

P C Policy Against Human Trafficking and Slavery

Date of issue:	April 2021
Issued by:	Department of Legal Services
Status:	Approved by BoD in June 2020
Replaces the following document:	N/A
Document Owner:	Head of Group Compliance

Table of Contents

- I. PURPOSE2
- II. SCOPE OF APPLICATION2
- III. POLICY STATEMENT2
- IV. DEFINITION2
- V. REPORTING INCIDENT OF HUMAN TRAFFICKING2
- VI. THE INVESTIGATION2
- VII. SANCTIONS AND DISCIPLINARY MEASURES.....2
- VIII. GOVERNANCE.....3

I. PURPOSE

The policy aims to protect the interests of Oerlikon. At the same time it intends to support employees, and all of Oerlikon's representatives in identifying and properly reporting any suspicion of human trafficking.

II. SCOPE OF APPLICATION

This Policy applies to all employees and representatives.

III. POLICY STATEMENT

Oerlikon is committed to a safe work environment that is free from and provides for protection against human trafficking and slavery, including forced labor and unlawful child labor. Oerlikon does not tolerate or condone human trafficking or slavery in any part of its global organization. Oerlikon prohibits trafficking in persons and slavery. Employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Oerlikon conducts business must not engage, involve or participate in any practice that constitutes trafficking in persons or slavery.

IV. DEFINITION

Human Trafficking or Trafficking in persons is defined as the crime of displacing people with a view to exploiting them.

V. REPORTING INCIDENT OF HUMAN TRAFFICKING

Oerlikon strongly urges the reporting of any incident of human trafficking. Employees or representatives are encouraged to report complaints to their immediate supervisor their department head, any senior manager of the business unit, their local Human Resources representative, their local Procurement representative, the Oerlikon Compliance Hotline (SpeakUp) which is the compliance telephone line in Switzerland at 0800-561422.¹

VI. THE INVESTIGATION

Any reported allegations of human trafficking will be promptly investigated.

VII. SANCTIONS AND DISCIPLINARY MEASURES

Oerlikon will take appropriate disciplinary action for the violation of this policy, which may include the discharge of employees, subcontractors, and agents.

¹ For all other regional Compliance Hotline numbers, please refer to the Compliance Whistleblowing Policy available in the House of Policies.

VIII. GOVERNANCE

This policy was approved by executive leadership and the Oerlikon Board of Directors, and oversight and responsibility for the implementation of this policy rests with a cross-functional team with members from Human Resources, Compliance Legal, and Procurement.

June 2020