

## Human Rights Statement of Oerlikon Textile

### 1. *What we stand for*

Oerlikon Textile GmbH & Co. KG and its controlled subsidiaries (“Oerlikon Textile”) believe that all human beings should be treated with dignity, fairness and respect.

We are aware that our operations and supply chains may have a potential detrimental effect on the human and environmental rights stipulated in the German Supply Chain Act (“GSCA”) and set out in **Annex 1** (“GSCA Rights”). Oerlikon Textile is committed to prevent, end or minimize the extent of violations of GSCA Rights in our own operations and supply chains, and take appropriate remedial actions where violations have occurred. We want to ensure that we are not involved in or benefit from GSCA Rights abuses and aim to strengthen respect for GSCA Rights in our operations and supply chains.

Oerlikon Group<sup>1</sup> has rules of conduct to uphold its standards worldwide and define the ethical and legal framework of all its business activities. As part of Oerlikon Group, Oerlikon Textile is embedded in and committed to this framework. The said rules include the Oerlikon Group Code of Conduct, Oerlikon Group Non-Discrimination and Anti-Harassment Policy, Oerlikon Group Policy on Sustainability, Health, Safety & Environment, Oerlikon Group Policy Against the Use of Child Labor, as well as our Oerlikon Group Supplier Code of Conduct. The Oerlikon Group Code of Conduct and named three policies address our commitment to GSCA Rights and clearly express our human rights-related expectations towards our employees<sup>2</sup>, members of the management bodies and suppliers. When local laws allow behavior that is not permitted by our Oerlikon Group Code of Conduct, our code prevails. If international standards on human and environmental rights extend beyond or conflict with local laws, we adhere to the local laws while trying - as far as possible - to uphold those international standards. Our human and environmental rights-related expectations, including those regarding GSCA Rights, towards our direct suppliers are furthermore set out in our Oerlikon Group Supplier Code of Conduct. Our direct suppliers are expected to have an appropriate human rights risk management system and to adequately address these human and environmental rights expectations along their supply chain. To the extent possible, we expect them to support our GSCA activities. With respect to our joint ventures, Oerlikon Textile makes efforts - to the extent possible - to also implement our standards and ethical and legal framework at the business operations and suppliers of these companies.

We are aware that specific GSCA Rights are more likely to be affected by our and our suppliers’ business operations. Oerlikon Textile currently considers the following risks regarding GSCA Rights to be the most likely ones to occur in our own operations and along our supply chains:

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<sup>1</sup> Oerlikon Group means OC Oerlikon Corporation AG, Pfäffikon (Switzerland) with its direct and indirect subsidiaries, including Oerlikon Textile.

<sup>2</sup> The term “employee” in this statement refers to employees, executive staff, temporary employees, working students, graduands, apprentice and trainees of Oerlikon Textile GmbH & Co. KG and its controlled subsidiaries.

## *Labor management relations, freedom of association and collective bargaining*

Oerlikon Textile operates globally and faces risks related to the assurance of international labor and social standards for its own and suppliers' employees. Oerlikon Group as a whole is committed to treat all employees fairly and with respect and to fully respect applicable employment and labor laws wherever it operates. Integrity and team spirit are two of Oerlikon Group's core values and aim at a respectful working environment honoring employees' rights. Oerlikon Group's long-standing belief is that the interests of the Group and its employees are best served through a favorable, collaborative work environment with direct communication between employees and management. Oerlikon Group endeavors to establish these favorable employment conditions, to promote positive relationships between employees and managers, to facilitate employee communications, and to support employee development. Oerlikon Textile is fully committed to these expectations and principles. Oerlikon Textile constantly strives to increase employment opportunities and standards for our employees and - where possible - our suppliers' employees. Throughout our operations, we honor equal employment opportunities. Qualifications, skill and experience are the basis for choosing and promoting our co-workers. We prohibit and do not tolerate discrimination and harassment. No one shall be discriminated against on grounds set out in item 7 of the GSCA Rights listed in **Annex 1**. Oerlikon Textile respects the legal rights of its employees to form, join or to refrain from joining worker organizations, including labor organizations or trade unions, and the right to collective bargaining. Oerlikon Textile complies with the applicable local laws regarding employee and third-party involvement and will not discriminate based on an employee's decision to join or not join a labor organization. Oerlikon Textile respects the rights of employees to organize themselves and makes managers aware of those rights. Oerlikon Textile also respects its employees' rights to take part in collective bargaining. We abide by legally binding collective agreements and work effectively and constructively with the employee representatives. We take care that employee representatives do not suffer discrimination and that they have open access to members in the workplace.

Furthermore, at Oerlikon Group, a safe work environment that is free from and provides for protection against human trafficking and slavery as well as unlawful child labor is core for us. It is a group-wide principle that we expect our suppliers and any other third party to respect these human rights, regardless of local legislation and customs. The textile and garment industry is associated with child labor and trafficking in its supply chains, e.g., children working in spinning mills or in garment factories. Countries that are known for child labor and trafficking in the textile and garment industry are e.g., India, China, Bangladesh, or Egypt. Oerlikon Textile produces and supplies machines that are used for the production of filaments and yarns. Those filaments and yarns are used for the production of textiles in downstream supply chains. Oerlikon Textile itself is however at no stage involved in the production of textiles and garments and the respective supply chains and the GSCA Rights risks and potential violations are beyond our control and influence. In addition, our direct customers' operations are at the beginning of the textile production process whereas – according to our understanding - the stages of the textile production processes that are associated with child labor and trafficking occur at later stages along the downstream supply chain and may also be beyond our customers' influence.

## *Principle of "Zero harm to people"*

As a manufacturing company, doing construction work everywhere in the world, accidents are a GSCA Rights risk that we cannot entirely avoid. Oerlikon Textile's ambition with respect to health and safety is "zero harm to people". I.e., our goal is to ensure that no one comes to harm within Oerlikon Textile's

sites or while working for Oerlikon Textile at external locations. We therefore put a strong emphasis on the health and safety of our employees at our German and foreign sites. Oerlikon Group as a whole is committed to this principle and adherence to the relevant standards as well as monitoring of risks, accidents and defined measures is not only done locally, but also on Oerlikon Group level. Our management system aims to ensure that the applicable workplace health, safety and environmental legislation is treated as a minimum standard in all areas where we conduct business. Our health, safety and environment program, which is based on hazard recognition, risk assessment and the elimination of hazards, seeks to establish an incident-free work environment.

### *Environmental aspects*

Oerlikon Textile provides solutions and systems used by our customers to manufacture polymer processing solutions. Our operations and manufacturing processes require amongst others the use of resources like land, water and energy and result in emissions. Oerlikon Textile has long recognized the need to reduce this impact of our business on the environment. We therefore constantly strive to reduce the use and consumption of resources along our operations and the generation of waste and to take improvement measures in this respect. For water discharged, we comply with local regulatory requirements and regularly perform compliance checks on effluent discharged when conducting our health, safety and environmental checks. We monitor our energy consumption on a regular basis and also started to improve the quality of our reporting on waste. We further engage in analysis to identify energy consumption, and waste disposal practices, and practices that result in Co2 emissions that we need to manage more effectively.

### *Raw materials in upstream supply chains*

Oerlikon Textile's operations are positioned at the end of multi-stage supply chains. Our production processes include the use of raw material, semi-finished and finished products made e.g. of iron, steel and metal. Semi-finished products which account for about three-quarter are the greatest share of our procurement spend. Finished products account for about 20% and raw materials account for less than 5% of our procurement spend. Oerlikon Textile procures more than 50% of the raw materials and semi-finished products and more than 40% of the finished products from German suppliers. We are however aware of the fact that the production of the goods procured by us is dependent from the sourcing and conversion of raw materials and the production of components, semi-finished and finished goods at earlier international stages of our upstream supply chains. The sourcing of raw materials and the production of those goods in foreign countries at earlier stages may result in risks with respect to GSCA Rights. Our machines and equipment include lubricants and the same may apply with respect to the lubricants we use in our production.

## 2. *Our approach to implement the GSCA and corresponding due diligence processes*

Oerlikon Textile strives for continuous improvement and further development of its human rights due diligence processes.

### *Risk analysis*

We understand it as part of our GSCA obligations to get an even better understanding and visibility of potential and actual GSCA Rights aspects at our own operations and along our supply chains. Oerlikon Textile will therefore continue its risk analysis with a specific focus on GSCA Rights in accordance with the GSCA at its own operations and regarding its suppliers in the course of 2023. This includes that GSCA Rights risks are being analyzed from the perspective of (potentially) affected persons. For this risk analysis we will continue to use an established analysis solution of an external provider to identify and evaluate GSCA Rights risks potentially or actually resulting from our own operations and our direct suppliers. Our activities will also include an analysis whether there exists competent evidence of GSCA Rights risks along our supply chain and indirect suppliers. We regularly conduct a dialogue with internal stakeholders to gain additional insights on potential GSCA Rights aspects for Oerlikon Textile. These dialogues create awareness for GSCA compliance of our employees. The risk analysis pursuant to the GSCA will be continued on an annual and occasion-related basis in the future, e.g., in case of material changes of our business activities or the launch of new products, or competent evidence of GSCA Rights risk at indirect suppliers.

We are currently in the process of conducting the GSCA risk analysis. Oerlikon Textile (i) operates globally and has multi-national supply chains, (ii) procures raw material, semi-finished and finished products sourced and produced at different stages of upstream supply chains, and (iii) is positioned at the end of multi-stage supply chains. Those facts lead to a certain complexity and diversity, and we consider them a material challenge of our risk analysis. Our above-mentioned rules of conduct address our commitment to and expectation with respect to certain GSCA Rights. So far, adherence to our rules of procedures is to a certain extent monitored at a local level and by suppliers. We strive to continuously replace the monitoring at those levels by a formal system that systematically and in a centralized manner gathers the data which of our operations are considered to have potential risks of GSCA Rights incidents. With respect to our suppliers, we have a supplier due diligence process as described below. We constantly make efforts to extend our supplier due diligence process to address further GSCA Rights aspects and to collect additional information regarding potential GSCA Rights risks. From the risks identified in the course of our risk analysis, we will prioritize those risks that may have the most negative impact for the affected parties or environment. The prioritization will be based on our influence and our contribution to the GSCA Rights issue, the severity of the (potential) negative impact and the probability of the occurrence of the risk.

### *Complaints procedure*

Oerlikon Group believes that an effective risk detection process must include a safe opportunity for whistleblowers to share their knowledge of risks and violations of rights with us. A robust whistleblowing process is therefore part of the compliance processes of Oerlikon Group, in which Oerlikon Textile has participated in the past. In the context of the GSCA, Oerlikon Textile strongly urges the reporting of any GSCA Rights incidents to prevent and early detect as well as effectively mitigate potential adverse effects on GSCA Rights. Employees and representatives are encouraged to report complaints to their

immediate supervisor, their department head, any senior manager of their business unit, their local human resources representative, or their local procurement representative. In addition, employees, representatives, suppliers, third parties' employees and persons directly or indirectly concerned are encouraged to report complaints over the Oerlikon compliance communication channels – in particular our 24/7 Reporting Hotline “Speak Up”. Our 24/7 Reporting Hotline “Speak Up” allows the complainant to bring up GSCA related issues on a confidential and anonymous basis. Any reported complaint will be promptly investigated in a transparent and standardized process. If possible, we aim at a cooperation with the complainant and an amicable and mutual development of actions and steps. In our rules of procedure for our complaints procedure we clearly commit ourselves to the protection of the whistleblower. Those rules of procedure and an overview of the responsibility and accessibility of the persons responsible are published on Oerlikon Group's homepage. In case of a justified suspicion or a specific tip on GSCA Rights risks or potential or actual violations of GSCA Rights at our own operations we will carefully assess the situation and matter of facts and define responsible steps to approach the situation.

## *Measures*

Oerlikon Textile has a robust management system to ensure compliance with legal and regulatory statutes as well as internal standards. This management system comprises amongst others an allocation of clear responsibilities for decision-making and running the business and a compliance and risk management system. It also includes training, communication and consulting activities designed to provide the respective individuals with the information and resources necessary to fulfill their responsibilities and understand their roles in ensuring compliance.

In the current initial phase of our risk analysis according to the GSCA, we started with the following two measures:

- (1) Amending systematically our risk management system by including GSCA Rights issues, e.g., we are currently amending our supplier audit checklist by additional GSCA Rights aspects. In addition, we intend to embed further specific GSCA due diligence processes in our management system on a personal, process and documentation level in the future.
- (2) Building and increasing awareness of the GSCA and having an ongoing dialogue to address our GSCA responsibility. We therefore provided trainings and workshops regarding GSCA Rights and our obligations under the GSCA to Procurement, HR, HSE and Quality employees. We also introduced the GSCA to our employees via our internal communication channels, e.g., our company newspaper “Inside”. We intend to continue the training and workshops at all levels as well as to give regular updates on our GSCA activities to our own business and our supply chains via our communication channels.

Further prevention and remediation measures will be defined in the course of 2023 based on the results of our risk analysis and the prioritization of potentially identified risks. For the definition of those measures, we will also consider potential information received via our complaint procedure.

Our management system comprises regular reporting of compliance issues to the management of Oerlikon Textile. We also have compliance council meetings to discuss compliance issues and aspects at management board level of Oerlikon Textile on an annual basis. In the future, the reporting and discussions will also include the results of our risk analysis and specific GSCA Rights aspects. We also aim to

consider the results of the risk analysis with respect to our business decisions on supplier choice, product development and responsibility and other areas as may be identified by our risk analysis.

Oerlikon Textile has a supplier qualification and onboarding process for new suppliers. This process includes the provision of supplier self-information and supplier audits, including on-site audits, based on defined standards and criteria also including aspects regarding GSCA Rights. Our Oerlikon Group Supplier Code of Conduct is furthermore part of our standard supply agreements and conditions of supply. We consider our processes, supply agreements and conditions of supply an important measure for engaging our suppliers with respect to GSCA Rights. We are aware that their effectiveness may be limited. However, Oerlikon Textile generally aims at developing long-standing supply relationships which will, with regard to GSCA Rights, allow for a more sustainable dialogue and collaboration with our direct suppliers. We assume that this co-operative approach may further foster effective results in this respect. Besides this, Oerlikon Textile is aware that our procurement strategy and practices may also impact GSCA Rights directly and indirectly. We therefore aim at accompanying our measures towards suppliers by also considering GSCA Rights aspects specifically in our procurement strategies and practices in the future.

Based on the results of our risk analysis and information on GSCA Rights risks received via our complaints procedure, we will complement our existing procedures and measures by those preventive measures covering identified GSCA Rights risks at our operations and along supply chains. If a potential or actual violation of GSCA Rights is found at the business operations of Oerlikon Textile or along its supply chains, we will take appropriate remedial action(s) to avoid, end or minimize the extent of the violation by developing a responsible solution. This also includes – as the case may be – to make reparations to affected persons. In case of potential or actual GSCA Rights issues at direct suppliers, we will carefully review the issue and use best efforts to take up and mitigate the issue in cooperation with the supplier. In case of a severe abuse of GSCA Rights we reserve the right to suspend or – as a last resort - to terminate the supply relationship if remedial actions do not take effect or less severe remedial actions are not available.

### *Regular assessment*

Both the effectiveness of our prevention and remediation measures as well as our complaints procedure will be assessed on an annual and occasion-related basis for avoiding, mitigating, and remedying adverse effects on GSCA Rights. Occasions that would trigger an assessment are e.g., a material change or extension of the GSCA Rights risk exposure at our own operations or at our direct suppliers due to the launch of new products or new projects or material changes of our business activities or fields.

We further intend to monitor on a regular basis if our measures are complied with. With respect to our own operations, we intend to conduct risk-based audits, regular GSCA compliance check surveys of employees and the management with respect to particular issues as well as follow-up tips and complaints on potential GSCA Rights aspects. With respect to our direct suppliers, we will conduct regular risk-based audits of selected suppliers, such as desk reviews, review of documents requested from the supplier as well as on-site audits, including aspects of social audits. It may be that our current or any future risk analysis identifies potential GSCA rights at our own operations or our direct suppliers that are not appropriately addressed by those measures in place or identified to be enacted. In such case, we will aim at the definition of a more appropriate measure to address such potential GSCA Rights at our

operations or along our supply chains. In any case – to the extent practical and feasible – the definition of our measures will consider the perspective of affected persons.

This statement is issued prior to the completion of our current risk analysis activities. It will be reviewed on a regular basis and, as the case may be, amended accordingly.

### *Reporting*

In our annual GSCA report, we will report on the fulfillment of our GSCA obligations. Such report will include amongst others information on identified violations of GSCA Rights, risks that have been prioritized due to certain aspects, and corresponding measures taken. It will also provide information on steps taken because of tips or complaints received via our complaints procedure and draw conclusions with respect to future measures and GSCA due diligence processes to be defined and taken.

December 2022

The management board of Oerlikon Textile GmbH & Co. KG

Georg Stausberg

Ralf Schilken

Uwe Model

## Annex 1 – GSCA Rights

If we refer to GSCA Rights, we refer to the human and environmental rights and prohibitions referred to in section 2 para. 2 of the GSCA, as set out below. This also includes the Conventions and the rights referred to in these Conventions to which section 2 of the GSCA and the annex to section 2 makes reference to:

1. prohibition of the employment of a child under the age at which compulsory education ends under the law of the place of employment, provided that the age of employment shall in any event not be less than 15 years, unless the law of the place of employment deviates therefrom in accordance with Article 2 para. 4 and Articles 4 through 8 of the Convention No. 138 of the International Labor Organization dated 26 June 1973 concerning the minimum age for admission to employment (Federal Law Gazette 1976 II pp. 201, 202);
2. prohibition of the worst forms of child labor for children under 18 years including in accordance with Article 3 of the International Labor Organization Convention No. 182 dated 17 June 1999 concerning the prohibition and immediate action for the elimination of the worst forms of child labor (Federal Law Gazette 2001 II pp. 1290, 1291):
  - a. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and servitude, and forced or compulsory labor, including the forced or compulsory recruitment of children for use in armed conflicts,
  - b. bringing in, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances,
  - c. attracting, procuring or offering a child to engage in illicit activities, in particular the production of or trafficking in drugs,
  - d. work which, by its nature or by reason of the circumstances in which it is carried out, is likely to be harmful to the health, safety or morals of children;
3. prohibition of the employment of persons in forced labor; this includes any work or service which is exacted from a person under the menace of punishment and for which he has not offered himself voluntarily, e.g., as a result of debt bondage or trafficking in human beings; excluded from forced labor are work or services which are in compliance with Article 2 para. 2 of the Convention No. 29 of the International Labor Organization dated 28 June 1930 concerning forced or compulsory labor (Federal Law Gazette 1956 II pp. 640, 641) or Article 8 letters b and c of the International Covenant dated 19 December 1966 on civil and political rights (Federal Law Gazette 1973 II, pp. 1533, 1534);
4. prohibition of all forms of slavery, slave-like practices, servitude or other forms of domination or oppression in the workplace environment, such as extreme economic or sexual exploitation and humiliation;
5. prohibition of disregarding the occupational health and safety obligations applicable under the law of the place of employment if this creates the risk of accidents at work or work-related health hazards, in particular through:



- a. obviously insufficient safety standards in the provision and maintenance of the worksite (*Arbeitsstätte*), the workplace and the work equipment,
  - b. absence of appropriate protective measures to avoid exposure to chemical, physical or biological substances,
  - c. absence of measures to prevent excessive physical and mental fatigue, in particular through inappropriate work organization in terms of working hours and rest breaks, or
  - d. inadequate training and instruction of workers;
6. prohibition of disregarding the freedom of association, according to which
- a. employees are free to form or join trade unions,
  - b. formation of, joining and membership in a trade union shall not be used as a reason for unjustified discrimination or reprisals,
  - c. trade unions are allowed to operate freely and in accordance with the law of the place of employment; this includes the right to strike and the right to collective bargaining;
7. prohibition of unequal treatment in employment, e.g., due to national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified by the requirements of the employment; unequal treatment includes in particular the payment of unequal remuneration for work of equal value;
8. prohibition of withholding an appropriate wage; the appropriate wage shall be at least the minimum wage determined by the applicable law and shall otherwise be determined in accordance with the law of the place of employment;
9. prohibition of causing harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption, which
- a. significantly impairs the natural basis for the preservation and production of food,
  - b. denies a person access to safe drinking water,
  - c. impedes a person's access to sanitary facilities or destroys them, or
  - d. harms the health of a person;
10. prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which secures the livelihood of a person;
11. the prohibition of hiring or using private or public security guards for the protection of the enterprise's project if, due to a lack of instruction or control on the part of the enterprise, the use of security guards
- a. violates the prohibition against torture and cruel, inhuman or degrading treatment,

- b. violates life or limb, or
  - c. the freedom of association and the right to organize are impaired;
12. prohibition of an act or omission in breach of a duty that goes beyond numbers 1 to 11, which is directly capable of impairing a protected legal position in a particularly serious manner and the unlawfulness of which is obvious by a reasonable assessment of all the circumstances in question.
  13. Prohibition to manufacture mercury-added products pursuant to Article 4 para. 1 and Annex A Part I of the Minamata Convention on mercury dated of 10 October 2013 (Federal Law Gazette 2017 II pp. 610, 611) (Minamata Convention).
  14. Prohibition of the use of mercury and mercury compounds in manufacturing processes as defined in Article 5 para. 2 and Annex B Part I of the Minamata Convention as of the phase-out date stipulated for the respective products and processes in the Convention.
  15. Prohibition of the treatment of mercury waste contrary to the provisions of Article 11 para. 3 of the Minamata Convention.
  16. Prohibition of the production and use of chemicals pursuant to Article 3 para. 1 letter a and Annex A of the Stockholm Convention dated 23 May 2001 on persistent organic pollutants (Federal Law Gazette 2002 II p. 803, 804) (POPs Convention), as lastly amended by the Decision dated 6 May 2005 (Federal Law Gazette 2009 II p. 1060, 1061), as amended by Regulation (EU) 2019/1021 of the European Parliament and of the Council dated 20 June 2019 on persistent organic pollutants (OJ L 169, 26.5.2019, p. 45), as lastly amended by the Commission Delegated Regulation (EU) 2021/277 dated 16 December 2020 (OJ L 62, 23.2.2021, p. 1).
  17. Prohibition of non-environmentally sound handling, collection, storage and disposal of waste in accordance with those laws being in force at the applicable jurisdiction pursuant to the provisions of Article 6 para. 1 letter d numbers (i) and (ii) of the POPs Convention.
  18. Prohibition of exports of hazardous waste pursuant to Article 1 para. 1 and other waste pursuant to Article 1 para. 2 of the Basel Convention on the control of transboundary movements of hazardous waste and its disposal dated 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704) (Basel Convention), as lastly amended by the Third Ordinance amending annexes to the Basel Convention dated 22 March 1989, 6 May 2014 (Federal Law Gazette II pp. 306, 307), and within the meaning of Regulation (EC) No 1013/2006 of the European Parliament and of the Council dated 14 June 2006 on shipments of waste (OJ L 190, 12.7.2006, p. 1) (Regulation (EC) No 1013/2006), as lastly amended by Commission Delegated Regulation (EU) 2020/2174 dated 19 October 2020 (OJ L 433, 22.12.2020, p. 11)
    - a. to a party that has prohibited the import of such hazardous and other waste (Article 4 para. 1 letter b of the Basel Convention);
    - b. to an importing state pursuant to Article 2 para. 11 of the Basel Convention which has not given its written consent to the particular import, if that importing state has not prohibited the import of that hazardous waste (Article 4 para. 1 letter c of the Basel Convention);

- c. to a party not being a party to the Basel Convention (Article 4 para. 5 of the Basel Convention);
  - d. to an importing state if such hazardous waste or other waste is not managed in an environmentally sound manner in that state or elsewhere (Article 4 para. 8 sentence 1 of the Basel Convention).
19. Prohibition of exports of hazardous waste from countries listed in Annex VII to the Basel Convention to countries not listed in Annex VII (Article 4A of the Basel Convention, Article 36 of Regulation (EC) No 1013/2006).
20. Prohibition of the import of hazardous and other waste from a party not being a party to the Basel Convention (Article 4 para. 5 of the Basel Convention).