

## **POLICY STATEMENT ON HUMAN RIGHTS STRATEGY**

### **OUR COMMITMENT**

As a globally operating Group, we appreciate the importance of protecting human rights in order to realize the vision of an inclusive and fair global economy. At our Group, we are aware of our responsibility and corporate due diligence obligations and are committed to respecting human rights at all levels of our corporate activities and along our entire supply chain.

As a Group of operating subsidiaries and production sites all over the globe, we consider respect for human rights to be one of the fundamental preconditions for our business activities. This is in line with our corporate goal of contributing to a sustainable society.

We align our business activities with the following internationally recognized guiding principles:

- The Universal Declaration of Human Rights of the United Nations,
- The Ten Principles of the UN Global Compact,
- The International Labor Organization's (ILO) Declaration on the four Fundamental Principles and Rights at Work,
- The OECD Guidelines for Multinational Enterprises,
- The European Convention for the Protection of Human Rights and Fundamental Freedoms.

We are also committed to the Sustainable Development Goals (SDGs) set by the United Nations to make the world a more sustainable and just place. From these, we have derived the relevant targets for us, which we pursue in the framework of our sustainability strategy. These SDGs are linked to our sustainability path and embedded in our operating activities.

The guiding principles and rules of our actions as well as the standards that we set ourselves in dealing with business partners and stakeholders are summarized in our long established Code of Conduct, Supplier Code of Conduct as well as further global policies. Our Code of Conduct contains all the fundamental principles and rules for responsible and ethical behavior and requires all employees across the world to act in a reasonable and lawful manner towards colleagues, business partners and communities. Our key approach is the integration of human rights related due diligence obligations into our business practices. Wherever we operate, we comply with applicable local laws and regulations. Where national law is interpreted more strictly than our standards, we ensure that we adhere to the national law. Where local legislation is less stringent than our standards, we will adhere to the commitments set out in our policies. We conduct business with high ethical and integrity standards and, thus, we expect our business partners to commit to respecting human rights as well, to establish appropriate due diligence processes, and to pass this expectation onto their own suppliers.

### **SCOPE**

This policy statement applies to all employees of the group in all countries we operate and concerns our acting towards people inside and outside of the company. We expect our business partners to also commit to respecting human rights, to establish appropriate due diligence processes to protecting human rights and to forward this expectation to their own business partners.

### **RELEVANT HUMAN RIGHTS THEMES**

We are aware that our complex global supply chains could potentially cause adverse human rights impacts, if not managed with care. We continuously assess potential human rights risks in its supply chains by using internal channels as well as external information sources. Based on our risk analyses we focus our due diligence processes on the following human rights themes which we identified as particularly sensitive areas:

- **Child labor**

We reject all forms of child labor. We do not employ children under the legal age for employment in any country or local jurisdiction.

- **Forced labor**

We do not tolerate forced, bonded or involuntary labor, human trafficking and modern slavery and emphatically prohibit the use of forced labor in our global operations and facilities as well as in those of our business partners.

- **Diversity and Inclusion**

We acknowledge and respect the cultural, social, political and legal diversity of all nations and societies and promote the diversity at the workplace. We are committed to equal opportunity and reject any forms of discrimination or harassment based on gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation, and identity.

- **Working conditions**

We adhere to high **health and safety** standards for our employees at work and promote their well-being. With the combination of many measures, we pursue a preventive approach to preserve the health of employees, safeguard third parties and prevent accidents, injuries and work-related illnesses. We provide and improve a safe working environment, attach a great importance to compliance with our Global Environment, Health and Safety Policy, statutory regulations and international industry standards.

We support the complying with all applicable national **working-time** regulations including overtime, working breaks, paid vacation and parental leave.

We **compensate** our employees on the basis of a contract in line with the respective local industry and labor market stipulating at least the minimum wages guaranteed by law and in accordance with the terms of applicable collective bargaining agreements, where they exist.

Good training and the readiness to adapt to changes in market forces by continuous development are the best prerequisites for all employees in order to secure jobs and sustain professional success. For this reason, we support the continuous training of all our employees regardless of age, the length of service with the company, the area of application or the career level of the employee or the specific location.

- **Freedom of Association and Collective Bargaining**

We recognize the fundamental right to the freedom of association and the right to collective bargaining within the scope of national regulations and existing agreements.

- **Data Protection**

We respect the privacy of all individuals and the confidentiality of any personal data we hold about them. Our Global Data Protection Policy provides appropriate safeguards for transmission of personal data belonging to our employees and business partners.

- **Environment**

As we understand it, the supply chain can pose a threat to the two areas we consider most worthy of protection: the human and labor rights on the one hand and safeguarding of our environment with its biodiversity on the other. We therefore pay particular attention to both of these. The careful use of natural resources and the adherence to environmental standards throughout the entire value chain is crucial. We consider environmentally responsible action as an ethical and corporate duty – far beyond the supply chain: within the framework of our own processes in manufacturing, sales and administration or at a later stage in the utilization phase of our products at the customer's premises.

**OUR APPROACH**

Our Group's approach to human rights is already well integrated into its existing business practices and their protection is a continuous process. Our commitment to respect human rights is reflected in our global policies and anchored in the internal procedures. The implementation of human rights due diligence is subject to constant review and further development depending on changing framework conditions and our business activities. We identify, assess and monitor adherence to human rights in our business activities through a continuous human rights due diligence process, which includes regular risk assessments across our functional organization and our portfolio of suppliers. We define and rely on the different measures to protect human rights as well as prevent and remedy human rights violations, as appropriate. Our Global CSR Board supports the process in all sustainability topics. It defines the sustainability strategy, determines the roadmap for implementing goals and measures, and discusses all major issues relating to sustainable action. Continuous improvements relating environmental topics at our main production sites are supported by certification to the environmental management standard ISO 14001. In order to comprehensively meet the legal and technological requirements for our products, we have introduced a global Product Compliance Management (PCM). This involves compliance with and ensuring the essential health and safety requirements for our products in the respective sales markets. According to our ethical standards, we also have installed processes to assure our products do not contain any conflict minerals.

We, as a Group with high ethical and integrity standards, expect the same from our business partners. We procure raw materials and pre-products from a large number of suppliers and use our Supplier Code of Conduct as a basis to communicate our expectations. By signing this document, our direct suppliers (existing suppliers or potential suppliers at the point of selection) are required to confirm their compliance with legal obligations concerning environmental protection, respect for human rights, compliance with other sustainability requirements and to adequately address human rights-related risks regarding their own business partners. If we have concerns that the products or services supplied to us are directly linked to human rights violations, we address these to our suppliers and offer our support to work with them to mitigate these impacts, as appropriate.

**STAKEHOLDER DIALOGUE**

We maintain a regular and transparent dialogue with their stakeholders. Our relevant stakeholders include groups and institutions with which we are directly or indirectly affiliated through our business activities and therefore have an interest in our social responsibility and sustainable actions. Among them are our customers and employees, suppliers and business partners, scientific institutions and research facilities, representatives of associations, public authorities and non-governmental organizations, and our shareholders. We conduct a dialogue with all the aforementioned stakeholders in a spirit of partnership and mutual trust in order to inform them about current developments at our companies. It is also important for us to learn about and discuss the stakeholders' manifold views and expectations of our company, also in relation to human rights topics.

## **GRIEVANCE MECHANISM**

We encourage our employees to address complaints and information about suspected human rights violations through the established accessible channels including local management, human resources departments or our compliance department. In addition, we provide all stakeholders with a web-based whistleblowing system to report and express their concerns relating our activities or activities of our suppliers and suspected human rights violations. These channels are accessible worldwide both inside and outside our company. The whistleblowing systems are certified according to data protection guidelines and can be used completely anonymously. All incoming messages are treated in confidence and the responsible department in the company deals with them appropriately.

## **REMEDY**

We are striving to avoid causing or contributing to adverse human rights impacts in our own activities and supply chain, and address such impacts, should they occur, in a timely and appropriate manner. We aim to prevent or mitigate any adverse human rights impacts directly related to our operations, products, services, and business relationships. If our business activities are suspected of causing or contributing to human rights violations, we will investigate, address, and respond to the concerns raised and take appropriate corrective action in response to any violation. In the case that our upstream supply chain is affected, we require our suppliers to cooperate in the investigation of the facts and to remedy or mitigate the effects of a violation within a reasonable timeframe, depending on the severity of the infringement. We will be prepared to walk away from suppliers, if our concerns that the products or services supplied to us could be directly linked to human rights violations, cannot be resolved through the active involvement of the supplier.

In addition, we look for ways to support the promotion of human rights within our operations and our sphere of influence.

## **REPORTING AND MONITORING**

We provide information related to our human rights due diligence obligations, consistent with this policy statement, as part of our annual reporting on the corresponding pages of the company's website.

We will continue to review the effectiveness of our measures to protect human rights on a regular basis as well as occasion related. Within the Group, we will actively involve our employees through regular surveys. In our supply chain, we check the effectiveness of measures through our supplier evaluation and, if necessary, through supplementary supplier audits.

## **GOVERNANCE**

We ensure compliance with the human rights strategy internally through clear structures and responsibilities. The Executive Board of the Group is responsible for compliance with the human rights strategy at a strategic level. The relevant Global Functional Departments with their responsibility are entrusted to implement the respective necessary steps via standardized processes in order to involve our employees as well as our suppliers in the human rights compliance process. An appointed Human Rights Officer supervises and monitors all operational processes and measures to implement the human rights strategy and informs the management about his or her work at least once a year.

## **TRAINING**

We shall ensure the group-wide communication of this policy, raise awareness and knowledge amongst our employees and business partners and offer training on human rights related themes to our employees.

## **ADOPTION**

This Policy Statement On Human Rights Strategy is adopted by Executive Board of the Group on 01.03.2024