



United Nations  
HCDH  
Palais des Nations  
1211 GENEVA, 10  
SWITZERLAND

Ref: AL OTH 94/2025

Paris, October 15th, 2025

**Response to Joint Communication from Special Procedures Mandate Holders – PT Weda Bay Nickel**

Dear [REDACTED]

We have the honor to acknowledge receipt of your joint communication dated 19 August 2025 transmitted by the Office of the High Commissioner for Human Rights on behalf of the Special Procedures of the Human Rights Council. Eramet expresses its full respect for the mandates of the Special Rapporteurs and Working Groups and wishes to reaffirm its commitment to the promotion and protection of human rights in all its activities and partnerships.

We welcome the opportunity to engage in constructive dialogue with the United Nations mechanisms and to provide detailed information and clarifications regarding the issues raised in your letter.

Eramet remains firmly committed to upholding international environmental and human rights standards, including the United Nations Guiding Principles on Business and Human Rights. We are committed to transparency and continuous improvement, and we take seriously any allegations or concerns raised in relation to our operations or those of our partners. As a minority shareholder in PT Weda Bay Nickel, our influence is limited by governance structures; however, we strive to act and influence responsibly and constructively within the scope of our shareholding rights.

In the following pages, you will find a summary of our group-level human rights policies, our actions and oversight mechanisms as a minority shareholder in PT Weda Bay Nickel, and the specific context concerning human rights defenders. We would like to emphasize that additional, detailed information on our human rights performance - including grievance mechanisms and community engagement - is available online in Eramet's Corporate Sustainability and Responsibility Disclosure (CSRD), prepared in accordance with the European Union's broader sustainability and transparency agenda.

Eramet reiterates its firm commitment to conducting its operations in full compliance with international human rights standards, including the United Nations Guiding Principles on Business and Human Rights, and to fostering responsible practices across its value chain. We remain available for further dialogue and cooperation with the Special Procedures of the Human Rights Council to promote the highest standards of human rights and environmental stewardship.

Please accept, Excellencies, the assurances of our highest consideration.

With my best regards,

[REDACTED]  
Paulo Castellari  
Chief Executive Officer



## Eramet Group Policies on Human Rights

Eramet has implemented a comprehensive and mandatory framework for human rights, applicable to employees, contractors, and suppliers, and available online:

- Our **Human Rights Policy**, adopted in 2019, was developed through consultation with internal and external stakeholders, including NGOs and trade unions. It is endorsed by all members of the Executive Committee and applies without exception to all Group-controlled sites. It incorporates key international instruments, including ILO conventions, the UN Charter of Fundamental Rights, and the UN Guiding Principles on Business and Human Rights, and forms the basis of our due diligence processes. <https://www.eramet.com/wp-content/uploads/2025/03/2023-09-Eramet-EN-Human-Rights-Policy.pdf>
- To extend these commitments to its supply chain, Eramet enforces a **Supplier Code of Conduct**, which outlines expectations in sustainable development and ethics. This code applies to all our suppliers (above a minimal threshold of €1,000 annual expenditure). [2023-Eramet-Supplier-code-of-conduct-EN.pdf](#)
- The **Eramet Ethics Charter** is the Group's second key document on human rights. It addresses discrimination, health, safety, and harassment, and is shared with and signed by contractors and suppliers. <https://www.eramet.com/en/eramet-group/governance/ethics-compliance/ethics-charter/>
- Eramet's whistleblowing mechanism Ethic Line (formerly known as Integrity Line) is open to all Group employees as well as external stakeholders - including suppliers, subcontractors, clients, and local communities - who wish to report unethical behavior. For each report received, Eramet commits to conducting an assessment and a thorough investigation and taking appropriate corrective action, while ensuring confidentiality and protection of whistleblowers, in line with the UN Guiding Principles on Business and Human Rights. The Ethics Line system is available in several languages including Bahasa Indonesia and complies with applicable legal standards for whistleblower protection. All alerts submitted through the system remain strictly confidential to safeguard both whistleblowers and individuals named in reports, in accordance with the principle of presumption of innocence.

In addition, the **Human Rights Key Standard** translates our policy into operational guidance for sites and departments, detailing specific obligations such as minimum housing conditions. This standard is integrated into the Eramet Management System (EMS) and is binding for all employees. Complementing this, Golden Rules on human rights—covering issues such as forced labor and working conditions—are embedded in the Eramet Production System and apply to all entities.

We apply strict consequence management in case of deviation from our standards arising from line or technical management oversight findings, audits and whistleblowing.

Oversight of these instruments lies with our Societal Impact and Human Rights Department, while a designated member of the Executive Committee ensures consistency with our commitments at the highest level of Eramet.

In accordance with France's 2017 Duty of Care Law, Eramet has conducted three successive Human Rights Risk Mappings (2017, 2020, and 2023), with support from independent experts. The 2023 mapping was significantly enhanced to meet evolving international standards, including the UNGPs, and now includes granular risk identification and robust action plans. PT Weda Bay Nickel had been included in the scope of the last Human Rights Risk Mapping that has made it possible to highlight the existence of salient risks and a dedicated action plan shared by Eramet with PT Weda Bay Nickel.

In 2024, as every year, Eramet carried out Technical Reviews as part of its agreements with its partner, the purpose of which is to monitor the progress of PT Weda Bay Nickel's environmental and social action plans and to provide, as required, expertise and recommendations in CSR and human rights.

Eramet is also voluntarily committed to the Initiative for Responsible Mining Assurance (IRMA), the most rigorous international standard for assessing social and environmental performance in mining. Finalized in 2018 after a decade-long multi-stakeholder consultation involving over 100 entities - including NGOs, unions, downstream users, communities, and mining companies - IRMA's governance model ensures legitimacy, transparency, and high standards of accountability. We seek to achieve IRMA audit process at Eramet controlled operations.

For additional information, we also detail our programs in the following documents:

- 🔗 Our Human Rights webpage: <https://www.eramet.com/en/eramet-group/governance/human-rights/>
- 🔗 Eramet's Human Rights 2023 Risk report: [eramet.com/wp-content/uploads/2023/12/2023-12-Eramet-Human-Rights-report.pdf](https://www.eramet.com/wp-content/uploads/2023/12/2023-12-Eramet-Human-Rights-report.pdf)
- 🔗 Eramet's 2024 CSR: [eramet.com/wp-content/uploads/2025/04/2025-04-23-Eramet-URD-2024-EN.pdf](https://www.eramet.com/wp-content/uploads/2025/04/2025-04-23-Eramet-URD-2024-EN.pdf)

### **Eramet's Role and Oversight as a Minority Shareholder in PT Weda Bay Nickel**

With an indirect 38.7% stake, Eramet is a minority shareholder in this joint venture and does not hold unilateral decision-making authority. Eramet's shareholding is held from Strand Minerals (Indonesia) Pte Ltd, the vehicle of Eramet and Tsingshan Group for their joint participation into PT Weda Bay Nickel). Since 2017, we have exercised our role of positive influence with rigor, transparency, and a commitment to responsible business conduct. We will continue to do so for as long as we remain a shareholder.

Of note, Eramet holds no capital or governance ties with respect to Indonesia Weda Bay Industrial Park, or its shareholders Tsinghan, Huayou Colbalt or Zhenshi Holding Group.

At Eramet's initiative, both Eramet and Tsingshan agreed in 2022 to commit the PT Weda Bay Nickel mine to the IRMA process. As a result, the mine completed internal IRMA self-assessments in 2022 and 2023, which led to the development of a dedicated action plan. This plan is currently under implementation.

In accordance with the PT Weda Bay Nickel shareholder agreement, Eramet conducts annual technical reviews to assess progress in implementing the IRMA Standard for Responsible Mining. Our teams maintain regular dialogue with PT Weda Bay Nickel's management. In the event of a confirmed or potential deviation from the IRMA roadmap, we immediately request clarification and corrective measures from Strand Minerals and WBN.

Beyond formal oversight, Eramet allocates significant time and expertise from its own management and ESG teams in France and Indonesia to support PT Weda Bay Nickel in managing environmental, social, and governance (ESG) risks. This includes proactive guidance on safety, environmental protection, biodiversity, community relations, and human rights. We regularly submit concrete proposals to promote good ESG practices.

As a responsible investor, Eramet also engages regularly with civil society organizations, both internationally and in Indonesia, regarding PT Weda Bay Nickel. We hold meetings to listen to their perspectives, review their research findings, and consider contributions from independent experts or consultants. These contributions help inform our internal assessments and shape our recommendations to Strand Minerals and WBN.

We are committed to transparency and regularly update our website with information on our role in PT Weda Bay Nickel. Additional details are also available in our annual report (including the CSRD):

- 🔗 Our FAQ regarding PT Weda Bay Nickel: <https://www.eramet.com/fr/groupe-eramet/nos-implantations/eramet-indonesia/questions-frequentes/>
- 🔗 Our Group 2024 URD: [eramet.com/wp-content/uploads/2025/04/2025-04-23-Eramet-URD-2024-EN.pdf](https://www.eramet.com/wp-content/uploads/2025/04/2025-04-23-Eramet-URD-2024-EN.pdf)

### **Eramet and Human Rights Defenders**

With regard to the situation described concerning human rights defender Ms. Dewi Anakoda, we regret the circumstances outlined in your letter. Based on the limited and non-specific information provided, we are not aware of the facts alleged and are therefore unable to offer further details or clarification. We previously have interacted extensively and responded to all inquiry raised by media outlets and civil society organizations she has reportedly worked with. None of these organizations have ever referenced this specific allegation or raised concerns related to her situation.

In light of the UN OHCHR letter, we have requested that PT Weda Bay Nickel inform us of their comments on these matters, and any appropriate mitigation measures they may have decided to implement.

We wish to emphasize that Eramet strongly opposes any form of intimidation or retaliation against anyone.

- 🔗 Our Ethics line: <https://eramet.integrityline.org>