



Ampco-Pittsburgh Corporation

CONFLICT MINERALS POLICY

Objective and Purpose

Ampco-Pittsburgh Corporation (together with its direct and indirect subsidiaries, “Ampco” or the “Company”) supports the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (the “DRC”) and surrounding countries and is committed to avoiding the use of Conflict Minerals in its products that either directly or indirectly contribute to the ongoing turmoil. The purpose of this Conflict Minerals Policy is to promote compliant vendor commercial practices and ensure a sustainable supply chain of “Conflict Minerals.”

In 2012, the United States Securities and Exchange Commission (the “SEC”) issued final rules regarding “Conflict Minerals,” frequently referred to as “3TG” for Titanium, Tin, Tungsten, and Gold, also defined to include columbite-tantalite (coltan), cassiterite, gold, wolframite and three specified derivatives (tin, tantalum and tungsten) and any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the DRC or an “adjoining country,” as mandated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”). The Act aims to prevent the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country and requires manufacturers, like Ampco, who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals that are “necessary to the functionality or production” of such products.

Ampco Policy

Ampco does not directly purchase any Conflict Minerals. The Company recognizes that tracing the origin and chain of custody of Conflict Minerals contained in its products is a complex process, which requires the cooperation and support of Ampco’s direct and indirect suppliers. Ampco follows the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas (“OECD Guidance”) to investigate our supply chain and engage with suppliers

Supplier Policy and Requirements

Ampco expects its suppliers to source (both directly and indirectly) any Conflict Minerals from ethical sources and reserves the right to request from any supplier at any time such information, certifications and documentation as deemed necessary to monitor or assess compliance with this Conflict Minerals Policy. Suppliers are expected to engage in the following conduct:

- Supplier must establish and maintain a publicly available policy on responsible minerals sourcing to ensure that the high-risk minerals procurements do not directly or indirectly finance armed conflict in the DRC.
- Suppliers must define, implement and communicate to sub-suppliers their commitment to responsible sourcing and legal compliance.

- Suppliers must work with sub-suppliers to ensure traceability of Conflict Minerals.
- Traceability information must be maintained and recorded for five years and provided to Ampco upon request.
- Suppliers of products to Ampco containing Conflict Minerals must conduct due diligence on the origin and chain of custody of such Conflict Minerals and report the source country, along with a determination of the mineral's conflict status.
- Suppliers are required to respond to Ampco's inquiries for reporting templates and due diligence information, and promptly implement corrective actions identified and requested by Ampco.

All notices and reporting should be submitted to Daniel Litwin: dlitwin@ampcopgh.com or phone: 412-429-2487.

Supplier Non-Compliance

Any supplier who is found to be in violation of this Conflict Minerals Policy will be required to implement a remediation plan promptly. The Company reserves the right to conduct audit procedures to assess vendor supply chains and to confirm vendor compliance with this Conflict Minerals Policy. Continued non-compliance or failure to undertake steps addressing issues of concern may lead the Company to terminate the business relationship between Ampco and such supplier.

Reporting and Anti-Retaliation

Suppliers and other parties can report concerns and alleged violations of this Conflict Minerals Policy in the following ways:

Ampco-Pittsburgh Compliance Line: 1-800-448-0236

Or web portal: <https://app.mycompliancereport.com/report?cid=APC>

Ampco will not retaliate against any individual for making a report in good faith.

Adopted: August 4, 2026