

MINE SITE ASSESSMENT SUMMARY OF THE FULL REPORT

MINE SITE

Grande Côte Opérations S.A.

OPERATING COMPANY

Eramet Group

COUNTRY OF OPERATION

Senegal

FEBRUARY 2026

TO ACCESS THE FULL REPORT:
[HTTPS://RESPONSIBLEMINING.NET/EGC](https://responsiblemining.net/egc)

Audit Summary

SUMMARY DETAILS ABOUT THE MINE AND THE IRMA AUDIT

More information regarding this data can be found in the full report, Section 1.0.

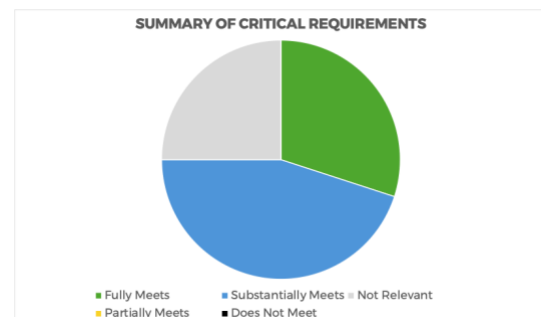
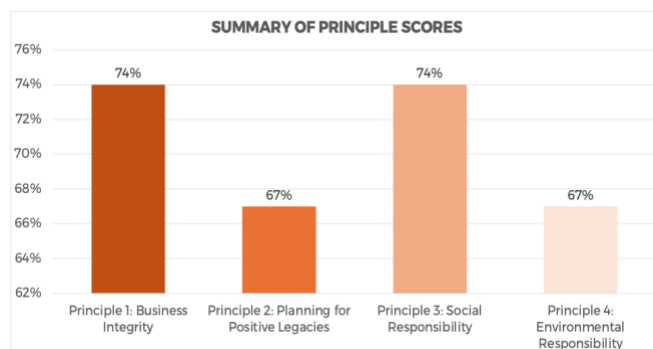
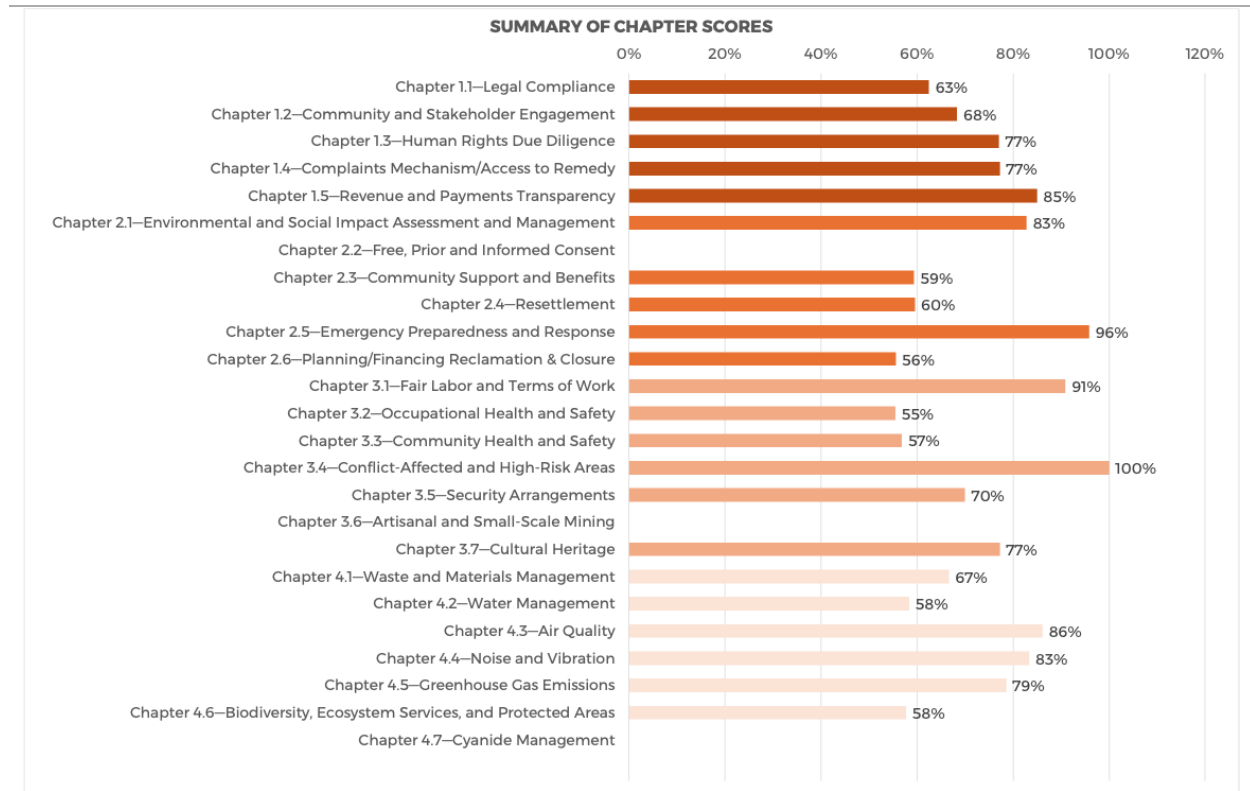
Name of Mine:	Grand Côte Opérations		
Operating Company:	Eramet Group	Mine Owner:	Eramet (90%) and State of Senegal (10%)
Country of Operation:	Senegal	Local Region:	from Saint Louis to Dakar in the administrative regions of Thiès and Louga
Mined Material(s):	Mineral Sands (Ilmenite, Zircon, Leucoxene, and Rutile)	Date first operated:	2014
Size of mining concession (hectares):	4500	Expected life of mine:	2048
Total # of workers:	2271	Direct workers	786
		Contracted workers	1485
Business language(s):	French, English	Community language(s):	French, Wolof
Scope of IRMA Assurance Process:	<u>Included:</u> Exploration areas, mine services (i.e., clearing, earth work, piping, etc.), artificial basins, dredge and wet concentration plant (WCP), mine rehabilitation areas, resettlement sites, mineral separation plant (MSP), packaging & loadout, power station, warehouse, laboratory, clinic, administration building & other offices, maintenance workshops, waste management facility plant, waste water treatment plant, tree and plant nursery, worker camp (i.e., accommodations, restaurants, laundry room, etc.), associated on-site infrastructure (power line, bores, piping, storage, internal access roads, gensets, etc.), and management, production & support processes. <u>Excluded:</u> This scope excludes off-site transportation facilities for products including railroad transportation and Port of Dakar in addition to offsite contractor camps, housing, and storage areas.		
IRMA audit webpage:	https://responsiblemining.net/egc		
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)		
Audit Type:	Initial Verification Audit		
Audit Firm Declaration:	✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) as presented during the Stage 1 and Stage 2 audit activities. ✓ The audit team members were deemed to have no conflicts of interest with the mine. ✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities. The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.		
Authorized Representative:	Mark Thurber, Mining Services Director	Representative Signature:	
Achievement Decision Date:	05 February 2026	Achievement Valid Until:	04 February 2029
IRMA Reference Number:	IRMA-STD-SCS-002-V-00008		

INITIAL REPORT: SUMMARY OF PERFORMANCE

IRMA's 428 requirements are organized into 26 chapters which are further grouped into 4 broad principles. Each requirement is rated by auditors as fully meets, substantially meets, partially meets, does not meet, or not relevant according to the evidence presented during the audit and IRMA guidance on performance ratings. Individual ratings for each requirement along with the justification are presented in Appendix A. Chapter scores are calculated based on the total point value of all relevant requirements in the chapter divided by the total possible points (total number of relevant requirements in the chapter x 2). This same equation is used to calculate overall principle scores. More information regarding chapter scores and critical requirements can be found in the full report, Section 3.0.

IRMA Achievement Level

IRMA 50



SUMMARY OF PERFORMANCE AGAINST IRMA CRITICAL REQUIREMENTS

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve full certification (IRMA 100) mines must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

More details on the performance of each critical requirement can be found in the respective chapter in Appendix A.

Requirement #	Requirement Summary (abbreviated)	Assigned Rating
1.1.1.1	The operating company shall comply with all applicable host country laws in relation to the mining project	Substantially Meets
1.2.2.2	The mine fosters two-way dialogue and meaningful engagement with stakeholders	Substantially Meets
1.3.1.1	The operating company has a policy in place that acknowledges its responsibility to respect all internationally recognized human rights	Fully Meets
1.3.2.1	and an ongoing process to identify and assess potential and actual human rights impacts from mining project activities and business relationships.	Fully Meets
1.3.3.3	The operating company is taking steps to remediate any known impacts on human rights caused by the mine.	Substantially Meets
1.4.1.1	Stakeholders have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to the mining operation.	Substantially Meets
1.5.5.1	The operating company has developed, documented, and implemented policies and procedures that prohibit bribery and other forms of corruption by employees and contractors.	Fully Meets
2.1.3.1	The operating company has carried out a process to identify potential impacts (social and environmental) of the mining project.	Substantially Meets
2.2.2.2	New mine sites have obtained the FPIC of Indigenous peoples, and existing mines either have obtained FPIC or can demonstrate that they are operating in a manner that supports positive relationships with affected Indigenous peoples and provides remedies for past impacts on Indigenous peoples' rights and interests.	Not Relevant
2.4.7.1	If resettlement has occurred, the mine monitors and evaluates its implementation and takes corrective actions until the provisions of resettlement action plans and/or livelihood restoration plans have been met.	Substantially Meets
2.5.1.1	All operations related to the mining project shall have an emergency response plan	Substantially Meets
2.5.2.1	and there is community participation in emergency response planning exercises.	Fully Meets
2.6.2.1	Reclamation and closure plans are compatible with protection of human health and the environment,	Substantially Meets
2.6.2.6	and are available to stakeholders.	Substantially Meets
2.6.4.1	Financial surety instruments are in place for mine closure and post-closure (including reclamation, water treatment and monitoring).	Not Relevant
3.1.2.1	Workers' freedom of association is respected.	Fully Meets
3.1.3.3	Measures are in place to prevent and address harassment, intimidation, and/or exploitation, especially about female workers.	Fully Meets
3.1.5.1	Workers have access to operational-level mechanisms that allows them to raise and seek resolution or remedy for complaints and grievances that may occur in relation to workplace-related issues.	Substantially Meets
3.1.7.2	No children (i.e., persons under the age of 18) are employed to do hazardous work	Fully Meets
3.1.7.3	and no children under the age of 15 are employed to do non-hazardous work.	Fully Meets
3.1.8.1	There is no forced labor at the mine site or used by the operating company.	Substantially Meets
3.2.4.1.a, b	Workers are informed of hazards associated with their work, the health risks involved and relevant preventive and protective measures.	Substantially Meets

3.3.1.1.	The risks to community health and safety posed by the mining operation are evaluated and mitigated.	Substantially Meets
3.4.2.1.	If operating in a conflict-affected or high-risk area, the mine has committed to not support any parties that contribute to conflict or the infringement of human rights.	Not Relevant
3.5.1.2.	The mine has policy and procedures in place that align with best practices to limit the use of force and firearms by security personnel.	Fully Meets
4.1.4.1.	A risk assessment has been done to identify chemical and physical risks associated with existing mine waste (including tailings) facilities.	Fully Meets
4.1.5.1.	Mine waste facility design and mitigation of identified risks shall be consistent with best available technologies and best available/applicable practices.	Not Relevant
4.1.5.6.	The operating company regularly evaluates the performance of mine waste facilities to assess the effectiveness of risk management measures, including critical controls for high consequence facilities.	Substantially Meets
4.1.8.1.	The mine does not use riverine, submarine or lake disposal for mine wastes.	Fully Meets
4.6.4.1.	and these impacts are being mitigated and minimized.	Not Relevant
4.6.5.3.	New mines are not located in or adversely affect World Heritage Sites (WHS), areas on a State Party's official Tentative List for WHS Inscription, IUCN protected area management categories I-III, or core areas of UNESCO biosphere reserves	Not Relevant
4.6.5.4.	and existing mines located in those areas ensure that activities during the remaining mine life cycle will not permanently and materially damage the integrity of the special values for which the area was designated or recognized.	Not Relevant
4.7.1.1.	Gold or silver mines using cyanide are certified as complying with the Cyanide Code.	Not Relevant
4.8.2.3.	Mercury wastes are not permanently stored on site without adequate safeguards,	Not Relevant
4.8.2.2.	are not sold or given to artisanal or small-scale miners and are otherwise sold only for end uses covered in the Minamata Convention or disposed of in regulated repositories.	Not Relevant

AUDIT METHODOLOGY

Additional information regarding audit methodology can be found in Section 2 of this report

Audit Firm:



Audit Team:

Lead Auditor (1), Social Auditors (2), Health and Safety Auditors (2), Environmental Auditors (3), Support team members (4)

Audit Timeline



Summary of Audit Engagement and Observation Activities

# of mine staff interviewed	27	# of total workers interviewed	92
# of external stakeholders interviewed in initial audit	803	# of external stakeholders interviewed in corrective action verification audit	330
Methods of invitation to participate	Direct outreach, radio and regional newspapers, and posters in French and Wolof; notification to workers by the mine.		
Methods of Engagement for Audit	Stakeholder engagement included in-person conversations (one on one or in groups), WhatsApp voice calls, and written feedback.		
Operational areas observed	Exploration areas, mine services (i.e., clearing, earth work, piping, etc.), artificial basins, dredge and wet concentration plant (WCP), mine rehabilitation areas, resettlement sites, mineral separation plant (MSP), packaging & loadout, power station, warehouse, laboratory, clinic, administration building & other offices, maintenance workshops, waste management facility plant, waste water treatment plant, tree and plant nursery, worker camp (i.e., accommodations, restaurants, laundry room, etc.), associated on-site infrastructure (power line, bores, piping, storage, internal access roads, gensets, etc.), and management, production & support processes		
Other areas visited	Market gardens, coastal beaches, pirogues, and fish transformation center, Lompul Desert tourist camps, L'Oasis du Sénégal planned tourist camp, select archaeological and environmental monitoring sites (i.e., power lines, pipelines, transportation routes and adjoining Niayes)		
Surrounding communities visited	Communities and nearby towns including Diogo, Diourmel, Foth, Kab Gaye, Keur Hoggo, Lompoul, Lompoul sur Mer, Thiakmat, and Mboro		
Audit-Specific Disclosures or Limiting Factors	None		

SUMMARY OF CORRECTIVE ACTION ACTIVITY AND ONGOING CORRECTIVE ACTION PLANNING

In the IRMA system, a mine may postpone release of its initial audit results for up to 12 months while it implements corrective actions to address non-conformities with critical or other requirements to reach a higher achievement level or gain recognition for improved performance. Any improvements or changes under the early corrective action period must be verified by auditors within the 12-month period. This enables sites to implement changes and have them verified by auditors before the next assessment (refer to 4.3 for future audits).

More information regarding the corrective action process can be found in the full report, Section 4. The site's corrective action plan is provided in the full report as Appendix B.

Optional Corrective Action Period:	January 2024 to November 2025
Verification Audit:	June to November 2025
# of Requirements identified in Completed Corrective Action Period	197
# of Requirements identified in ongoing Corrective Action Plan	19
Summary of outcome from optional corrective action period	During the 12-month period, Grande Côte Opérations undertook a substantial effort to design and implement corrective actions addressing major nonconformities across several areas of the IRMA Standard, including 197 criteria in pursuit of broader performance improvements. This resulted in a longer interval than 12 months between the Stage 2 on-site audit (January 2024 - November 2025). The corrective action period verification included a five-day on-site audit, which also involved additional stakeholder engagement to confirm the effectiveness of the corrective actions implemented. Some corrective measures are recent and will require additional time to become fully operational and produce measurable results and will be further assessed during the next surveillance IRMA audit.
Link to current corrective action plan	Grande Côte Opérations prepared a final corrective action plan (CAP) in line with IRMA requirements to address both major and minor non-conformities with critical requirements. A copy of the corrective action plan is provided as Appendix B.
Next steps	The mine's surveillance audit will take place no more than 18 months after the publication of this IRMA Initial Assessment Report.
Providing feedback to IRMA	If any IRMA stakeholder wishes to file a complaint related to the mine site assessment process, they may do by visiting the IRMA website. Details on the complaints process can be found in IRMA's Issues Resolution Procedure. - https://responsiblemining.net/what-you-can-do/complaints-and-feedback/
Providing feedback to the audit firm	Feedback regarding the mine's performance can be submitted to the audit firm, SCS Global Services at: - feedback@scsglobalservices.com
Providing feedback to the mine site	Interested parties are encouraged to share their feedback directly with the site via the site's grievance mechanism options: - https://grande-cote.eramet.com/fr/contact/ - By phone: 00221 32 824 2828

Figure 1: Illustrative, global location of the site

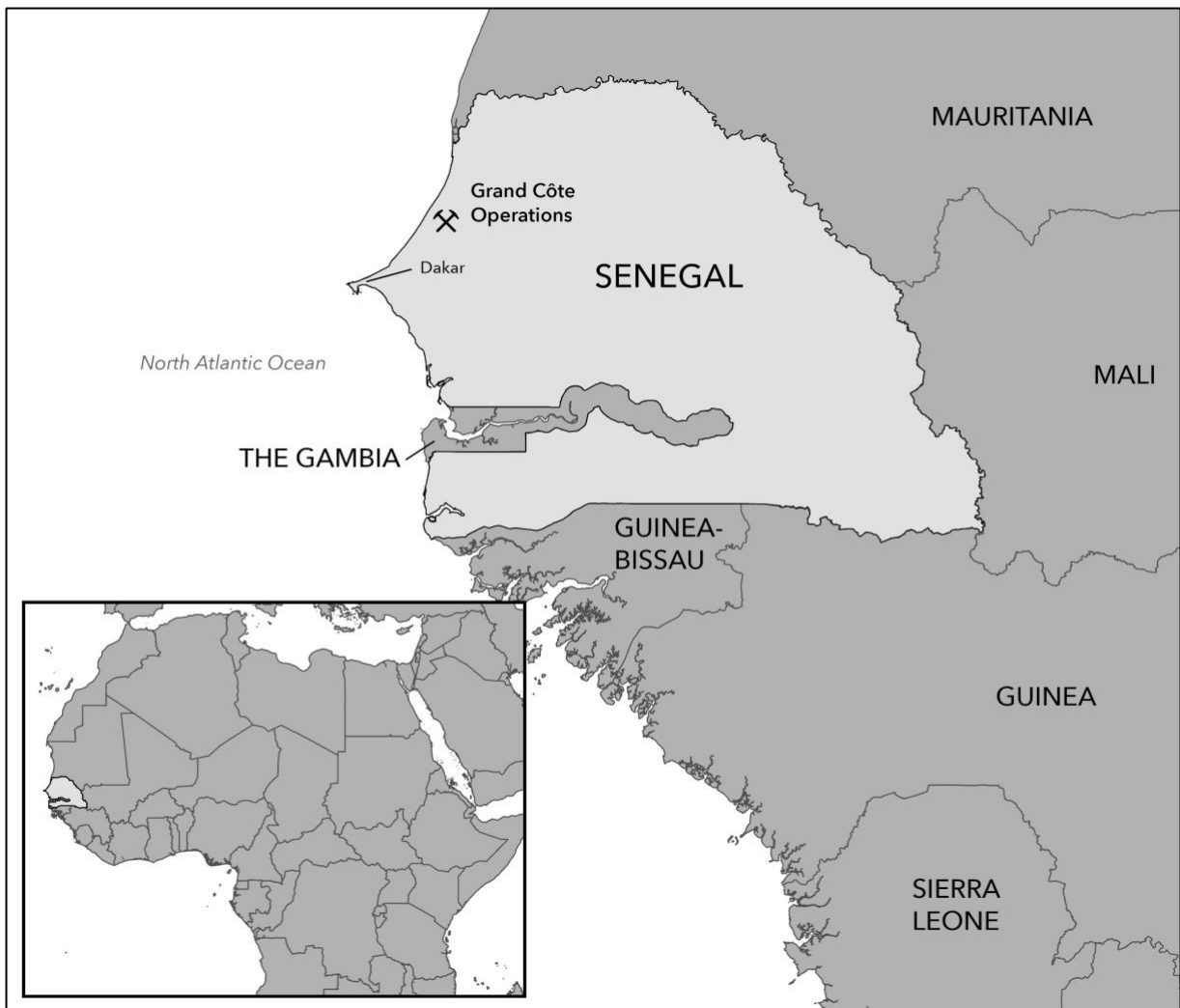


Figure 2: Illustrative, regional location of the site

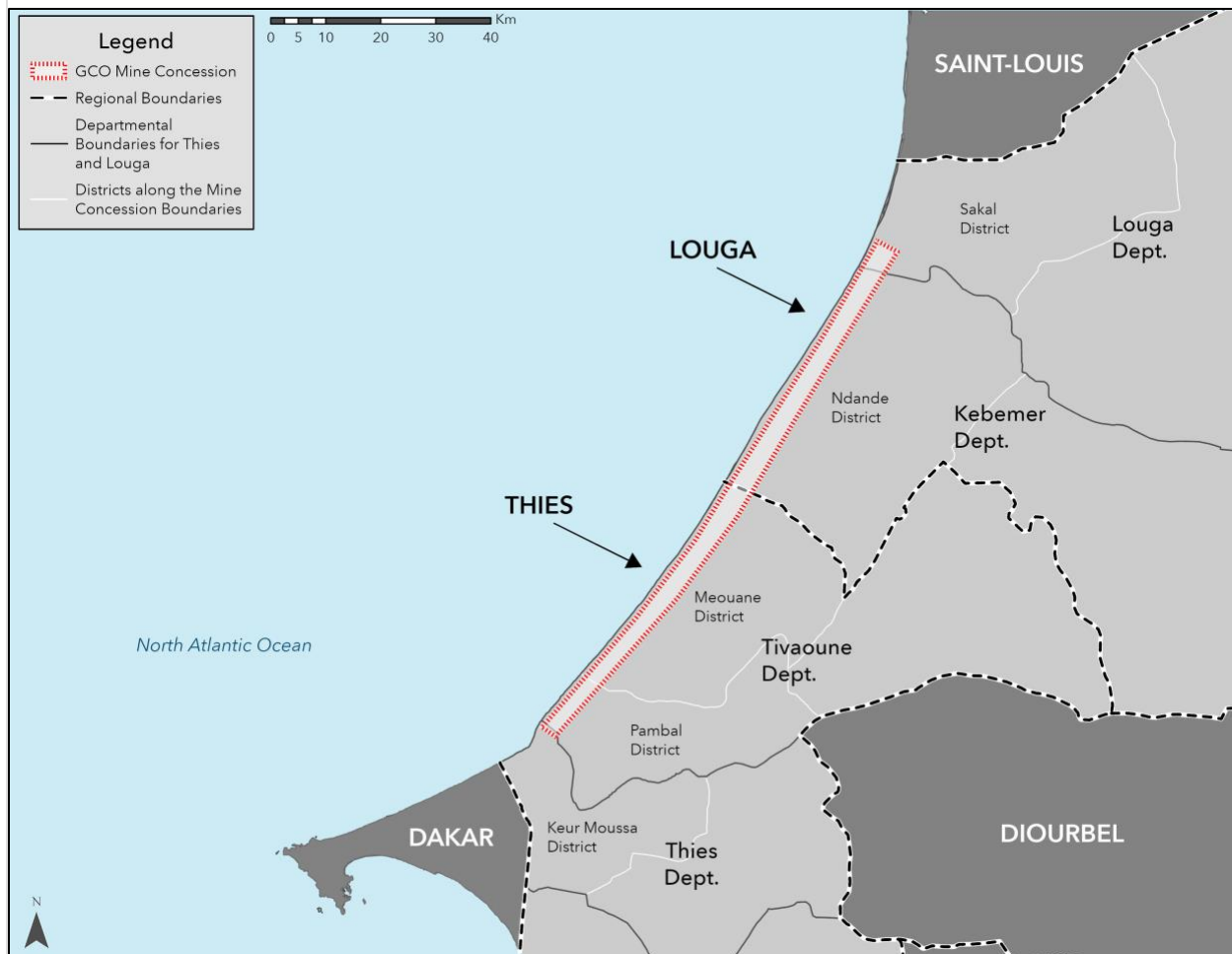


Figure 2: Illustrative, local location of the site

