
Policy on Human Rights

Introduction

AMG Advanced Metallurgical Group N.V. (“AMG”) is a global company operating in a global market. We rely on our employees’ behaviors to reflect our ethical values to ensure our business is conducted in a way that values human rights, in alignment with the UN’s Guiding Principles on Business & Human Rights.

We formally support the United Nations Global Compact including its labor, environmental, anti-corruption and human rights commitments. With respect to human rights:

“AMG supports and respects the protection of internationally proclaimed human rights and will work to make sure it is not complicit in human rights abuses.”

We will continuously support our human rights standards by demonstrating our values in our interactions with local and national governments, and the communities in which we operate and endeavor to extend our values and principles to our suppliers and contractors.

Responsibilities

AMG as a company, its employees, contractors, and suppliers supporting all AMG operations are responsible for complying with internationally accepted norms and national laws related to human rights. AMG Divisions are responsible for developing business specific guidelines that align with this policy and the human rights issues related to their operations.

The AMG Management Board reaffirms that human rights principles are enacted through the provision of safe and healthy working conditions in a non-discriminatory environment. The AMG Management Board regularly reviews global operations, their potential impact on human rights issues and the controls required for global compliance.

Impacts, Risks, and Opportunities

AMG as a company, its employees and contractors supporting all operations are responsible for compliance with internationally accepted norms and national laws.

AMG has reviewed the UN Guiding Principles on Business & Human Rights, and the following are material to AMG, more specifically:

- **Children and Young Workers.** AMG does not employ children or support the use of child labor. AMG adheres to minimum age provisions of national labor laws and regulations, and where national law is insufficient, takes into account international labor standards. We will support the creation of educational programs for young people including apprenticeships and the possibility of formal education.
- **Equality of Opportunity.** AMG has zero tolerance for any kind of discrimination or harassment. We embrace cultural and gender differences and preferences in our workforce, this includes the protection of women’s and ethnic minority rights. Employees

are selected on the basis of their ability to do the job and there is no distinction, exclusion or preference made on other grounds.

- **Freedom of Engagement.** All AMG employees have chosen to work for the company and AMG does not engage in forced labor or compulsory hiring practices. Labor is freely given, and employees are free to leave, subject to providing notice of reasonable length.
- **Compensation.** AMG will compensate its employees through wages and benefits to ensure it meets or exceeds legal regional minimum wages and is in full compliance with all applicable laws.
- **Freedom of Association.** AMG respects the right of all employees to freely and voluntarily establish and join groups for the promotion and defense of their occupational interests without fear of intimidation or reprisal in accordance with national law. AMG upholds the freedom of association and the right to collective bargaining.
- **Relationships with Communities.** AMG respects the customs, values and cultures of the local communities in which we operate, including communities indigenous to those areas, taking into account their concerns and needs. We endeavor to employ local employees, to invest in building diverse talent pools and provide training to improve skill levels, where appropriate.
- **Modern Slavery.** AMG abides by anti-trafficking and modern slavery legislation and monitors its supply chain for human rights risk, including human trafficking.
- **Stakeholder Involvement.** Where appropriate, AMG engages with a wide range of organizations and stakeholders on human rights issues related to our business. This includes within our Company and throughout our supply chain.

These human rights principles are universal to AMG, applied in everything we do, and are implemented irrespective of the developed or developing status of the countries in which we operate. This policy provides additional details to those commitments made in our Code of Business Conduct and applies to all AMG Advanced Metallurgical Group N.V wholly and majority owned facilities and shall be communicated annually to all employees.

Principles

AMG's commitments to human rights align with the following principles:

- UN Global Compact
 - Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights
 - Principle 2: Make sure they are not complicity in human rights abuses
 - Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
 - Principle 4: The elimination of all forms of forced and compulsory labour
 - Principle 5: The effective abolition of child labour
 - Principle 6: The elimination of discrimination in respect of employment and occupation.
- Global Reporting Initiative (GRI) Principles
 - Principle 102-41: Collective Bargaining Agreements
 - Principle 405-1: Diversity of Governance Bodies and Employees
- UN Universal Declaration of Human Rights
 - Article 23: Right to favourable work conditions and remuneration