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Ferroglobe
Advancing Materials Innovation

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The 2026 Transparency Act Statement
Ferroglobe Mangan Norge AS



VAT Number.: NO 957 779 808 MVA

Ferroglobe Mangan Norge AS
Mo Industripark
P.O. Box 394
N-8601 Mo i Rana
NORWAY

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1. General information about the company

Ferroglobe is a global leading producer of silicon metal, silicon-based alloys and manganese-based alloys and provides best-in-class services to customers worldwide in fast-growing and dynamic end-sectors such as solar, automotive, consumer products, construction and energy. Ferroglobe PLC is listed on the Nasdaq Capital Market in the United States under the ticker symbol “GSM”. We have global presence across five continents and operate in 9 countries and employs 3033 people whereof 13% are women and 97% are full-time employees.

At the plant in Mo i Rana, we produce silicomanganese (SiMn) and ferromanganese (FeMn). The main constituents of SiMn are manganese (Mn), silicon (Si), iron (Fe) and carbon (C). All these elements originate from the raw materials. The plant in Mo i Rana has two furnaces (Closed Submerged Arc Furnace). The furnaces have an installed capacity of 60 MVA. Operating time for 2025 was around 98.0%, representing 355-360 days of operations per year (maintenance shutdown days are subtracted from days of operation). Ferroglobe Mangan Norge AS had 79 full-time employees year-end 2025, whereof 15.9% of the workforce was women.

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2. Responsibilities and organisation

The management at Ferroglobe Mangan Norge is responsible for follow-up and evaluation of compliance with the Transparency Act. The CEO at Ferroglobe Mangan Norge has the overall responsibility for following up compliance with the Act, in accordance with §4 and §5 of the Act. The board of Ferroglobe Mangan Norge AS is chaired by Benjamin Noel Camille Crespy, who is Chief Operating Officer in Ferroglobe PLC. The board consists of representatives from both group level and local company, totalling 7 members. The board has 43% female representation and thus meets the Norwegian requirement of minimum 40%.

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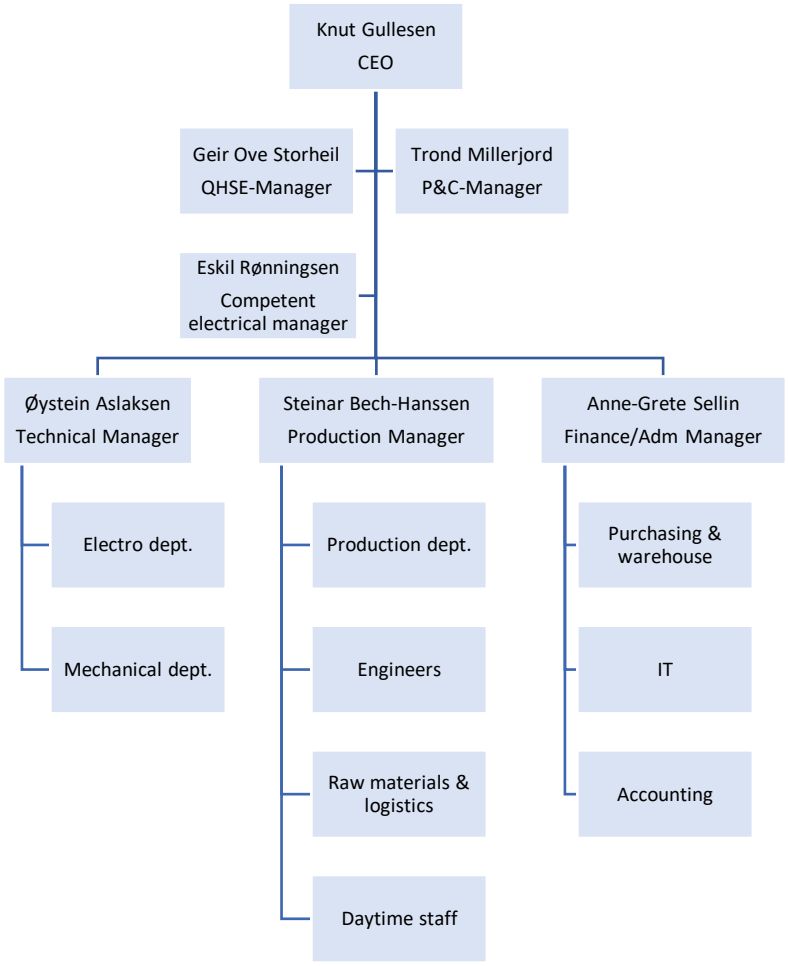

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3. Markets

Ferroglobe PLC sold 306 000 tonnes of Manganese-based alloys in 2025 whereof Ferroglobe Mangan Norge sold 111 300 tonnes. The annual production capacity, in total for all production facilities globally, is 561 500 tonnes of Manganese-based alloys. The majority of our customers are located in Europe but some also in North America.

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4. Policies and guidelines

Ferroglobe Mangan Norge is 100% owned by Ferroglobe PLC, and every corporate policy and guideline are applicable for the Norwegian plant, in addition to Norwegian legislation. The activities in the company are covered by a general collective agreement, and the majority of employees are members of a trade union.

The company has a high standard in all aspects of the business. The work force at Ferroglobe Mangan Norge is required to be familiar with and be updated on the company's code of conduct, at any given time. This includes, but not limited to:

- Plant OHS Policy (available on ferroglobe.com)
- Plant Energy Policy (available on ferroglobe.com)
- Plant Environmental Policy (available on ferroglobe.com)
- Plant Quality Policy (available on ferroglobe.com)
- Corporate OHS Policy (available on ferroglobe.com)
- Anti-corruption Policy (available on ferroglobe.com)
- Corporate Governance Policy (available on ferroglobe.com)
- Modern Slavery Statement (available on ferroglobe.com)
- Code of Conduct (available on ferroglobe.com)
- Employee onboarding Policy
- Guidelines for gifts and events
- Procurement Policy and delegation of authority
- Guidelines for sponsorship

Furthermore, Ferroglobe is publishing an annual global ESG-report, reaffirming our commitment to a more sustainable management of the company, aimed at strengthening ties with all our stakeholders. The ESG-report describes the activity of the company, markets which it operates in, the work with human rights and decent working conditions, whistleblower channels and reporting mechanisms to address any apparent violations and adverse events.

The Code of Conduct is updated periodically, and is based on international standards for human rights, anti-corruption etc. The Code of Conduct shall be read in conjunction with the annual renewal of the company's key compliance policies. The Code of Conduct is followed by an obligatory test and must be digitally signed by all employees in Ferroglobe.

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5. Whistleblowing mechanisms

All employees have the right to report irregularities and unlawful behaviour, corruption, violation of ethical standards, human rights breaches, bullying, harassment etc. The reporting can be facilitated by contacting your supervisor, P&C Manager at the plant, your union representative or local safety delegate.

The company also has a whistleblowing service where every employee and other interested parties can report irregularities, or another issue as mentioned above. In total, there are 5 different reporting options:

- Contact your supervisor, P&C Manager, union representative, or a safety delegate.
- Email, whistleblower@ferroglobe.com.
- Telephone (Norway), 800 62593.
- Regular mail, Whistleblowing Ferroglobe PLC, Paseo de la Castellaña, 259 D, 49th Floor, 28046 Madrid, Spain.
- WhistleB platform, https://report.whistleb.com/en/start, or scan the QR-code below.

6. Reporting and information obligation

Ferroglobe Mangan Norge will publicly report on its diligence assessments on the company website. Ferroglobe Mangan Norge will also respond to information requests from business associates, journalists, and other stakeholders about the work with due diligence assessments and relevant measures.

7. Supply chain

Ferroglobe Mangan Norge is a responsible purchaser of products and services, and we have high demands related to human rights and decent working conditions. We expect that our suppliers are respecting the UN Guiding Principles on Business and Human Rights, and the International Labour Organisation (ILO) Conventions. A complete description is provided for in the company Code of Conduct.

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8. Negative consequences and risks

To safeguard a proper due diligence assessment and human and labour rights, Ferroglobe Mangan Norge is conducting a pre-qualification of new suppliers, a commercial and technical assessment before making a purchase, supplier dialogue and follow-up talks, external audits and other risk assessments where appropriate.

Annually, we conduct an assessment on all strategic suppliers, based on the following criterions:

- Delivery efficiency
- Quality
- Environment
- Price and terms
- Energy
- Ethics
- Location

The company also have a questionnaire to be completed when mapping the ethical standard, human rights, child labour and slavery.

9. Human Rights assessments

Is assessed using a questionnaire. We are not familiar with any breaches in own activities at plant level, or in the supplier chain.

10. Risk assessment in the supplier chain and other relevant interested parties

The following areas in the supplier chain of Ferroglobe Mangan Norge has been identified as important and with potential high risk:

- Risk for poor health and safety conditions for people working in manganese mines.
- Risk for improper salary- and working conditions for suppliers of cleaning services, transportation and construction companies.
- Risk for employee right breaches in the supply chain of coke and coke breeze.
- Risk for human right breaches in the supply chain of protective working clothes.
- Lack of resources, routines and systems to carry out due diligence assessments in accordance with OECD Guidelines for Multinational Enterprises.

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Ferroglobe Mangan Norge has currently 316 suppliers in its supplier base, whereof 303 had transactions in 2025. An overview of our strategic important suppliers in 2025 is illustrated in the table below. The last annual assessment of our critical suppliers was finalized, 30th April 2026.

COMPANY	COUNTRY
Mo Industripark AS	Norway
Mo Industritransport AS	Norway
Rana Industriterminal AS	Norway
Helse & Sikkerhet BA	Norway
Nemko Norlab AS	Norway
Øijord & Aanes Entreprenørforretning AS	Norway
Goodtech AS	Norway
Braathe Group AS	Norway
Mo i Rana Havn KF	Norway
Miljøteknikk Terrateam AS	Norway
Momek Services AS	Norway
Transportsentralen Rana	Norway
Svabo Industrinett AS	Norway
Miras Hydraulikk AS	Norway

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11. Our measures

Through systematic follow-up, the presence of ethical guidelines (Code of Conduct), external audits and controls, Ferroglobe Mangan Norge believe the risk for violation of human rights and decent working condition is significantly reduced. Evidently, the effort to reduce risk is best carried out by continuous and long-term work. At the plant in Mo i Rana, we try to maintain a culture where this work is an integral part of the operations.

We have a reputable system by procurement policies, purchasing practices and guidelines to ensure that we make responsible purchases. No concrete adverse consequences have been identified at Ferroglobe Mangan Norge AS or among our suppliers.

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12. Conclusion and Approval

This statement has been prepared by our best understanding of the guideline, available on the webpage of the Norwegian Consumer Authority: https://www.forbrukertilsynet.no/vi-jobber-med/apenhetsloven.

The report was presented at the Ferroglobe Mangan Norge AS' board meeting on 12th June 2026.

Benjamin Noel Camille Crespy
Board chairman

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Alberto Jose Fuentes Alvarez
Board member

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Board member

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CEO Ferroglobe Mangan Norge AS

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