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ENVIRONMENTAL POLICY

环境政策

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

At AMG Critical Materials N.V. and its group companies (“**AMG**”), we are dedicated to making a positive contribution to a sustainable world. We endorse and support the definition of corporate social responsibility set by the World Business Council for Sustainable Development, hence commit to ethical business practices, and contribute to economic development. For AMG, this translates into three main sustainable development objectives:

在AMG关键材料有限公司及其集团公司（“**AMG**”），我们致力于为可持续发展的世界做出积极贡献。我们赞同并支持世界可持续发展工商理事会对企业社会责任的定义，致力于道德商业行为，为经济发展做出贡献。对于AMG来说，这可以转化为三个主要的可持续发展目标：

1. Be responsible stewards of the environment;
做负责任的环境管理者；
2. Meet or exceed regulatory standards through sound business practices; and
通过良好的商业运作达到或超过监管标准；和
3. Target industrial activities contributing to greenhouse gas reduction through the circular economy or technologies enabling partners to reduce emissions.
针对通过循环经济或使合作伙伴能够减少排放的技术有助于减少温室气体的工业活动。

Our primary environmental goal is to directly facilitate activities that substantially reduce CO₂ emissions through the circular economy or by developing technologies enabling our business partners to lower greenhouse gas (“**GHG**”) levels.

我们的主要环境目标是直接促进通过循环经济或通过开发技术使我们的业务合作伙伴降低温室气体（“**GHG**”）水平来大幅减少二氧化碳排放的活动。

This Environmental Policy (“**Policy**”) is designed to actively address the identified environmental material impacts, risks, and opportunities (“**IRO**”) linked to AMG operations, as set forth in our double materiality assessment and reach our sustainable development goals. For completeness this Policy also includes non-material, but relevant, other environmental-related sustainability matters.



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本环境政策（“政策”）旨在积极解决双重重要性评估中所述的与AMG运营相关的已确定的环境重大影响、风险和机遇（“IRO”），并实现我们的可持续发展目标。为完整起见，本政策还包括非实质性但相关的其他与环境有关的可持续性事项。

2 SCOPE AND APPLICABILITY 适用范围及适用性

This Policy applies to AMG and all its AMG group companies, in and during all its operations, extending to service providers, suppliers and temporary workers.

本政策适用于AMG及其所有AMG集团公司，包括服务提供商、供应商和临时工。

AMG is firmly committed to full compliance with all local and national rules and regulations applicable to AMG's subsidiaries. Where the requirements of such domestic legislation are stricter than this Policy or set additional requirements, the relevant stricter or additional rules of such domestic legislation shall prevail.

AMG坚定地承诺完全遵守适用于AMG子公司的所有地方和国家法规。国内立法的要求比本政策更严格或另有规定的，以其更严格或附加的有关规定为准。

This Policy is available to all stakeholders concerning AMG's environmental impact. Relevant stakeholders are required to comply with the Policy by collaborating on improving AMG's environmental impact. Significant Policy updates are communicated to relevant portfolio companies and stakeholders.

本政策适用于所有有关AMG环境影响的利益相关者。相关利益相关者必须通过合作改善AMG的环境影响来遵守该政策。重要的政策更新被传达给相关的投资组合公司和利益相关者。

3 ROLES & RESPONSIBILITIES 角色和职责

- The Management Board has adopted this Policy for all employees of the AMG Group and is responsible for the implementation of this Policy. The AMG Management Board regularly reviews the effectiveness of IRO management in the company's ESG policies, programs, and practices, sharing findings with the Supervisory Board.

管理委员会对 AMG 集团的所有员工采用了本政策，并负责本政策的实施。AMG 管理委员会定期审查 IRO 管理在公司 ESG 政策、计划 and 实践方面的有效性，并与监事会分享调查结果。

- The AMG group companies are responsible for developing business-specific guidelines that align with this Policy and environmental issues related to their operations.

AMG 集团公司负责制定与本政策相一致的特定业务指导方针，以及与其运营相关的环境问题。

- The EHSS department is responsible for tracking, coordinating, and reporting progress on our key environmental programs.

EHSS 部门负责跟踪、协调和报告公司关键环境项目的进展情况。



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4 AMG'S COMMITMENTS TO THE ENVIRONMENT AMG对环境的承诺

AMG is committed to minimizing its overall environmental impact while encouraging its group companies to advance innovative CO₂ reduction technologies. We are dedicated to reducing our operations' impact on the environment and promoting sustainability across all organizational levels. Sustainability drives us to minimize negative impacts and maximize value globally. Specifically, AMG aims to conserve water, energy, and ecosystems; reduce carbon emissions; minimize waste; and support environmental sustainability. We seek to identify, measure, and understand the direct and indirect impact of its operations, developing realistic solutions for mitigation. We comply with environmental regulations, and commit to regular communication of progress to stakeholders.

AMG致力于将其对环境的整体影响降至最低，同时鼓励其集团公司推进创新的二氧化碳减排技术。我们致力于减少运营对环境的影响，并在所有组织层面促进可持续发展。可持续发展促使我们在全球范围内减少负面影响，实现价值最大化。具体来说，AMG旨在节约水、能源和生态系统；减少碳排放；减少浪费；支持环境的可持续性。我们力求确定、衡量和了解其运作的直接和间接影响，制定切实可行的缓解办法。我们遵守环境法规，并承诺定期与利益相关者沟通进展情况。

4.1 Climate change 气候变化

At AMG we assess the impacts and opportunities of near- and long-term environmental-related physical and transitional risks as part of the overall AMG risk management process.

在AMG，我们评估近期和长期与环境相关的物理风险和过渡性风险的影响和机会，作为AMG整体风险管理流程的一部分。

In doing so, we identified climate change as a material topic¹ for AMG.

在此过程中，我们将气候变化确定为AMG的重要主题。

Limiting global warming will reduce climate change-related impacts on ecosystems and human health. AMG has a role to play in supporting climate change mitigation by implementing voluntary reductions of greenhouse gasses within its control, and by developing materials science solutions that assist our customers in reducing CO₂ emissions through the end use of products. At AMG, we define this as enabled CO₂ reduction or “scope 4”.

限制全球变暖将减少气候变化对生态系统和人类健康的影响。AMG通过在其控制范围内自愿减少温室气体排放，并通过开发材料科学解决方案，帮助我们的客户通过产品的最终使用减少二氧化碳排放，在支持减缓气候变化方面发挥作用。在AMG，我们将其定义为启用二氧化碳减排或“范围4”。

¹ As per the EU Corporate Sustainability Reporting Directive Double Materiality Assessment



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We annually measure our contribution to climate change, by quantifying direct and indirect emissions of our operations and value chain². We have been measuring and combating our scope 1 and 2 emissions since 2019 and have added scope 3 since 2022.

我们每年通过量化我们的运营和价值链的直接和间接排放来衡量我们对气候变化的贡献。自2019年以来，我们一直在测量和打击第1类和第2类排放，并自2022年以来增加了第3类排放。

As part of our Climate Transition Action Plan, we have identified the following levers.

作为《气候转型行动计划》的一部分，我们确定了以下方法。

4.1.1 Scope 1 and 2: Direct and electricity-based decarbonization levers

范围1和范围2：直接和基于电力的降碳方法

In 2019, AMG has set its scope 1 and 2 baseline and has identified decarbonization levers:

2019年，AMG设定了范围1和范围2基线，并确定了降碳方法：

- Optimizing metallurgical processes to reduce the combustion of carbon-containing materials.
优化冶金工艺，减少含碳材料的燃烧。
- Reducing electricity and natural gas use in our innovative production facilities through our energy management programs.
通过我们的能源管理计划，在我们创新的生产设施中减少电力和天然气的使用。
- Expanding renewable energy sourcing through on-site electricity generation, power purchasing agreements and covering energy use with renewable energy certificates.
通过现场发电、电力购买协议和使用可再生能源证书来扩大可再生能源的采购。

4.1.2 Scope 3: Value chain decarbonization levers 价值链降碳方法

In 2023, AMG has set its baseline for scope 3 and has identified decarbonization levers:

2023年，AMG设定了范围3的基线，并确定了降碳方法：

- Engaging with relevant stakeholders to combat climate change.
与相关利益攸关方合作应对气候变化。
- Working with suppliers to reduce their carbon footprint and to minimize their climate impacts.
与供应商合作，减少他们的碳足迹，并尽量减少他们对气候的影响。
- Identifying opportunities to purchase less carbon-intensive goods and services.
寻找购买低碳产品和服务的机会。

² In accordance with The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard



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4.1.3 *Enabling CO₂ reduction for customers* 为客户减少二氧化碳排放

At AMG, we additionally report on avoided emissions as it aligns with our core strategy:

在AMG，我们还会报告避免排放的情况，因为这符合我们的核心战略：

- We continuously develop opportunities related to the growth of our enabling CO₂ reduction product portfolio.
我们不断开发与二氧化碳减排产品组合增长相关的机会。
- As per the GHG Protocol guidance, avoided emissions are not netted against Scopes 1, 2, 3.
根据温室气体议定书指南，避免的排放量不计入范围 1、2、3。

4.1.4 *Climate-related physical and transitional risk and opportunity levers*

与气候相关的物理和过渡性风险和机会方法

AMG completed its baseline assessment of climate-related physical risks and opportunities and has identified the following levers:

AMG完成了对气候相关物理风险和机遇的基线评估，并确定了以下方法：

- For physical risk climate change, continue to evaluate effectiveness of resilience measures and incorporate mitigations into our CapEx planning.
对于物理风险气候变化，继续评估弹性措施的有效性，并将缓解措施纳入我们的资本支出计划。
- For transition risk, develop and deliver solutions that reduce carbon emissions and minimize the negative environmental effects of energy production.
对于转型风险，开发并提供减少碳排放的解决方案，并将能源生产对环境的负面影响降至最低。
- For transition opportunity, support a lower-carbon economy and provide customers alternatives to achieve resource efficiency, cost savings, and the enabling of CO₂ reduction through the use of our products and technologies.
对于转型机会，支持低碳经济，并通过使用我们的产品和服务为客户提供替代方案，以实现资源效率、成本节约和二氧化碳减排。



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4.2 Resource use and circular economy 资源利用与循环经济

At AMG we assess the impacts and opportunities of near- and long-term environmental-related physical and transitional risks as part of the overall AMG risk management process. In doing so, we identified resource use and circular economy as a material topic³ for AMG.

在AMG，我们评估近期和长期与环境相关的物理风险和过渡性风险的影响和机会，作为AMG整体风险管理流程的一部分。在此过程中，我们将资源利用和循环经济确定为AMG的重要主题。

Our slogan is “*Everything that can be recycled will be recycled*”. As a leader in circular economy trends, AMG is committed to minimizing waste. We transition to recycled material when technically possible and consider further transitioning away from the use of virgin resources as a competitive advantage in many of its processes. In doing so, AMG has already innovated several secondary metals manufacturing technologies.

我们的口号是“一切可以回收利用的东西都会被回收利用”。作为循环经济趋势的领导者，AMG致力于减少浪费。在技术上可行的情况下，我们过渡到可回收材料，并考虑在许多过程中进一步过渡，不再使用原始资源作为竞争优势。在此过程中，AMG已经创新了几种二次金属制造技术。

Environmental Management programs (ISO 14001) assist us in building and implementing programs based on the highest standards in our activities and at our sites. This includes reducing waste from our operation which is aligned with circular economy.

环境管理项目（ISO 14001）帮助我们根据最高标准在我们的活动和现场建立和实施项目。这包括减少我们运营中的浪费，这与循环经济相一致。

As part of our circularity program, we have identified the following material resource levers.

作为我们循环计划的一部分，我们确定了以下材料资源方法。

4.2.1 Optimizing resource outflows related to products and services

优化与产品和服务相关的资源外流

It is our mission to provide critical materials and related process technologies that in addition advance a less carbon-intensive world. To this end, AMG is focused on the production and development of energy storage materials and products including highly engineered systems and critical materials addressing CO₂ reduction in a variety of end use markets.

³ As per the EU Corporate Sustainability Reporting Directive Double Materiality Assessment



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我们的使命是提供关键的材料和相关的工艺技术，从而推动低碳世界的发展。为此，AMG专注于能源存储材料和产品的生产和开发，包括高度工程化的系统和关键材料，以解决各种最终用途市场的二氧化碳减排问题。

4.2.2 Improving resource inflows, including resource use

改善资源流入，包括资源利用

The objective of our resource use and circular economy Policy is to establish a consistent approach for planning, implementing, measuring, and monitoring our strategies. We encourage our global operations to transition away from the use of virgin resources, including relative increase of secondary (recycled) resources. Further, our global operations are encouraged to sustainably source and use renewable resources where possible and practicable. We strive to manufacture products and technologies that align with the principles of the circular economy.

我们的资源利用和循环经济政策的目标是建立一个一致的方法来规划、实施、衡量和监测我们的战略。我们鼓励我们的全球业务从使用原始资源过渡，包括相对增加二次（回收）资源。此外，我们鼓励全球业务在可能和可行的情况下可持续地采购和使用可再生资源。我们努力生产符合循环经济原则的产品和技术。

4.2.3 Managing (hazardous) waste (危险) 废物管理

We aim to minimize waste streams by deploying comprehensive waste management programs within the businesses promoting the management and recycling of business, production, and chemical wastes. Waste management programs are built on the foundations of efficient use of raw materials, increasing reuse, recycling, and keeping landfill disposal minimalized and as a last resort. AMG seeks to increase its use of renewable resources and sustainably sourcing where practical in its operations.

我们的目标是通过在企业内部部署全面的废物管理计划，促进商业、生产和化学废物的管理和回收，从而最大限度地减少废物流。废物管理计划是建立在有效利用原材料，增加再利用，回收和保持填埋场处置最小化和作为最后手段的基础上的。AMG寻求增加可再生资源的使用，并在实际操作中可持续采购。

At AMG we conform to the requirements of the European Commission's REACH (Registration, Evaluation, Authorization and Restriction) Program for the manufacturing and importing of products. AMG manufactured and imported products' properties of chemical substances are identified, which will allow their safe handling and registration as required by REACH. We are committed, when possible, to the substitution of the most dangerous chemicals when suitable alternatives have been identified.



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在AMG，我们符合欧盟委员会的REACH（注册，评估，授权和限制）计划对产品制造和进口的要求。AMG制造和进口产品的化学物质特性被识别，这将允许它们按照REACH的要求进行安全处理和注册。我们承诺在可能的情况下，在确定了合适的替代品后，以最危险的化学品取而代之。

4.3 Water conservation 节约用水

At AMG we view water consumption and water scarcity as global trends that are important to monitor. Though our activities are found not significantly water-intensive during our sustainability due diligence procedures, we consider the right to water a fundamental human right and thus have taken measures to guard this right.

在AMG，我们将水资源消耗和水资源短缺视为需要监测的重要全球趋势。虽然在我们的可持续性尽职调查程序中发现我们的活动用水量并不大，但我们认为用水权是一项基本人权，因此已采取措施保护这项权利。

4.4 Water recycling 水循环利用

At AMG, we encourage our businesses to recycle water. AMG mining assets generate tailings (residues of mineral processing), which are stored in purpose-built tailings storage facilities (TSFs). TSFs are specially designed reservoirs filled with tailings and water. We remove water through drains or evaporation while the solids settle, gradually filling the reservoir. Our mining operations and tailings management programs are developed with consideration of the following.

在AMG，我们鼓励我们的企业循环利用水。AMG矿业资产产生尾矿（矿物加工的残留物），这些尾矿储存在专门建造的尾矿储存设施（tsf）中。水库是专门设计的尾矿和水的水库。当固体沉淀时，我们通过排水管或蒸发去除水分，逐渐填满储存器。我们的采矿作业和尾矿管理计划是根据以下考虑制定的。

- **Affected communities:** We respect the rights of project-affected people through meaningful engagement with them and their perspectives.
受影响社区：我们尊重受项目影响人群的权利，通过与他们和他们的观点进行有意义的接触。
- **Integrated knowledge base:** We maintain a knowledge base to support safe tailings management and inform decision-making.
综合知识库：我们维护知识库，以支持安全的尾矿管理并为决策提供信息。
- **Design, construction, operation and monitoring:** We manage risk for all phases of the lifecycle of TSF, from design through construction, operation, monitoring and closure.
设计、施工、运营和监控：我们对 TSF 生命周期的各个阶段进行风险管理，从设计到施工、运营、监控和关闭。
- **Management and governance:** We establish standards, systems and accountabilities to support the safety and integrity of the TSF.
管理和治理：我们建立标准、系统和问责制，以支持 TSF 的安全和完整性。



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- **Emergency response and long-term recovery:** We make sure there is preparation for emergency response to failures, and long-term recovery at all our TSFs.

应急响应和长期恢复: 我们确保所有 TSF 都为故障应急响应和长期恢复做好准备。

- **Public disclosure and access to information:** We publicly disclose and provide access to information to support public accountability.

公开披露和获取信息: 我们公开披露和提供获取信息的途径，以支持公共问责制。

Our mining operations have management systems and dedicated facilities to dispose of mineral residues while preventing environmental contamination. Facilities with mining activities are required to assess natural phenomena such as extreme flooding and seismic events, as well as operational criteria, and incorporate these factors into their tailing's storage facilities designs. They are also required to monitor to detect tailings dam seepage.

我们的采矿业务有管理系统和专用设施来处理矿物残留物，同时防止环境污染。采矿设施必须评估极端洪水和地震事件等自然现象以及作业标准，并将这些因素纳入其尾矿储存设施的设计中。他们还需要监测尾矿坝渗漏情况。

There are three key monitoring elements that our tailings storage facilities undertake.

我们的尾矿储存设施有三个关键的监测要素。

1. Regular surveillance to monitor operational activities and storage facility integrity.
定期监督运营活动和仓储设施的完整性。
2. Dam safety inspections, by third party engineers to evaluate and observe operations to identify potential deficiencies.
大坝安全检查，由第三方工程师评估和观察运行，以发现潜在的缺陷。
3. Dam safety audits conducted by a third party, to independently review the integrity and safety of our tailing's storage facilities.
由第三方进行的水坝安全审计，以独立审查我们的尾矿储存设施的完整性和安全性。

The results of these audits are reported to the Company's senior management team and regulatory authorities, as required. Corrective actions are implemented for deficiencies and verification reviews conducted to prevent re-occurrence.

这些审计的结果应按要求报告给公司的高级管理团队和监管机构。对缺陷实施纠正措施，并进行验证评审以防止再次发生。

Our operations with tailing storage facilities are continuously evaluating new technologies and approaches to improve operation, maintenance, and monitoring activities. We reuse as much inert waste as possible. For example, where possible, we use waste rock to backfill our mines, fill roads with non-hazardous mineral wastes, and continually assess tailings for additional mineral extraction. The design, construction, operation, and closure of our waste storage facilities aligns with the requirements of environmental assessments and government approvals.



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我们的尾矿储存设施业务不断评估新技术和方法，以改善操作、维护和监测活动。我们尽可能多地重复利用惰性废物。例如，在可能的情况下，我们使用废石回填我们的矿山，用无害的矿物废物填充道路，并不断评估尾矿以进行额外的矿物提取。我们废物贮存设施的设计、建造、运作及关闭均符合环境评估及政府审批的要求。

4.5 Biodiversity 生物多样性

When we operate in critical habitats – those that are rich in biodiversity and important to conservation – we apply stringent mitigation standards. AMG’s position on areas of “High Conservation Value” is to limit development as much as possible.

当我们在生物多样性丰富且对保护很重要的关键栖息地开展业务时，我们采用严格的缓解标准。AMG对“高保育价值”地区的立场是尽可能限制开发。

We apply the mitigation hierarchy in our projects and operations to minimize our impact on the environment as much as possible. First, we avoid impacts on biodiversity and ecosystem services. Where avoidance is not possible, we minimize our impact. Where our operations have affected biodiversity, we seek to restore and/or mitigate impacted habitats.

我们在我们的项目和运营中应用了缓解层次结构，以尽可能减少我们对环境的影响。首先，避免对生物多样性和生态系统服务的影响。在无法避免的情况下，我们尽量减少我们的影响。如果我们的业务影响了生物多样性，我们会寻求恢复和/或减轻受影响的栖息地。

AMG has conducted a review of our global operations to determine the potential for adverse impacts to biodiversity and actions to mitigate or lessen their severity. We conduct impact assessments for any new major project or large expansions to existing operations. As part of this biodiversity assessment, we carefully consider the potential environmental impact of our activities and how local communities may be affected before, during and after operations (decommissioning), and, when appropriate, develop biodiversity action plans before we start.

AMG对我们的全球业务进行了审查，以确定对生物多样性的潜在不利影响，并采取措施减轻或减轻其严重程度。我们为任何新的大型项目或现有业务的大规模扩建进行影响评估。作为生物多样性评估的一部分，我们仔细考虑我们的活动对环境的潜在影响，以及在运营（退役）之前、期间和之后对当地社区的影响，并在适当的情况下，在我们开始之前制定生物多样性行动计划。

Our standards are aligned with relevant international standards, including those set by the International Finance Corporation.

我们的标准与相关的国际标准保持一致，包括国际金融公司制定的标准。



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4.6 Product stewardship 产品管理

We are committed to minimizing the harmful impact of our operations and products. As a global manufacturer, we comply with global product-related regulations. We work to limit the negative environmental impact of our products and this responsibility is at the forefront of our employees' daily focus.

我们致力于将我们的运营和产品的有害影响降到最低。作为全球制造商，我们遵守全球产品相关法规。我们努力限制产品对环境的负面影响，这一责任是我们员工日常工作的重中之重。

5 MONITORING AND GRIEVANCES 监督 and 不满

We systematically identify, assess, and manage and track environmental impacts, risks & opportunities in our operations, along the value chain and throughout the product life cycle. Certain large operations locations comply with ISO14001 and ISO50001 (environmental management systems) certification requirements in order to ensure proper topic management cycles.

我们系统地识别、评估、管理和跟踪我们运营中的环境影响、风险和机会，沿着价值链和整个产品生命周期。某些大型作业场所符合ISO14001和ISO50001（环境管理体系）认证要求，以确保适当的主题管理周期。

The EHSS team will oversee tracking environmental related indicators and progress across the entire group. Insights into our progress will be detailed in our annual sustainability report.

EHSS团队将监督跟踪整个集团的环境相关指标和进展。我们将在年度可持续发展报告中详细介绍我们的进展情况。

AMG is committed to preventing environmental violations in its own operations. In our own operations, we will promptly resolve any violations. Employees are encouraged to report situations of non-compliance with this Policy to their immediate supervisor, department head, or the designated EHS officer or in writing through an incident report. Employees may also report concerns following our Speak Up & Reporting Policy published on AMG Critical Materials N.V.'s website under "corporate governance". AMG prohibits retaliation against anyone that raises a good faith concern or complaint under this Policy, regardless of whether the concern or complaint ultimately is determined to be a violation of this Policy or applicable law.

AMG致力于在自身运营中防止违反环境的行为。在我们自己的行动中，我们会及时解决任何违规行为。鼓励员工将不遵守本政策的情况报告给直接主管、部门主管或指定的EHS官员，或以书面形式报告事件。员工也可以按照我们在AMG Critical Materials n.v.网站“公司治理”下发布的“畅所欲言和报告政策”报告问题。AMG禁止对根据本政策善意提出关切或投诉的任何人进行报复，无论该关切或投诉最终是否被认定为违反本政策或适用法律。



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6 TRAINING 培训

AMG group companies are responsible to provide initial and periodic training to relevant AMG employees on this Policy and AMG group company specific guidelines prepared to support the implementation of the elements of this Policy. The Corporate EHSS department regularly reviews this Policy to ensure compliance with all applicable laws and regulations and advises AMG group companies of any revisions.

AMG集团公司负责向相关的AMG员工提供关于本政策和AMG集团公司为支持本政策要素的实施而制定的具体指导方针的初步和定期培训。公司EHSS部门定期审查本政策，以确保符合所有适用的法律法规，并向AMG集团公司提供任何修订建议。

7 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 Speak Up & Reporting Policy AMG发言和报告政策
- AMG GHG Data Collection Procedure AMG温室气体数据收集程序
