



## **FERROGLOBE PLC**

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024**

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.

#### **SUPPLY CHAIN AND MEASURES TAKEN TO PREVENT MODERN SLAVERY**

Ferroglobe PLC is a leading global producer of silicon metal, silicon- and manganese-based specialty alloys, and 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.

In 2024, we introduced a new global onboarding procedure for our suppliers. This policy was crafted with the goal of creating a consistent standard across all our business operations. To ensure the successful application of our new onboarding policy and to foster a productive relationship with our suppliers, we are now deploying a market-leading third-party risk management SaaS platform, which is employed to centrally store, manage, and verify governance, risk and compliance (GRC) and environmental, social and governance (ESG) data and certificates of third parties. The tool has been successfully rolled out in France and we intend to expand its use to the United States and Spain and the rest of the Group during 2025.

This decision aligns with our commitment to promoting transparency, efficiency, and effectiveness in our business operations. This tool will aid in monitoring and mitigating supply chain compliance risks and enhancing communication with our suppliers. We are confident that this investment will significantly strengthen our business relationships and enhance our internal processes.

## **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. In 2023, we conducted a thorough review of our Code of Conduct to ensure its relevance and effectiveness within the current and future framework of our organization. After the review, we printed and distributed the updated Code, making sure every member of our organization could access it. Furthermore, to foster a better understanding of our principles and guidelines, we undertook a comprehensive awareness campaign across our facilities. This reaffirms our commitment to integrity, transparency, and ethics in all our operations and employee relations. 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 minimize 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.

Ferroglobe established a new whistleblowing channel (<https://report.whistleb.com/en/ferroglobe>) to make it easier for our employees, shareholders, and other stakeholders to report complaints. This platform enables anyone to confidentially and safely report any indications or suspicions of wrongdoing or violations of laws related to modern slavery or human trafficking. 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.

Training has been provided in 2024 to our employees about our Code of Conduct and corporate policies through an online training platform ensuring that all employees have access to the necessary training modules and can certify that they have reviewed and understood our policies. The training includes specific content related to human and labor rights, to promote the policy throughout our organization. Additionally, all employees are required to read, understand and commit to comply with our corporate governance policies.

No incidents of modern slavery have been reported or identified during 2024 or any prior year.

## **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We use the following indicators (KPIs) to measure our effectiveness 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 of the procedures in place within 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 and supply chains;
- c) **Whistleblowing:** the number of reports received through our confidential

whistleblowing hotline accessible to all employees, which employees may use to report any allegations or suspicions of wrongdoing within the Group, including modern slavery or human trafficking. All whistleblowing reports are fully investigated;

d) **Remedial action taken:** the instances of remedial action taken.

#### **BOARD APPROVAL**

This statement was approved by the Ferroglobe PLC board of directors on 12 December 2024.

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



Marco Levi

Chief Executive Officer and Director Ferroglobe PLC