



Document type:	AMG Policy	Classification:	Private
Title:	Social Media & Media Policy	Publication date:	May 2026
Department:	Corporate Communications	Last update:	05-2024
Policy Owner:	Head of Communications	Version: 2.0	Page: 1 of 6

## SOCIAL MEDIA & MEDIA POLICY

### 1. PURPOSE

AMG Critical Materials N.V. (“AMG”) is a globally operating and publicly listed company. External communication, including social media activity, may affect AMG’s reputation, legal position and market value. This Policy provides clear and practical guidance to ensure responsible communication while safeguarding AMG’s confidential, price-sensitive and other non-public information.

### 2. SCOPE AND APLLICABILITY

This Policy applies to AMG and all its business units and applies to all employees, directors, officers, temporary staff and individuals representing AMG. It applies to traditional media and all social media platforms. This Policy shall be reviewed periodically by Corporate Communications and Group Compliance to ensure continued alignment with applicable laws, regulatory requirements and best practices.

### 3. ROLES AND RESPONSIBILITIES

- The Management Board has adopted this Policy and is responsible for its implementation.
- The Management Board shall review this Policy and its implementation regularly in consultation with the Supervisory Board.
- The Chief Compliance Officer reports to the Chairman of the Management Board and has been authorized to properly implement this Policy.
- The local management of the units and the local Compliance Officers are responsible for creating local awareness of the Policy.
- All AMG employees are responsible for holding up the principles set forth in this Policy and are expected to report any irregularities.

### 4. MEDIA PROTOCOL

We must not respond or approach journalists or media representatives online or off-line unless explicitly authorized and we refer them without delay to AMG Corporate Communications.

Please request the journalist’s name, organization, contact details and deadline. Immediately inform Corporate Communications ([gstubel@amg-nv.com](mailto:gstubel@amg-nv.com)). If relevant, inform Group Compliance ([compliance@amg-nv.com](mailto:compliance@amg-nv.com)).



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## 5. SOCIAL MEDIA

### 5.1 General Principles of Conduct

At AMG we apply the following guidelines:

- we are vigilant in protecting the reputation of AMG and the reputation of the products and services provided by AMG;
- we do not use photo's or video's that reveal AMG Company assets;
- we are aware that actions online, like posts, publications, and tags in a social media context, can have a bearing on the reputation of AMG and its Group companies as employees are always perceived as representatives of AMG;
- in all your actions, confidentiality and legal obligations apply at all times;
- no employee may speak on behalf of AMG and we do not comment on social media about AMG and/or its products and services, unless authorized to do so by the senior management of AMG or the AMG unit involved, for example authorised under the AMG ambassador program;
- personal opinions must clearly be identified as such;
- confidential or price-sensitive information must never be disclosed;
- communication must remain respectful and professional;
- privacy and intellectual property rights must be respected;
- company devices and networks must not be used to access or distribute inappropriate content; and
- managers may provide additional local guidance where necessary.

### 5.2 Platform-Specific Guidance

In addition we apply the following guidelines for the following platforms:

#### *LinkedIn*

In addition to the general guidelines set out above:

- Profiles must be accurate and up to date.
- Professional photos and language are required.
- Assess confidentiality before referencing AMG.
- Consult Corporate Communications before referencing AMG.

#### *Private Social Media*

In addition to the general guidelines set out above:

- Keep profiles private where possible;
- Do not reference AMG, your work at AMG or post any photos or videos that reveal AMG company assets;



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- Never disclose confidential AMG information;
- Never use AMG's email addresses for private accounts.

### **5.3 No longer with AMG**

Should you leave or be dismissed by AMG or any of its group companies, please update your profile on social media accordingly.

## **6. TRAINING**

AMG provides awareness and guidance regarding this Policy through onboarding processes, periodic communications and, where appropriate, training initiatives.

- New employees are informed of this Policy during onboarding.
- Updates to this Policy will be communicated internally.

## **7. DISCIPLINARY MEASURES**

Violations of this Policy may result in corrective or disciplinary measures in accordance with AMG's internal procedures and applicable law. Serious breaches, including disclosure of confidential or price-sensitive information, may result in termination of employment and/or legal action.

## **8. OTHER RELATED DOCUMENTS**

- AMG Code of Business Conduct

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