Rosenberger

Compliance

Human Rights and Environmental Policy Statement

ROSENBERGER GROUP





Human Rights and Environmental Policy Statement

Dear valued colleagues and business partners,

Social, human rights and environmental responsibility is a cornerstone of our way of doing business. Already since years, we express this in our Mission Statement and the Rosenberger Code of Conduct. With this policy statement we now take the chance to specify our obligations, expectations and approach for all stakeholders of company Rosenberger, employees as well as external business partners like customers and suppliers.

Our principle is: We convince with our products. The companies of the Rosenberger Group are known for the quality of their products, in which they make no compromises. For us, this also includes human rights obligations and environmental protection requirements. They may not be bypassed, limited or even breached during the production of our products and all preliminary products.

Rosenberger aligns its corporate actions with recognised environmental and human rights standards.

With this policy statement, we clearly acknowledge our responsibility to protect human rights and the environment. Insofar as we have direct influence in our own business areas, we ensure compliance with human rights and environmental obligations through training, work instructions, controls, audits and reports. We expect the same from our supply chain. Our suppliers must therefore confirm our Supplier Code of Conduct or equivalent requirements as a basis and support us in further risk reduction measures.

We have established a team that continuously develops and applies further risk mitigation measures in addition to this policy statement and the Supplier Code of Conduct. These are applied, for example, to deliveries with an increased risk profile. In particular, it also applies the assistance provided by both the authorities and our clients. Members of the aforementioned team are active in industry associations relevant to us in order to learn from and apply industry best practices. This team informs us at defined intervals and in the event of special developments.

Human rights and environmental risks start with our mindset and daily actions. We therefore expect all colleagues and business partners to ensure that the documents and risk reduction measures mentioned are not just empty shells but are lived and implemented in their daily actions. We can be permanently successful together only by acting sustainably, responsibly and with integrity.



Eric Küppers
CEO

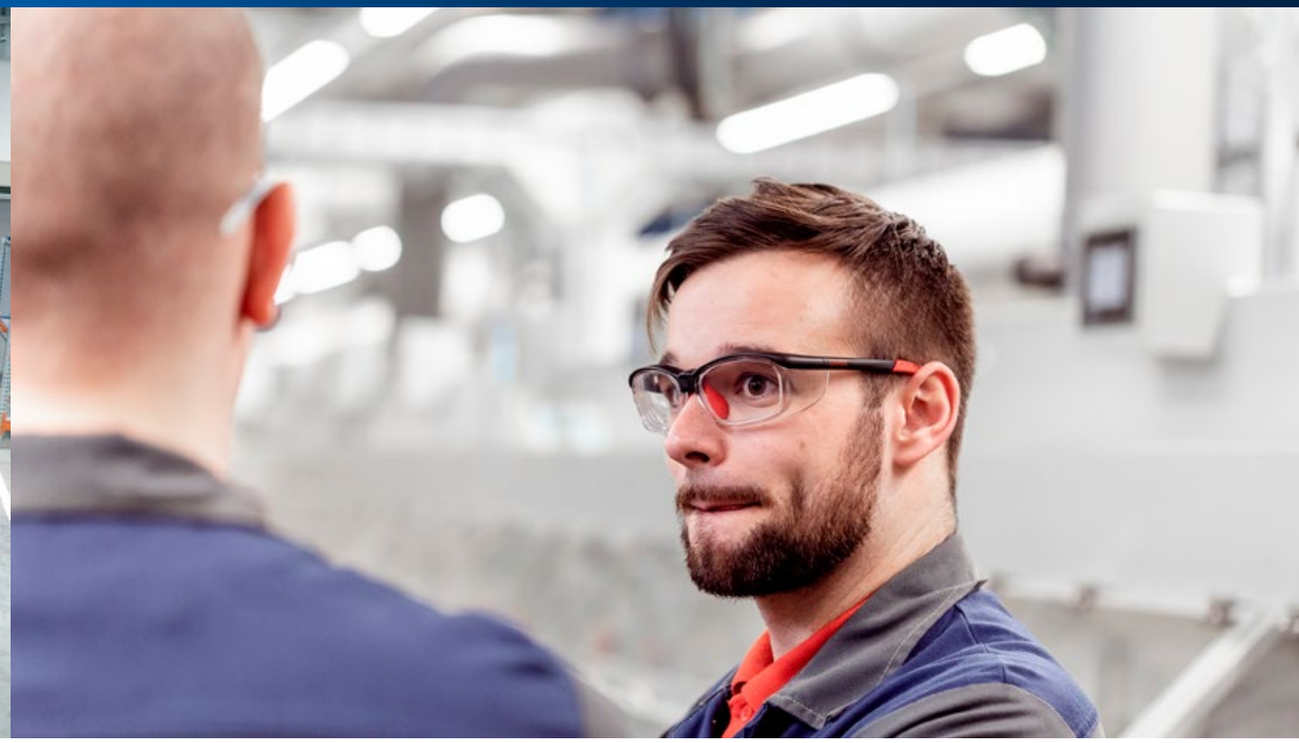


Josef Rottenaicher
CFO



Jochen Ehrenberg
COO





Our Approach – Respect for Human Rights and the Environment

This policy statement explains and reaffirms our requirements for responsible and sustainable action as set out in our Mission Statement and Supplier Code of Conduct. Both documents are an integral part of the agreements with our employees and suppliers. At Rosenberger the customer and the social responsibility for our employees are the basis for our thoughts and acting.

We therefore align our corporate actions with the following guidelines and standards:

- United Nations Universal Declaration of Human Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations Covenant on Economic, Social and Cultural Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- Principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises (Chapter IV)
- Standard SA 8000®

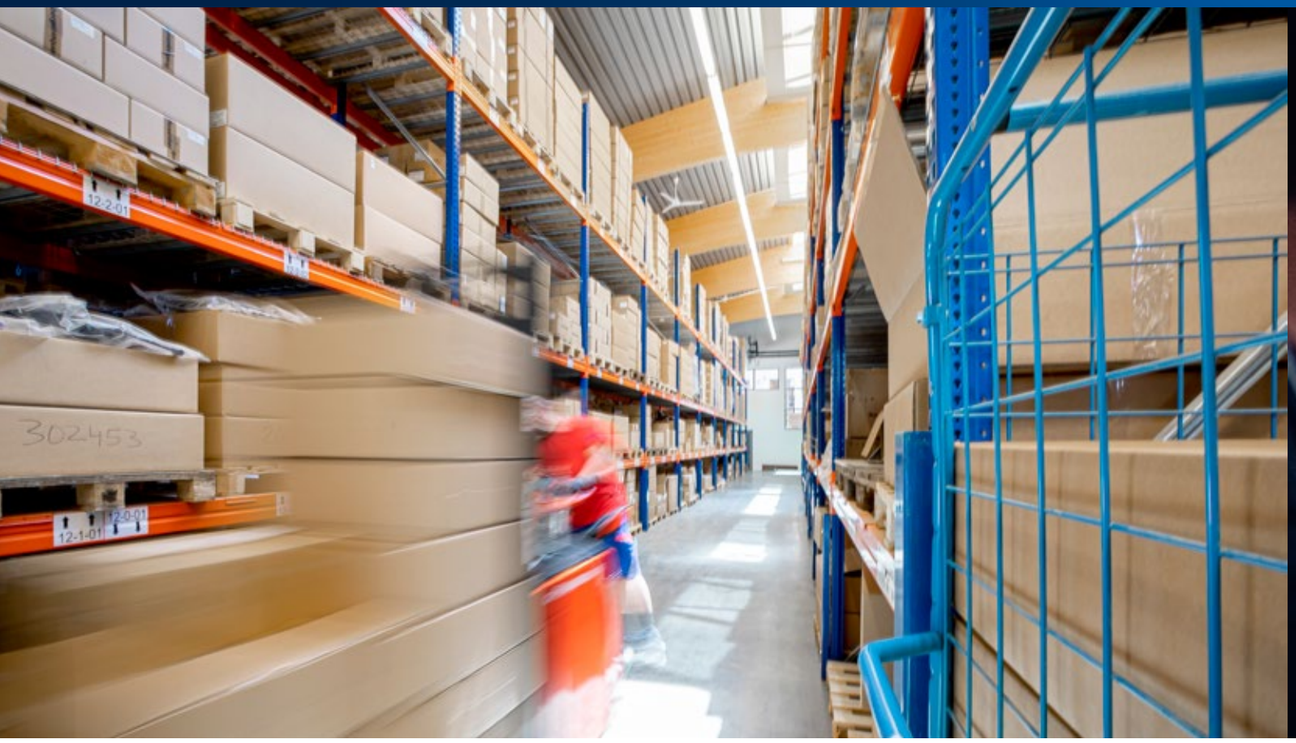
We are part of a supply chain that understands that economic activity always presents opportunities and risks in terms of respect for human rights and the environment. In addition to uncompromising quality and performance, sustainability and social responsibility are requirements that our customers and we ourselves place on us. Together with our customers, suppliers and business partners, we use our global competencies in the Rosenberger Group to contribute to the protection of human rights and the environment.

Our Human Rights and Environmental Risk Management

We are aware that our economic activities may also be associated with human rights and environmental risks. We are supplier for the electrical and electronic industry with our business areas Interconnect and Test & Measurement as well as of the automotive industry with our Business Area Automotive.

For this reason, the human rights and environmental risks that exist for the electrical and electronics industry and the automotive industry are also important for Rosenberger. For both industries the extraction and processing of raw materials, especially metals, is associated with increased human rights and environmental risks. These metals often originate from countries with increased government and human rights challenges and sometimes from artisanal mining. Several metals are essential for our products. Examples are copper and gold, in smaller amounts also cobalt and nickel for coatings or as alloying elements. Further human rights risks, particularly in the form of working time and occupational safety risks, exist for the electrical and electronics industry in the production of electronic components, especially in Southeast Asian countries, and in all production steps with a high manual content.

We address the risks through our human rights and environmental risk management. In our risk





analysis, we involve all relevant internal departments and apply tools and information that are customary in our industry.

We prevent the violation of human rights-related and environmental obligations in our own business areas through training, work instructions and, where appropriate, internal audits, combined with the continuous review in the risk analysis, which incorporates information from our whistleblowing system. We expect our suppliers to share our values. They therefore confirm our Supplier Code of Conduct as the basis for our cooperation. We continue to use risk analysis tools provided by industry associations and public bodies, which specifically consider the country of origin, type of activity and existing certifications.

All risk mitigation measures are reviewed regularly and as warranted.

We do not accept any violations of human rights obligations in our own business and stop them immediately. Also our suppliers must ensure that human rights and environmental risks are mitigated as far as possible in their supply chain. This is stipulated by our Supplier Code of Conduct, which is mandatory.

Whistleblowing System

Our employees and business partners can report actual or potential breaches of the rules via our whistleblowing system. The processing of indications of (potential) breaches of rules is carried out by particularly qualified employees (e.g. especially from the Compliance Department), who carry out a risk-based examination and initiate appropriate risk-reducing measures. Rosenberger is committed to the protection of whistleblowers in accordance with applicable laws.

Human Rights and Good Working Conditions

The commitment to social and ethical responsibility is an essential part of Rosenberger‘s corporate philosophy. Rosenberger Group is committed to full compliance with social and ethical conventions according to the international standard SA8000®.

Our suppliers are also required to recognise these requirements.

In detail, the provisions of the abovementioned international standards apply to us in their current version. We list below some human rights requirements that deserve special attention according to the risks in our supply chain:

Prohibition of Child Labour

We at Rosenberger strictly reject any form of child labour in the sense of the SA8000® standard, the other international standards mentioned and applicable legal requirements, e.g. the German Supply Chain Act. All employer practices of Rosenberger companies must be aligned with the requirements of the SA8000® standard. The development of children must not be inhibited, and the special needs of young workers must be taken into account.

Prohibition of Forced Labour and Slavery

We at Rosenberger strictly reject any form of forced labour or slavery in the sense of the SA8000® standard, the other international standards mentioned and applicable legal requirements, e.g. the German Supply Chain Act. Employment relationships are always based on voluntariness and can be terminated with reasonable notice.

Right to Health and Safety at the Workplace

As an employer, we at Rosenberger ensure safety and health protection at the workplace at least within the framework of the applicable laws and constantly review our measures. Our aim is to have no workrelated accidents and illnesses. We expect the same in our supply chain, especially in the mining and processing of raw materials.





Compliance with legal requirements on Working Hours and Rest Periods

Working hours comply with local legal requirements or the respective industry standards. The specifications in SA8000® should be adhered to as far as possible.

Freedom of Association and the right to Collective Bargaining

At Rosenberger, we recognise the right of our employees to form employee representative bodies, to bargain collectively to regulate working conditions and their right to strike, subject to applicable law. The establishment, joining or membership of a trade union recognised under the applicable law shall not be used as a reason for unjustified unequal treatment or retaliation.

Equal Opportunities and Protection against Discrimination

At Rosenberger, we do not tolerate any form of discrimination or unfounded unequal treatment, for example on the basis of characteristics such as gender, ancestry, origin and nationality, religion and ideology, political, social or trade union activity, sexual identity and orientation, physical and/or mental limitations or age.

Prohibition of Withholding a Reasonable Wage

At least the minimum wage set by applicable law must be paid and the wage must also enable our workers to at least earn a living. Besides this the wage is determined according to the laws of the place of employment.

Prohibition of Land Grabbing

We strictly reject the unlawful eviction and the unlawful deprivation of land that serves as the livelihood of individuals.

Safeguarding of Human Rights also when using own or Private Security Service Providers

When we use our own security forces or private security providers to protect our operations, internationally recognised human rights must be respected.

Environment and Emissions

Emissions

Emissions shall be kept to a minimum and shall comply with all applicable legal and regulatory requirements. They shall not be capable of damaging food production, access to drinking water or the health of persons.

Environment

Legal requirements and international conventions on environmental protection or the restriction of certain substances must be complied with. These include, but are not limited to, the Minamata Convention, the EU POP Regulation and the Basel Convention.

Reports

Transparency regarding compliance with this policy statement is important to us. This creates trust among our employees, customers, suppliers and the public and helps us to ensure that we are constantly improving. We therefore report annually in accordance with regulatory requirements and on our homepage on the results of our risk assessment, risk mitigation measures and any residual risks that may exist.

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Certified by IATF 16949 · DIN EN 9100 · ISO 9001 · ISO 14001 · ISO 50001

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