

## I. OERLIKON SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of Oerlikon Metco Coatings Ltd. pursuant to the Modern Slavery Act 2015.

The Modern Slavery Act 2015 came into effect on 29th October 2015. This law requires manufacturers and retailers doing business in the UK which supply goods or services and have an annual turnover exceeding £36 million to disclose information regarding their policies to eradicate slavery and human trafficking from their supply chain and within their business.

Oerlikon Metco Coatings Ltd. hereby referred to as Oerlikon UK Company is proud of the integrity measures they take in this regard.

Oerlikon UK Company's efforts to eradicate slavery and human trafficking in its supply chain and own business include the following.

## II. STRUCTURE OF THE ORGANIZATION

All relevant company information can be found under our official website: <https://www.oerlikon.com/en>

## III. SUPPLY CHAIN

### 1. Written policies and procedures

#### *Supplier Code of Conduct*

Oerlikon UK Company maintains written policies that strictly prohibit the use of slavery or human trafficking in its direct supply chain, first and foremost Oerlikon's Code of Conduct with its Whistleblowing Policy. Our Supplier Code of Conduct requires all Oerlikon UK Company's suppliers to sign up to a sustainability clause which details all requirements around forced labor, slavery and human trafficking. The code can be found on Oerlikon's supplier portal: <https://www.oerlikon.com/en/company/supplier-portal/supplier-code-of-conduct/>

#### *Business Partner Integrity Screening Process*

Furthermore, Oerlikon has established a Business Partner Integrity Screening Process with which due diligence of high risk business partners for any potential compliance and human rights related issues is performed. In case of any detected red flags these must be resolved before Oerlikon enters into a business relation with said business partners.

### 2. Supplier certifications

When a supplier signs up to our sustainability clause, it confirms that they will adhere to the guidelines and expectations that Oerlikon would expect, focusing on but not limited to "Child Labor Avoidance", "Freely Chosen Employment", and "Freedom of Association" in line with the Modern Slavery Act. This agreement is mandatory and Oerlikon UK Company does not deal with suppliers who do not sign up to this clause.

### 3. Third party audits

Oerlikon UK Company has the right at any time to audit suppliers for compliance against the sustainability clause.

### 4. Violations

Oerlikon UK Company has a zero tolerance policy towards violations of the laws banning forced labor, slavery and human trafficking. Oerlikon UK Company contractual agreements permit the termination of suppliers for a single violation.

## IV. OUR OWN BUSINESS

Oerlikon UK Company's Integrity Code details the rules and procedures by which we should treat fellow employees. This includes:

- Transparent and fair behavior, such as protecting human rights,
- Compliance with legislation, including fundamental rights at work - in particular freedom of association and elimination of discrimination throughout employment.

### 1. Employee Training

Oerlikon UK Company conducts online or face to face training for all employees to emphasize the importance of acting with integrity and in line with our own internal Ethical Business Code.

Guidance regarding the Modern Slavery Act is especially given to all UK Company's employees.

### 2. Human Rights

Oerlikon's Ethical Business Code ensures that all businesses comply with international human rights standards and that all employees are treated in a fair and transparent manner. This includes adherence to the Working time Directives and the Minimum Wages.

### 3. Violations

Oerlikon UK Company's disciplinary policy permits the termination of employees found to be involved in any breach of the law banning forced labor, slavery and human trafficking.

Oerlikon UK Company will continue to update its policies and procedures as required to ensure it maintains appropriate safeguards against any mistreatment of persons involved in its supply chain or own business.

Dunkinfield, April 2024



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