

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.

All employees of ams OSRAM are mandated to ensure that this Human Rights Policy is adequately implemented in their area of responsibility.

Contents

1. The ams OSRAM human rights commitment	2
2. Managing human rights risks and impacts across the ams OSRAM value chain	4
3. Grievance mechanisms	5
4. Review	6

1. The ams OSRAM human rights commitment

ams OSRAM respects and supports internationally recognised human rights wherever we operate. Our company therefore expects its employees, suppliers and business partners worldwide to comply especially with the following guidelines: UN Universal Declaration of Human Rights and associated international covenants; UN Convention Against Corruption; ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work; ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; OECD Guidelines for Multinational Enterprises; UN Global Compact and the fundamental principles it states and RBA (Responsible Business Alliance) Code of Conduct.

We are committed to preventing, mitigating and where necessary remediating negative impacts as well as strengthening positive impacts on people which are part of our operations, business relationships, supply chain and products.

1.1 Scope

The ams OSRAM Human Rights Policy applies to all business activities of our company, i.e. ams OSRAM AG and all affiliated companies. Where we hold a minority interest, we use our leverage to work towards the same or similar standards.

1.2 To meet our responsibility along the value chain, we also expect our business partners and suppliers, including contractors, to act in line with the standards outlined in this Policy. Roles and responsibilities

All employees

At ams 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 ams OSRAM. All employees must obey the laws and regulations of the legal systems, including those that support human rights, within which they operate. Where conflicts between local laws and regulations and internationally recognized human rights may arise, we seek out solutions to respect human rights while complying with local regulations. If local legislation goes beyond this Policy, the higher standard applies.

Every ams OSRAM function, everywhere, can have an impact on human rights. In their daily work, ams OSRAM employees must verify that their interactions with others are consistent with the values set forth in the [Code of Conduct](#) (page 3), esp. Respect for Human and Personal Rights, Mutual Respect, Honesty and Integrity. ams OSRAM expects all employees to stay vigilant for potential human rights violations. ams OSRAM employees, our business partner and suppliers are encouraged to report any human rights issues or concerns related thereto for themselves or others, including the risk of harm to anyone connected to ams OSRAM anywhere in our value chain. To do this, employees and third parties can use the notification system '[Tell ams OSRAM](#)' anonymously if they so wish. Possible breaches can also be reported through internal company channels, such as the relevant Compliance Officer, Corporate Compliance, HR Business Partner, Local HR, Corporate HR, or the line manager. All reports are followed up. Retaliation against anyone who complains will not be tolerated. Further information on our grievance mechanisms is provided below.

Governance and Lead Functions

On behalf of the ams OSRAM Management Board, the Corporate Human Resources Department coordinates human rights topics at ams OSRAM and human rights due diligence in cooperation with internal stakeholders from corporate functions, Business Units and affiliated companies. This role explicitly includes awareness-raising and capability-building with employees and other relevant internal and external stakeholders.

Our human rights due diligence process covers the following priority human rights and environment-related risk areas. We identified the following risk areas via a structured risk assessment process which is reviewed annually and as required where there are significant changes in our risk profile:

- Working conditions of employees
- Environmental protection, health and safety
- Working conditions and livelihoods in the supply chain
- Product impacts
- Privacy and data protection
- Impacts related to strategic business decisions, mergers, acquisitions and divestitures
- Integrity and anti-corruption

The Lead Function for the respective risk area is responsible for implementing function-specific processes or measures to ensure the implementation of human rights due diligences – including the identification and mitigation of relevant human rights and environment-related risks – throughout the group. This includes active participation, with other relevant stakeholders (e.g. Corporate Audit, local risk owners in HR and Compliance) in the annual continuous human rights risk monitoring and management process. If necessary, they shall engage other relevant internal stakeholders as required.

The following chart shows our human rights and environment-related risk areas and the Lead Function for each area:

Human rights and environment-related risk areas	Lead Functions
Working conditions of employees	Human Resources
Environmental protection, occupational health, safety	Environmental Protection, Health & Safety
Working conditions and livelihoods in the supply chain	Procurement
Product impacts	Quality
Privacy and data protection	Data Privacy
Impacts related to strategic business decisions, mergers, acquisitions and divestitures at a corporate level	Mergers & Acquisition, Post Closing Management Corporate Strategy
Integrity and anti-corruption	Compliance

The General Managers and Finance Directors of our legal entities are responsible for ensuring that this Policy is implemented in the context of local law and practice. In particular, they are responsible for ensuring employees have received information on the Policy and how to report any human rights-related concerns.

Corporate Audit is responsible for assessing the implementation status of this Policy via the Enterprise Risk Management (ERM) process, the Company Level Controls (CLC) questionnaire process and relevant site audits. Human rights aspects have been integrated into these processes.

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

2.1 Our due diligence processes

Based on this **policy commitment**, we conduct human rights due diligences on a regular basis to assess and address human rights aspects at ams OSRAM.

- **Risk assessment:** We regularly assess human rights risks and impacts related to our own operations, including affiliated companies and joint ventures, supply chain and M&A projects. Human rights aspects have been embedded in our enterprise risk management and corporate audit processes, and we plan to establish a cross-function annual human rights risk monitoring and management process. We will also review our risk assessment approach as required where there are significant changes to our risk profile.
- **Preventive measures:** We address identified risks and impacts via changes in management processes, and clearly define mitigation plans, measures and responsibilities. We will conduct awareness-raising, capability-building and training activities for our employees and other relevant stakeholders.
- **Grievance management and remedial measures:** We seek to ensure effective grievance mechanisms are in place for all (potentially) affected individuals. We are also committed to providing effective remediation for grievances raised which we have caused or to which we have contributed. Where we are directly linked to adverse impacts via our business relationships, we will work with the responsible party to enable effective remedy. Our key grievance channel is '[Tell ams OSRAM](#)', our confidential notification system for human rights violations.
- **Tracking and communicating:** We will annually review the effectiveness of our preventive and remediation measures as well as grievance mechanisms. We report on our efforts via our Group [website](#) and our annual [sustainability reporting](#).
- **Stakeholder engagement:** We continuously engage internal stakeholders on human rights. In addition, we work with external stakeholders such as the UN Global Compact and its local networks and the Responsible Business Alliance (RBA) to further develop our human rights commitments and due diligence processes.

In conducting these processes, 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, and to continuously improve our strategy regarding human rights protection.

Overall, we focus on the following identified salient risk areas for ams OSRAM.

2.2 Working conditions of employees

ams OSRAM is committed to upholding the human rights of its employees and treating them with dignity and respect. This applies to all workers, including temporary and migrant workers, student workers, temporary workers, permanent workers and all other types of workers.

Working hours shall not exceed the maximum number of hours applicable under local law. In addition, weekly working hours, including overtime, shall generally not exceed 60 hours. Exceptions include emergencies and exceptional circumstances. Our goal is for all overtime to be worked voluntarily. Employees must be granted one day off at least every seven days, provided there are no emergencies or exceptional circumstances.

Compensation paid to employees shall, at a minimum, comply with all relevant laws concerning this matter, including laws on minimum wage, overtime and legally established social benefits. We are committed to paying equal wages for equal work.

We are committed to equal opportunities and an inclusive environment for all people working for ams OSRAM or seeking to do so. We do not tolerate discrimination based on a person's national or ethnic origin, social background, skin colour, age, gender, sexual orientation and identity, health status, disability, culture, religion, union membership, political opinions and worldview. We furthermore do not tolerate (sexual) harassment or any other type of offensive behaviour. These principles are detailed in the [ams OSRAM Code of Conduct](#).

Employment must be freely chosen. We do not tolerate any form of modern slavery, child and forced labour or human trafficking. Confiscating or withholding worker identity documents or other valuable documents such as work permits is prohibited. ams 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. We will not discriminate based on an employee's decision to join or not join a labour organisation, and we will not tolerate any form of intimidation, reprisal or harassment of worker representatives. In countries where the law restricts the right to collective bargaining, we will seek out and support alternative means of independent and free association and bargaining for all employees.

2.3 Environmental protection, occupational health and safety

We are committed to achieving high standards of environmental and climate protection and to providing a safe and healthy 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 [EHS policy and supporting EHS processes](#). We publicly report on our relevant preventive and corrective measures via established sustainability reporting processes.

2.4 Working conditions and livelihoods in the supply chain

We expect our suppliers of goods and services to respect the human rights of all internal and external workers, and to pass this expectation on to their suppliers. We seek to support our suppliers on their journey towards continuous improvement. This is detailed in the [Code of Conduct for ams OSRAM Group Suppliers](#) and reflected in our supply chain management. Further information on our preventive and remedial measures regarding our suppliers is available in our annual [sustainability reporting](#).

2.5 Product impacts

The long-term protection of people and the environment is an integral part of our product safety and quality management. ams OSRAM aims to make its business and products environmentally friendly and is constantly working to improve its eco-balance. Accordingly, designing our products to be environmentally and climate friendly is already a fixed target in their development. 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, section 2.6).

2.6 Personal privacy and data protection

We respect the privacy of our customers and employees and protect their personal data. Personal privacy and data security are key elements of our [Code of Conduct](#) and relevant internal guidelines. The requirements of national and international data privacy laws and data security regulations form the basis of our business dealings. Compliance with data privacy principles is part of all stages of ams OSRAM's product and process design (privacy by design).

2.7 Impacts related to strategic business decisions, mergers, acquisitions and divestitures

We strengthen the integration of human rights due diligence in our strategic business decision-making. We assess and act upon human rights risks in relation to mergers, acquisitions and divestitures.

2.8 Integrity and anti-corruption

We are committed to the prevention of corruption, bribery and unethical conduct – amongst other reasons because corruption and human rights violations are closely connected. We have a strong compliance culture in place to uphold this commitment.

3. Grievance mechanisms

We strive to continuously improve the accessibility of our grievance mechanisms to (potentially) affected individuals. We will review their effectiveness annually and as required where there is a significant change in our risk profile.

Via [Tell ams OSRAM](#), our confidential notification system which also covers compliance and data privacy, employees and all external stakeholders can and should raise grievances and concerns about human rights impacts or abuses that might be related to the ams OSRAM operations, business relationships, supply chain or products. Reports can be made anonymously, and are all followed up. Retaliation against reporter will not be tolerated. Further information on what can be reported and how reports will be processed is available on the Tell ams OSRAM [website](#).

Any other questions on the ams OSRAM human rights strategy or how to implement human rights due diligence can be directed to humanrights@ams-OSRAM.com.

4. Review

In line with our commitment to continuous improvement, the Corporate Human Resources Department reviews this Human Rights Policy on a regular basis to reflect changes in the ams OSRAM human rights risk profile, implementation experience and other relevant developments.

Signatures




Alexander Everke
Chairman of the Management Board, CEO



Ingo Bank
Member of the Management Board, CFO



Thomas Stockmeier
Member of the Management Board, CTO



Mark Hamersma
Member of the Management Board, CBO