

I. Introduction

The following Joint Report has been produced by Ferroglobe Canada ULC (“**Ferroglobe Canada**”), Quebec Silicon General Partnership (“**QSGP**”), and Quebec Silicon Limited Partnership (“**QSLP**”) (hereinafter referred to as the “**Canadian Reporting Entities**”) for the financial year ending December 31, 2023 (the “**Reporting Period**”). This Report explains the procedures and policies adopted to prevent and reduce the risk of child labour and forced labour being present in any step of the production, importation, and sale of goods in Canada or elsewhere.

The Canadian Reporting Entities are committed to ensuring that fundamental human rights are respected and that their business practices and operations remain in line with and in support of the UN Guiding Principles on Business and Human Rights by upholding the highest standards of integrity, ethical behaviour, transparency, safety, and corporate citizenship.

This Report is the first to be produced by the Canadian Reporting Entities pursuant to Canada’s newly adopted *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”). They have been included within comparable reports filed by Ferroglobe PLC since 2016 under the United Kingdom’s *Modern Slavery Act 2015*.

II. Structure, Activities and Supply Chains

Ferroglobe PLC is the parent company of the Ferroglobe Group in which the Canadian Reporting Entities are consolidated (generally “**Ferroglobe**”). Ferroglobe is a public limited company registered in England and Wales and listed on NASDAQ as “GSM.” Ferroglobe is 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. Ferroglobe has operations worldwide and employs over 3,400 employees globally.

QSLP and QSGP are registered in Quebec. QSLP is a silicon metal production joint venture in Bécancour, Quebec, that is 50.99% owned by Ferroglobe Canada, 49% by Dow Chemical Canada ULC, and .01% by QSGP. QSLP has approximately 160 employees. QSGP in turn is 51% owned by Ferroglobe Canada and 49% owned by Dow Chemical Canada. QSGP has no employees or operations beyond the management of QSLP. It is governed by a standard shareholders’ agreement with majority Ferroglobe control except for certain minority protections. Through QSGP, Ferroglobe operates the QSLP facility. QSGP is governed by a Board of Directors that has approved this report for both QSGP and on behalf of QSLP.

Ferroglobe Canada is registered in Halifax, Nova Scotia, and ultimately is owned by Ferroglobe. It purchases and sells goods produced by QSLP in Canada. Ferroglobe Canada has no employees. Ferroglobe Canada is governed by a Board of Directors that has approved this report.

Ferroglobe’s Code of Conduct, Anti-Corruption Policy, Whistleblower Policy, and other policies and procedures apply to the Canadian Reporting Entities. In addition, Ferroglobe oversees

procurement activities for the Ferroglobe Group, including those for QSLP, through its central procurement function headquartered in Madrid, Spain. Significant portions of QSLP's raw materials are produced and sourced vertically from other Ferroglobe operations.

III. Policies and Training on Countering, Reporting and Detecting Forced and Child Labour

The Canadian Reporting Entities enforce and abide by all Ferroglobe policies, including those to not only verify that child and forced labour is not present in our operations and transactions or that of our suppliers, but also to ensure that members, employees, and personnel have the means and training to identify and alert suspected instances of illegal and illicit activities, including forced and child labour.

A. Code of Conduct & Training

Ferroglobe's Code of Conduct (the "**Code**") reinforces a pledge to guarantee that no forced labour and child labour is present in any part of its business. The Code is subject to annual certification by all employees, including those of the Canadian Reporting Entities in 2023, and is part of our mandatory training procedures. Further, the Code expresses Ferroglobe's support for the UN Guiding Principles on Business and Human Rights and outlines its express intent and responsibility to implement procedures to identify and minimise the risk of forced and child labour within its business or supply chain.

As stated in the Code, Ferroglobe does not tolerate nor employ any forms of exploitative or unlawful forms of labour, including forced and child labour. Ferroglobe aims to ensure that the welfare, health, and safety of children are always paramount. It is unacceptable under any circumstance for Ferroglobe's Code to be violated for the sake of expediency or results. Additionally, members of the Ferroglobe purchasing department (including those based in Canada) are responsible for complying with applicable laws and regulations, such as those relating to the unlawful employment of forced and child labour in some jurisdictions.

These guarantees and responsibilities are also extended to suppliers to the Canadian Reporting Entities. It is Ferroglobe's policy to encourage suppliers and all others with whom the Canadian Reporting Entities deal to act consistently with our commitment to human rights, and contractually require them to do so wherever feasible.

B. Duty to Report

Members, employees, and personnel of the Canadian Reporting Entities have a duty to report any suspected or actual breach of any aspect of the Code, the law, or regulations. Further, this duty to report extends to the conduct by third parties working with the Canadian Reporting Entities in any capacity, including suppliers, contractors, agents, representatives, consultants, and business partners. It does not matter if this suspicion or belief is later found to be inaccurate or mistaken, if the individual is acting in good faith.

This duty to report supersedes any instructions provided by supervisors or managers that may constitute a breach of the Code, the law, or regulations. In this case, the individual or individuals are advised and instructed to immediately contact Ferroglobe's legal department.

C. Non-Retaliation and Whistleblower Policies

The Code does not permit any forms of retaliation, punishment or disciplinary actions against personnel or others for raising concerns or reporting breaches of Ferroglobe's Code or other unlawful conduct (whether in the past, current, or with a sufficiently high likelihood to happen in the future). As mentioned above, it is irrelevant if the individual is found to have been mistaken or erroneous, if he or she acts in good faith.

Furthermore, Ferroglobe prohibits any forms of retaliation or reprisal, including discharge, demotion, transfer, suspension, threat, intimidation, harassment, or any other form of discrimination, against any whistleblower or any witness who, truthfully and in good faith reports or provides information about a complaint or cooperates or assists with an investigation of a complaint. Ferroglobe encourages personnel to speak up when they are concerned about suspected wrongdoing at work, such as human rights abuses, failure to comply with any legal obligations, by act or omission, or concealment of any unlawful or illicit wrongdoing contrary to the law, the Code or regulations. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

D. Consequences of Violations of Code, the Law, or Regulations

If the Canadian Reporting Entities are notified of any human rights breaches by a supplier or any other person or firm with whom we deal, and such entities or individuals fail to take corrective action upon request, Ferroglobe's policy prescribes that the Canadian Reporting Entities will sever commercial ties with such entity, personnel, or individual.

IV. Parts of Our Supply Chain that Carry a Risk of Forced or Child Labour

QSLP purchases quartz, timber, coal, electrodes, and other raw materials. The only goods purchased by Ferroglobe Canada are silicon metal from QSLP.

According to the Responsible Sourcing Tool, the extractives, mining, and metal sectors generally possesses the following risk factors:¹

- hazardous/undesirable work;
- vulnerable, easily replaced, and/or low-skilled workforce;
- migrant workforce;

¹ Responsible Sourcing Tool, "Identify Risks in Your company's Global Supply Chains", accessed on 15 May 2024. The Responsible Sourcing Tool is the result of a collaboration between Verité, and independent civil society organization, and the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons. See <https://www.responsiblesourcingtool.org/>.

- presence of labour contractors, recruiters, agents or other middlemen in labour supply chain; or
- long, complex, and/or non-transparent supply chains.

The Canadian Reporting Entities have identified heightened risk relating to certain purchases based on the countries from which they are sourced. As discussed below, additional diligence was performed with respect to these purchases.

V. Due Diligence

To assist in the identification and assessment of the risk of child and forced labour in our business and our supply chain, as part of our compliance with the *Modern Slavery Act* in the United Kingdom, Ferroglobe undertook a comprehensive survey of its suppliers as well as its central procurement function in 2022 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. This survey included all suppliers to the Canadian Reporting Entities. Going forward, this process will be repeated and updated on a routine basis through a process of ongoing monitoring.

The Canadian Reporting Entities also ensure their necessary personnel:

- understand the red flags which may indicate slavery and human trafficking;
- have appropriate processes in place to identify, encourage the reporting of, and minimise the risk of slavery and human trafficking; and
- have not identified any reports or allegations of slavery and human trafficking.

The Canadian Reporting Entities have also taken the following additional steps in 2024 for the purpose of this report:

- for suppliers operating in or importing from countries with a heightened risk of forced and child labour, the Canadian Reporting Entities sought and obtained additional information regarding the origin of the suppliers' raw materials;
- the Canadian Reporting Entities verified, wherever possible, that none of our suppliers are named on any published list that we are aware of that identifies companies with a suspected connection to forced or child labour, including the United States Withhold Release Orders and Findings List and the Uyghur Forced Labour Prevention Act Entity List;² and

² U.S. Customs and Border Protection, "Withhold Release Orders and Findings List", 12 April 2024. The Withhold Release Orders and Findings are issued by the Commissioner and are published in the Federal Register. See <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>; U.S. Department of Homeland Security, "Uyghur Forced Labor Prevention Act (UFLPA) Entity List", 14 May 2024. See <https://www.dhs.gov/uflpa-entity-list>.

- the Canadian Reporting Entities consulted third-party reports and databases, including “Know the Chain”, that allow companies to input the names of suppliers to verify that no illicit or illegal practices, such as child and forced labour, are included in any place throughout its global supply chains.³

We will continue to monitor the aforementioned resources to ensure that none of our suppliers are flagged.

VI. Measures Taken to Remediate Any Forced Labour or Child Labour

No remedial action required.

VII. Self-Assessment of Effectiveness

The indicators (KPIs) that Ferroglobe (including the Canadian Reporting Entities) uses to measure how effective it has been in ensuring that forced and child labour are not taking place in any part of its business or supply chains include:

- **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 Ferroglobe’s business;
- **Vetting and screening:** the number of suppliers who have engaged with Ferroglobe and provided reasonable assurances of their commitment to combatting slavery and human trafficking in their business or supply chains;
- **Whistleblowing:** Ferroglobe has 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, including slavery or human trafficking. Any such allegations would be fully investigated. The number of reported breaches is one of Ferroglobe’s KPIs; and
- **Remedial action:** the instances of remedial action needed.

In 2022, Ferroglobe’s responsible managers made the requested confirmations, and over 850 suppliers engaged with Ferroglobe in response to its due diligence survey regarding slavery and human trafficking within their business or supply chain. Going forward, this process will be repeated and updated on a routine basis through a process of ongoing monitoring. Further, Ferroglobe has had no whistleblowing reports involving allegations of slavery or human trafficking and no remedial action required.



³ KnowTheChain, “Company List”, accessed on 16 May 2024. See <https://knowthechain.org/company-list/>.

VIII. Conclusion

The Canadian Reporting Entities remain dedicated to the prevention and exclusion of forced and child labour throughout their operations, business transactions and supply chains. Ferroglobe will continue to review and evaluate the effectiveness and potency of its policies, procedures, and practices to ensure that high ethical standards are maintained, and if needed, enhanced.

IX. Approval and Attestation

This Joint Report was approved pursuant to subparagraph 11(4)(b)(i) of the Act by the Board of Directors of QSGP, on behalf of itself and on behalf of QSLP, and by the Board of Directors of Ferroglobe Canada.

Quebec Silicon General Partnership (on behalf of itself and QSLP)	Ferroglobe Canada ULC
<p>In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.</p> <p>Signed by Brian D'Amico</p>  <p>Name: Brian D'Amico Position: Director and Secretary Company Name: Quebec Silicon General Partnership (on behalf of itself and QSLP) Date: May 30, 2024</p> <p>I have the authority to bind QSGP and QSLP.</p>	<p>In accordance with the requirements of the Act, and in particular section 11 thereof, I, the undersigned, attest that I have reviewed the information contained in this report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.</p> <p>Signed by Brian D'Amico</p>  <p>Name: Brian D'Amico Position: Vice-President/Secretary/Director Company Name: Ferroglobe Canada ULC Date: May 30, 2024</p> <p>I have the authority to bind Ferroglobe Canada ULC.</p>