



**Ferroglobe**

## FERROGLOBE PLC CORPORATE POLICY

POLICY NAME: **Whistleblower Policy**

### **COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS, AND VIOLATIONS OF GLOBAL ANTI-CORRUPTION POLICY AND CODE OF ETHICS**

Any director, officer or employee of Ferroglobe PLC or a subsidiary of Ferroglobe PLC (the “Company”) may submit a complaint to the management of the Company of his or her reasonable belief of the existence of questionable accounting or auditing matters or violations of the Global Anti-Corruption Policy or the Code of Ethics without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable laws and regulations, accounting standards, accounting controls and audit practices. The Audit Committee of the Board of Directors of Ferroglobe PLC (the “Audit Committee”) will oversee treatment of concerns in this area.

In order to facilitate the reporting of complaints, the Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints regarding accounting or auditing matters, and violations of the Global Anti-Corruption Law Policy or the Code of Ethics (“Complaints”) and (2) the confidential, anonymous submission of Complaints.

#### Receipt of Complaints

- Directors, officers or employees with Complaints regarding accounting or auditing matters or violations of the Global Anti-Corruption Policy or Code of Ethics may report their concerns to any member of the Audit Committee.
- Complaints may be submitted to the Audit Committee by e-mail to [whistleblower@ferroglobe.com](mailto:whistleblower@ferroglobe.com) or regular mail to:

Audit Committee  
Ferroglobe PLC  
2<sup>nd</sup> Floor West, Lansdowne House  
57 Berkeley Square, London,  
United Kingdom, W1J 6ER

- Complaints may be submitted on a confidential or anonymous basis to the Audit Committee through the Internet:

[www.ethicspoint.com](http://www.ethicspoint.com)

#### Scope of Matters Covered by These Procedures

These procedures relate to Complaints relating to any questionable accounting or auditing matters and alleged violations of the Global Anti-Corruption Policy or Code of Ethics, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- deviation from full and fair reporting of the Company's financial condition;
- violations of the Anti-Corruption Laws or the Global Anti-Corruption Policy; and
- other conduct prohibited by the Code of Ethics.

#### Treatment of Complaints

- Complaints relating to accounting or auditing matters or violations of the Global Anti-Corruption Policy or Code of Ethics will be reviewed under Audit Committee direction and oversight by the Chairman or such other persons as the Audit Committee determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.
- Upon receipt of a Complaint, (i) it will be determined whether the Complaint actually pertains to accounting or auditing matters or violations of the Global Anti-Corruption Policy or Code of Ethics and (ii) when possible, acknowledgement of receipt of the Complaint will be made to the sender.

- Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Audit Committee.
- The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to reporting of Complaints, as specified in Section 806 of the Sarbanes-Oxley Act of 2002, or other applicable local law.

#### Reporting and Retention of Complaints and Investigations

- The Audit Committee will maintain a log of all Complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the entire Audit Committee. Copies of Complaints and such log will be maintained in accordance with the Company's document retention policy, and in accordance with applicable law.