

# OSRAM

## Human Rights Policy

The Human Rights Policy formalizes our commitment to respect and uphold human rights for people affected by our operations, business relationships, supply chain and products.

OSRAM respects and supports internationally recognised human rights wherever we operate. Our human rights policy is based on the [International Bill of Human Rights](#), the [ILO Declaration on Fundamental Principles and Rights at Work](#) and its Follow-up, the [United Nations Global Compact Principles](#) and the [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#).

We strive to prevent, mitigate and where necessary remediate negative impacts as well as strengthen positive impacts on people affected by our operations, business relationships, supply chain and products. To meet this responsibility, we expect our business partners and suppliers, including contractors, to do the same.

## **1. Roles and Responsibilities**

At OSRAM, it is everyone's responsibility to integrate this human rights commitment into their daily work and behaviour towards others, particularly those at management level or other positions involving higher responsibility for others.

Observing the law in every country where we do business is a fundamental principle for OSRAM. In countries where conflicts between local laws and regulations and internationally recognized human rights may arise, we seek to find solutions to respect human rights while complying with local regulations.

On behalf of the OSRAM Managing Board, the Corporate Human Resources Department coordinates human rights topics at OSRAM and human rights due diligence in cooperation with internal stakeholders from corporate functions, Business Units and subsidiaries.

The OSRAM Human Rights Policy applies to all companies that are directly or indirectly owned and/or controlled by OSRAM Licht AG. Where we hold a minority interest, we use and seek to increase our leverage to ensure the same or similar standards are upheld.

## 2. Managing human rights risks and impacts across the OSRAM value chain

For OSRAM, human rights due diligence is a process of continuous improvement and learning. OSRAM regularly assesses human rights risks related to our own operations, supply chain, products and investment decisions. We seek to engage internal and external stakeholders to understand the concerns and perspectives of the people (potentially) affected by our activities and business relationships. Overall, we focus on the following identified salient risk areas for OSRAM.

### 2.1 Working conditions of employees

We respect the human rights of everyone who works for us – including part-time, temporary or contract workers. Everyone working for us must be treated with respect and dignity. We are committed to equal opportunities and an inclusive environment for all people working for OSRAM or seeking to do so. We do not tolerate discrimination based on ethnic background, culture, religion, age, disability, sexual identity, world view and gender, (sexual) harassment or any other type of offensive behaviour. These principles are detailed in our [Business Conduct Guidelines](#).

Any form of modern slavery, child and forced labour or human trafficking becoming known to us are not justifiable – whether in our own operations or linked to our suppliers and business partners. OSRAM seeks to understand and address modern slavery and human trafficking risks and implements precautionary measures in regions with known higher modern slavery risks.

We respect the freedom of association and right to collective bargaining of our employees and are committed to collaborating in good faith with employee representatives.

### 2.2 Environmental protection, health and safety

We are committed to achieving high standards of environmental protection and to providing a safe and healthful workplace for our employees, contractors and communities. Our organization strives to live a culture of highest respect for protecting human health and the environment. This commitment and implementation measures are detailed in our [Environmental, Health and Safety \(EHS\) Policy](#).

### 2.3 Working conditions and livelihoods in the supply chain

We expect our suppliers of goods and services to respect human rights and pass this expectation on to their suppliers. We seek to support our suppliers on their journey towards continuous improvement. This is detailed in our Code of Conduct for Suppliers and reflected in our supply chain management.

## 2.4 Product impacts

The long-term protection of people and the environment is an integral part of our product safety and quality management. We seek to minimize negative impacts and externalities of our products in the whole life-cycle including development, production, use and end of life. This includes potential impacts on the right to privacy (see below). We plan to continuously increase the use of sustainable materials.

## 2.5 Privacy and data protection

We respect the privacy of our customers and employees. Personal privacy and data security are key elements of our Culture Values and are anchored in our business principles and internal guidelines. The requirements of national and international data privacy laws and security regulations form the basis of our business dealings. Compliance with data protection principles is part of all stages of OSRAMs product and process design (privacy by design).

## 2.6 Impacts related to strategic business decisions, mergers, acquisitions and divestitures

We assess and act upon basic labour rights risks related to investment decisions and corruption and bribery risks. We are working on the further integration of human rights due diligence in our strategic business decisions, mergers, acquisition and divestitures.

## 2.7 Impacts related to integrity and corruption

We are strongly committed to the prevention of corruption, bribery and unethical conduct. We have a comprehensive compliance approach in place to uphold this commitment (see [Business Conduct Guidelines](#)).

## 3. Grievance mechanism

Via "[Tell OSRAM](#)", our confidential third party notification system which also covers compliance and data privacy, employees and external stakeholders can raise concerns about human rights impacts or abuses that might be related to the OSRAM operations, business relationships, supply chain or products.

#### 4. Review

The Corporate Human Resources Department reviews this Human Rights Policy on a regular basis to reflect changes in the OSRAM human rights risk profile, implementation experience and other relevant developments.

Signature

A handwritten signature in blue ink, consisting of a large, stylized 'B' followed by a horizontal line and a wavy tail.

Dr. Olaf Berlien (CEO)