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| PREPARED BY: GROUP COMMUNICATIONS & IR | GROUP POLICY | GP-HR-007 |
| APPROVED BY: MANAGEMENT BOARD | | EFFECTIVE DATE: 24 JANUARY 2008 |
| TO BE REVIEWED BEFORE: 15 OCTOBER 2031 | | LAST UPDATE: MAY 2023 |
| DONATIONS GUIDELINES | | |

1 Introduction

Umicore seeks to benefit the communities in which it operates and give back to the planet. These benefits can be both direct, such as providing employment and paying local taxes, as well as indirect. Umicore wants the benefits of its activities and actions to extend beyond these direct impacts and wishes to be a responsible corporation and a good corporate neighbour. In this context, Umicore wishes to support a number of worthwhile causes either through financial support or by putting time and talent at their disposal.

By supporting these causes, Umicore wishes to make meaningful contributions to the wellbeing of the communities in which it operates and the protection of the environment, in line with its [Let's Go For Zero ambitions](#) (Zero Harm, Zero Inequality and Net Zero scope 1 and 2 GHG emissions).

2 Organization & set-up

Umicore donates both at business unit and site level, where the general focus is on supporting and promoting a strong social fabric in the community around the sites, and at corporate level where the emphasis is on projects with an international scope.

2.1. Corporate donations

At corporate level, the emphasis is on projects with an international scope with priority given to initiatives that have a direct sustainable impact on society and the planet through the empowerment of minorities & communities. Next to disaster relief, the projects supported are aligned with the Let's go for Zero ambitions of Umicore of achieving net zero scope 1 and 2 greenhouse gas (GHG) emissions by 2035; ensuring zero inequality and zero harm. The corporate donations budget is managed by a Group Donations Committee.

2.2. Donations at business unit and site level

Umicore has decided to channel resources to donations with significant efforts dedicated to initiatives in and for communities concerned by Umicore's operations at the initiative of the local management and staff.

Umicore believes that by making Umicore sites responsible for local donation initiatives, we can create the biggest impact where it matters. Local teams can best define where the needs are the highest and where donations have the most impact. Moreover this approach allows to create ownership and engagement among colleagues across the Group. In this sense, every colleague

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can contribute and help make a difference. Umicore's support may include contributions in kind and freeing staff to work on community related projects.

2.3. Donations champions

The management and follow-up of the business units' donations are ensured by the donation champions as appointed by the business unit manager. The role of the donation champions is among others to drive the donations within their business unit, to communicate about the initiatives through the internal communication channels – using Connect to communicate at BU and site level and the Umicore for Humanity community on Yammer to share initiatives across the Group – , and to closely align with the business unit controller regarding reporting.

3. Donations budget

The **Group donation budget** is based on a percentage of the previous year revenues and is split equally between Corporate donations and the business unit donations. This percentage is defined every year by the Management Board and reviewed in line with industry practices. The budget is expressed as a percentage of revenues to ensure an equal contribution from the different business units according to their size in terms of revenues.

The priority is that the **business unit donation budget** provides sufficient donations support to each site's community engagement programme. It is the responsibility of each business unit manager to allocate the available budget over the various sites under his / her responsibility. It is recommended that in multi business unit sites, the business unit donation budgets, as allocated by the business unit managers, are grouped. This will allow to increase impact and support longer-term initiatives.

The **corporate donation budget** is managed by a Group Donations Committee. As of 2024, a part of the corporate donation budget is allocated to the corporate departments for them to select charities of their choice in line with this policy. The management and follow-up of the corporate departments donations are ensured by a donation champion as appointed by the head of the department following the same model as the business unit (see: 2.3 Donations champions).

For development activities or office locations that fall outside the scope of a business unit the budget should be established at the discretion of the local management and in line with the local community engagement priorities.

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4. Reporting

All Corporate and Business Units donations are included in the Group's financial reporting procedures and tools.

On quarterly basis, the business units and the Corporate Donations Committee report the spending on donations. This is part of the regular BU financial reporting, and includes an overview of the donation expenses and budget and a short project description of major donations.

By year end, the amounts spent on donations (whether monetary, in-kind or as staff time) of all business units, sites and at corporate level are consolidated and audited, prior to publication in Umicore's Integrated Annual Report.

5. Criteria for donations

5.1. What qualifies as a donation?

In short, any payment / contribution (in cash or otherwise) that is made to a not-for-profit organization and which is not for Umicore's commercial gain, qualifies as a donation. Donations to political parties are not permitted in any event. Fund-raising efforts for disaster relief are coordinated at Corporate level. Any funds raised by employees for disaster relief at site level should be considered as separate from the local donations budget. Further guidance can be found in the attachment (see below 3.7).

5.2. Should there be a specific focus?

While sites should determine the specific focus of their own initiatives, there should be a general focus on initiatives that support and promote a strong social fabric in the community around the site. All initiatives should contribute to stakeholder engagement, particularly engaging with the local community. At corporate level the accent is on international sustainable development-linked initiatives, with a specific focus on empowerment of communities and minorities.

All donations should be aligned with the Let's go for Zero ambitions of Umicore of achieving net zero scope 1 and 2 greenhouse gas (GHG) emissions by 2035; ensuring zero inequality and zero harm.

Further guidance is contained in the annexes.

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6 Group Donations Committee

A Group Donations Committee consisting of a diverse mix of colleagues with different regional and functional backgrounds meets every quarter to manage the Corporate level donations initiatives. The role of the Committee is primarily to select Group-level projects within the scope of the Corporate Donations budget. The Committee is also tasked with reviewing the overall donations efforts throughout the Group and encouraging the sharing of best practices. The Committee also provides guidance at the request of sites and business units.

Members of the Group Donations Committee:

Group Communications: Evelien Goovaerts, Quentin Poncelet
 Government Affairs: Wouter Ghyoot
 Rechargeable Battery Materials: Tatiana Cervak
 APAC region: David Fong
 North America: Mark Caffarey

7 Contact

For questions related to donations, please contact Quentin Poncelet.

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8 Attachments

8.1 Guidelines for donations at business unit and site level

This document provides concise guidelines regarding what kind of projects and initiatives fall within the definition of “donations” at business unit and site level. It also provides some general guidelines regarding considerations to make in a site’s general approach to donations.

1 General:

1.1 What qualifies as a donation?

In short, any payment / contribution (in cash or otherwise) that is made to a public organization or not-for-profit private organization and which is not for Umicore’s / the business unit’s / the site’s commercial gain.

1.2 Should there be a specific focus?

While sites should determine the specific focus of their own initiatives, there should be a general focus on initiatives that support and promote a strong social fabric in the community around the site. All initiatives should contribute to stakeholder engagement, particularly engaging with the local community. At corporate level the accent is on international sustainable development-linked initiatives, with a specific focus on empowerment of communities and minorities.

All donations should be aligned with the Let’s go for Zero ambitions of Umicore of achieving net zero scope 1 and 2 greenhouse gas (GHG) emissions by 2035; ensuring zero inequality and zero harm. Projects that contribute to both environmental and social issues (e.g., environmental learning and skills development projects, climate equity or justice projects, etc.), in line with our Let’s Go for Zero ambitions, are of particular interest.

2 Questions and answers

2.1 Can we make donations in forms other than financial?

Yes, of course! You can provide donations in kind (donation of old but serviceable equipment, raw materials, food etc) and also in terms of *pro-bono* work carried out by Umicore employees. In order

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to keep track of the approximate financial value of the overall effort it is necessary to report an estimated financial equivalent for such donations in the Hermes reporting tool.

2.2 Can we donate to political parties?

No. Donations to political parties are not permitted in any event. If you are placed under pressure to donate to a political organization please inform your business unit management and also the Corporate Compliance Officer.

However, it is allowed to work with local authorities to set up charities or to support events that benefit the local community.

2.3 How is the budget established?

The Group donation budget is based on a percentage of the previous year revenues and is split equally between Corporate and the business units. The percentage is defined every year by the Management Board and reviewed in line with industry practices. The budget is expressed as a percentage of revenues to ensure an equal contribution from the different business units according to their size in terms of revenues.

2.4 How do we report the initiatives?

All donations are included in the Group’s financial reporting procedures and tools.

On a quarterly basis, the business units report the spending on their initiatives indicating to which pillar of the Let’s go for Zero ambitions the donations contribute. They also provide a short project description of the main donations.

By year end, the amounts spent on donations (whether monetary, in-kind or as staff time) of all business units, sites and at corporate level are consolidated and audited, prior to publication in Umicore’s Integrated Annual Report.

2.5 Should we expect to be able to “brand” our donation and benefit from the association with the related cause?

It is entirely normal that the connection between the initiative and the site be made clear through some form of branding – a logo on a leaflet, a mention in a local newspaper / website, bulletin on

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local radio etc. It would, however, not be correct to demand advertising space or media coverage as a precondition of a donation. This would not be in accordance with the Umicore Way.

2.6 How should we communicate about our efforts?

Donations can have many objectives. The most obvious is to do good for the recipient organization. This may also have direct and tangible benefits for Umicore such as reinforcing links between Umicore and the local community, raising the level of pride that employees have in being part of the site / Umicore, bring credit to Umicore's caring nature and actions as a responsible corporate citizen. Communication is an essential part of the process, particularly from a local perspective. Such information can provide inspiration for other employees and can also be reflected in for our company's broader communications, for example in the Annual Report and on our website.

It is part of the responsibilities of the donation champion to communicate internally about the initiatives through the internal communication channels – using Connect to communicate at BU and site level and the Umicore for Humanity community on Yammer to share initiatives across the Group. External communication should be aligned with Group Communications.

2.7 How should we set up a decision process for filtering requests?

A donations champion is appointed for each business unit or corporate department to manage and follow-up on the donations. They are free to adopt their own approach regarding requests.

The size and location of each site will play a key role in determining the detail and sophistication of its selection process. The one key element of guidance that should apply to all sites relates to the concentration of decision making; the two eyed principle should be followed (see: at least 2 people should be involved in choosing a charity). This principle helps to ensure that the selected projects are representative of the site and not just of one individual.

2. 8 What is the role of the donations champion?

The role of the donation champions is to drive the donations within their business unit or corporate department, to communicate about the initiatives through the internal communication channels, and to closely align with the business unit controller regarding reporting.

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3 Examples of approved donations

3.1 Education in the community

Education related projects can be an excellent way of engaging with young people in a community and reinforcing the link between Umicore and its neighbourhood. This is particularly relevant for Umicore as a technology-oriented business. Projects could include providing classroom equipment, giving staff time to help refurbish facilities, providing technical expertise or lessons, sponsoring a prize...

3.2 Collective sponsored walks, rides, runs etc

Employees frequently dedicate their time and effort to collective sponsored walks, rides, runs etc.. When a Umicore site has made an agreement to sponsor an individual or set up its own team of runners / riders etc any money contributed to Umicore employees or the site can be considered as a donation.

3.3 Site level sponsoring of local sports teams

At site level, the sponsorship of a sports team should be considered as a donation. In the vast majority of cases such initiatives at site level are aimed at generating goodwill in the community and reinforcing the bond between the site and its neighbours.

3.4 Aid agencies, charities and other non-governmental organizations

Around each site there exist various not-for-profit organizations that might seek or need support from Umicore. These might also include local branches of national or international organizations. Site management should use its own discretion when selecting such organizations. It is important, however, to consider the reputation and affiliation of the recipient organization. Organizations with strong religious or political affiliations should be avoided and care should be taken not to engage with any organization that holds views that might be at odds with the general principles of the Umicore Way. National or international aid agencies or charities should only be supported if the project has a specific local impact.

3.5 Cultural initiatives

Many examples exist of sites offering their support to local cultural initiatives such as a local orchestra, art project, study group etc...Support for such initiatives can fall well within the scope of

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donations. It is, however, worth considering the reach of any such project before engaging site resources. Questions that are worth asking are: “does the project have a suitably broad impact in the community?”, “Does the project aim to attract / involve all neighbours and employees?”

3.6 Pro-bono work

Depending on regional / business unit / site policy it might be possible for employees to dedicate time to work without remuneration for a not-for-profit organization. Such engagements can help such organizations gain access to skills that would otherwise be out of reach for them. The engagements can also provide an enriching experience for Umicore employees in a different work environment. It is preferable that such engagements enable employees to bring their specific Umicore-related skills to bear in the external environment e.g. an accountant working on a charity’s bookkeeping, a marketer working on the publicity for a project or a technician sharing scientific skills and knowledge with school children.

3.7 Disaster relief

In recent years several major disasters have taken place that have mobilized Umicore’s employees to demonstrate solidarity with the victims.

Often the company is faced with difficult choices in determining which disaster merits the launch of a Group-wide appeal. In order to ensure a longer-term and more consistent approach the Group has established partnerships with several global charities / relief agencies. These partnerships ensure a stable commitment and also provide more opportunities for Umicore employees around the world to engage with the work and efforts of these organizations on an on-going basis.

In general all donations made in the context of disaster relief should be considered as part of the Corporate donation budget. If your business unit, site or corporate department would like to donate towards disaster relief, please reach out to the Group Donations Committee. Only when the disaster has a very local impact close to a site, it can be included in the local BU/site donation budget.

3.8 Volunteering

Donating employee working time in the service of a non-profit organization can be a constructive way of providing support. This kind of initiative can also provide much-needed skills for such organizations and can promote employee engagement. Employee volunteer work can be accepted as an in-kind donation as long as the time is spent working for an organization supported by the

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site / business unit. Longer-term individual engagement in such initiatives e.g., for a sabbatical can also be considered at the discretion of the site and business unit management.

3.9 Other

If you have a proposal for a project that you think might not fit in the site donations program but which might be worthwhile from a Group point of view, please don't hesitate to refer it to the Group Donations Committee by contacting Quentin Poncelet.

4 Examples of donations that are out-of-scope

4.1 Education for recruiting purposes

Any initiative that is specifically and directly targeted at recruiting employees after they leave school or university should not be considered as a donation.

4.2 Personal initiatives to sponsored walks, rides, runs...etc

If the initiative is purely personal and the money raised by the individual is in a personal capacity this does not qualify as a Umicore donation.

4.2 Open days

Sites often organize open days on a periodic basis. These events are designed to reinforce the links between the site and its neighbouring community. This type of activity should be regarded as part of the general on-going community relations work of the site and related costs should not be booked as a donation.

4 Major sports teams

At Group level the sponsorship of a major professional sports team would be considered as promotional advertising.