

CONFLICT MINERAL POLICY AMG BRASIL S.A

1. PURPOSE

AMG BRASIL S.A., a company from AMG Group (www.amg-nv.com), is committed to achieving the highest standards of safety, environmental conduct and producing materials that help its customers to minimize negative environmental impact.

The company provides quality products and solutions to a wide range of customers, mainly in the following segments: transportation, chemicals and specialty metals, infrastructure and energy. We focus our efforts on sustainable products and processes to reduce the carbon footprint, benefiting all stakeholders.

We formally support the United Nations Global Compact including its labor, environmental, anti-corruption and human rights aspects. We will continuously support our human rights standards by living our values in our interactions with local and national governments, and the communities where we operate and whenever possible endeavor to extend our values and principles to our suppliers and contractors.

2. PRINCIPLES

AMG expects its Suppliers to conduct their business responsibly, with integrity, honesty and transparency and to adhere to the following Principles:

2.1 Applicable regulations and international standards AMG expects its Suppliers to:

- be aware and comply with all applicable laws and regulations of the countries of their operation; and
- adhere to relevant international standards, such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the RMAP (Responsible Minerals Assurance Process) RMI (Responsible Minerals Initiative) standard for Tantalum and Tin.

2.2 OECD Annex II Risks

AMG Brasil is aware of activities involving the exploitation of natural resources that contribute to human rights violations, their impacts are adverse and may be associated with the extraction, trading, handling and export of minerals from conflict-affected areas, specifically involving raw materials containing tantalum, lithium and tin. Therefore, AMG Brasil S.A. has fully adhered to all recommendations described in Annex II of the OECD for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – Third Edition, as described below:

2.2.1 Regarding serious abuses associated with the extraction, transport or trade of minerals:

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- i) any forms of torture, cruel, inhuman and degrading treatment;
- ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- iii) the worst forms of child labour;
- iv) other gross human rights violations and abuses such as widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

AMG Brasil S.A
Materiais Especiais

amg-br.com

Rodovia 383 Km 94
Colônia do Marçal, CEP: 36.302.186
São João Del Rei - MG

2.2.2 Regarding direct or indirect support to non-state armed groups:

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;⁵ and/or
- ii) illegally tax or extort⁶ money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

2.2.3 Regarding public or private security forces:

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

2.2.4 Regarding bribery and fraudulent misrepresentation of the origin of minerals:

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

2.2.5 Regarding the payment of taxes, fees and royalties due to governments

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation, financing of terrorism or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI)

3. COMPLIANCE

AMG Brasil will immediately suspend or discontinue engagement with any supplier that violates the OECD Annex II risks mentioned above.

4. WHISTLEBLOWER CHANNEL

AMG Brasil has implemented a reporting mechanism that allows any interested party (affected persons or whistleblowers) to express their concerns about the circumstances of the extraction, trade, handling and export of minerals. The reporting channel is available at: <https://amg-br.com/pt/contato/compliance/> . All reports will be investigated, and when applicable, corrective and preventive actions will be taken.

A handwritten signature in blue ink, appearing to read 'A. Bruno de Paiva', written over a horizontal line.

Alexander Bruno de Paiva
Procurement Manager

Review 08: May 16, 2025