

Policy - Human Rights in the Supply Chain

This policy defines our commitment to respect and uphold human rights for people affected by our supply chain. It establishes the standards and principles that direct our actions throughout the supply chain, identifies key risk areas and describes the preventive and corrective measures available to ensure compliance with human rights due diligence obligations.

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1. Commitment to Human Rights and Supply Chain Integrity

ams OSRAM¹⁾ is committed to upholding the highest standards of integrity and responsibility throughout our supply chain, guided by internationally recognized human rights frameworks such as those established by the United Nations and the International Labour Organization. We follow best practices and recommendations from leading international bodies, including the UN and OECD, and demonstrate our ongoing commitment through participation in initiatives like the UN Global Compact and the Responsible Business Alliance.

We recognize the importance of proactively identifying and addressing potential human rights risks and impacts in the supply chain. Our ams OSRAM Policy Human Rights in the Supply Chain (“Policy”) is designed to ensure that any risks or negative impacts, whether potential or actual, are managed with timely and suitable actions using a risk-based and impact-oriented approach.

This includes preventing and responding to serious concerns such as modern slavery, forced labor, human trafficking, child labor, excessive working hours, and violations of occupational health and safety standards affecting supplier employees. To support this, we have implemented robust policies, governance structures, and due diligence processes.

This Policy outlines the standards and principles that guide our actions within the ams OSRAM supply chain, covering the sourcing of raw materials, components, services, and finished products. We aim to encourage our partners to consider and, where appropriate, integrate these standards into their own operations, in support of responsible business practices.

ams OSRAM is a global provider of lighting and sensor technology solutions. Our product portfolio includes high-quality semiconductor-based light-emitting sources (LEDs and laser diodes), sensors, CMOS-ICs (complementary metal-oxide-semiconductors) and software, classic lighting technologies as well as LED-based lighting solutions for automotive and specialty applications. Operational implementation of our business largely takes place via the two segments Semiconductors and Lamps & Systems, which serve our end customers in the consumer, automotive, and industrial & medical technology markets. Geographically, our activities are split into three regions or regional markets: EMEA (Europe, Middle East and Africa), Americas and APAC (Asia/Pacific). Our supply chains are multi-layered and involve a wide range of participants, from raw material extraction to the delivery of finished components. We strive to observe and address any potential or actual risks and impacts that may emerge along this supply chain.

Specific risk factors and negative impacts identified for ams OSRAM include the following:

- **Sector and Industry:** The electronics industry is perceived as high-risk in human rights and labor practices.
- **Geography:** Our suppliers are located in countries with potential risks in the areas of human rights and labor practices, including working hours, health, and safety.
- **Products and Services:** The ams OSRAM product portfolio requires materials that may be classified as conflict minerals due to their origins, particularly from the Democratic Republic of the Congo and neighboring countries, as well as from conflict-affected and high-risk areas (CAHRAs) as defined by EU Regulation 2017/821. This exposes our supply chain to potential human rights risks. Additionally, the procurement of services such as cleaning, construction, and logistics may involve risks of modern slavery, particularly in countries with a higher potential for unethical labor practices or human rights violations. We actively mitigate these impacts and risks to ensure ethical practices throughout our value chain.
- **Workforce Profile:** Our operations, as well as those of our suppliers, often involve the use of recruitment agencies and labor providers. This workforce includes potentially vulnerable groups, such as low-skilled and

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migrant workers, who may face higher risks of human rights abuse. To mitigate these impacts and risks, we implement robust measures such as regular audits, comprehensive training programs, and strict adherence to ethical recruitment practices.

2. Policies and Governance

We are committed to adhering to internationally recognized human rights standards and directives not only in our own operations but also in our upstream and downstream supply chain. Our governance framework is designed to proactively manage and mitigate assumed adverse human rights impacts across our operations and supply chain.

We are a signatory of the [UN Global Compact](#) and an active member of the [Responsible Business Alliance \(“RBA”\)](#).

The [Code of Conduct for Suppliers](#) defines the principles and requirements for our suppliers in terms of their responsibility for adhering to human rights, fair working conditions, and environmental protection. These requirements comply with international standards such as the UN Global Compact, the Code of Conduct of the Responsible Business Alliance (RBA), and the [Conventions of the International Labour Organization \(ILO\)](#).

Our [ams OSRAM Conflict-Free Minerals Sourcing Policy](#), and the respective due diligence management system is consistent with the OECD Guidance and furthermore follows in particular:

- the EU Conflict Minerals Regulation 2017/821
- the requirements of the German Supply Chain Due Diligence Act (“Act”) see [LKSG Policy Statements](#)
- Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act - [factsheet](#)
- Responsible Minerals Assurance Process (“RMAP”) of [Responsible Minerals Initiative](#) by RBA

At ams OSRAM, various corporate and specialist departments work closely together to fulfill our Human Rights and environmental due diligence obligations. The Procurement organization is responsible for ensuring that our human rights due diligence obligations are fulfilled throughout the entire supply chain of ams OSRAM. The Corporate Compliance department is responsible for the company’s whistleblowing system „[Tell ams OSRAM](#)“, which is globally available and one of the main reporting channels of our complaints management system. The Corporate Audit department assesses compliance with our human rights due diligence obligations via our Supply Chain Due Diligence Risk Management System, as well as its effectiveness and efficiency. The Legal Department provides legal advice for all functions.

All departments regularly report on the company’s human rights due diligence obligations directly to the Human Rights Officer. The Human Rights Officer is responsible for monitoring the compliance of ams OSRAM with all due diligence obligations on human rights and environmental activities in own operations and the supply chain and regularly informs the Management Board and the Supervisory Board about these at least once a year.

3. Managing human rights risks and their impacts across upstream value chain

3.1 Assessment of risk, violations and negative impacts and prioritization

Ongoing reviews of the procurement process to identify potential risks are a core element of our supplier management process. The management of human rights-related risks and violations are integrated into our company-wide risk management system.

Our annual Human Rights risk analysis for ams OSRAM suppliers to identify and assess possible human rights risks and violations is conducted for the entire purchasing volume. This process is based on the assumption that adverse human rights impacts may occur, and is designed to identify, prioritize, and address these impacts.

- **Risk and negative impact identification:** As part of the risk and negative impact identification process, an abstract analysis is carried out using the RBA risk assessment platform matching our information on suppliers’ sourcing origin, addressed category and spend with publicly available risk Key Performance Indicators (KPI) by the World Bank, ILO, UNICEF and the Walk Free Foundation, etc. The indexes used offer a first supplier risk classification based on country and product risk.
- **Risk Assessment:** Identified risks and respective impacts are further evaluated using existing supplier information like supplier certificates, self-assessments, audits, and sustainability ratings.

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- **Prioritization:** Supplier risks are prioritized based on their likelihood, severity and potential impact. Dependent on the risk assessment results, the suppliers are categorized into a heat map with low, medium, and high risk.

Based upon prioritization, specific appropriate actions and measures are defined.

3.2 Preventive, Mitigating and Remediate Measures

To proactively address human rights risks within our supply chain, we have established a comprehensive set of preventive and mitigating measures. These measures are designed to eliminate human rights violations and to prevent and mitigate risks. By integrating these practices into our procurement strategies and supplier management processes, we ensure that our operations and those of our partners uphold the highest standards of human rights and ethical conduct.

- **Supplier Code of Conduct:** The [Code of Conduct for Suppliers](#) defines the principles and requirements for our suppliers in terms of their responsibility for adhering to human rights, fair working conditions, health and safety and environmental protection. Among others this code requests an explicit ban on all forms of modern slavery, forced labor, and human trafficking, prohibition of unethical recruitment practices, such as excessive fees or costs for recruitment, and suppliers to use reasonable efforts to identify and mitigate social, human rights, environmental, and climate-related risks in their own supply chains. These requirements comply with international standards such as the [UN Global Compact](#), the Code of Conduct of the [Responsible Business Alliance \(RBA\)](#), and the [Conventions of the International Labour Organization \(ILO\)](#).
- **Procurement Strategies and Practices:** ams OSRAM maintains a procurement strategy which is based on the principles of responsible procurement. Sustainability is part of ams OSRAM Supplier Management Process. Minimizing human rights risks is an integral part of ams OSRAM's procurement sustainability strategy. The global procurement guidelines, our Code of Conduct for Suppliers, and their implication in supplier contracts as well as our supplier and risk management process constitute the framework.
- **Risk-Based Control measures:** Regular self-assessments, sustainability evaluations and audits to verify compliance with the Code of Conduct are an integral part of our supplier monitoring process. Supplier self-assessments and supplier audits encompass a range of critical topics, including anti-corruption and anti-bribery measures, occupational health and safety, fair wages, sustainable labor practices, and the protection of human rights. As part of the audit process, we also verify the existence and accessibility of grievance mechanisms for supplier employees.
- **Responding to Human Rights Reports: Investigation and Remedial Actions:** Whenever we receive credible information or reports such as those submitted through our Tell ams OSRAM system indicating a possible human rights violation within our supply chain, we have established clear processes to manage these cases. Each case is carefully reviewed and investigated in accordance with our internal procedures. Where violations or risks are identified, we implement appropriate remedial actions to resolve the issue and prevent recurrence involving where necessary for the affected third party.
- **Supplier Requirements:** At ams OSRAM, we mandate several supplier requirements, including the Code of Conduct, Self-Assessments, Conflict Mineral Declarations, various ISO certifications, and multiple audits, to ensure supplier qualification. These measures enable us to positively impact workers throughout our supply chain. For instance, industry-standard ISO certifications such as ISO 14001, ISO 9001, and ISO 45001 are compulsory for applicable suppliers in the 'direct materials' procurement category. These certifications confirm the presence of robust process infrastructures and effective management systems, facilitating not only comprehensive risk management practices but also having positive impact among others in reducing the risks in the area of health and safety and fair working conditions. Our collaboration with these suppliers significantly benefits the workers in our supply chain.
- **Supplier Engagement:** We actively collaborate with our suppliers and partners, prioritizing clear communication and comprehensive training. For instance, we host webinars and provide training materials on our [Supplier Portal](#) to ensure all business partners are well-informed and adhere to our standards. For more details, please refer to our training documentation on [Protecting Human Rights in the Supply Chain](#). We engage suppliers in continuous improvement processes and support them in implementing corrective actions.
- **Conflict Minerals:** At ams OSRAM, a global [ams OSRAM Conflict-Free Minerals Sourcing Policy](#) is in place. It is based, among others, on our commitment to the OECD's 'Due Diligence Guidance for Responsible Mineral Supply Chains'. This policy is followed by internal due diligence processes which aim to identify and mitigate supply chain risks in this area like torture, cruel, inhuman, and degrading treatment, child and forced labour, war crimes or other serious violations of international humanitarian law etc. A monthly report to show the results of our due diligence activities is published on our [Product Stewardship Website](#).

- **Sanctions List Checks:** We cross-check new suppliers against international sanctions lists to prevent Human Rights violations. This includes checking for flags on lists like the U.S. Department of Homeland Security's Entity List acc. [Uighur Forced Labor Act](#) (UFLPA).
- **Industry Initiatives:** Participation in the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI) helps us enhance awareness and monitoring of Human Rights. Through these initiatives, we collectively create knowledge and improve our practices.
- **Employee Training:** We provide regular training for our procurement teams to maintain effective supplier management. This includes sessions on human rights and responsible sourcing practices.

3.3 Grievance mechanism for human rights impacts

The global whistleblowing system [„Tell ams OSRAM“](#) is a crucial part of our compliance management system, available at all times and in multiple languages and can be reached via our Website. Suppliers, along with their employees, service providers, business partners, and local communities, can report concerns or breaches, including human rights issues like forced labor, modern slavery, human trafficking, child labor or further issues on working conditions. Reports can be made anonymously via our external website or internal intranet.

Key points:

- **Accessibility:** Available globally and in multiple languages.
- **Confidentiality:** All reports are treated confidentially, and retaliation against reporters is not tolerated.
- **Follow-Up:** Reports lead to internal investigations, and necessary preventive or remediation measures are implemented and monitored.
- **Supplier Focus:** Misconduct by business partners results in recommended remediation measures, close monitoring, and potential contract termination.

This system ensures that suppliers and other stakeholders can safely report issues, contributing to our commitment to ethical practices and human rights.

4. Effectiveness

[Tell ams OSRAM](#) is key to assessing the effectiveness of our actions to prevent and remediate human rights related risks.

The Corporate Internal Audit department constantly reviews on a group-wide basis the appropriateness, efficacy, and efficiency of our human rights risk management system, including the complaints procedure, and can provide recommendations for further improvement.

Our continuous human rights due diligence process also serves to assess the effectiveness of risk management system to address human rights risks line with our commitment to continuous improvement, this Human Rights Policy is being reviewed on a regular basis and in case needed, to be adapted to reflect any changes in the ams OSRAM human rights risk profile, the implementation experience, or other relevant developments.