STAKEHOLDER ENGAGEMENT POLICY

1 PURPOSE

AMG Critical Materials N.V. and its group companies ("**AMG**") has formulated this stakeholder engagement policy ("**Policy**") on the sustainability aspects of AMG's strategy, in accordance with the Dutch Corporate Governance Code and the EU Corporate Sustainability Reporting Directive.

Stakeholder engagement is an important part of AMGs efforts to positively affect our license to operate, our market position and our efforts to create sustainable long-term value. This Policy provides a framework for identifying key stakeholders and engaging with them to enhance communication, collaboration, and mutual understanding. We seek and are open to feedback on the topics that matter to our stakeholders, particularly sustainability aspects of AMG's strategy. This helps us to understand, address, and manage the expectations of relevant stakeholder groups regarding our business interests.

In any exchange with our stakeholders, we are guided by our core Values in what we hold dear, what we believe in and what we aim for: Safety, Value Creation, Respect for people, Enabling CO_2 Reduction and Integrity. AMG stakeholders and the communities where we operate remain central to our business. Within our company, our human rights principles are sustained through the provision of safe and healthy working conditions in a non-discriminatory environment. We continuously support these principles by living our Values in our interactions with local and national governments and the communities in which we operate. AMG is invested in the communities where we operate and committed to hiring employees from the community, investing in building diverse talent pools, and providing training to improve skill levels. Wherever possible, we endeavor to extend our Values and principles to our suppliers and contractors.

2 SCOPE AND APPLICABILITY

This Policy encompasses engagement with AMGs internal and external stakeholders and is applicable to AMG and all its group companies.

As AMG operates in various countries and regions, local laws will differ. AMG is firmly committed to full compliance with all national rules and regulations applicable to AMG's group companies. Where the requirements of local legislation deviate from this Policy and apply stricter or additional rules, these stricter or additional rules shall prevail or apply.

3 ROLES AND RESPONSIBILITIES

- The Management Board has adopted this Policy and is accountable for its implementation. It shall review this Policy and its implementation regularly in consultation with the Supervisory Board.

- Implementation shall include engagement planning, communication, feedback, reporting and documentation, and shall be executed in close consultation and cooperation with the management of its group companies.

4 DEFINITIONS

- **Stakeholder**: Stakeholders are those who can affect or be affected by the organization. They may be affected stakeholders or users of sustainability statements, or both. Affected stakeholders are individuals or groups whose interests are affected or could be affected by AMG's activities and its direct and indirect business relationships across its value chain, such as employees, local communities and nature. Examples of users of financial reporting and sustainability statements include AMG's shareholders / investors, business partners, authorities and governments.
- **Stakeholder engagement/ dialogue:** Stakeholder engagement is a two-way process at different levels and associated engagement methods of communication between AMG and its stakeholders, where information or opinions are exchanged. It involves active listening, open and honest communication, and a willingness to understand different perspectives.

5 AMG'S COMMITMENT TO STAKEHOLDER ENGAGEMENT

5.1 Stakeholder mapping

AMG identifies its key stakeholders based on their potential to influence or be affected by our activities, as well as potential relevant knowledge about certain sustainability aspects. The group of stakeholders we engage with is not static and can be adjusted depending on the topics of the dialogue and the developments thereof over time. AMG conducts regular stakeholder mapping at an appropriate level.

5.2 AMG's key stakeholders

- ***Shareholders / Investors***: We are committed to delivering strong and sustainable returns for the capital that investors provide. We actively engage with our shareholders and aim to be clear and transparent in how we communicate our strategy, financial results and operating developments, so they can make informed investment decisions.
- ***Customers***: The relationships with our customers form the foundation of AMG's products and services. AMG's units continuously engage with their customers to offer solutions to meet their needs.
- ***Employees***: Our employees are our most valuable asset. We believe that collaborating, investing in opportunities for personal growth, and diversity of thinking lead to better results, today and in the future.
- ***Business partners***: We have relationships with our suppliers and many other partners in our value chain, including intermediaries and other entities linked to our operations, products and

services. We stimulate good cooperation and engagement with our business partners through our activities to contribute to the well-being of people and the planet.

- ***Local communities***: AMG is dedicated to contributing to the overall well-being of the communities in which we operate. Our objective is to be a valued participant in the local economy, community, and society.
- ***Nature***: The responsibility to nature is of significant importance for AMG. We do business with the future in mind and want to contribute to a world where people can thrive for generations to come. We do this by investing our assets responsibly and integrating sustainability factors into our activities. For example, the development of innovative products that enable the reduction of CO_2 emissions, is fundamental to AMG's business strategy.
- ***Authorities and governments***: We have direct engagements with public decision-makers and regulators, including governments or authorities at local, national and international level, concerning regulatory and financial markets related issues by way of exchanging relevant information, wherever appropriate, and discuss relevant policy developments.

5.3 Stakeholder engagement

AMG operates through a highly decentralized management organization where its group companies carry full responsibility for the operational results and interaction with their immediate stakeholders. AMG's Management Board oversees and guides stakeholder engagement by its group companies and engages with stakeholders directly as and when appropriate.

Our dialogue is guided by materiality. We engage in early dialogue with key stakeholders to understand their perspectives. We acknowledge our responsibility to address stakeholder concerns, feedback, and expectations, and we take our stakeholders' concerns and expectations seriously when making decisions about how we develop and operate our business.

AMG interacts through day-to-day interaction and regular feedback sessions with customers on its products and services; employee works council meetings and other dialogue with colleagues; meetings with (potential) shareholders, bondholders and industry analysts; regular contact with regulatory bodies, government agencies and other organizations (including non-governmental organizations (NGOs), trade unions and industry associations); surveys; roundtables with policymakers, academics and peers. The dialogue on sustainability aspects of the strategy also takes place as part of regular meetings between the Management Board, and Supervisory Board.

AMG stimulates stakeholder dialogue in all its business activities and via the various channels and activities for stakeholder engagement. The form that is chosen for any specific dialogue depends on the topic and on the stakeholders involved. AMG may decide not to accommodate or accept any requests or invitations to enter into a dialogue with stakeholders, or to accommodate or accept such request or invitation under certain conditions. AMG shall adhere to all legal obligations relating to confidentiality and shall only disclose publicly known information in meetings. In the event that inside

information is inadvertently disclosed during any (bilateral) contact, AMG will publicly announce such information as soon as possible.

AMG conducts regular assessments to understand the needs, interests and expectations of our stakeholders, using this information to inform engagement strategies and review results in relation to AMG's strategy.

We provide our stakeholders with relevant information about our activities, decisions and performance, in accordance with applicable law, to foster transparency and trust.

6 MONITORING AND GRIEVANCES

Stakeholder engagement is characterized by its diversity in terms of key stakeholders, engagement objectives, methods, scope and frequency. To ensure effectiveness, AMG tracks and reports relevant data transparently in line with the sustainability disclosures of the EU Corporate Sustainability Reporting Directive ("**CSRD**").

Should a stakeholder have any queries or concerns or require any clarifications relating to AMG, it is always possible to contact us in accordance with our Speak Up & Reporting Policy to be found on the AMG Critical Materials N.V.'s website. Confidentiality, non-retaliation, and remedy are maintained in accordance. We welcome any comments from our stakeholders regarding this Policy. These can be addressed through AMG's website contact information.

7 OTHER RELATED DOCUMENTS

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

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

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