HUMAN RIGHTS POLICY

1 PURPOSE

This Human Rights Policy ("**Policy**") reaffirms and clarifies AMG Critical Materials N.V. and its group companies' (together "**AMG**") commitment to respecting human rights and lays out the general approach to human rights due diligence including processes and mechanisms to monitor its compliance. AMG as global company operating in a global market is built on the AMG Values - safety, value creation, respect, integrity and enabling CO_2 reduction - and is committed to respecting internationally recognized human rights in our own operations and to fostering respect for human rights in relationships with our business partners along the value chain.

2 SCOPE AND APPLICABILITY

This Policy is applicable to AMG and all its group companies. Every AMG employee is expected to exhibit conduct that reflects this Policy during work, when representing AMG, on or off the work site, as well as in interactions with AMG external business partners and stakeholders.

AMG embraces its responsibility to respect the internationally recognized human rights and foster respect for human rights in relationships with business partners along the value chain.

AMG is firmly committed to full compliance with all national rules and regulations applicable to AMG's group companies. Where the requirements of such domestic legislation are stricter, meaning are even more strict or provide additional rules in protecting human rights than this Policy, the relevant stricter or additional rules of such national legislation shall prevail. This Policy shall stipulate the minimum principles that AMG applies.

3 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, in particular human resources or local management, are responsible for implementing this Policy covering human rights issues related to their operations and complying with local laws.
- All AMG employees are responsible for treating others with dignity and respect at all times. Employees have a personal responsibility to adhere to the human rights and are expected to report any irregularity.

4 DEFINITIONS

- **Human Rights**: Internationally recognized human rights are expressed in the International Bill of Human Rights covering both the Universal Declaration of Human Rights and economic,

social, cultural rights, and civil and political rights. In addition, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work needs to be respected by businesses.

- **Human Rights Due Diligence**: In order to identify, prevent, mitigate and account for how AMG addresses its adverse human rights impacts, AMG should carry out human rights' due diligence. The process should include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

5 AMG'S COMMITMENT AND APPROACH TO HUMAN RIGHTS

AMG embraces its responsibility to respect the internationally recognized human rights and foster respect for human rights in relationships with business partners along the value chain. AMG supports and respects the internationally recognized human rights in line with international standards and initiatives as the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises; the ILO Declaration on Fundamental Principles and Rights at Work. In addition, AMG is a signatory of the United Nations Global Compact.

AMG's human rights risk analysis follows a risk-based approach, aligning with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. AMG Group-wide assessments are conducted to identify, assess, and manage human rights and environmental risks. AMG sees due diligence as a continuous improvement and learning process. The following sections outline key commitments in order to respect human rights and ensure favorable conditions of work within AMG's business activities.

5.1 Respecting human rights in AMG's own operations

- ***Diversity and inclusion***: We are committed to embracing diversity and inclusion in all our practices and policies to create an environment where everyone has an opportunity to thrive and feel a sense of belonging. Through engagement, we endeavour to gauge the needs of employees to the extent possible, including all minority groups.
- ***Health, safety and wellbeing:*** Nothing is more important to AMG than the safety, health and well-being of our workers. We are dedicated to establishing safe and healthy workplaces with programs for physical and mental well-being.
- ***Non-discrimination and promoting diversity and inclusion***: AMG has zero tolerance for any kind of discrimination or harassment based on racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, or other forms of discrimination.
- ***Remuneration: Fair and equal pay***: AMG adheres to the principle of equal pay for work of equal value and compensates its employees with fair wages and benefits, at all times subject to applicable national practice and regulations.

- ***Working time***: AMG complies with national legal working time regulations as a minimum requirement. AMG supports parental leave to the extent possible, and is prepared to offer flexible work hours, remote work options, and part-time opportunities.
- ***Freedom of association, collective bargaining and social dialogue***: AMG upholds the principles of freedom of association and collective bargaining. Social dialogue is characterized by information and consultation with worker representatives based on national regulations.
- ***No forced or compulsory labor or human trafficking***: AMG has zero tolerance for the use of forced or unlawful compulsory labor of any kind in its business activities. AMG abides by anti-trafficking and modern slavery policies.
- ***No child labor***: AMG fully rejects child labor and adheres to minimum age provisions of national labor laws and regulations, and where national law is insufficient, we consider international labor standards.
- ***Relationships with communities and handling of conflict minerals***: AMG endeavors to support the development of local communities and to foster strong relationships in areas of its operations. AMG respects the customs, values, and cultures of local communities, including indigenous communities. AMG is dedicated to ethical business practices. We deem any mining activities that are linked to armed conflicts and related human rights abuses unacceptable.

5.2 Preventive measures

AMG develops and implements appropriate preventive measures, if the human rights risk analysis identifies any potential risks to people. In our own operations we continuously strive to improve respective processes to address potential risks. Within direct business relationships we are implementing assessment processes to consider social and environmental aspects. This may include incorporating expectations into contractual agreements, ongoing engagement with business partners, and conducting on-site assessments or audits. We expect our direct business partners to exert their best efforts in promoting respect for human rights among their suppliers and contractors.

5.3 Remediation measures

AMG is committed to preventing human rights 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.

6 MONITORING AND GRIEVANCES

Human Rights Due Diligence at AMG is a continuous process, reviewed at least annually for effectiveness to be improved as necessary. Ad-hoc assessments may be conducted for significant changes or expanded risk situations.

We are committed to providing our workforce, workers in our value chain, community members, and others with access to effective grievance mechanisms. Grievances can be reported by both internal and external stakeholders, including but not limited to our employees, workers in our value chain, and communities through AMG's Speak Up procedure (see Speak Up & Reporting Policy). Confidentiality, non-retaliation, and remedy will be maintained in accordance.

AMG expects all its employees to comply with this Policy. If any employee is found to have exhibited inappropriate conduct or behavior in breach of this Policy, AMG reserves the right to take actions, in particular, but not conclusively to take disciplinary actions, including dismissal.

Feedback from our own workforce or workers from our value chain regarding this Policy are welcomed and can be addressed through AMGs websites and contact information.

7 TRAINING

AMG periodically provides training to relevant AMG employees (through training on AMG's Code of Business Conduct), and regularly reviews this Policy to ensure compliance with all applicable laws and regulations. Training will take place in the following manner:

All new employees take the AMG Code of Business Conduct online training course.

All new employees are being inducted by the local compliance officer once they start employment and are being advised about the application, amongst other policies, of the AMG Code of Business Conduct, Speak Up & Reporting Policy and this Policy.

All AMG employees are trained regularly, at least every three years, in the AMG Code of Business Conduct, either online or by way of onsite meetings. Designated groups of AMG Employees may receive regular specific training on the matters referred to in this Policy.

8 OTHER RELATED DOCUMENTS

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

- AMG Code of Business Conduct
- AMG Diversity and Inclusion Policy
- AMG Supplier Code of Conduct
- AMG Speak Up & Reporting Policy

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