

Modern Slavery Act Transparency Statement

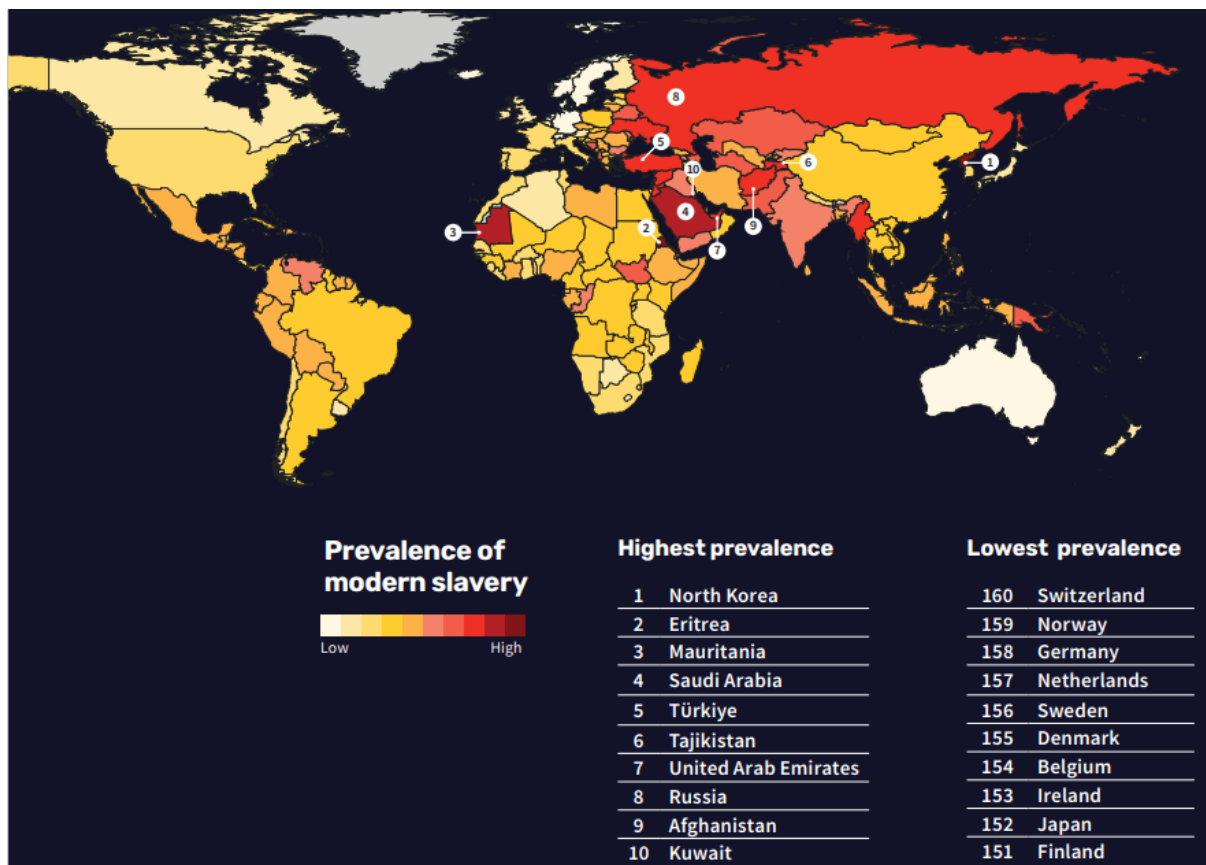
Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It sets out the steps AMG Chrome Limited and AMG Alpoco UK Limited have taken during the 2025 financial year to prevent slavery and human trafficking from taking place in our supply chain, or in any part of our business together with the additional steps we intend to take in 2026.

Organisations with an annual turnover of £36 million or more must produce and publish a slavery and human trafficking statement each financial year.

Modern Slavery takes place in many forms; debt bondage, servitude, child slavery, forced labour and human trafficking. Slavery thrives on every continent and in almost every country and affects the world's most vulnerable people.

The global slavery index (www.walkfree.org/global-slavery-index/) reported in 2023 that 50 million people worldwide are trapped in some form of slavery, this is an increase of 10 million since the last published figures in 2018.



Organisation Structure, Business and Supply Chain

AMG Chrome Limited and AMG AlpoCo UK Limited are UK subsidiaries of AMG Critical Materials N.V. ('AMG').

AMG is a global critical materials company at the forefront of CO₂ reduction trends. AMG produces highly engineered specialty materials and provides vacuum furnace systems and services to the transportation, infrastructure, energy, and specialty metals and chemicals end markets.

With approximately 3,600 employees, AMG operates globally with production facilities in Germany, the United Kingdom, France, the United States, China, Mexico, Brazil, India, Sri Lanka and has sales and customer service offices in Japan.

AMG Chrome Limited is a leading provider of speciality metals, alloys and materials. The company is a world leading manufacturer of chromium metal and chromium powders.

AMG AlpoCo UK Limited is a world leading manufacturer of aluminium powders.

Each UK subsidiary sources raw materials, products and services globally.

Raw materials are sourced globally and some can only be sourced from a limited number of countries. Raw materials account for approximately 64% of our production costs with the remaining 36% being made up of 6% indirect costs, 19% direct costs, 6% other costs and 5% SG&A.

For more information please visit our global website: www.amg-nv.com

Policy

AMG are fully committed to human rights and expect their supply chain to meet the provisions laid out in the following company policies:

AMG Supplier Conduct Charter

A supplier charter has been in place for the AMG group since 2013. Most of our existing major suppliers have accepted our Supplier Conduct Charter to demonstrate their commitment towards Human Rights, Labour, the Environment and Anti-Corruption. The minority of suppliers who don't accept our Supplier Conduct Charter supply their own and we verify their document to check it matches or exceeds ours. Going forward we are looking to implement a defined exception process outlining who is authorised to accept a Supplier's Code of Conduct as a suitable alternative to AMG's and this will be included in the Sustainable Procurement Policy.

In 2024 the Supplier Conduct Charter was updated by AMG and sent to our key suppliers. This document continues to be issued with each Supplier Self Assessment form as well as a copy with all purchase orders. We expect each supplier to accept our conduct charter as part of the approval process.



AMG Code of Business Conduct

The AMG Code of Business Conduct, which has been in place since 2009, serves to guide the actions of all employees and is used as a tool to help employees make the right decisions and resolve ethical issues that they may encounter. The code helps employees to do the right thing and abide by the rules wherever AMG operate around the world.

To reinforce the principles of the AMG Code of Business Conduct (updated in 2023), employees are required to complete training when they commence employment and periodically thereafter. The next scheduled refresher training will take place in 2026.



Policy on Human Rights

AMG supports and respects the protection of internationally proclaimed human rights and will work to make sure it is not complicit in human rights abuses. The key principles of the AMG Policy on Human Rights are driven by internationally accepted norms and national law.



Robust HR policies and procedures are in place to support ongoing compliance with UK employment legislation. These include conducting right to work and age verification checks, issuing formal contracts of employment and ensuring all employees are paid in accordance with National Minimum Wage requirements.

These measures help safeguard against unlawful employment practices and reduce the risk of modern slavery and labour exploitation within our business. We offer market related pay and reward packages for the local areas in which we operate, which includes pensions and additional health and welfare benefits to support our employees during and after their working lives.

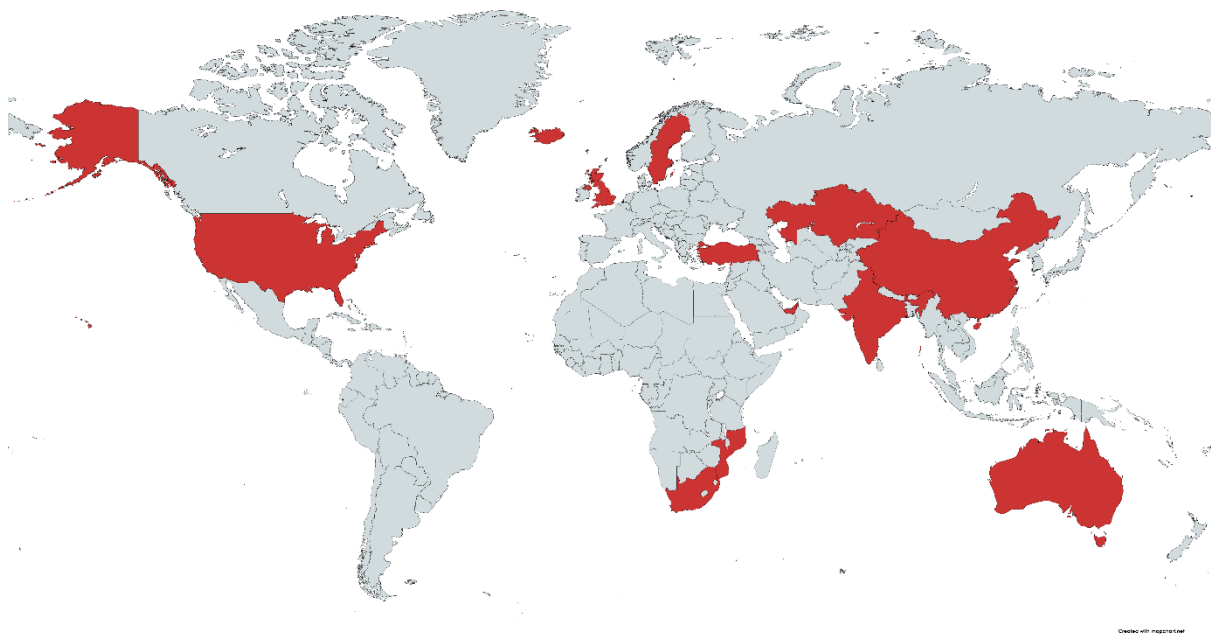
Our employment is not seasonal in nature and we do not employ people on zero-hours contracts. We have a good working relationship with the trade union who represent a proportion of the staff at our sites.

Risk Assessment

AMG Chrome Limited and AMG Alpoco UK Limited have adopted a process that focuses on the Supplier Self Assessment feedback where each supplier is rated high, medium or low risk. We have dedicated personnel who review each completed form and risk assess based on the depth of the response in the ethical section to include any supporting documents such as a Modern Slavery policy and / or statement the supplier may have. AMG's Supplier Conduct Charter acceptance and geographical location of supplier and products sourced are also taken into consideration before the relevant risk rating is applied. Further work on risk will be carried out during the supplier audit process to fully understand how often our suppliers audit their suppliers. Suppliers who we score as high risk will be audited more frequently.

The world map below highlights the countries from which AMG Chrome Limited and AMG Alpoco UK Limited source critical raw materials.

AMG Chrome Limited and AMG Alpoco UK Limited Supply Map



AMG UK did not source any raw materials from Russia during 2025.

Priorities based on the risk assessment

AMG has worked with and will continue to work closely with suppliers where risk has been identified. Ethical site audits have and will continue to be completed on high and medium risk suppliers. Training will be provided to suppliers on modern slavery on a case-by-case basis.

AMG have further assessed high risk suppliers by distributing a specific questionnaire to be completed by the supplier, this is to fully understand the overall potential risk of slavery. From the reviews it is

evident that our suppliers are taking the issue of forced labour seriously in regards to their own supply chain.

Monitoring / auditing

AMG carried out 39 supplier audits during 2025 against an annual target of 39. Of these audits, 69% were desktop based and the remaining 31% face to face. From those suppliers audited, 64% have a Modern Slavery policy in place which demonstrates their commitment to Modern Slavery. Our target for 2026 is to perform 36 supplier audits with more focus on site visits, where possible.

Actions taken to reduce risk or to provide remedy

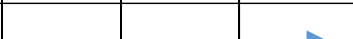
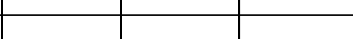
To promote the reporting of violations of the Code of Business Conduct, AMG has adopted a Speak Up and Reporting Policy, enabling employees and other stakeholders to submit complaints on an anonymous basis without fear of the complaints leading to disciplinary action. The Speak Up and Reporting Policy can be found on the Company website at www.amg-nv.com under the Corporate Governance section. The Speak Up and Reporting policy applies to the reporting of any suspicions our employees or other stakeholders may have regarding modern slavery. A portal has been set up where employees and external parties can speak up by using the app or via the internet.

AMG has a designated Compliance Officer and Compliance Representative for our UK sites, their contact details are made available to all employees. AMG has delivered training to all relevant personnel on the risks of modern slavery.

During 2025, 138 suppliers completed our Supplier Self Assessment; 6% of these were existing suppliers and 94% were new suppliers. All 138 suppliers signed up to our Supplier Conduct Charter or provided their own charter, demonstrating their commitment to work with AMG.

AMG have recognised the significance of Modern Slavery, and during 2025 AMG Chrome Limited retained their Stronger Together Advanced Business Partner status. This shows our commitment to tackling Modern Slavery within the business and also allows us to progress our objectives of preventing and recognising Modern Slavery within our organisation and Supply Chain.

AMG 2025 progress report and further commitments during 2026

	Not Started	In Progress	Completed
Progress report 2025			
Introduce induction video on Modern Slavery for new starters			
Retain Stronger Together Advanced Business Partner status			
Review supplier audit form following suggestions from Stronger Together audit workshop			
Attend refresher Modern Slavery workshops held by Stronger Together			
Encourage suppliers to check out the Stronger Together website and resources and workshop attendance			
Provide refresher training for Security staff on how to recognise and respond appropriately to potential signs of Modern Slavery			
Provide refresher training for the recruitment team on Modern Slavery and ethical employment practices			
Employees to complete an online compliance awareness refresher course			

In regards those actions that weren't completed in 2025, such as refresher training, this is due to being unable to find a suitable course, however, relevant training has now been identified and will be delivered in 2026.

During 2026 AMG propose to do the following

	Not Started	In Progress	Completed
Commitments during 2026			
Introduce induction video on Modern Slavery for new starters			
Provide refresher training for the recruitment team on Modern Slavery and ethical employment practices			
Employees to complete an online compliance awareness refresher course			
Retain Stronger Together Advanced Business Partner status			
Attend refresher Modern Slavery workshops held by Stronger Together			
Embed a zero tolerance approach into company policies by reviewing our recruitment and whistleblowing policies			
Track the percentage of key suppliers who have provided equivalent training to their workforce			
Carry out regular worker welfare checks on our employees using questionnaires to help identify potential issues such as harassment, bullying, control or exploitation			
Review of the existing Modern Slavery policy			
Encompass Modern Slavery compliance into ESG reporting to the senior management team with regular review meetings			

Monitoring effectiveness using KPIs

At AMG Chrome Limited and AMG Alpocho UK Limited we understand that modern slavery risk is not static and we will continue our leading approach to mitigating the risk in the years ahead and strive to collaborate with our suppliers on a frequent basis to better understand their policies and processes.

Since AMG UK started their Modern Slavery journey and regular auditing of suppliers, it is evident that companies are more engaged now with this important issue by developing their own Modern Slavery policies and publishing annual statements.

AMG UK are pleased to report that no incidents of Modern Slavery have been identified.

We will continue to monitor our performance through regular reviews of modern slavery related risks. These are assessed through our key performance indicators, such as number of ethical site audits, completed supplier self assessments and also number of staff trained on modern slavery and spotting the signs. It is encouraging to see that more of our suppliers have a Modern Slavery policy or statement in place compared with previous years.

Training

Our in house training on modern slavery is a continuous process.

In order to keep modern slavery awareness high in our business, we have set up an online compliance awareness course which employees are required to complete. The first course was held in 2019 with a refresher in 2021. The next refresher course is planned for 2026. Three members of the Supply Chain department attended the Stronger Together “Effective Human Rights Due Diligence in Supply Chains” workshop in 2025. This has enhanced our knowledge of Modern Slavery and improved our ability to deter, detect and deal with Modern Slavery should it arise at AMG in addition to improve what we might ask and look for during our supplier audits.

AMG will continue to update its policies and procedures, as required, in order to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Collaboration and stakeholder engagement

AMG have a dedicated project team that includes members of Finance, Supply Chain and HR.

Employee training is carried out onsite to raise awareness and how to spot the signs of modern slavery, information on sharing risks and approaches is included on all notice boards and annual updates in the company team brief.

AMG understand that there is a clear moral case for eliminating modern slavery and human rights, we acknowledge the need to take a collaborative approach with supplier engagement and will share knowledge and training material where necessary.

This statement was approved on 22nd June 2026 by the Board of Directors.

Kevin Lawson
President - AMG Chrome Limited
Managing Director - AMG AlpoCo UK Limited