

# Corporate Policy for the Correct Handling of Conflict Minerals

Revision: 01

Version: 11/2024

Published by: EHS

Page 1 of 3

ALD Vacuum Technologies GmbH (ALD), a company of AMG Critical Materials NV (AMG, see [www.amg-nv.com](http://www.amg-nv.com)) pursues a **responsible** strategy regarding the **sourcing, production and marketing of conflict minerals**. ALD's policy adheres to the OECD Guidelines for Responsible Supply Chains from Conflict-Affected and High-Risk Areas, particularly concerning minerals such as tungsten, tantalum, tin and gold.

ALD recognizes that this responsibility can only be fulfilled in cooperation with its business partners. Corresponding guidelines and requirements for our suppliers are outlined in the AMG Supplier Code of Conduct. For example, it stipulates that ALD expects its suppliers to comply with the OECD Guidelines and international standards such as the UN Guiding Principles on Business and Human Rights.

Through the participation of our parent company AMG in the UN Global Compact, we are also committed to the Ten Principles of the UN Global Compact, including labour, environmental, anti-corruption and human rights aspects.

Our goal is to embody these values in our interactions with governments and local communities and to pass them on to our suppliers.

ALD acknowledges that the exploitation of natural resources can contribute to human rights abuses and other negative impacts associated with the extraction, trade, handling and export of minerals from conflict-affected and high-risk areas, particularly resources containing tungsten, tantalum, tin and gold.

The following sections summarize ALD's principles and measures for responsible sourcing, respect for human rights, combating corruption and sustainable risk management.

These principles and measures ensure compliance with ethical and legal standards throughout the supply chain and foster sustainable cooperation with our suppliers.

## 1. Procurement and due diligence

ALD does not procure tantalum-, tungsten-, tin-, or gold-containing raw materials that actually or potentially originate from conflict-affected or high-risk areas. ALD conducts appropriate due diligence with its suppliers to ensure that no human rights violations such as torture, forced labour or child labour are supported. We unequivocally reject and do not support:

- any form of torture or inhuman treatment;
- forced or compulsory labour;
- child labour;
- other human rights violations.

## Corporate Policy for the Correct Handling of Conflict Minerals

Revision: 01

Version: 11/2024

Published by: EHS

Page 2 of 3

### 2. Cooperation with suppliers

ALD will immediately suspend or terminate cooperation with suppliers if ALD identifies a substantiated risk that a supplier is associated with a party that directly or indirectly supports public or private security forces and/or non-state armed groups by mining, transporting, trading, handling or exporting minerals, making payments to armed groups or their affiliates, or otherwise providing them with logistical support or equipment that:

- a. Illegally controls mine sites or otherwise controls transportation routes and locations where minerals are traded;
- b. Illegally taxes or extorts money or minerals at access points to mine sites, along transportation routes, or at points where minerals are traded;
- c. Practice illegal taxation or extortion of middlemen, export companies or international traders.

The role of public or private security forces at mine sites, in surrounding areas, or along transport routes must solely serve to uphold the rule of law, including the protection of human rights, safety of mine workers, equipment, facilities, and ensuring the legal extraction and trade of minerals.

### 3. Proof of origin for minerals

All supplies of conflict minerals to ALD must include adequate proof of origin to meet OECD standards and any other applicable legal regulations. ALD supports measures to combat money laundering and rejects any bribery or attempts to conceal the origin of minerals.

- a. We support efforts to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising from or related to the extraction, trade, handling, transportation or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded from upstream suppliers.

In alignment with the AMG Code of Conduct and AMG's "ANTI-BRIBERY, ANTI-CORRUPTION AND CONFLICTS OF INTEREST" policy, ALD will not offer, promise, give, or solicit bribes. We will resist any solicitation for bribes aimed at concealing the origin of minerals or misrepresenting taxes, fees and royalties payable to governments for the extraction, trade, handling, transportation and export of minerals.

# Corporate Policy for the Correct Handling of Conflict Minerals

Revision: 01

Version: 11/2024

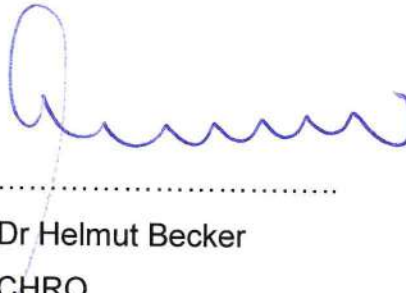
Published by: EHS

Page 3 of 3

## 4. Risk management and complaint mechanism

In addition to continuously reviewing the rules mentioned above, a “Speak Up” complaint mechanism has been implemented (see AMG Corporate Governance). Suppliers who violate the company’s policy on the responsible handling of conflict minerals will be removed from the supply chain.

Hanau, 27 November 2024

  
.....  
Michael Hohmann  
CEO  
.....  
Dr Helmut Becker  
CHRO