policy is applicable worldwide.

2.2. Scope of the Group's activities

This sector policy applies to Societe Generale and all consolidated companies over which it exercises exclusive control (together, the "Group").

It applies to the following banking and financial products and services: credit, debt and equity markets, guarantees and advisory activities.

2.3. Scope of sector activities

This sector policy covers the following activities and client companies owning mining assets involved in them:

- Exploration.
- Mines planning and development (including associated facilities).
- Mines operation.
- Mines closure and rehabilitation.

- On-site processing of extracted ores.

3. MINING SECTOR ESG RISKS

A non-exhaustive list of potential E&S and governance risks considered by Societe Generale in its risk management framework is provided in the E&S general principles.

When evaluating corporates' activity in the Mining sector, particular attention will be paid to the following risks:

- Impacts on natural habitats, and areas protected for biodiversity or cultural considerations.
- Increased access to previously remote areas (which can result in impacts by third parties such as clearance of forest, or conflict with local communities).
- Development of deep-sea mining technologies.
- Greenhouse Gases (GHG) emissions.
- Impact on the water security of local communities. The use of large volumes of water, particularly in dry environments, could reduce the availability and/or quality of water for downstream users and fisheries. Inadequate tailings management, direct riverine or submarine tailings disposal or the risk of acid mine drainage can all pose a threat to the quality of the local water supply.
- Impact on the health and safety of local communities due to air emissions, increased disease risks, increased exposure to disasters (e.g., from poor management of tailings dams, from erosion or subsidence) including from collateral environmental pollutions and safety risks (such as from truck traffic and associated road constructions).
- Impact on the livelihood of the local population, due to loss of habitations or assets, resettlement away from traditional means of living, restricted access to previously available resources (such as access to fisheries, farmland or forest resources) or activities (economic resettlement, typically of squatters and artisanal miners).
- Impact on land rights as a result of forced relocation, a poorly managed expropriation process, or as a result of involuntary resettlement.
- Inadequate financial provisions for rehabilitating mine sites after closure.
- Impact on workers' health and safety in the absence of robust emergency preparedness and health or safety management (e.g., high accident rates).
- Impact on workers' rights, particularly regarding vulnerable workers. Migrant workers are often to be considered vulnerable as a group more likely to be subject to bonded or forced labour conditions.
- Risks of forced or child labour.
- Inadequate access to remedy for impacted rightsholders, including workers and affected communities (with particular attention to vulnerable people among them).
- Impact on indigenous peoples' rights, such as a lack of free, prior and informed consent where applicable, violent or forced removal from ancestral lands, and damage to sites that form the basis of the identity of these groups.
- Impacts on the security of the local population, where operations take place in an area of social conflict and/or the mine deploys armed forces for security purposes. The risk of contributing to heightened social tensions is marked in countries with a history of conflict, a weak regulatory framework, and high levels of corruption.

In addition, governance risks are managed as part of the Know Your Customer (KYC) and other Compliance processes to

guarantee alignment of the Group with applicable laws and regulations, including exclusions based on international sanctions.

4. SECTOR SPECIFIC E&S STANDARDS AND INITIATIVES

The Group requests its clients to comply with the laws and regulations of each relevant country or region while encouraging them to apply the following E&S standards and initiatives.

A number of institutions, business associations of the Mining industry, and other civil society organizations have developed standards and initiatives¹ addressing the E&S impacts resulting from the sector activities. The standards and initiatives listed below provide guidance for Societe Generale E&S assessment framework in the Mining sector:

- The [IFC Performance Standards](#) and [World Bank Group Environmental, Health and Safety Guidelines](#) applicable to the Mining sector.
- The ten principles and related position statements of the [International Council on Mining & Metals](#) (ICMM).
- The regulations of mining activities adopted by the [International Seabed Authority](#) (ISA).
- The [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)², and mineral-specific initiatives relying on or consistent with this framework (such as the [International Tin Supply Chain Initiative](#) (ITSCI), the [Conflict-Free Gold Standard](#) of the [World Gold Council](#) or the [Kimberley Process Certification](#) for diamonds).
- The [Extractive Industries Transparency Initiative](#) (EITI).
- The [Voluntary Principles on Security and Human Rights](#) (2000), the [UN Declaration on the Rights of Indigenous People](#) (2008).
- The [EU Conflict Minerals Regulation](#).
- The [FAO Voluntary Guidelines on the responsible governance of Tenure of Lands, Fisheries and Forests](#).

New regulations and voluntary standards will be developed in the future. The Group will closely follow these developments, use them as references in implementing its Mining sector policy and update it if necessary.

5. IMPLEMENTATION PROCESS

While it is incumbent on the Group's clients to manage the E&S risks associated with their operations and to comply with the applicable E&S laws and regulations, the Group evaluates, for its part, the consistency of their activities with the Group's E&S commitments.

The Group's E&S general principles set out the main features and implementation processes of the Group's E&S risk management system. The Group decisions are based on public information, information made available by its clients or from external data providers. The Group shall make its reasonable endeavors to ensure the quality and reliability of this information but accepts no liability whatsoever in connection with any such information.

¹ These standards and initiatives may take the form of conventions, directives, standards, recommendations or guidelines...

² While the OECD Due Diligence Guidance has been developed for downstream companies to monitor their supply chain, part of the framework is directly applicable to upstream companies such as Annex II.

Three types of application criteria have been defined:

The **E&S exclusion criteria** are intended to exclude certain types of corporates, dedicated transactions or services or financial products from the Group's activities.

The **E&S priority evaluation criteria** are criteria for which an analysis is requested as part of the evaluation process. For client's evaluation, if the relevant criteria are not fulfilled, a positive evolution from the company current practices is expected in a limited and reasonable timeframe and can be formalized through action plans or contract clauses. For dedicated transactions on projects, alignment with the criteria is expected as part of the project development; for dedicated advisory services ahead of a project's development, the client's commitment to develop the project according to these criteria is evaluated.

The **other E&S evaluation criteria** aim to identify the other risk factors of the sector, that will also be considered as part of the evaluation, and also to specify the best practices that the Group wishes to encourage.

These E&S criteria are applicable:

- in a proportionate manner based on the importance of the E&S risks inherent to the clients' activities and to the underlying activities related to dedicated transactions, products and services; and
- in any jurisdiction in which the Group operates to the extent not contradictory to provisions of any applicable local law, rule, regulation or regulatory guidance or directive in such jurisdiction.

The results of the evaluation regarding the different criteria will provide evidence for decision-making process to the Group. The Group will only work with clients within the implementation scope of the policy who meet or aim at meeting the applicable E&S criteria.

Based on an objective, risk-based and individualized assessment, the Group reserves the right to refuse to provide banking or financial products or services to any client or not to participate in certain transactions following this assessment, even if the exclusion criteria defined in this sector policy do not apply. The Group may also require additional actions or engage in an additional due diligence process before concluding on the acceptability of a client or a transaction.

Any deviation from this policy may be granted, on an exceptional basis, by a Societe Generale group oversight committee chaired by senior management.

6. APPLICATION CRITERIA OF THE POLICY

Based on the analysis of the initiatives listed in Section 4. and of best practices of multilaterals and other financial institutions, the Group has defined the following E&S criteria which are incorporated into its decision-making process when considering provision of banking and financial products and services in the Mining sector.

In addition:

- Client companies with uranium mining activities (and related dedicated transactions, products and services) fall in the scope of Societe Generale Civil Nuclear Power sector policy.
- Client companies with thermal coal extraction activities (and related dedicated transactions, products and services) fall in the scope of Societe Generale Thermal Coal sector policy.

Applicable criteria of these sector policies will be used in addition to the criteria listed below.

6.1. Client criteria

Exclusion criteria

The Group will not provide new financial products or services to:

- Any company involved in asbestos mining.
- Any corporate entity³ involved in Mountaintop removal coal mining in the Appalachians.
- Any company which makes direct use of child or forced labour, as defined in the associated International Labour Organisation (ILO) Conventions.

The Group will not enter into a new relationship with:

- Any company with more than 50% of their revenue linked to metallurgical coal extraction.
- Any artisanal and small-scale mining⁴ company with regard to financial services.

Priority evaluation criteria

When conducting a corporate E&S assessment of a client involved in this sector, the Group considers the following criteria:

- Whether the client company has E&S risks measures in place, commensurate to its impacts, and addressing in particular:
 - Workers' Health, safety and working conditions.
 - Tailings management.
 - Impacts on biodiversity.
 - Impacts on human rights, with specific consideration of child and forced labour as defined in the International Labour Organization (ILO) Conventions, and, where applicable, management of impacts on indigenous people.
 - Engagement with local stakeholders.
- When operating in conflict-affected and high-risk areas, whether the client company has implemented measures to ensure responsible management of the relationships with public or private security forces.

Other evaluation criteria

When conducting a corporate E&S assessment of a client involved in this sector, the Group also considers the following criteria:

- When operating in conflict-affected and high-risk areas, whether the client company discloses material payments to local governments and authorities (including taxes, royalties or license fees), taking into account confidentiality undertakings.
- Whether the client company analyses the Human rights impacts and risks of its providers, contractors and subcontractors.
- When involved in operations affecting indigenous peoples, and in the circumstances prescribed by IFC Performance Standard 7, whether the client company implements a Free, Prior and Informed Consent (FPIC) consultation process.

³ Corporate entity directly operating or owning coal mining assets.

⁴ Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing and transportation. ASM is normally low capital intensive and uses high labour-intensive technology (OECD definition).

In addition, Societe Generale encourages its clients to join best practice initiatives of the Mining sector for E&S risk management, such as:

- The ICMM.
- The EITI to support transparency and good governance.
- The Voluntary Principles on Security and Human Rights.
- Mineral-specific sustainability initiatives where applicable.

6.2. Acquisition transactions, products and services criteria

Exclusion criteria

The Group will not provide financial transactions, products and services aiming at the sale or acquisition of metallurgical coal mining or asbestos mining assets.

6.3. Dedicated transactions, products and services criteria

Exclusion criteria

The Group will not provide dedicated financial transactions, products and services when the underlying activities are:

- Metallurgical coal extraction activities.
- Asbestos mining activities.
- Infrastructures primarily linked to metallurgical coal extraction or asbestos mining.
- Artisanal and small-scale mining activities.
- Mines disposing any type of mining waste into rivers or into shallow water (epipelagic zone) of natural water bodies, lakes and marine bodies.
- Development, construction or expansion of mining activities involving forced or child labour, as defined in the associated International Labour Organization (ILO) Conventions.
- In the circumstances prescribed by IFC Performance Standard 7, development, construction or expansion of mining activities for which the Free, Prior, and Informed Consent (FPIC) of affected Indigenous peoples has not been obtained.
- Development, construction or expansion of mining activities with a footprint overlapping areas where Indigenous Peoples are known to live in voluntary isolation.
- Development, construction or expansion of mining activities located within a UNESCO World Heritage Site, a Ramsar site, a nationally protected area (IUCN categories I-IV) or a site of the Alliance for Zero Extinction.
- Any operation with material adverse impacts on the Outstanding Universal Value of a UNESCO World Heritage Site.

Priority evaluation criteria

When conducting an E&S assessment of a dedicated transaction, products or service in this sector, the Group considers the following criteria:

E&S risk management

- For mines located outside high income OECD countries, whether the IFC Performance Standards and World Bank Group EHS Guidelines for Mining are complied with, when applicable.

Environmental impacts

- Where cyanide is used, whether its use is consistent with the principles and standards of practice of the [International Cyanide Management Code](#).
- Where mining waste disposal into natural water bodies not excluded by the exclusion criteria above is relied upon, whether a third-party alternative assessment has been conducted which concludes that there is no environmentally and socially sound land-based alternative and that this solution is the best available practice considering the local environment.
- When the activities associated with the transaction or service are located within, or with potential material impacts on Key Biodiversity Areas or protected areas, whether a third-party assessment of the potential impacts on biodiversity and related ecosystem services has been carried out. The assessment will have demonstrated that:
 - The client is implementing a mitigation strategy which prioritizes efforts to prevent or avoid adverse impacts to biodiversity, then to minimize and reduce those effects, to repair or restore them, and finally to offset or compensate them, with a view to achieving no net loss, and preferably gain, of biodiversity.
 - Adequate consultation of local population and other stakeholders, where relevant.

For activities located within, or with potential material impacts on a protected area, if the exclusion criteria are not triggered, evidence is provided that the development is legally permitted and consistent with any regulatory management plans for such area.

- For new mines, whether a commitment has been made by the client to engage in site restoration at closure and post-closure phases.
- For development, construction or expansion of mining activities located in a water stressed area, whether water management mitigation measures have been developed to minimise water use and impact on water availability for other users.

Social impacts

- For development, construction or expansion of mining activities involving a significant involuntary resettlement due to land acquisition or restrictions on land use, whether the client operates in compliance with IFC Performance Standard 5.
- Whether a health and safety management plan (including tailings management consideration where relevant), has been developed.
- Where security forces are used for the project, whether the client operates in compliance with IFC Performance Standard 4.
- Whether local stakeholders' engagement is developed and if necessary, a process of Informed Consultation and Participation (ICP).
- Whether the client has a project policy in place for non-discrimination and equal opportunity in terms of employment.

- Whether an effective grievance mechanism for workers and affected communities has been developed.
- For projects located outside high income OECD countries, whether material payments to local governments (including taxes, royalties or license fees) are disclosed in accordance with local regulations or other applicable regulations. Where such regulations are not applicable, sponsors or clients are encouraged to voluntarily disclose such information and support transparency initiatives such as the EITI.

The Group applies the [Equator Principles](#) to the transactions and services falling in the scope of this initiative. The criteria above are applied in conjunction with, or addition to the underlying standards of this initiative, including when applicable the IFC Performance Standards and World Bank Group EHS Guidelines.

7. APPLICATION DATE AND UPDATES

This sector policy is applicable from the date of its publication for any jurisdiction in which the Group operates to the extent not contradictory to provisions of any applicable local law, rule, regulation or regulatory guidance or directive in such jurisdiction, with exceptions for pre-existing business commitments or opportunities at an advanced stage of negotiation.

This sector policy may evolve in time, in accordance with legislative or regulatory evolutions and as a result of the discussions between the Group and its various stakeholders. Therefore, the Group reserves the right to modify this sector policy at any time. Updated versions will be posted on the Group's website, where the E&S general principles and the E&S transversal statements and other sector policies are also available.

This sector policy has been established in French and in English.

In case of inconsistency between the French and the English version, the French version shall prevail.