



ANTI-HARASSMENT POLICY

JUNE 2021

INTRODUCTION AND SCOPE

The Group undertakes to protect employees from all forms of harassment, intimidation and violence. Mersen has developed a company-wide policy intending to prevent harassment of any type, including sexual harassment, of its employees, or non-employees (such as clients, vendors and contractors) and to deal quickly effectively with any incident that might occur.

This policy applies to harassment whether it occurs on Mersen premises or in some other location where Group activities occur, such as on business trips or at Group social events.

There are more specific policies depending on the country. You can find these specific policies, in Mersen One: HR Internal Communication / Latest Documents / Group HR Charters / Policy against harassment.

DEFINITION OF HARASSMENT

Harassment occurs when a person is subjected to unwelcome verbal or physical conduct because of race, religious beliefs, color, gender identity, physical disability, mental disability, age, ancestry, place of origin, family status, sexual orientation or any other protected characteristic applicable to the country in which this person works.

These following examples can be considered as harassment:

- Physical, written or verbal abuse;
- Repetitive bullying/mobbing
- Ethnic or racial insults;
- Behaviour intending to provoke or humiliate another person;
- Offensive printed or electronic material;
- Systematic targeting of a person;
- Sexual harassment is any unwelcome contact, sexual advances, jokes of an offensive sexual nature; innuendoes or requests for sexual favours.

The above list of examples is not intended to be all-inclusive. Additionally, care must also be taken in informal business situations, including at Company parties and on business trips.

The Group intends as well to prevent sexist or gender-based actions or behaviors.

HOW TO PROCEED IF YOU ARE BEING HARASSED



Employees who believe they have been subjected to harassing conduct (including sexual harassment) or sexist behaviors should:

1. If possible, tell the alleged harasser that their behavior is unwelcome and ask them to stop.
2. Keep a record of incidents (date, times, locations, possible witnesses, what happened, person response). The person do not have to have a record of events in order to make a complaint, however, keeping a record can strengthen your case and help you remember details over time.
3. Make a complaint. If, after asking the alleged stalkers to stop their behavior, the harassment continues, or if you are unable to confront the alleged harasser directly, report the problem to any of the following individuals:
 - Immediate Manager, or dotted-Line Manager
 - Human Resources department (at facility, region, business line or Group level). A special procedure has been established in some countries, namely Canada, China, the United States and France. You can find them on Mersen One, under the HR domain Group HR charter section.
 - Any other manager or executive within the company
 - The Group Compliance Officer

If it seems difficult according to the local situation to report the facts, you can send an e-mail to the ethical address for the Group: ethics@mersen.com



HARASSMENT COMPLAINT PROCESS

Human Resources Department in coordination with appropriate persons and/or managers, will investigate the case. The Human Resources will interview the complainant as well as the alleged stalker and any individuals who may be able to provide relevant information related to the allegation. All information collected will be kept confidential. A detailed investigation report will be prepared and placed at the disposal of the Group Compliance Officer.

Such investigation will remain strictly confidential to the extent possible. However, Mersen may need to disclose certain information in connection with the investigation..

At the end of the investigation period: if the case is confirmed, the Group will take appropriate remedial action to correct the situation. This action may include, but is not limited to, verbal or written warning, referral to formal counselling, disciplinary suspension, or probation or termination of employment from Mersen for cause.

Any person found to have retaliated against an individual for reporting discriminatory harassment or for participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action, up to and including termination for cause. Conversely, if the investigation results in a finding that an employee knowingly falsely accused another individual of harassment or discrimination, the accusing employee will be subject to appropriate disciplinary action, up to and including termination for cause.

No retaliatory action will be taken against any employee who in good faith complains of harassment or any employee who is involved in the investigation of harassment. The Group considers retaliation to be a serious violation of this policy and urges employees to report any incidents of retaliation immediately. The Group will investigate and resolves reports of retaliation in the same manner as reports of harassment and other discrimination.

RESPONSIBILITY OF MANAGEMENT

It is the responsibility of executives, managers, HR departments or any other person within this company who supervises one or more employees to take immediate and appropriate action to report or deal with incidents of suspected sexual conduct or harassment of any type, whether brought to their attention or personally observed. More generally anyone who has witnessed harassment is invited to report it. Under no circumstances should a complaint be dismissed or downplayed, nor should the complainant be told to deal with it personally.

Mersen seeks to provide a safe, healthy and rewarding work environment for its employees, clients and customers. Harassment will not be tolerated within our Group. If you feel that you are being harassed, do not hesitate to report it. Vigilance against sexist stereotypes must also be stepped up, particularly through dialogue with the perpetrators of stereotypes.

COMPLIANCE WITH THE LAW AND HUMAN RIGHTS

In the event of a conflict between legislation or local customs and the Mersen Harassment Policy, the more stringent rules shall prevail.

**THE HUMAN RESOURCES DIRECTOR &
THE GROUP COMPLIANCE OFFICER**