CODE OF CONDUCT

Ferroglobe



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Message from the Chief Executive Officer



Dear Colleague,

One of the most important roles of senior management is to help maintain the best possible work environment for everyone at Ferroglobe. We should have the comfort of knowing that Ferroglobe is committed to the highest standards of integrity, ethical behaviour, transparency, safety and corporate citizenship. My hope is that we are proud to work here, feel good about our jobs, and strive for excellence in all that we do.

Every year, we will distribute our Code of Conduct, which incorporates our key policies, and ask that our directors, officers, employees and other personnel (including temporary staff) certify that they have read and understood, and will abide by, its contents. I am confident that every person will do their part to support our goal.

It is important that you take the time to read the Code of Conduct thoroughly, as it outlines extremely important rules governing our business operations around the world and will help you understand how our compliance program works. It is especially important to Ferroglobe that our personnel, including the personnel of all subsidiaries in the Group, be made aware of, understand and share the values contained in the Code of Conduct. Investigating potential deviations from the Code of Conduct has been and will continue to be an area upon which I am personally focused. Complying with the Code of Conduct and applicable laws is compulsory for all of us at all times, and we should feel proud of upholding such high ethical standards. For that reason, we all have a duty to report any breach of the Code of Conduct or violation of the law. Contractors, agents, representatives, consultants, suppliers, business partners and other third parties working with us are also expected to act consistently with the Code of Conduct and applicable laws.

If you have any questions, it is important that you inform your supervisor or manager, or Ferroglobe's Legal Department (legal@ferroglobe.com), so that someone may assist you in understanding the requirements of the Code of Conduct.

Honesty and integrity are not just values that should guide our personal behaviour; they also define how each of us must act to ensure that Ferroglobe as an organisation remains fully committed to satisfying its social, cultural and environmental obligations. My view is that only an ethical organisation is truly sustainable. I invite you to become familiar with all aspects of the Code of Conduct and to live up to its spirit, so we can all take pride in the results we achieve and in doing the right thing.

Best regards,



Marco Levi



1

Understanding and Using this Code of Conduct

Understanding and Using this Code of Conduct

1

A. ABOUT THIS CODE

This Code of Conduct (this "Code") incorporates the key policies of Ferroglobe PLC and its subsidiaries, all of which are underpinned by our commitment to the highest standards of integrity, ethical behaviour, transparency, safety and corporate citizenship.

1

Supplemental materials

This Code may be supplemented with additional standards or policies established by Ferroglobe PLC or other Group companies from time to time. In certain countries or jurisdictions, this Code may also be supplemented with additional materials to account for local laws and regulations. Such supplemental materials, where provided, form an integral part of this Code and should be read in conjunction with this Code.

Standards or policies adopted by a Group company may vary in order to comply with local law. If this Code conflicts in any way with supplemental materials or with local law, whichever sets the higher standard of behaviour takes precedence (unless contrary to local law). If you have any questions regarding the standards and policies that apply, you should contact the Legal Department.

2

Commitment to integrity

We must comply with the laws and regulations that apply to our business, and to ourselves, and always act with high standards of integrity, ethical behaviour and transparency.

Our actions must always be lawful. Acting with integrity means that our manner of doing business, and our dealings with the people with whom we work and interact, must be responsible, honest, fair, ethical and transparent. If you have any questions regarding the standards and policies that apply, you should contact the Legal Department.

We are all expected to know, understand and follow this Code.

This Code, including any applicable supplemental materials, applies to all Group company directors, officers and employees, as well as secondees, trainees, interns and other temporary staff. This Code applies to all companies that Ferroglobe PLC owns or controls, whether through a greater than 50% equity position or otherwise. Ferroglobe PLC will make reasonable efforts to have companies in which it has a non-controlling interest adopt this Code in full.

If you are a contractor, agent, representative, consultant, supplier, business partner or other third party working with us, we expect you to act consistently with this Code when working with us and to apply similar standards and commitment to integrity, fairness and ethical behaviour within your own organisation.

3

Supervisors and managers must lead by example

Supervisors and managers must know, understand and follow this Code consistently, and must satisfy themselves that everyone on their team also does so. They should listen to and support personnel who raise concerns or need guidance regarding the right thing to do or the way to behave. Supervisors and managers must take or recommend appropriate action to address any issues raised.

4

Act in an ethical way

This Code cannot cover every situation we may encounter at work, so it is important to adhere to its spirit as well as to the letter of the text. This means using good judgement and applying common sense at all times. If the right course of action is unclear, try asking yourself:

Is it legal and in line with the internal rules and guidance of Ferroglobe that may apply to this situation?

—

Does it fit with my personal values and am I comfortable doing what is proposed?

—

Could it endanger or cause injury to someone?

—

Would I be comfortable explaining my conduct to my supervisor, manager, family and friends, or seeing it described on the front page of the newspaper?

—

Whom will my conduct affect, and would they consider it fair to them?

If you are still unsure, seek guidance from your supervisor or manager, or the Legal Department, before proceeding any further.

5

Duty to report

You have a duty to report any suspected or actual breach of any aspect of this Code or the law. You should also report any such conduct by third parties working with the Group, including but not limited to contractors, agents, representatives, consultants, suppliers or business partners. Your duty to report is subject to, and may in certain jurisdictions be limited by, local law.

No supervisor or manager has authority to order or approve any action that is contrary to this Code or against the law. In no circumstances may standards or policies be compromised for the sake of expediency or results. If a supervisor or manager directs you to do something in breach of this Code or the law, you should immediately contact the Legal Department.

This Code prohibits any form of retaliation, punishment or disciplinary action against personnel or others with whom we work for raising concerns or reporting breaches of this Code or unlawful conduct in good faith, even if they turn out to be mistaken. If despite this anti-retaliation policy you still are not comfortable reporting any suspected or actual wrongdoing you have witnessed, you may report anonymously (unless anonymous reporting is not allowed under applicable law). See "Whistleblowing" below for further details.

6

Consequences for breach

If at any time management or, in appropriate cases, the Audit Committee determines that Group personnel have engaged in conduct that breaches the standards or policies set out in this Code or is illegal, the Group will take appropriate disciplinary action against those involved, up to and including termination of employment for serious breaches.

See "Whistleblowing – Treatment of reports" below for further details. Breaches of this Code, or of the law, can have severe consequences for Ferroglobe and those involved, such as large fines or imprisonment. If such conduct appears to have been criminal in nature, the Group will immediately refer the matter to the proper authorities for further investigation.

7

Annual confirmation

Every year, all Group personnel must confirm in writing that they have read, understood and complied with, and will continue to abide by, this Code.

This confirmation is made via our annual sign-off on this Code, in which Group team members each re-affirm their commitment and adherence to this Code and re-declare any personal conflicts of interest for purposes of transparency.

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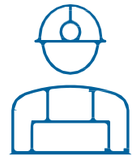
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department
(legal@ferroglobe.com)



B. GLOSSARY

- "Audit Committee" means the Audit Committee of the Board of Directors of Ferroglobe PLC

- "Board of Directors" means the Board of Directors of Ferroglobe PLC

- "Ferroglobe" or "Group" means Ferroglobe PLC and all of its subsidiaries

- "law" includes all applicable law and regulations

- "Legal Department" means the Chief Legal Officer of Ferroglobe PLC and the Group lawyers and staff who report to him or her

- "Personnel" includes directors, officers and employees of Ferroglobe PLC and all other Group companies, as well as secondees, trainees, interns and other temporary staff

- "Standards" or "Policies" can mean the Group standards or policies set out in this Code or the standards or policies adopted locally by a Group company, whichever sets the higher standard of behaviour

C. WHISTLEBLOWING

It can take courage to raise concerns about wrongdoing. Ferroglobe's Whistleblowing Policy imposes a duty to report violations of this Code, other Ferroglobe accounting and auditing matters or other Group compliance policies and the law, but it also encourages the reporting of suspicions and concerns and seeks to impart confidence that issues raised will be evaluated carefully and handled appropriately. Your duty to report is subject to, and may in certain jurisdictions be limited by, local law.

1

Ferroglobe encourages you to speak up

Personnel who are concerned about suspected wrongdoing at work (whether in the past, current or likely to happen in the future) are obligated and encouraged to raise their concerns.

EXAMPLES OF WRONGDOING INCLUDE:

- Criminal acts, including theft, fraud, bribery and corruption
- Endangering health or safety, or damaging the environment
- Harassment or discrimination in the workplace
- Human rights abuses
- Fraud, deliberate error o manipulation in the preparation, evaluation, review or audit of financial records
- Noncompliance with this Code or other Ferroglobe standards, policies or controls, including internal accounting controls
- Failing to comply with any legal obligation, by act or omission
- Concealing or covering up any wrongdoing

2

Questions about employment-related issues and/or personal grievances should be directed to the local People & Culture team. Whom you can speak to:

In order to facilitate the reporting of Complaints, Ferroglobe has established the following channels to alert the organisation about suspicions of misconduct in a confidential way:

Contact your supervisor or manager;

—

Contact Ferroglobe's Whistleblower Response Team directly via email at: whistleblower@ferroglobe.com or via regular mail at: Whistleblowing Ferroglobe PLC, Paseo de la Castellaña 259 D, 49th Floor, 28046 Madrid, Spain

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Contact Ferroglobe's external whistleblowing service provider, Navex, using its WhistleB platform, by visiting https://report.whistleb.com/en/ferroglobe, scanning the QR code below on your mobile device, or by calling the applicable telephone number below.

Scan the QR Code

- Argentina: 0800 345 1950
- Canada: 833 979 8213
- China: 4001205086
- France: 0 800 90 52 16
- Norway: 800 62593
- South Africa: 087 195 1124
- Spain: 900 751 301
- United Kingdom: 0800 066 8784
- United States: 888 279 6238
- Venezuela: 0212 7710496

A whistleblower does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is an abuse of the whistleblowing process that may result in disciplinary action or other legal consequences.

All messages are treated seriously and in accordance with the Ferroglobe's Whistleblower Policy, which is available on Ferroglobe's website and through the Legal Department.

3

No reprisals

A whistleblower expressing genuine suspicion or misgiving according to this policy will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Ferroglobe will not, in relation to the reporting of any complaint under the Whistleblower Policy, permit any form 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 does not tolerate the harassment or victimisation of anyone for raising concerns. Such conduct is itself a breach of this Code, and will be treated as a serious disciplinary matter.

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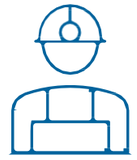
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department (legal@ferroglobe.com)



2

Our Relationships: Personal and Business Integrity

Our Relationships: Personal and Business Integrity

2

A. CONFLICTS OF INTEREST

1

Key principles on conflicts of interest

We must avoid conflicts of interests in business dealings and be transparent if we have personal circumstances where a conflict might arise. Where there is a conflict, or a potential for one to arise, it must be managed transparently and effectively according to the Ferroglobe's Conflicts of Interest Policy, which is available on Ferroglobe's website and through the Legal Department.

I. Acting in Ferroglobe's best interests

We must avoid situations where our personal interests may actually or apparently conflict with the interests of the Group or any Group company.

A conflict of interest is a situation in which someone could use his or her position within the Group to further a personal interest in some way, such as by seeking a potential financial gain (beyond the normal pay and benefits of employment) or furnishing a benefit to a family member or friend. Additional examples of conflicts of interests are provided below.

A conflict of interest may exist whenever the circumstances create a risk that someone's business decisions will be unduly influenced by personal interests.

An actual conflict of interest arises when such risk exists in the present. An apparent conflict of interest arises where the circumstances could appear to affect someone's objectivity. A potential conflict of interest exists where the circumstances could give rise to an actual or apparent conflict of interest in the future.

II: Disclosing conflicts of interest

As soon as an actual or apparent conflict of interest arises, you must report it to request authorization according to the Ferroglobe's Conflicts of Interest Policy. You should remain mindful of your potential conflicts of interest and inform immediately should any of them become an actual or apparent conflict of interest.

Sometimes it will be possible to manage a particular conflict by making changes to your role or responsibilities, or your line of reporting. It is important that you inform so the Group can initiate steps to remove the conflict, mitigate it to an acceptable degree, or ensure a potential conflict does not turn into an actual or apparent one. If you are unsure whether the situation is acceptable or manageable, you should seek advice from the Legal Department.

Directors of Group companies must disclose conflicts to, and seek formal approval from, the Chief Legal Officer of Ferroglobe PLC.

Personnel must disclose (and annually re-disclose) any actual or apparent conflicts of interest they may have in the annual sign-off on this Code. This is an important part of the Group's internal controls.

2

Examples of conflicts of interest

I. Family or personal relationships

Situations in which close relatives are working together within the Group, or have business interactions through a relationship with a customer, supplier or other business with which the Group deals, can often lead to conflicts of interest. "Close relative" means, in this context, spouses, partners, children, parents, siblings, nephews, nieces, aunts, uncles, first cousins, grandparents and grandchildren (including where arising by marriage).

Intimate relationships between personnel in a direct or indirect reporting line likewise can lead to conflicts of interest.

In the course of their work, Group personnel should not have:

the ability to hire, supervise, affect the terms and conditions of employment of, or influence the management of close relatives or persons with whom they are involved in an intimate relationship

—

any business involvement with close relatives or persons with whom they are involved in an intimate relationship, including (but not limited to) approving purchases, sales or any other contractual or financial commitment involving any business in which such persons work or hold a material financial interest

Where there is a direct or indirect reporting line between close relatives or between persons involved in an intimate relationship, the more senior person is strictly prohibited from exerting managerial influence over the other and, if ever called upon to do so, must immediately disclose the pertinent facts as indicated in the Ferroglobe's Conflicts of Interest Policy.

Where any of our personnel has, or is called upon to have, direct or indirect business involvement with a close relative or an intimate partner at a customer, supplier or other business with which the Group deals, such person must immediately disclose the pertinent facts, so that management may consider whether changes are warranted in respect of the person's role.

III. Financial interests

Personnel must disclose material financial interests in a competitor, supplier, customer or other business with which any Group company has significant dealings. This includes:

any supplier, customer or other external business if he or she has any involvement in the Group's dealings with that business or supervises anyone who does

—

any direct competitor of the Group, or any business conducting activities against the Group's interests

"Material financial interest" means any financial interest that may, or may appear to, influence a person's judgement. It does not include ownership of publicly traded mutual funds, index funds and similar pooled investments, but it may include ownership of shares, bonds or other securities issued by a business entity that has significant dealings with the Group. If you are in any doubt, ask the Legal Department.

While disclosure of such interests is always required, a person may be permitted to retain a financial interest in a competitor, supplier, customer or other business with which any Group company has significant dealings if he or she acquired it before joining the Group and the Legal Department concludes in its discretion that any apparent or potential conflict is minimal.

Prior ownership of any such interest by a director of a Group company must be reported to the Chief Legal Officer of Ferroglobe PLC.

III. Outside employment

Personnel must obtain written approval from according to Ferroglobe's Conflicts of Interest Policy prior to undertaking any work for or on behalf of a third party that is:

a competitor of any Group company

—

a customer or supplier a Group company regularly deals with "Working for or on behalf of a third party" means taking on a second job, serving as a director or consultant, or otherwise performing services for any organisation outside the Group (including charitable or not-for-profit organisations). It does not include unpaid voluntary work on your own time, but outside work (whether paid or unpaid) must not interfere with your job duties and responsibilities to the Group.

IV. Corporate opportunity

Personnel must not use information gained from employment with the Group, or take advantage of a corporate opportunity properly belonging to a Group company, to secure a personal gain or benefit (or to benefit any close relative or person with whom they are involved in an intimate relationship), without first obtaining written approval according to Ferroglobe's Conflicts of Interest Policy.

Particular care must be taken where a person has access to material, non-public "inside information" relevant to the price of Ferroglobe's shares, bonds or other securities. See "Insider dealing and market abuse" below for further details.

Any questions — CONTACT

The Legal Department
(legal@ferroglobe.com)

B. BRIBERY AND CORRUPTION

It is Ferroglobe's policy that all our business activities comply with the US Foreign Corrupt Practices Act of 1977, the UK Bribery Act 2010, and all applicable local anti-bribery and anti-corruption laws. The requirements described below are supplemented by Ferroglobe's Global Anti-Corruption Policy, which is available on Ferroglobe's website and through the Legal Department. If you have any questions regarding the standards and policies that apply, you should contact the Legal Department.

Ferroglobe does not tolerate any person who carries out business for or on our behalf (each an "associated person") being involved or implicated in any way in bribery or other corrupt practices. Associated persons include Group companies, personnel, contractors, agents, representatives, consultants, suppliers, business partners and other third parties working with us.

1

No bribery

Bribery of any person is prohibited under this Code and Ferroglobe's Global Anti-Corruption Policy.

PERSONNEL, AFFILIATES, AGENTS AND OTHER ASSOCIATED PERSONS OF THE GROUP MUST NEVER ENGAGE IN OR COUNTENANCE:

- bribery of any kind committed by a person carrying out business for or on behalf of Ferroglobe in order to obtain or retain business or a business advantage for Ferroglobe or otherwise
- the offering, promising or making an unauthorised payment, or the authorising of an improper payment (be it in cash, in kind, or in other form or thing of value) to any person, including (but not limited to) a government official, or any person related to or associated with a government official
- any attempt otherwise to induce or reward improper conduct or influence any decision by any person, be it a government official or otherwise
- "turning a blind eye" or failing to report any improper payment or other inducement
- offering or receiving any gift, payment or other benefit in relation to gaining business or awarding contracts (see also "Entertainment and gifts" below)
- setting up an unrecorded fund, such as a secret cash account, for any purpose
- inducing, facilitating, or overlooking another person's breach of these prohibitions
- "passive bribery" by requesting, agreeing to receive or accepting a bribe
- facilitation payments

A "bribe" means any payment, gift, hospitality or other financial or non-financial benefit offered in order to help obtain an advantage (whether legal or illegal and whether personal or business-related) from either the person to whom it is offered, promised or paid or a third party. The bribe need not actually be paid: asking for or offering it is enough to violate this policy. The word "bribe" may also refer to a payment, gift, hospitality or other financial or non-financial benefit offered without seeking to obtain anything in exchange and simply out of respect for the position held by the official.

A "government official" includes any official, whether elected or appointed, who holds a legislative, administrative or judicial position, or otherwise acts to carry out a public duty of any kind. It also includes any person who performs public functions or duties of any kind, be it in national, local or municipal government or for any public agency or public enterprise, such as professionals working for public health agencies and officers of state-owned enterprises. A government official may also include an officer of the European Union, an agent of a public international organisation such as the UN or the World Bank, or a juror, arbitrator, expert, court-appointed administrator or receiver.

"Improper conduct" means performing a business activity or public function other than in good faith, impartially or in line with a duty of trust.

Bribing a government official is a crime in almost every country. In many, it is also a crime to bribe employees or agents engaged in private business ("private bribery") or to request, agree to receive or accept a bribe.

2

No facilitation payments

Personnel, affiliates, agents and other associated persons of the Group must never make facilitation payments.

"Facilitation payments" are usually small payments made to smooth or speed up performance by a low-level official of a routine action to which the payer is already entitled, such as processing visas, providing police protection or supplying public utilities. Facilitation payments are illegal in many countries and prohibited under this Code.

3

Duty to report

You have a duty to report any suspected or actual breach of any aspect of this Code or the law (though your duty to report is subject to, and may in certain jurisdictions be limited by, local law). See "Whistleblowing" below for further details.

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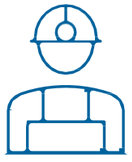
Any questions — CONTACT



Your supervisor or manager



The Legal Department
(legal@ferroglobe.com)

C. ENTERTAINMENT AND GIFTS

Offering and accepting business entertainment or gifts is acceptable when what is proposed, given or received is lawful, modest, appropriate, consistent with reasonable business practice and does not involve any government official. Entertainment and gifts must never be used to unduly influence business decision-making or cause others to perceive that there has been improper influence.

1

Key considerations when offering or accepting entertainment or gifts

Intent: is the intent only to build or maintain a business relationship or offer normal courtesy, or is it to influence the recipient's objectivity in making a specific business decision?

—

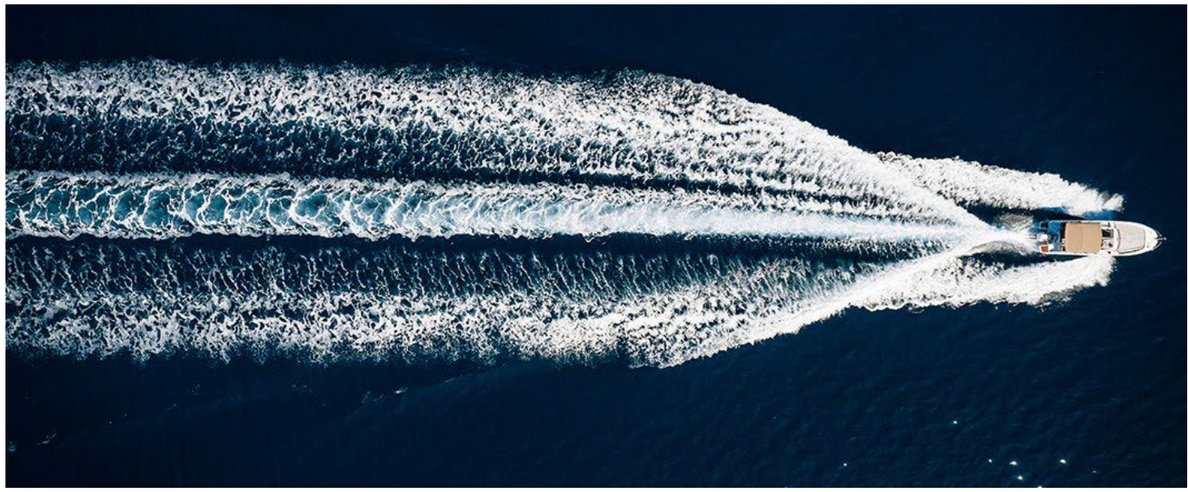
Materiality: is it modest, appropriate and infrequent?

—

Legality: is it legal in your country and in the country of the other party?

—

Transparency: would you be embarrassed if your manager, colleagues, or anyone outside the Group knew about the entertainment or gift?



2

Acceptable without prior approval

Occasional drinks and meals, attendance at ordinary sports or cultural events, and modest gifts are usually acceptable within an approximate value of US$250 or equivalent in local currency. Group companies should provide guidance on what is considered modest and appropriate in their markets, but in no event exceeding US$250.

3

Prior approval required

Group personnel must seek prior written approval from their supervisor or manager, or the Legal Department, where any entertainment or gift proposed, given or received within the private sector:

costs or has a fair value of more than the limit under local guidance

—

involves overseas travel or any accommodation

Generally, such entertainment or gift should be refused or returned. If returning it would be inappropriate or cause offence, the entertainment or gift may be accepted but will become the property of the relevant Group company. It will often be easier to decline to accept the entertainment or gift on grounds of company policy than to return it later, and personnel are advised to decline whenever practicable.

Paying personally for entertainment or gifts proffered does not relieve you of these obligations.

4

Prohibitions on certain entertainment and gifts

Entertainment and gifts, whether given or received, are never acceptable where they:

are illegal or, to your knowledge, prohibited by the other party's organisation

—

involve parties engaged in a tender or competitive bidding process

—

may have, or reasonably may be viewed as having, a material effect on a transaction involving any Group company

—

are a gift of cash or any cash equivalent (e.g., gift certificates, loans, or securities)

—

are actively solicited or demanded, or are offered for something in return

—

are inappropriate (disrespectful, indecent, sexually explicit or might otherwise reflect poorly on a Group company or its personnel, having regard to local culture)

5

Entertainment of or gifts to, or received from, government officials are strictly prohibited

It is the policy of Ferroglobe that Group personnel, affiliates, agents and other associated persons of the Group are strictly prohibited from furnishing gifts or hospitality to government officials in all circumstances, no matter how modest and regardless of the person's intent.

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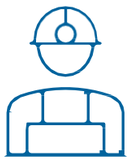
Any questions — CONTACT



Your supervisor or manager



The Legal Department (legal@ferroglobe.com)

D. POLITICAL CONTRIBUTIONS

1

Group political activity prohibited

Group companies are prohibited from using Ferroglobe resources (including any Ferroglobe funds, facilities or services) to support any political candidate, campaign or issue advocacy. Indeed, such gifts are prohibited by law in certain jurisdictions where we operate.

2

Personal political activity

AS INDIVIDUALS, WE HAVE A RIGHT TO PARTICIPATE IN THE POLITICAL PROCESS. FERROGLOBE PERSONNEL WISHING TO UNDERTAKE PERSONAL POLITICAL ACTIVITIES MUST:

do so on their own time, using their own resources

minimise the possibility of their views and actions being misconstrued as those of any Group company

take care that their activities do not conflict with their duties and responsibilities to the Group

If you plan to seek or accept public office, you should notify your supervisor, manager and HR P&C manager in advance, discuss with them whether such efforts or duties may affect your work, and co-operate with them to minimise any such impact.

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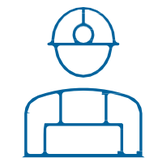
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department (legal@ferroglobe.com)



E. CHARITABLE CONTRIBUTIONS

We recognise the role of business as a corporate citizen and Group companies are encouraged to support local community and charitable projects. Group companies may make charitable contributions, provided that they are lawful and not made to secure any improper business or other advantage.

Group companies should always consider any proposal to make a charitable contribution in the context of the Group's overall policy favouring good corporate citizenship.

1

Verifying reputation and status

Ferroglobe prohibits any charitable donation that could influence, or appear to influence, another party's business decision or government action. Group companies should not make any charitable contribution without verifying the recipient's reputation and status.

BEFORE MAKING ANY CONTRIBUTION, GROUP COMPANIES MUST:

satisfy themselves that the recipient is acting in good faith and with charitable objectives, such that the contribution will not be used for any improper or commercial purposes

obtain express written authorisation, in advance, by the Chief Executive Officer of Ferroglobe PLC

2

Full record-keeping

Any charitable contribution by a Group company must be fully recorded by the Legal Department and, if required, placed on public record either by the Group company or the recipient. Group companies must ensure that such reporting through the Legal Department for public disclosure purposes accords with what they report to the Finance and Accounting Department for financial and statutory reporting purposes.

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Any questions — CONTACT

Your supervisor or manager

The Legal Department (legal@ferroglobe.com)

F. MONEY LAUNDERING

Ferroglobe does not tolerate any involvement in money laundering, which involves possessing, or dealing with, the proceeds of crime. This includes concealing the identity of illegally obtained money so it appears to have come from a lawful source.

1

No involvement in dealing with the proceeds of crime

In most jurisdictions it is a crime for any person or company to engage in transactions involving assets which they know or suspect are derived from crime. Ferroglobe team members must be alert to situations which ought to raise suspicions, including:

- payments in any currency different from that specified in invoices
- substantial payments in cash or cash equivalents
- payments from multiple sources to satisfy a single invoice
- payments to or from an account that is not the normal business relationship account
- requests for overpayments
- payments made by, or requests to supply our products to, a non-contracting party
- requests to deliver our products to an unusual location or to adopt an unusual shipping route



FERROGLOBE TEAM MEMBERS MUST NOT:

- engage in any transaction which they know or suspect involves the proceeds of crime
- otherwise be knowingly involved directly or indirectly in money laundering activity

Ferroglobe team members must also ensure that the Group's activities do not inadvertently contravene money laundering laws.

2

Minimising the risk of involvement and reporting suspicious activity

FERROGLOBE SEEKS TO:

- minimise the risk of inadvertent participation in transactions involving the proceeds of crime
- detect and prevent dishonest involvement in money laundering by personnel
- support personnel in identifying situations which ought to give rise to a suspicion of money laundering

Group companies must ensure that their customer approval (or "know your customer") procedures are sufficient to provide comfort, as far as possible, that customers are not involved in any criminal activity or any trade that violates applicable international sanctions.

You should promptly refer suspicious transaction or activity by any customer or other third party to your supervisor or manager, or the Legal Department.

?

Any questions — CONTACT

Your supervisor or manager

The Legal Department
(legal@ferroglobe.com)



3

Our People: Health and Safety, Environment, Respect and Human Rights

Our People: Health and Safety, Environment, Respect and Human Rights

3

A. HEALTH AND SAFETY IN THE WORKPLACE

Ferroglobe places a high value on the well-being of all Group team members and is committed to providing a healthy and safe working environment.

Ferroglobe strives to:

meet or exceed applicable legal requirements regarding workplace health and safety

—

achieve "zero accidents" operations and to minimise occupational injuries and illnesses

—

work with personnel to ensure that health and safety are fostered, maintained and improved

Ferroglobe will work continuously to maximise the physical security of Group personnel worldwide, ensuring that its standards and policies are understood and that training is provided so Group team members are aware of the health, safety and security issues and requirements relevant to their work.

In keeping with this commitment, personnel are entitled to decline to travel on Ferroglobe's behalf to countries or areas where personal safety is a concern. Personnel may likewise decline to travel by means that raise safety concerns (e.g., a small aircraft or crowded ferry).

Healthy and safe operations depend not only on technically sound plant and equipment but also on all personnel taking responsibility for preventing workplace-related injuries and illnesses.

Workplace health and safety is closely monitored by Ferroglobe and regularly reviewed.

? Any questions — CONTACT

Your supervisor or manager

Your EHS manager

Your P&C manager

The Legal Department (legal@ferroglobe.com)



B. ENVIRONMENTAL COMMITMENT

1

Responsible environmental policy

Ferroglobe is committed to being environmentally responsible, as evidenced by numerous investments in environmental measures. Environmental audits are performed regularly in all plants in order to maintain and improve the degree of compliance with our environmental commitments.

In addition, Ferroglobe is committed to monitoring and managing its greenhouse gas emissions, and to working with others to improve the global response to climate change.

FERROGLOBE SEEKS TO ACHIEVE THE FOLLOWING THROUGH ITS RESPONSIBLE ENVIRONMENTAL POLICY:

strict compliance with all applicable laws, regulations and standards applicable

proper functioning of its Integrated Management System ("IMS") for the Prevention of Risks, Quality and the Environment

regular review of the IMS to increase efficiency and establish specific improvement targets

implementation of safety, environmental and quality criteria in respect of contractors and suppliers, with the aim of ensuring that they also comply with the principles of this policy and the applicable IMS guidelines

?

Any questions — CONTACT



Your supervisor or manager



Your EHS manager



Your P&C manager



The Legal Department (legal@ferroglobe.com)

C. RESPECT IN THE WORKPLACE

Ferroglobe expects its personnel and business partners to be collaborative and supportive and to treat each other inclusively, with dignity, and with respect.

1

Promoting equality and diversity

Ferroglobe is dedicated to providing equal opportunities to all Group personnel and to creating an inclusive workforce by promoting employment equality. Accordingly, its personnel are expected to embrace diversity to strengthen the Group's business. We should respect and celebrate differences in culture, identity, traditions and customs. We must treat colleagues as we expect to be treated, and respect their characteristics and opinions.

Supervisors, managers and P&C personnel must not allow race, colour, creed, gender, age, disability, sexual orientation, marital status, class, religion, politics or any other irrelevant personal characteristic to influence judgement in the recruitment, development, advancement, dismissal or retirement of personnel.

2

Preventing harassment and bullying

All aspects of harassment and bullying are completely unacceptable. Ferroglobe is committed to removing such behaviour and associated attitudes from the workplace.

Harassment and bullying include, but are not limited to, any form of sexual, verbal, non-verbal and physical behaviour that is abusive, intimidating, mocking or humiliating. If you experience or witness such behaviour, or behaviour that is offensive or unacceptable in any other way, you should report it to your supervisor or manager.

Harassment and bullying should not be confused with constructive feedback on work performance or work-related behaviour of an individual given for development purposes.

Ferroglobe seeks to maintain a climate of confidence where personnel feel empowered to raise issues and aim for a swift resolution to the satisfaction of all concerned.

To this end, you should refer to "Whistleblowing" above and familiarise yourself with any local grievance procedures.

3

Work-life balance

Ferroglobe supports work-life balance. It encourages Group companies to explore and adopt family-friendly policies according to local practice.

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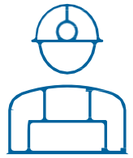
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department
(legal@ferroglobe.com)

D. HUMAN RIGHTS AND OUR OPERATIONS

Ferroglobe considers the human rights implications of its activities and strives to conduct operations in a way that respects the human rights of personnel, suppliers and others with whom it works, and the communities in which it operates.

Ferroglobe believes that fundamental human rights, as affirmed by the Universal Declaration of Human Rights, should be respected.

We support the UN Guiding Principles on Business and Human Rights which outline the duties and responsibilities of industry to address business-related human rights issues through the creation of the "Protect, Respect and Remedy" framework.

1

Managing breach of human rights risks

Ferroglobe is firmly committed to promoting human rights in its sphere of influence, including the Group's supply chains. Based on its Human rights policy, Ferroglobe tries to identify and allow it to minimise and account for breach of human rights risks.

To ensure good behavioral standards throughout the Group's supply chains, it is Group policy to encourage suppliers and all others with whom the Group deals to act consistently with Ferroglobe's commitment to human rights, and contractually require them to do so wherever feasible.

If a Group company becomes aware of human rights breaches by a supplier or any other person or firm with whom the Group deals, and such person or firm fails to take corrective action upon request, the Group should sever commercial ties with the same.

Ferroglobe does not employ, condone or tolerate child labour, and seeks to ensure that the welfare, health and safety of children are paramount at all times.

Ferroglobe does not employ, condone or tolerate forced, bonded, indentured or involuntary labour, or the exploitation or unlawful use of immigrant labour.

Where Ferroglobe employees are represented by lawfully certified or company-recognised trade unions, or other bona fide representatives, such representatives should be able to carry out their activities within the framework of applicable law and regulation, prevailing labour relations and practices, and agreed company procedures.

2

Local communities

Ferroglobe endeavours to identify specific breach of human rights risks that may be relevant to its operations. In doing so, the Group welcomes the views of our stakeholders, including (but not limited to) employees and their representatives. The Group will take appropriate steps to ensure that its operations do not contribute to breaches of human rights and to remedy any adverse human rights impacts it may identify.

Ferroglobe personnel are encouraged to play an active role in both their local and business communities. Group companies should seek to create opportunities for skills development for personnel and within communities, and aim to work in harmony with the development objectives and initiatives of host governments.

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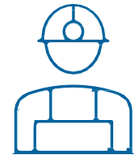
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department
(legal@ferroglobe.com)

4

Our Resources: Company Assets and Financial Integrity

Our Resources: Company Assets and Financial Integrity

4

A. ACCURATE ACCOUNTING AND RECORD-KEEPING

Honest, accurate and objective recording and reporting of financial and non-financial information is essential to the Group's reputation, its ability to meet its legal, tax, audit and regulatory obligations, and for supporting business decisions and actions by Group companies.

Ferroglobe personnel, contractors, agents, representatives and consultants must follow applicable laws, external accounting requirements and Group procedures for reporting financial and other business information.

All data created, whether financial or non-financial, must accurately reflect the transactions and events covered. This applies whether the data is in paper or electronic form, or any other medium. Failing to keep accurate records is contrary to Group policy and may also be illegal.

There is never any justification for falsifying records, concealing or otherwise tampering with information, or misrepresenting facts. Such conduct may amount to fraud and result in civil or criminal liability.

1

Records management

Ferroglobe personnel must manage all of the Group's critical business records in strict compliance with applicable policies and procedures, and never alter or destroy company records unless consistent with those policies and procedures. Ferroglobe personnel should be familiar with the policies and procedures that apply, including any additional policies on records management that supplement this Code.

2

Following accounting standards

Financial data (such as books, records and accounts) must conform both to generally accepted accounting principles and to the Group's accounting and reporting policies and procedures.

Group companies' financial data must be maintained in line with the generally accepted accounting principles applicable in their country of domicile. For consolidated Group reporting, data must be in line with the Group's accounting policies ("IFRS") and procedures.

Any actual or suspect irregularities or weaknesses in relation to internal controls, accounting or reporting matters should be reported. See "Whistleblowing" above for further details.



3

Cooperating with external auditors

Ferroglobe team members must co-operate fully with the Group's external and internal auditors and ensure that all information relevant to the audit of any Group company (relevant audit information) is made available to that company's external auditors.

Group team members should respond promptly to any request by external auditors and allow them full and unrestricted access to relevant staff and documents. Under no circumstances should we provide information to external or internal auditors which we know (or ought reasonably to know) is misleading, incomplete or inaccurate.

4

Documenting transactions

All transactions and contracts must be properly authorised at all levels and accurately and completely recorded.

All contracts entered into by Group companies, whether with another Group company or a third party, must be evidenced in writing.

If you are responsible for preparing, negotiating or approving any contract on behalf of a Group company, you must make sure that it is approved, signed and recorded in accordance with the relevant delegations of authority and approval procedures.

All documents prepared by a Group company in connection with sales of its products, whether for domestic use or export, must be accurate, complete and give a proper view of the transaction.

All documentation must be retained (together with relevant correspondence) in strict compliance with applicable policies and procedures for possible inspection by tax, customs or other authorities.

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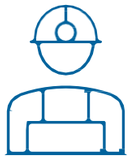
Any questions — CONTACT



Your supervisor or manager



The Legal Department
(legal@ferroglobe.com)

B. PROTECTION OF COMPANY ASSETS

All Ferroglobe team members are responsible for safeguarding and making appropriate use of Group assets

1

Acting in Ferroglobe's best interests

Ferroglobe team members must ensure that Group assets are not damaged, misused, misappropriated or wasted and must report their abuse or misappropriation by others. "Group assets" include physical and intellectual property, funds, time, proprietary information, corporate opportunity, equipment and facilities.

Competitively sensitive and proprietary information must be treated as an asset and protected from unauthorised use or disclosure. This may include:

operational data, such as data related to the Group's production and maintenance or equipment and process control systems

—

strategic and marketing plans

—

information used in trading activities

—

research and other technical data

2

Guarding against theft and misuse of funds

Ferroglobe team members must protect Group funds (i.e., cash or cash equivalents, including company credit cards) and safeguard them against misuse, fraud and theft. Any claims for expenses, vouchers, bills and invoices must be legitimate, accurate and submitted in a timely manner. Fraud or theft of any kind by team members will result in their dismissal and could result in prosecution.

3

Devoting sufficient time to work

Ferroglobe team members are all expected to devote sufficient time to their work to fulfil their responsibilities, subject to applicable law and any collective agreements governing working hours and overtime. While at work, personnel are expected to be fully engaged and not to undertake personal activities beyond a modest level that does not interfere with their jobs.

4

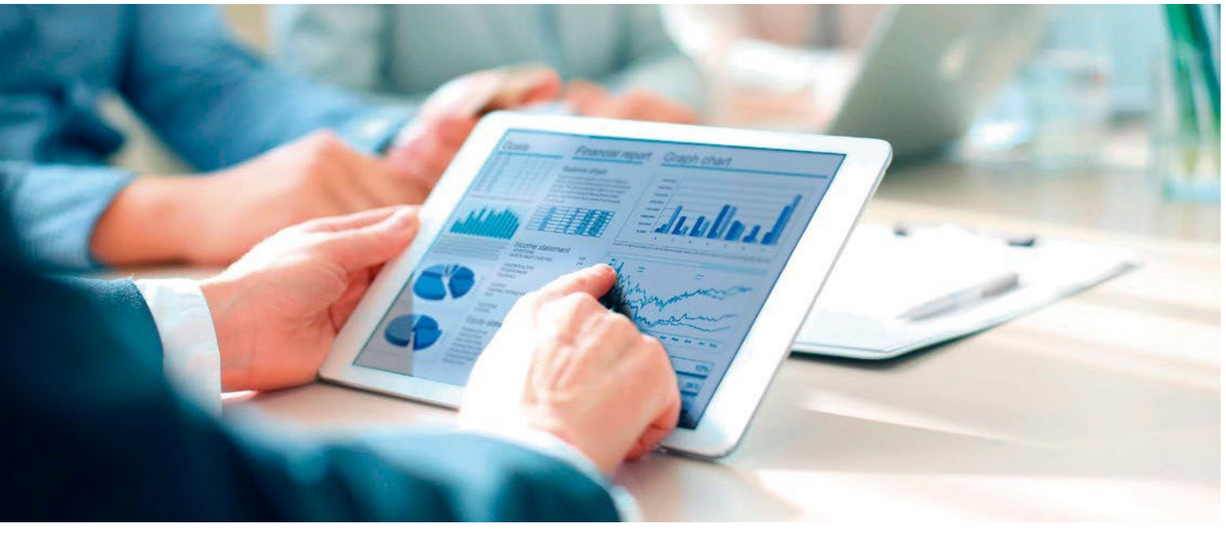
Protecting our intellectual property

Ferroglobe team members must protect against theft, misappropriation and misuse of all intellectual property owned within the Group. Intellectual property includes patents, copyrights, trademarks, design rights and other proprietary information (such as know-how). This duty extends beyond the termination of employment.

5

Securing access to Group assets

Ferroglobe team members must protect information that may be used to provide access to Group assets. Personnel must always maintain the security of any information used to access company property and networks, including building access cards, ID, passwords and codes.



6

Respecting the assets of third parties

Ferroglobe team members are also expected to respect both the physical and non-physical assets of others. You must never knowingly:

- damage, misuse or misappropriate the physical assets of third parties
- infringe valid patents, trademarks, copyrights or other intellectual property in violation of third parties' rights
- perform unauthorised activities which adversely impact the performance of third parties' systems or resources

You should show the same respect to the physical and intellectual property of third parties that we expect them to show towards Group assets.

7

Use of company equipment

Ferroglobe team members must not use company equipment or facilities for personal activities, other than as set out below. Limited, occasional or incidental personal use of company equipment and systems issued or made available to you is permitted, provided that it:

is reasonable and does not interfere with your proper job performance

—

does not have an adverse impact on the performance of company systems

—

is not for any illegal or improper purpose

Reasonable and brief personal phone, email and internet use is permitted. Improper uses include:

- communication which is derogatory, defamatory, sexist, racist, obscene, prurient, vulgar or otherwise offensive
- improperly disseminating copyrighted, licensed, or other proprietary materials
- transmitting chain letters, adverts or solicitations
- visiting inappropriate internet sites
- altering company-owned hardware or software in any manner that could harm Ferroglobe, including (but not limited to) downloading or otherwise introducing potentially harmful software, applications, malware or other electronic media

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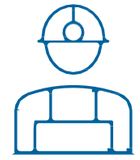
Any questions — CONTACT



Your supervisor or manager



Your P&C manager



The Legal Department
(legal@ferroglobe.com)

C. CONFIDENTIALITY AND INFORMATION SECURITY

It is essential for Ferroglobe team members to maintain the confidentiality of all commercially sensitive information, trade secrets and other confidential information (including legally privileged information) relating to the Group and its businesses.

Our confidential information is any non-public information or knowledge, including information or knowledge which may prejudice the Group's interests if disclosed to third parties, such as:

- sales, marketing and other company databases
- pricing and marketing strategies and plans
- confidential product information and trade secrets
- research and technical data
- new product development material
- business ideas, processes, proposals or strategies
- unpublished financial data and results
- company plans
- personnel data and matters affecting personnel
- software licensed to or developed by a Group company

In addition, the taking of any photograph or video of any Ferroglobe facility, production process, material, products or office without prior approval from the Legal Department is strictly prohibited. Likewise, the disclosure, including through media or social networks, of sensitive, confidential material, or of any images referred to in the previous sentence, is strictly prohibited without prior approval from the Corporate Communications Department.

1

Disclosing confidential information

Ferroglobe team members must not disclose confidential information relating to a Group company or its business outside the Group without authorisation from senior management and only:

- to agents or representatives of a Group company owing it a duty of confidentiality and requiring the information to carry out work on its behalf
- under the terms of a written confidentiality agreement or undertaking
- under the terms of an order of a competent judicial, governmental, regulatory or supervisory body, having notified and received prior approval from the Legal Department

If confidential information is to be transmitted electronically, then technical and procedural standards should be agreed with the other party and expressly confirmed by the Legal Department in consultation with IT personnel.

Ferroglobe team members must be mindful of the risk of unintentional disclosure of confidential information through discussions or use of documents in public places.

2

Access and storage of confidential information

Access to confidential information relating to a Group company or its business should only be provided to team members requiring it in order to carry out their work. You must not take home any confidential information relating to a Group company or its business without making adequate arrangements to secure that information. For further guidance, consult with the Legal Department.

3

Use of confidential information

Ferroglobe team members must not use confidential information relating to a Group company or its business for their own financial advantage or for that of a friend or relative. See "Conflicts of interest" above for further details. Particular care must be taken if personnel have access to "inside information," which is confidential information relevant to the price of Ferroglobe shares, bonds and other securities. See "Insider dealing and market abuse" below for further details.

4

Personal data

Group companies and team members must ensure that they comply at all times with data protection laws. Access to personal data must be limited to authorised team members who have a clear business need to access that data. Data protection laws in various jurisdictions in which Ferroglobe operates govern the handling and processing of personal data and the extent to which it may be transferred between companies or countries. These laws typically apply to personal data relating to personnel or customers.



5

Third party information

Ferroglobe team members must not solicit or wilfully obtain from any person confidential information belonging to another party without that party's consent. If we inadvertently receive information which we suspect may be confidential information belonging to another party, we should immediately notify the Legal Department.

?

Any questions — CONTACT

Your supervisor or manager

The Legal Department
(legal@ferroglobe.com)

D. INSIDER DEALING AND MARKET ABUSE

Ferroglobe is committed to supporting fair and open securities markets throughout the world. Team members must not deal in Ferroglobe's shares, bonds or other securities on the basis of inside information relating to the Group or any Group company, nor engage in or facilitate any form of market abuse under any circumstances. The requirements described below are supplemented by Ferroglobe's "Insider Trading Policy", which is available through the Legal Department. If you have any questions regarding the standards and policies that apply, you should contact the Legal Department.

1

Inside information

"Inside information" is information of a precise nature which:

- is not generally available;
- relates directly or indirectly to a publicly listed company (such as Ferroglobe PLC) or to its shares, bonds or other securities; and
- would, if generally available, be likely to have a significant effect on the price of that company's shares, bonds or other securities, or related investments

2

Market abuse

Ferroglobe team members must not commit any form of market abuse, including:

- improper disclosure of inside information
- dealing in securities on the basis of inside information
- misuse of inside information
- engage in market manipulation

"Market abuse" means conduct which harms the integrity of financial markets and public confidence in securities and derivatives. Market abuse and insider dealing (committing it or encouraging it in others) is illegal in most countries.

For more information about behaviour that may constitute market abuse or insider dealing, see Ferroglobe's "Insider Trading Policy".

3

Handling inside information

If you have or receive information that may be inside information relating to Ferroglobe publicly traded securities, you must consult with the Legal Department before disclosing it to any person outside the Group. Any such information must not otherwise be disclosed without specific authorisation, and then only to:

- personnel who require it to carry out their work
- agents or representatives of a Group company who owe it a duty of confidentiality and require such information in order to carry out work on its behalf

Care is needed when handling inside information, as its misuse could result in civil or criminal penalties for Group companies and the individuals concerned.

4

Responsible dealing

Ferroglobe personnel must not deal in the securities of a publicly traded company (including Ferroglobe PLC), or encourage others to do so, while in possession of inside information relating to that company. If you intend on dealing in the shares, bonds or other securities of any publicly traded company, and from time to time have access to inside information relating to that company, then you must comply with local securities dealing laws and Ferroglobe's "Insider Trading Policy".

Ferroglobe's "Insider Trading Policy" sets out the rules that apply to the Group's "restricted persons", for whom there are additional restrictions on dealing in Ferroglobe securities. Ferroglobe is legally required to keep a list of all insiders, who will be individually notified of their status.

?

Any questions — CONTACT



The Legal Department
(legal@ferroglobe.com)

5

National and International Trade

National and International Trade

5

A. COMPETITION AND ANTI-TRUST

Ferroglobe is committed to fair competition and to complying with the applicable competition laws.

Ferroglobe believes in fair competition. Group companies must compete fairly and ethically, in line with all applicable laws regulating competition and trade practices, including (but not limited to) “anti-trust” laws.

1

How competition laws affect our business

Competition laws impact on almost all aspects of Ferroglobe’s operations, including sales, relationships with suppliers, distributors, customers and competitors, the negotiation and drafting of contracts, pricing strategy and trading conditions. These laws vary from one jurisdiction to another, and are complex, but failure to comply with them can have serious consequences.

The law is linked to market conditions, such as market concentration and product homogeneity, which will affect how a competition issue is approached.

2

Collusion prohibited

WE MUST NOT COLLUDE WITH OUR COMPETITORS TO:

- fix prices or any element or aspect of pricing (including rebates, discounts, surcharges, pricing methods, payment terms, or the timing, level or percentage of price changes)
- fix other terms and conditions
- divide up or allocate markets, customers or territories
- limit production or capacity
- influence the outcome of a competitive bid process
- collectively refuse to deal with certain parties



3

Meeting competitors

Given the risk of improper collusion, any meeting or direct talk with any of our competitors should be treated with extreme caution. Ferroglobe personnel must keep careful records of such communications, and break them off if they become, or could be seen as, collusive or anti-competitive.

Not all arrangements with competitors are problematic. Legitimate contact can be made in the context of trade associations, certain limited information exchange, and joint initiatives on regulatory engagement or public advocacy.

4

Competitor information

We may only gather information about our competitors by legitimate legal means and in compliance with competition law. Obtaining competitor information directly from competitors is never justifiable, save for very limited and exceptional circumstances.

Gathering competitor information from third parties (including customers, consultants, analysts and trade associations) often raises complex local legal issues and should only be undertaken in close consultation with the Legal Department.

5

Dominant position

In certain markets, anti-trust laws may limit our ability to engage in practices such as exclusivity arrangements, discriminating between equivalent customers, charging excessively high or low (below cost) prices, or tying or bundling together different products. Such practices should only ever be undertaken in close consultation with the Legal Department.

6

Resale price maintenance

While rare in Ferroglobe's businesses, certain contractual restrictions upon parties in different levels of the supply chain, such as "resale price maintenance" provisions between a supplier and a distributor or reseller, may be unlawful.

Resale price maintenance is where a supplier seeks to, or does in fact, control or influence (including indirectly, through threats or incentives) the prices at which its customers resell its products. Any contract containing a resale price maintenance or similar provision must be presented to the Legal Department prior to execution.

7

Seeking specialist advice

If you are involved in business activities where competition laws may be relevant, you must consult with the Legal Department and follow regional, area or market guidelines that give effect to Group policy and the law in this area.

Group personnel should never assume that competition and trade practices laws will not apply simply because such laws are not in effect locally. Many countries, such as the US and those within the EU, apply their anti-trust and other competition laws extra-territorially (where conduct occurs and where it has effect).

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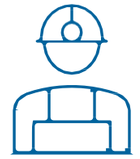
Any questions — CONTACT



Your supervisor or manager



The Legal Department
(legal@ferroglobe.com)

B. SANCTIONS

Ferroglobe is committed to ensuring that its business is conducted in compliance with all applicable sanctions regimes and other applicable laws, regulations and restrictions relating to international trade, and that it does not engage with any sanctioned parties.

Sanctions include prohibitions or restrictions on:

exports or re-exports to a sanctioned country

—

imports from, or dealings in property originating from, a sanctioned country

—

travel to or from a sanctioned country

—

trading, investments and other dealings in a sanctioned country, or with individual parties or banks designated under applicable sanctions programs

—

making funds or resources available to parties designated under applicable sanctions programs

—

transfer of restricted software, technical data or technology by email

1

Awareness and compliance with sanctions

We must be aware of, and fully comply with, all international sanctions programs affecting our business. Our policy is to ensure that we never knowingly:

supply our products, or allow our products to be supplied, to any designated or blocked person

—

purchase goods from any designated or blocked person

—

otherwise deal with any designated or blocked person or property

in contravention of any applicable sanction, trade embargo, export control or other trade restriction.

Sanctions may be imposed by individual countries or supra-national bodies, such as the UN and EU.

Some sanctions regimes apply both to US persons (wherever located) and to exports/re-exports of US-origin products and products with US-origin content (whether or not the entity handling them is a US person).

Breaching sanctions carries serious penalties, including fines, loss of export licences and imprisonment.

2

Minimising the risk of breach

Our policy is to use internal controls to minimise the risk of breaching sanctions, and provide training and support to ensure that personnel understand them and implement them effectively, particularly where their work involves international financial transfers or cross-border supply or purchase of products, technologies or services.

As noted above, trade sanctions no longer just target whole countries with economic, trade or diplomatic restrictions. Increasingly, they are also aimed at designated or blocked individuals or groups, and the companies, banks or organisations associated with them. The applicable lists of prohibited countries and designated persons change frequently. If your work involves the purchase, sale or shipment of products, technologies or services across international borders, you must keep up to date with the rules.

Personnel must also notify the Legal Department whenever initiating a new supplier, agent or customer relationship with a person outside the US or EU (wherever located) in order that appropriate trade sanctions diligence may be carried out. Always contact the Legal Department immediately upon receipt of any sanctions-related communications or requests from official bodies or our business partners. If ever in doubt as to what should be done, contact the Legal Department.

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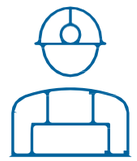
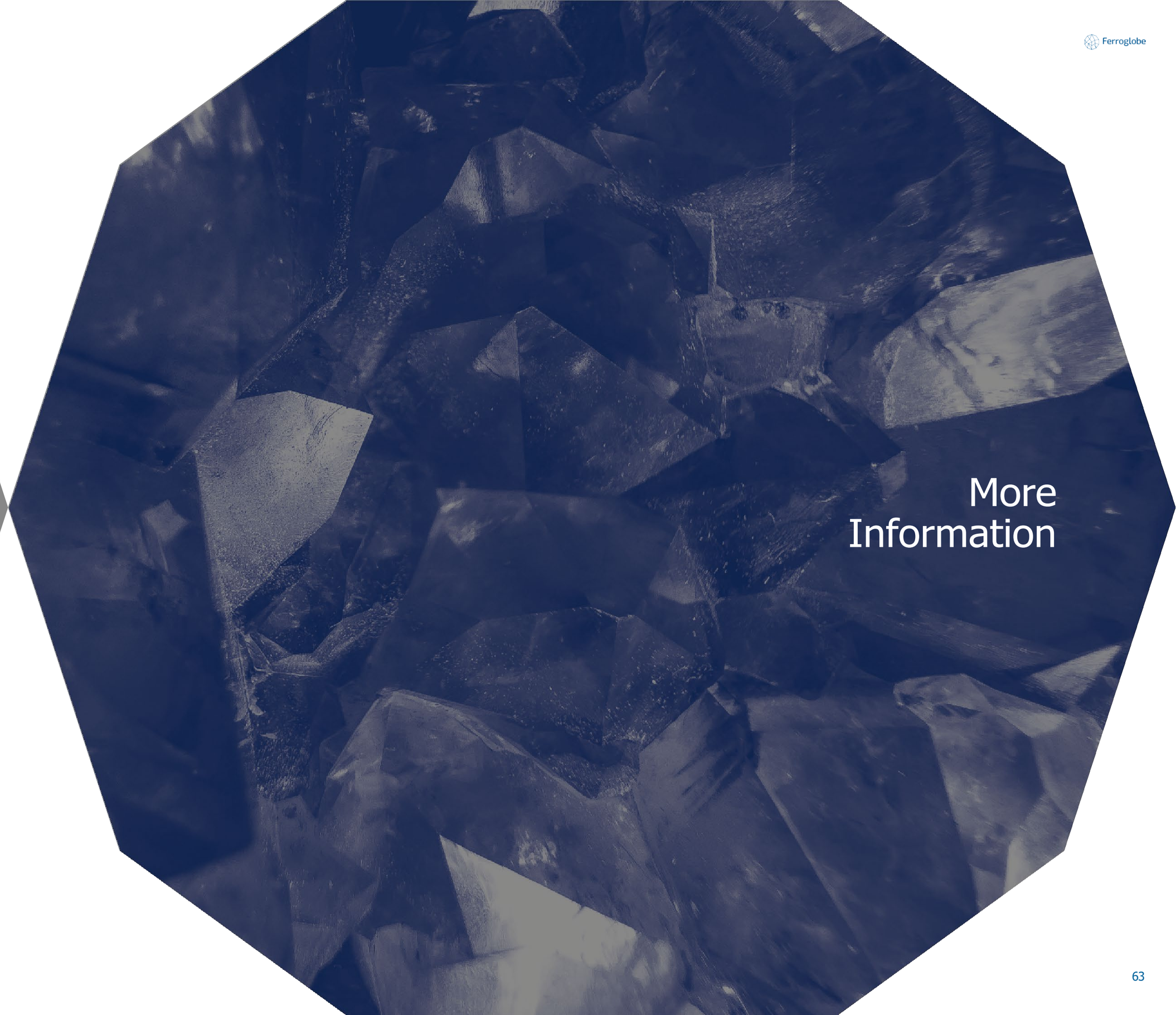
Any questions — CONTACT



Your supervisor or manager



The Legal Department (legal@ferroglobe.com)



6 More Information

More Information



Please contact

The Legal Department

Ferroglobe PLC

Paseo de la Castellana 259D, 49th Floor

28046 Madrid

Spain

- Telephone: +34 91 590 32 19
- Email: legal@ferroglobe.com

Ferroglobe