



<b>Group Compliance Policy</b>	Release Date:	01.12.2021
<b>Compliance</b>	Revision:	1
<b>Group Modern Slavery Act Statement</b>	Page:	1 of 2

## Introduction

AMG Advanced Metallurgical Group N.V. ("AMG") is a global, diversified Critical Materials company with operations in several countries with developing governance and human rights challenges, including slavery and human trafficking. 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.

In acknowledgement of Section 29 of the UK Modern Slavery Act 2015, by this statement AMG Group voluntarily provides assurance that it actively seeks to ensure that no slavery, servitude, forced labour or human trafficking is used within its supply chain.

## Policies & Procedures

AMG has established measures and put policies in place, applicable to its own workforce and suppliers, which touch or directly applicable to the integrity of its supply chain:

- i. AMG Code of Business Conduct
- ii. AMG Human Rights Policy
- iii. AMG Supplier Conduct Charter
- iv. AMG Speak-Up & Reporting Policy

These policies appear under Corporate Governance on the company's Group website <https://amg-nv.com/about-amg/corporate-governance/>.

AMG's UK entities, AMG Superalloys UK Ltd and AMG Aluminium Ltd, publish a separate annual statement detailing their compliance with the UK Modern Slavery Act at <https://amg-s.com/modern-slavery-act/>.

## Supply Chain Integrity

AMG has an established procedure for review and updating of the above and related policies, to ensure they reflect commercial and local conditions and legislative and regulatory changes. AMG's vigilance against such human rights abuses is reflected in its commitment to and membership of the UN Global Compact (UNGC) and Extractive Industries Transparency Initiative (EITI) and its Human Rights Policy and Supplier Conduct Charter, which sets out requirements on human rights and the elimination of all forms of forced and compulsory labour.

In 2021, AMG revised its due diligence procedures to further strengthen its third-party risk screening process as well as its identification, assessment, and management of risk. AMG has established procedures for compliance and risk management overseen by its Management and Supervisory Boards.

These measures reflect AMG's vigilance to ensure that modern slavery plays no part in the production, development or delivery of the products it provides. AMG undertakes to advise its partners if it becomes aware of modern slavery issues potentially or actually affecting the relationship with its partners.



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<b>Group Modern Slavery Act Statement</b>	Page:	<b>2 of 2</b>

## Principles

AMG's commitment to elimination of slavery aligns with the following principles:

- UN Global Compact
  - Principle 4: The elimination of all forms of forced and compulsory labour
  - Principle 5: The effective abolition of child labour
- UN Universal Declaration of Human Rights
  - Article 23
- UK Modern Slavery Act 2015
  - Section 29