



Excelitas Noblelight Supply Chain Due Diligence Policy

VERSION 01/12/2023

I. Introduction

Excelitas Noblelight is committed to the principle of sustainability in its supply chains. Excelitas Noblelight is aware that the selection and monitoring of its suppliers, especially in precious metal trading and in the sourcing of critical raw materials is of key importance for business activities which are focused on sustainability.

II. PREAMBLE AND SCOPE

The various business segments of Excelitas Noblelight pursue the goal of aligning their value chains with due regard to the protection of human rights. In doing so, Excelitas Noblelight follows in particular:

- the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- the requirements of the German Supply Chain Due Diligence Act ("Act"); the EU Conflict Minerals Regulation 2017/821;

Excelitas Noblelight aims at sourcing Risk Products (as defined below) only from legitimate sources that are not associated with crime, armed conflict or human rights violations.

The objective of the Excelitas Noblelight human rights due diligence process is:

- to identify and assess the risk of violation of human rights;
- to prevent and mitigate the negative impact of the detected risks if these risks are directly or indirectly linked to the activities of Heraeus.

III. THIS POLICY APPLIES TO ALL EXCELITAS NOBLELIGHT COMPANIES. SOURCING PRINCIPLES

Excelitas Noblelight will not tolerate, profit from, contribute to, assist with or be associated with:

- torture, cruel, inhuman and degrading treatment;
- the worst forms of child labor or any form of forced labor. The age of employees shall not be less than 15 years or, where permitted by applicable local law, not less than 14 years;
- other gross human rights violations and abuses such as sexual violence;
- corruption or any other illegal activities such as bribery or money-laundering;
- violations of the freedom of association or the right to organize, including the right to participate in collective bargaining and strikes;
- violations of international humanitarian law;
- war crimes, genocide, or any other crimes against humanity;
- the direct or indirect support of non-state armed groups;
- the involvement of public or private security forces, if, due to a lack of control, their use leads to a

- cruel or inhumane treatment of workers or to the injury of workers or the restriction of the freedom of association;
- the unauthorized sourcing from world heritage sites and protected areas;
- the unlawful eviction or the unlawful taking of land;
- the fraudulent misrepresentation of the origin of minerals;
- the non-payment of taxes, fees, and royalties to governments;
- the withholding of minimum wages provided for under applicable law;
- excessive working hours with the risk of mental or physical fatigue;
- harmful soil contamination, water or air pollution, harmful emissions, or excessive water consumption harmful to the health of humans or constituting a significant impairment of the basis for the preservation or production of food;
- insufficient safety standards or a working environment with an unacceptably high risk of occupational accidents;
- any breach of statutory requirements with a high risk of considerable bodily injury or harm to the environment.

Excelitas Noblelight will not pursue any business opportunity or engage in any transaction with business partners and will immediately withdraw from existing business relationships if any of the risks listed above are identified by Excelitas Noblelight, unless Excelitas Noblelight can manage the identified risk by taking appropriate measures to eliminate or mitigate the risk. Business relationships with partners acting against those principles are not tolerated throughout the organization.

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

IV. SUPPLIER DUE DILIGENCE PROCESS AND MANAGEMENT SYSTEM

a. Supplier risk assessment

Excelitas Noblelight sets up a process for risk analysis and the assessment of suppliers, which includes a requirement for a risk-appropriate review. The risk analysis is based on the evaluation of country and industry risks. For the risk analysis, Excelitas Noblelight may also use information which they have requested from the supplier, researched themselves or obtained from external sources (commercial data and ESG data providers).

b. Measures derived from the risk assessment

Based on the risk analysis, Excelitas Noblelight is required to take appropriate measures if deemed necessary. Depending on the risk identified, such measures can range from obtaining confirmations of compliance with the Excelitas Noblelight Supplier Code of Conduct, to

transmitting and evaluating questionnaires, collecting external data, committing the supplier to certain measures, and to on-site supplier audits. Or Excelitas Noblelight may even decide not to enter into a business relationship or to terminate an existing business relationship with certain suppliers. The terms of the sample purchase contracts and the terms of the Supplier Code of Conduct provide that the suppliers of Excelitas Noblelight companies are to commit their sub-suppliers in a risk-appropriate manner to also comply with the human rights and environmental standards laid down in the Excelitas Noblelight Supplier Code of Conduct.

c. Management system

Human rights training courses are part of the compliance training seminars. Employees of the procurement department are invited to specific human rights training courses on human rights risk in the supply chain. Excelitas Noblelight is required to report the results of the risk assessment and the implementation of preventive and remedial measures to their top management or their supervisory board. The processes for the implementation of the supplier risk assessment and the measures derived from the risk assessment will be reviewed at least annually by a supply chain expert group. Excelitas Noblelight has a Compliance Hotline (“grievance mechanism”) which is available to employees and to third parties.

d. Responsibilities

The responsibility for the operational implementation of this Policy, in particular for the risk assessment and any adequate measures taken based on such risk assessment, lies with the managing director of the relevant Excelitas Noblelight company, who may delegate the responsibility for the risk assessment to the procurement department.

V. GRIEVANCE MECHANISM

Excelitas Noblelight encourages its own employees or any external stakeholders to use the Excelitas Noblelight grievance mechanism, allowing to anonymously voice concerns about our supply chain or any newly identified risks. Any reports made in good faith will be treated discreetly and are strictly confidential. Any attempt to identify a whistle-blower who has reported a concern in good faith and who has chosen to raise his concerns anonymously is strictly forbidden.

Compliance hotline:

Germany: 0800-182-9411
UK: 0808-234-0329
US: 1-877-236-6327

Adress:

Excelitas Noblelight GmbH
Heraeusstraße 12–14
63450 Hanau

Excelitas Technologies Legal Department
200 West Street Waltham, MA 02451
United States

Webbased reporting:

<https://www.tnwgrc.com/excelitas/>

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VI. DEFINITIONS

Risk Products: Products or services are considered “Risk Products” if their exploitation and purchase involve a particularly high risk of violation of human rights, violation of international trade rules or of criminal offenses. According to Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, tin, tungsten and tantalum (“3Ts”) as well as gold and their respective minerals are always considered as Risk Products.

Outside the 3Ts, products and services are considered as Risk Products if the risk analysis shows risks in the areas described in Section 3 above and in Section 2 of the Act.