



Conflict Minerals Policy

Effective as of August 27, 2026

Background:

In August 2012, the SEC (United States Securities and Exchange Commission) unveiled its final directives on „Conflict Minerals“ (referred to as ‚3TG‘ – Tantalum, Tin, Tungsten, and Gold), as outlined in section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. **In the European Union, Regulation (EU) 2017/821 establishes corresponding supply chain due diligence requirements concerning minerals originating from conflict-affected and high-risk areas.** Consequently, companies are called to evaluate the presence and origins of Conflict Minerals in their products, including their sourcing from conflict-affected and high-risk areas worldwide.

AMC recognizes the significance of addressing Conflict Minerals within its supply chain. We are committed to ensuring that our products do not contain Conflict Minerals sourced from mines that support or fund conflict in conflict-affected and high-risk areas, including the Democratic Republic of Congo and adjoining countries. This commitment aligns with our broader corporate responsibility efforts to uphold high social, environmental, and human rights standards.

Commitments:

In line with our values, AMC commits to:

- Determining the AMC products affected by Conflict Minerals and guiding actions accordingly.
- Refraining from acquiring products and materials containing Conflict Minerals directly from conflict mines.
- Encouraging our suppliers to verify that Conflict Minerals in their provided products and materials originate from Conflict-Free Sources.
- Advocating for conflict-free trade by urging our suppliers to treat all sources of Conflict Minerals fairly.
- Collaborating with our suppliers on their disclosure responsibilities to enhance transparency and accountability across our operations.

Due Diligence and Risk Management Measures:

To fulfill these commitments, AMC has implemented the following measures:

- Requiring our suppliers to implement a policy addressing Conflict Minerals and conduct thorough investigations to determine their origins **and enable the identification and assessment of potential supply chain risks.**
- Requiring suppliers to use smelters/refiners conformant to a 3rd party responsible mineral sourcing validation program like RMAP.
- In case non-active or non-conformant smelters/refiners are reported, requesting them to participate in RMAP.
- We work with our supply-chain to address **identified risks, including risks related to non-conformant smelters/refiners**, and to support their RMAP compliance. If a smelter does not become RMAP compliant again **within a reasonable period**, we ask our supply chain to transition away from this smelter.
- In case the supplier lists an entity that is currently subject to applicable sanctions, the supplier has to provide a product level report detailing the specific 3TG smelters/refiners and confirm that material from such entity did not enter AMC supply chain while subject to sanctions.
- Collaborating with suppliers to ensure prompt responses to requests for proof of compliance. Supplier commitment to this endeavor will impact our procurement choices.
- Periodically revising the AMC Supplier Code of Conduct and procurement terms to align with our Conflict Minerals policy.

Additionally, AMC monitors and evaluates its Conflict Minerals compliance program and seeks its continuous improvement. This includes risk assessments and, where appropriate, audits and supplier performance evaluations. Furthermore, clear communication channels **are maintained** internally and externally to facilitate reporting of concerns or violations related to Conflict Minerals sourcing.