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## **Health and Safety Policy**

### **Purpose**

At AMG Critical Materials N.V. and its group companies (“**AMG**”) people are our greatest asset: nothing is more important to AMG than the safety, health and well-being of our workers and their families. Therefore, “*We act Safely*” is one of AMG’s core Values.

AMG commits itself to provide a healthy and safe working environment for all employees, contractors working on its premises and for those hired by AMG further along the supply chain. This commitment enhances our standing as a responsible and attractive business partner and employer of choice and improves our productivity. This Health and safety policy (“**Policy**”) is designed to address material impacts, risks, and opportunities (IRO) linked to health and safety (“**H&S**”) at AMG.

### **Scope and Applicability**

This Policy applies to AMG and all its group companies (“business units”) and extends to service providers, suppliers and temporary workers. All employees are expected to exhibit conduct that reflects this Policy during work, when representing AMG, on or off the work site.

AMG is firmly committed to full compliance with all local and national rules and regulations applicable to AMG’s group companies. Where the requirement of domestic legislation are stricter than this Policy, the relevant stricter or additional rules of such domestic legislation shall prevail.

AMG Health and Safety Reporting is done in accordance with OSHA standards. If additional local reporting requirements need to be met by the business units, these records shall be maintained locally and handled by the business units directly.

### **Roles and Responsibilities**

- The Management Board has adopted this Policy and is accountable for its implementation. It shall review this Policy and the implementation of this Policy regularly in consultation with the Supervisory Board.
- AMG group companies are responsible for developing business-specific guidelines that align with this Policy and health & safety issues related to their operations.
- AMG, its employees, and contractors are collectively responsible for safety and compliance with all relevant regulations and standards, prioritizing health and safety and, understanding the hazards and controls associated with their work-related activities. We do so by listening to and understanding health and safety issues, while supporting each other to work in a safe and healthy manner.

- All employees are required to promptly report any health and safety incidents or issues. In case of immediate danger, employees should take the necessary actions to mitigate risks, provided they are trained and authorized to do so.
- The Environmental, Health, Safety & Sustainability (“EHSS”) department is responsible for overall policy implementation and compliance and group-wide monitoring and reporting.
- Onsite EHSS managers are responsible for day-to-day implementation and oversight in their respective areas, including communication of significant Policy updates.

### **AMG’S commitment to Health and Safety**

AMG is dedicated to fostering a safe work environment through a range of commitments:

- **Management systems:** AMG conforms to the highest standards which includes internationally recognized standards such as ISO 45001 occupational health and safety management systems.
- **Target setting:** Group companies annually identify or recommit to targets and initiatives aligned with strengthening the safety culture and improving safety-related performance.
- **Integration in HR processes:** We empower and demand that employees work safely, integrating H&S performance evaluations into relevant staff appraisals and reward systems accordingly.
- **Transparency:** We assess and communicate performance metrics and targets, aiming for a Lost Time Injury Rate (LTIR) of zero.
- **Training:** We train the relevant employees in their safety-related responsibilities, using clear and multilingual instructions and information.
- **Contractors:** We require contractors to manage H&S programs related to work at AMG sites in line with this Policy and the guidelines of the respective AMG group.

### **Monitoring and Grievance**

#### **Due diligence**

We systematically identify, assess, remediate, and manage H&S risks in our operations, adhering to the standards set by our H&S management systems. AMG has implemented, throughout the organization, critical planning processes such as emergency preparedness, crisis management, business continuity and, where applicable, flood and earthquake emergency response plans to help ensure resilience and the ability to recover quickly from unexpected events. These detailed and comprehensive plans involve the identification of the risks, tools, and resources to mitigate impact and the responsible personnel to successfully implement the response.

Using internal and external resources, employees are trained in their responsibilities and those employees participate in exercises to ensure readiness.

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### **Monitoring and reporting**

Safety performance data is a key metric used for identifying initiatives for strengthening safety culture and ensuring a safe workplace for our employees, contractors, and visitors. Each lost time incident is investigated and immediately communicated to AMG's senior management across the company to ensure lessons learned are shared.

Safety performance data, including injuries and accidents for all AMG employees, are compiled into a monthly report which is distributed internally to and reviewed by the Management Board and stakeholders throughout the AMG businesses. At the conclusion of the calendar year a final safety performance report is prepared, and the relevant data is included in the AMG annual and sustainability reports.

### **Remedy and grievances**

AMG is committed to preventing health and safety violations in its own operations and in its business relationships. If detected despite our efforts, we will take decisive action. In our own operations, we will promptly cease any violations. Within direct business relationships, we will collaborate with business partners to develop corrective action plans if immediate mitigation or termination is not feasible. For violations within indirect business relationships, we will utilize our leverage to the extent possible alongside our direct business partner, to agree on a corrective action plan.

Employees must report unsafe situations immediately to their immediate supervisor, department head, or the designated EHSS officer or in writing through an incident report. Unsafe situations can include, but are not limited to, hazards, equipment malfunctions, potential safety violations, and other conditions that may pose a threat to health and safety. Employees may also report violations or raise concerns during engagement with supervision or if necessary, by following our Speak Up & Reporting Policy published on AMG Critical Materials N.V.'s website under "corporate governance". AMG prohibits retaliation against anyone that raises a good faith concern or complaint under this Policy, regardless of whether the concern or complaint ultimately is determined to be a violation of this Policy or applicable law.

### **TRAINING**

AMG group companies are responsible to provide initial and periodic training to relevant AMG employees on this Policy and AMG group company specific guidelines prepared to support the implementation of the elements of this Policy. The EHSS department regularly reviews this Policy to ensure compliance with all applicable laws and regulations and advises AMG group companies of any revisions.

### **OTHER RELATED DOCUMENTS**

Other AMG policies and AMG documents that are related to the topic of this Policy are, amongst others:

- AMG Speak Up & Reporting Policy
- AMG Code of Business Conduct

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