



Document Type:	AMG Policy	Classification:	Public
Title:	Human Rights Policy	Publication date:	August 2024
Department:	Workforce Reporting		
Policy Owner:	Legal & Compliance		Page: 1 of 4

# HUMAN RIGHTS POLICY

## 人权政策

In the event of any discrepancies, the English version of the guidelines shall prevail. The chinese translation is provided for reference purposes only.

如有任何差异，应以政策的英文版本为准。中文译本只供参考之用。

### 1 PURPOSE 目的

This Human Rights Policy (“**Policy**”) reaffirms and clarifies AMG Critical Materials N.V. and its group companies’ (together “**AMG**”) commitment to respecting human rights and lays out the general approach to human rights due diligence including processes and mechanisms to monitor its compliance. AMG as global company operating in a global market is built on the AMG Values - safety, value creation, respect, integrity and enabling CO<sub>2</sub> reduction - and is committed to respecting internationally recognized human rights in our own operations and to fostering respect for human rights in relationships with our business partners along the value chain.

本人权政策（“政策”）重申并阐明了AMG关键材料有限公司及其集团公司（统称“AMG”）尊重人权的承诺，并阐述了人权尽职调查的一般方法，包括监督其遵守情况的程序和机制。作为在全球市场运营的全球性公司，AMG建立在安全、价值创造、尊重、诚信和减少二氧化碳的AMG价值观之上，并致力于在我们自己的运营中尊重国际公认的人权，并在与价值链上的商业伙伴的关系中促进对人权的尊重。

### 2 SCOPE AND APPLICABILITY 适用范围及适用性

This Policy is applicable to AMG and all its group companies. Every AMG employee is expected to exhibit conduct that reflects this Policy during work, when representing AMG, on or off the work site, as well as in interactions with AMG external business partners and stakeholders.

本政策适用于AMG及其所有集团公司。每位AMG员工在工作期间、在工作现场或工作场所外代表AMG时，以及在与AMG外部业务合作伙伴和利益相关者互动时，都应表现出反映本政策的行为。

AMG embraces its responsibility to respect the internationally recognized human rights and foster respect for human rights in relationships with business partners along the value chain.

AMG有责任尊重国际公认的人权，并在与价值链上的商业伙伴的关系中促进对人权的尊重。

AMG is firmly committed to full compliance with all national rules and regulations applicable to AMG's group companies. Where the requirements of such domestic legislation are stricter, meaning are even more strict or provide additional rules in protecting human rights than this Policy, the relevant



Document Type:	AMG Policy	Classification:	Public
Title:	Human Rights Policy	Publication date:	August 2024
Department:	Workforce Reporting		
Policy Owner:	Legal & Compliance		Page: 2 of 4

stricter or additional rules of such national legislation shall prevail. This Policy shall stipulate the minimum principles that AMG applies.

AMG坚定地承诺完全遵守适用于AMG集团公司的所有国家法规。如果这种国内立法的要求更严格，即比本政策更严格或在保护人权方面提供额外规则，则应以这种国家立法的有关更严格或额外规则为准。本政策应规定AMG适用的最低原则。

### 3 ROLES AND RESPONSIBILITIES 角色和职责

- The Management Board has adopted this Policy and is accountable for its implementation. It shall review this Policy and the implementation of this Policy regularly in consultation with the Supervisory Board.
- 管理委员会通过了本政策，并对其实施负责。它应与监事会协商，定期审查本政策及其实施情况。
- AMG group companies, in particular human resources or local management, are responsible for implementing this Policy covering human rights issues related to their operations and complying with local laws.
- AMG集团公司，特别是人力资源或当地管理部门，有责任执行本政策，涵盖与其运营相关的人权问题，并遵守当地法律。
- All AMG employees are responsible for treating others with dignity and respect at all times. Employees have a personal responsibility to adhere to the human rights and are expected to report any irregularity.
- 所有AMG员工在任何时候都有责任以尊严和尊重对待他人。员工有维护人权的个人责任，并有义务报告任何违规行为。

### 4 DEFINITIONS 定义

- **Human Rights:** Internationally recognized human rights are expressed in the International Bill of Human Rights covering both the Universal Declaration of Human Rights and economic, social, cultural rights, and civil and political rights. In addition, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work needs to be respected by businesses.
- **人权:** 国际公认的人权在《国际人权法案》中得到表达，涵盖了《世界人权宣言》和经济、社会、文化权利以及公民和政治权利。此外，企业需要尊重国际劳工组织（ILO）关于工作中的基本原则和权利的宣言。
- **Human Rights Due Diligence:** In order to identify, prevent, mitigate and account for how AMG addresses its adverse human rights impacts, AMG may carry out human rights' due diligence. The process will include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.



Document Type:	AMG Policy	Classification:	Public
Title:	Human Rights Policy	Publication date:	August 2024
Department:	Workforce Reporting		
Policy Owner:	Legal & Compliance		Page: 3 of 4

- **人权尽职调查：**为了识别、预防、减轻和解释AMG如何解决其不利的人权影响，AMG可能会开展人权尽职调查。这一进程将包括评估实际和潜在的人权影响，整合调查结果并据此采取行动，跟踪回应情况，并就如何解决影响进行沟通。

## 5 AMG'S COMMITMENT AND APPROACH TO HUMAN RIGHTS

### AMG对人权的承诺和做法

AMG embraces its responsibility to respect the internationally recognized human rights and foster respect for human rights in relationships with business partners along the value chain. AMG supports and respects the internationally recognized human rights in line with international standards and initiatives as the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises; the ILO Declaration on Fundamental Principles and Rights at Work. In addition, AMG is a signatory of the United Nations Global Compact.

AMG有责任尊重国际公认的人权，并在与价值链上的商业伙伴的关系中促进对人权的尊重。根据《联合国工商业与人权指导原则》、《经合组织跨国企业指导方针》等国际标准和倡议，支持和尊重国际公认的人权；劳工组织《工作中的基本原则和权利宣言》。此外，AMG是联合国全球契约的签署国。

AMG's human rights risk analysis follows a risk-based approach, aligning with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. AMG Group-wide assessments are conducted to identify, assess, and manage human rights and environmental risks. AMG sees due diligence as a continuous improvement and learning process. The following sections outline key commitments in order to respect human rights and ensure favorable conditions of work within AMG's business activities.

AMG的人权风险分析遵循基于风险的方法，与《联合国工商业与人权指导原则》和《经合组织跨国企业指南》保持一致。AMG在整个集团范围内进行评估，以识别、评估和管理人权和环境风险。AMG将尽职调查视为一个持续改进和学习的过程。以下部分概述了在AMG的业务活动中尊重人权和确保有利工作条件的主要承诺。

### 5.1 Respecting human rights in AMG's own operations

#### 在AMG自身经营中尊重人权

- **Diversity and inclusion:** We are committed to embracing diversity and inclusion in all our practices and policies to create an environment where everyone has an opportunity to thrive and feel a sense of belonging. Through engagement, we endeavour to gauge the needs of employees to the extent possible, including all minority groups.



Document Type:	AMG Policy	Classification:	Public
Title:	Human Rights Policy	Publication date:	August 2024
Department:	Workforce Reporting		
Policy Owner:	Legal & Compliance		Page: 4 of 4

- **多样性和包容性：**我们致力于在我们所有的实践和政策中拥抱多样性和包容性，以创造一个每个人都有机会茁壮成长并感到归属感的环境。通过参与，我们努力尽可能地衡量员工的需求，包括所有少数群体。
- **Health, safety and wellbeing:** Nothing is more important to AMG than the safety, health and well-being of our workers. We are dedicated to establishing safe and healthy workplaces with programs for physical and mental well-being.
- **健康、安全和福利：**对AMG来说，没有什么比员工的安全、健康和福利更重要。我们致力于建立安全健康的工作场所，为身心健康提供方案。
- **Non-discrimination and promoting diversity and inclusion:** AMG has zero tolerance for any kind of discrimination or harassment based on racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, or other forms of discrimination.
- **非歧视和促进多样性和包容性：**AMG对基于种族和民族血统、肤色、性别、性取向、性别认同、残疾、年龄、宗教、政治观点、国籍或社会出身或其他形式的歧视或骚扰采取零容忍态度。
- **Remuneration: Fair and equal pay:** AMG adheres to the principle of equal pay for work of equal value and compensates its employees with fair wages and benefits, at all times subject to applicable national practice and regulations.
- **薪酬：**公平和同工同酬：AMG坚持同工同酬的原则，在任何时候都根据适用的国家惯例和法规向员工支付公平的工资和福利。
- **Working time:** AMG complies with national legal working time regulations as a minimum requirement. AMG supports parental leave to the extent possible, and when feasible is prepared to offer flexible work hours, remote work options, and part-time opportunities.
- **工作时间：**AMG最低遵守国家法定工作时间规定。AMG尽可能支持育儿假，并在可行的情况下准备提供灵活的工作时间，远程工作选择和兼职机会。
- **Freedom of association, collective bargaining and social dialogue:** AMG upholds the principles of freedom of association and collective bargaining. Social dialogue is characterized by information and consultation with worker representatives based on national regulations.
- **结社自由、集体谈判和社会对话：**《集团》坚持结社自由和集体谈判的原则。社会对话的特点是根据国家规定向工人代表提供信息和协商。
- **No forced or compulsory labor or human trafficking:** AMG has zero tolerance for the use of forced or unlawful compulsory labor of any kind in its business activities. AMG abides by anti-trafficking and modern slavery policies.
- **禁止强迫或强制劳动或人口贩运：**AMG对在其业务活动中使用任何形式的强迫或非法强制劳动持零容忍态度。AMG遵守反贩运和现代奴役政策。
- **No child labor:** AMG fully rejects child labor and adheres to minimum age provisions of national labor laws and regulations, and where national law is insufficient, we consider international labor standards.



Document Type:	AMG Policy	Classification:	Public
Title:	Human Rights Policy	Publication date:	August 2024
Department:	Workforce Reporting		
Policy Owner:	Legal & Compliance		Page: 5 of 4

- **不使用童工：**AMG完全拒绝使用童工，并遵守国家劳工法律法规的最低年龄要求，在国家法律不充分的情况下，我们考虑国际劳工标准。
- **Relationships with communities and handling of conflict minerals:** AMG endeavors to support the development of local communities and to foster strong relationships in areas of its operations. AMG respects the customs, values, and cultures of local communities, including indigenous communities. AMG is dedicated to ethical business practices. We deem any mining activities that are linked to armed conflicts and related human rights abuses unacceptable.
- **与社区的关系和冲突矿产的处理：**AMG努力支持当地社区的发展，并在其运营区域建立牢固的关系。AMG尊重当地社区，包括土著社区的习俗、价值观和文化。AMG致力于道德商业实践。我们认为，与武装冲突和有关的侵犯人权行为有关的任何采矿活动都是不可接受的。

## 5.2 Preventive measures 预防措施

AMG develops and implements appropriate preventive measures, if the human rights risk analysis identifies any potential risks to people. In our own operations we continuously strive to improve respective processes to address potential risks. Within direct business relationships we are implementing assessment processes to consider social and environmental aspects. This may include incorporating expectations into contractual agreements, ongoing engagement with business partners, and conducting on-site assessments or audits. We expect our direct business partners to exert their best efforts in promoting respect for human rights among their suppliers and contractors.

如果人权风险分析确定了对人们的任何潜在风险，AMG就会制定和实施适当的预防措施。在我们自己的运营中，我们不断努力改进各自的流程，以应对潜在的风险。在直接业务关系中，我们正在实施评估流程，以考虑社会和环境方面的因素。这可能包括将期望纳入合同协议，与业务伙伴的持续接触，以及进行现场评估或审计。我们期望我们的直接业务伙伴尽最大努力促进其供应商和承包商尊重人权。

## 5.3 Remediation measures 补救措施

AMG is committed to preventing human rights violations in its own operations and in its business relationships. If detected despite our efforts, we will take decisive action. In our own operations, we will promptly cease any violations. Within direct business relationships, we will collaborate with business partners to develop corrective action plans if immediate mitigation or termination is not feasible. For violations within indirect business relationships, we will utilize our leverage to the extent possible alongside our direct business partner, to agree on a corrective action plan.

AMG致力于在其自身业务和业务关系中防止侵犯人权。如果在我们的努力下仍被发现，我们将采取果断行动。在我们自己的行动中，我们将立即停止任何违规行为。在直接业务关系中，如果无法立即缓解或终止，我们将与业务伙伴合作制定纠正行动计划。对于间接业务关系中的违规行为，我们将尽可能与我们的直接业务伙伴一起利用我们的杠杆，就纠正行动计划达成一致。







Document Type:	<b>AMG Policy</b>	Classification:	<b>Public</b>
Title:	<b>Human Rights Policy</b>	Publication date:	<b>August 2024</b>
Department:	<b>Workforce Reporting</b>		
Policy Owner:	<b>Legal &amp; Compliance</b>		<b>Page: 7 of 4</b>

所有新员工都参加AMG商业行为准则在线培训课程。

All new employees are being inducted by the local compliance officer once they start employment and are being advised about the application, amongst other policies, of the AMG Code of Business Conduct, Speak Up & Reporting Policy and this Policy.

所有新员工在入职后都会由当地合规官进行指导，并就AMG商业行为准则、举报政策和本政策等政策的适用情况提供建议。

All AMG employees are trained regularly, at least every three years, in the AMG Code of Business Conduct, either online or by way of onsite meetings. Designated groups of AMG Employees may receive regular specific training on the matters referred to in this Policy.

所有AMG员工都定期接受培训，至少每三年一次，培训内容包括在线或现场会议。指定的AMG员工小组可就本政策所述事项定期接受专门培训。

## **8 OTHER RELATED DOCUMENTS 其他相关文件**

Other AMG policies and AMG documents that are related to the topic of this Policy are, amongst others:

与本政策主题相关的其他AMG政策和AMG文件包括：

- AMG Code of Business Conduct      AMG商业行为准则
- AMG Diversity and Inclusion Policy      AMG多元化和包容政策
- AMG Supplier Code of Conduct      AMG供应商行为准则
- AMG Speak Up & Reporting Policy      AMG发言和报告政策

\*\*\*