

AMG POLICY ON ANTI-CIRCUMVENTION OF TAX LAWS

BACKGROUND

The laws applying taxes and duties to our products and services vary by country, and the regulating authorities in those countries rely on the companies that conduct business in them to properly assess which taxes and duties apply to their transactions, and comply with the applicable authorities' requirements.

POLICY

It is the policy of AMG Advanced Metallurgical Group NV and its subsidiaries (here collectively referred to as "AMG") that each operating company exercise care and prudence in complying with the filing and payment requirements of their taxing jurisdictions. It is against AMG policy to (i) file a false or fraudulent tax return; (ii) to willfully attempt to evade an applicable tax or duty; or (iii) to fail to file a tax return.

Consistent with AMG's Corporate Financial Policies, including but not limited to the Controllershship and Financial Reporting, and Travel and Entertainment Sections, it is also AMG's policy to accurately reflect all transactions on AMG's books and records.

This policy shall be communicated to all business associates (e.g., joint venture partners, agents, brokers, logistics providers, customers, and suppliers) on an as-needed basis. The AMG employees responsible for paying the duties and taxes that apply to a given transaction are to make good faith efforts to ensure that all AMG personnel have properly evaluated and documented AMG transactions as required by this policy, and to ensure that all required payments are made.

SCOPE

This policy applies worldwide to all employees (including officers and directors) of the AMG Group.

IMPLEMENTATION

It is to be immediately implemented with the framework of the existing compliance programs and must be monitored continuously.

Amsterdam / Wayne
Management Board
AMG Advanced Metallurgical Group NV

Chief Executive Officer



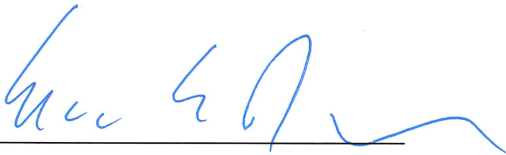
Heinz C. Schimmelbusch

Chief Financial Officer



William Levy

Chief Operating Officer



Eric Jackson