

FERROGLOBE PLC

SLAVERY AND HUMAN TRAFFICKING STATEMENT 2023

In its Code of Conduct, FerroGlobe PLC (**FerroGlobe, Company or we** and, together with its subsidiaries, the **Group**) clearly expresses its commitment to the highest standards of integrity, ethical behaviour, transparency, safety and corporate citizenship. This includes its belief that fundamental human rights be respected, its support for the UN Guiding Principles on Business and Human Rights and its policy to encourage all those with whom the Company deals to act consistently with FerroGlobe's commitment to human rights and contractually require them to do so wherever feasible.

ORGANIZATIONAL STRUCTURE AND SUPPLY CHAIN

FerroGlobe PLC is the parent company of the FerroGlobe Group, one of the world's leading suppliers of silicon metal, silicon- and manganese-based specialty alloys, and other ferroalloys serving a customer base across the globe in dynamic and fast-growing end markets, such as solar, automotive, consumer products, construction and energy. The Company is based in London, and the Group employs over 3,400 employees globally.

The Group has operational quartz mining activities in Spain, the United States, Canada and South Africa, low-ash metallurgical quality coal mining activities in the United States, interests in hydroelectric power plants in France and a carbon electrodes plant in China. FerroGlobe owns a significant portion of the operations supplying the raw material necessary for its production processes and procures coal, manganese ore, quartz, petroleum and metallurgical coke, electrodes and most additive metals through a central procurement function headquartered in Madrid, Spain.

OUR POLICIES AND TRAINING ON SLAVERY AND HUMAN TRAFFICKING

We are committed to making every effort to ensure that there is no slavery or human trafficking in our supply chain or in any part of our business. Our Code of Conduct, which was most recently revised in 2021, is subject to annual certification by all employees and is the subject of mandatory training. The Code of Conduct clearly expresses our support for the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights and our express intent to implement, wherever possible, procedures to identify and allow us to minimise the risk of slavery and human trafficking within our business or our supply chain.

As clearly stated in our Code of Conduct, FerroGlobe does not employ, condone or tolerate forced, bonded, indentured or involuntary labor, or the exploitation or unlawful use of immigrant labor. Similarly, FerroGlobe does not employ, condone or tolerate child labor, and seeks to ensure that the welfare, health and safety of children are paramount at all times.

If anyone in the Company becomes aware of human rights breaches by a supplier or any other person or firm with whom the Company deals, and such supplier or other person fails to take corrective action upon request, the Company's policy is to sever commercial ties with such entity or person.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

To assist in the identification and assessment of the risk of human slavery in our business and our supply chain, over the past twelve months we have undertaken a comprehensive survey of our suppliers as well as our central procurement function to gauge their level of awareness and understanding of the risks of slavery and human trafficking and how these may be and are being mitigated against in their own business and the supply chains that they operate. We have also sought express confirmation from them that they are committed to standards of ethical behaviour no less rigorous than our own and specifically that they have policies or procedures in place to identify, guard against and deal with any instances of slavery or human trafficking in their business or supply chains and have had no reported instances of slavery or human trafficking within their business or supply chains. In addition, we have reached out to each responsible manager within the Group to ensure that they understand the red flags which may indicate slavery or human trafficking within their plant, facility or operation;

ensure that they have appropriate processes in place to identify, encourage the reporting of and minimise the risk of slavery or human trafficking within their plant, facility or operation; and confirm that there have been no reports or allegations of slavery or human trafficking within their plant, facility, operation or business.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

The indicators (KPIs) we use to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains include:

- a) **Confirmation:** the number of responsible managers who have confirmed their understanding and the procedures in place with their plant, facility or operation to identify and guard against slavery and human trafficking within our business;
- b) **Vetting and screening:** the number of suppliers who have engaged with us and provided reasonable assurances to us of their commitment to combatting slavery and human trafficking in their business or supply chains;
- c) **Whistleblowing:** we have established a confidential whistleblowing hotline accessible to all employees to whom it is lawful to provide access which employees may use to report any allegations or suspicions of wrongdoing within the Group, including slavery or human trafficking. Any such allegations would be fully investigated. The number of reported breaches is one of our KPIs;
- d) **Remedial action taken:** the instances of remedial action needed.

Over the last twelve months, all our responsible managers have made the requested confirmations, and over 850 suppliers have engaged with us in response to our due diligence survey regarding slavery and human trafficking within their business or supply chain. We have had no whistleblowing reports involving allegations of slavery or human trafficking and no remedial action required.

BOARD APPROVAL

This statement was approved by the Ferroglobe PLC board of directors on 22 February 2023.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.



Marco Levi
Chief Executive Officer and Director
Ferroglobe PLC