



Heraeus Human Rights Policy

VERSION 10/2024

I. Introduction

As a family-owned company with a history of more than 160 years, Heraeus commits to the principle of sustainability and the observance of universally recognized human rights. Heraeus commits to treat its employees, including temporary hires and migrant workers, and all individuals in other types of employment relationships, with respect and dignity.

Occupational safety is a very high priority at Heraeus and is ensured by a comprehensive occupational safety compliance management system. Heraeus' commitment to maintaining high occupational safety standards is set forth in the Heraeus Code of Conduct and the Heraeus EHS Policy.

Heraeus also expects its business partners, especially suppliers, which for the purposes hereof includes mines that send precious metal-containing materials to Heraeus for recycling, to respect the human rights of their employees and to protect their employees' health. Heraeus' expectations towards its suppliers are laid down in the Heraeus Supply Chain Due Diligence Policy.

II. HUMAN RIGHTS POLICY - UNDERLYING REGULATIONS

- Universal Declaration of Human Rights;
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the corresponding fundamental Conventions;
- UN Guiding Principles on Business and Human Rights;
- Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (Germany);
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

III. SCOPE OF APPLICATION AND OBJECTIVES

Human rights due diligence at Heraeus is performed with the objective to:

- identify and assess the risk of human rights violations;
- prevent and mitigate the negative impact of the identified risks if these risks are directly or indirectly related to the business activities of Heraeus;
- address the negative impact of the identified risks if the impact derives from direct or indirect business activities of Heraeus.

This Policy applies to all companies within the Heraeus Group.

IV. PRINCIPLES AT HERAEUS

Heraeus is committed to compliance with the following principles:

1. Prohibition of child labor

Children may not be employed below the minimum age for admission to employment permitted by applicable law.

The minimum age for admission to employment must not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years, as set out in ILO Convention No. 138, or, where permitted under applicable local law, not less than 14 years.

a) Hazardous work

Heraeus does not tolerate the employment of minors below the age of 18 for hazardous work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety, customs or lifestyles.

Where a minimum age of 16 years is permitted under local law for admission to employment in hazardous conditions, especially in connection with professional education, Heraeus will tolerate the employment of minors only if the health, safety, customs and lifestyles of the minors involved are protected in every respect and the minors have received appropriate specific instructions or professional training in the corresponding field of activity.

b) Worst forms of child labor

Heraeus does not tolerate the worst forms of child labor¹.

2. Prohibition of all forms of slavery, forced labor and human trafficking

Heraeus denounces, and does not tolerate, any form of forced labor as defined in ILO Convention No. 29, including slave labor, labor exacted under threat of penalty or involuntary labor. The employees' freedom of movement must not be restricted in an inappropriate manner. Employees must always be free to terminate their employment relationship observing the agreed notice period. Heraeus, and any of its agents or other third parties acting on behalf of Heraeus, may not withhold, seize or destroy identity cards, passports, immigration documents or licenses of employees unless such withholding, seizure or destruction is required by applicable law. Employees must not be required to pay to Heraeus, or any of its agents, recruitment

¹ see ILO Convention No. 182 on the Worst Forms of Child Labour.

fees or similar fees which, in aggregate, exceed one month's salary.

Heraeus condemns any form of human trafficking.

3. Working hours

Working hours must not exceed the limits prescribed by applicable local law. Without prejudice to the provisions of local law, the regular weekly working time, including overtime, must not exceed 60 hours. Exceptions are only acceptable under extraordinary circumstances or in case of emergency. Employees are entitled to at least one free day per week. These provisions are based on the ILO standards.

4. Salary and social benefits

The salary and social benefits must be at least in accordance with the minimum legal standards applicable in the country where an employee performs work for Heraeus. Overtime must at least be remunerated in compliance with the applicable laws and regulations. Heraeus employees are entitled to a conclusive and verifiable salary statement substantiating payment of the agreed salary by Heraeus.

Temporary hires may only be recruited in accordance with the provisions stipulated in the applicable laws and regulations.

5. Humane treatment of employees

Brutal or inhuman treatment of employees is prohibited. Moreover, harassment of any type, corporal punishment and mental or physical coercion are considered as inhuman treatment and will therefore not be tolerated.

6. Non-discrimination

Heraeus denounces, and does not tolerate, any form of discrimination, harassment, retaliation or prejudice (disadvantage) on grounds of gender, race, ethnic or social origin, color, age, religion, philosophical belief, political orientation, marital status, sexual preference or physical or mental disability.

In particular, Heraeus does not tolerate any form of discrimination in the workplace in relation to hiring, remuneration, overtime, access to training, promotion, termination of employment and retirement.

Heraeus pays particular attention to the most vulnerable groups, which are at particularly high risk of discrimination depending on the country in which Heraeus operates. These groups may be for example women, minorities or members of indigenous peoples.

7. Freedom of association and collective bargaining

Within the limits permitted by applicable mandatory law, all employees are free to set up or join trade unions or equivalent representative organizations and to exercise their right to collective bargaining.

8. Prohibition of the unlawful taking of land and the inappropriate use of security forces

Heraeus denounces the unlawful taking of land and unlawful eviction. The use of private or public security forces is prohibited if, due to a lack of control, such use results in the inhumane treatment of employees, injury to life and limb or the impairment of the freedom of association and union.

9. Protection of the environment, access to water, biodiversity

Climate change poses a threat to our employees, but also to employees of our business partners and all people affected by Heraeus' business activities. Heraeus is actively working to promote decarbonization and reduce greenhouse gas emissions. To this end, projects for the improvement of energy efficiency and the use of renewable energy are constantly being implemented. For example, the installation of solar modules is being evaluated for all new and existing buildings. Heraeus has committed to the goals of the Paris Agreement and has pledged to reduce its Scope 1 and 2 emissions by 42% by 2030 compared to 2021.

Heraeus recognizes the importance of access to drinking water for its own employees and all individuals. In particular, when auditing mines from which Heraeus sources precious metal-containing materials, Heraeus reviews that access to drinking water is not compromised.

Heraeus is committed to animal welfare and biodiversity. Heraeus is working to define targets for improving biodiversity in its own business operations and along the supply chain.

10. Workplace safety

All employees, in particular managers, must comply with the mandatory rules and regulations on safety in the workplace and in employment so as to ensure overall safety. Heraeus offers a working environment that allows employees to report inappropriate or unsafe working conditions to the Heraeus management without fear of discrimination or retaliation.

V. HUMAN RIGHTS DUE DILIGENCE IN THE PRECIOUS METALS SUPPLY CHAIN (UPSTREAM AND DOWNSTREAM)

Heraeus reasonably ensures that the precious metals in its supply chain originate from legal and ethical sources, that the precious metals are not associated with crimes, armed conflicts or human rights abuses and that they will not be used for money laundering, financing terrorism, tax evasion, fraud or any other crime.

In order to verify the observance of human rights by Heraeus' contracting partners in the precious metal supply chain, a due diligence process has been established at Heraeus which includes, without limitation, the following measures:

- informing contracting partners of the applicable Heraeus human rights policies;
- verification of the contracting partners' compliance with local human rights laws by way of document analyses;
- performance of site visits (mines) and, if possible, of guided interviews with employees, to assess the employees' work situation and workplace conditions unless independent third-party reports are available;
- provision of clarifying statements in the event of doubts and/or suspicions regarding the violation of human rights;
- refusal to enter into a new business relationship, or termination of an existing business relationship, if unacceptable violations are detected which cannot be resolved or corrected and which are inconsistent with the principles adopted by the Heraeus Group.

A more detailed description of the management system for the monitoring of suppliers and, in particular, of Heraeus' contracting partners in the precious metal supply chain is provided in the Heraeus Supply Chain Due Diligence Policy.

VI. EXCHANGE WITH STAKEHOLDERS

Heraeus is in constant communication with the competent government departments, authorities, industry associations and with other companies in order to continuously review the appropriateness and effectiveness of its own guidelines and processes. In the particularly sensitive area of supply chains for precious metal-containing materials, Heraeus maintains contact with industry associations in the precious metals sector as well as with non-governmental organizations and continuously adapts its own processes to new requirements and findings.

VII. DEALING WITH (POTENTIAL) HUMAN RIGHTS VIOLATIONS

Employees as well as external parties, e.g. employees of suppliers, can report human rights violations in their native language via Heraeus [SpeakUp](#) 24/7. Reports can also be made anonymously, and the protection of the reporting person is guaranteed. Heraeus SpeakUp is publicized via the Internet, on Heraeus' own communication channel *Heraeus touch* and on posters.

Reports via Heraeus SpeakUp are transmitted to the Heraeus Compliance Officer. All serious reports will be investigated. The Rules of Procedure for Heraeus SpeakUp, which are available on the Internet, define responsibilities and the investigation process. If the reported information is confirmed, appropriate remedial action will be taken by the responsible management. The Rules of Procedure also specify how individuals who make serious reports in good faith are protected.

Each Heraeus business unit conducts an annual human rights risk analysis for its employees. The results of such analysis are consolidated by the Responsibility Office and reported to the GRC Human Rights Chapter, which includes one representative of the Group Management Committee. If the risk analysis suggests that preventive or remedial measures are necessary and these measures have not yet been taken by the respective business unit, the GRC Human Rights Chapter can initiate suitable measures. The implementation of these measures is monitored by the Responsibility Office and, if necessary, reviewed by Corporate Audit.

VIII. RESPONSIBILITIES AND CONTACT INFORMATION

The Responsibility Office (Heraeus Business Solutions GmbH) is the division responsible for this Policy. The Policy was approved by the Board of Directors of Heraeus Holding GmbH. The managing directors of the respective Heraeus companies are responsible for implementing this Policy.

For questions regarding this Policy please contact:

Chief Compliance Officer Heraeus Group

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