

# Human Rights Policy

The Human Rights Policy defines 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.

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### 1. The ams OSRAM<sup>1</sup> human rights commitment

We at ams OSRAM respect and are committed to internationally recognized human rights wherever we operate. This comprises the human rights in the International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. Our implementation approach is guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. We are a signatory of the UN Global Compact and an active member of the Responsible Business Alliance.

All our business activities can potentially have an impact on human rights and the environment. We are committed to preventing, mitigating and where necessary remediating human rights and environmental risks, violations, and any other adverse impacts, as well as to strengthening positive impacts on people and the environment along our whole value chain. We expect the same from our suppliers, including contractors and other business partners.

#### 1.1 Scope

Our Human Rights Policy applies to all business activities of ams OSRAM; it complements our [Code of Conduct](#), our Global HR Guideline, our [Sustainability Policy](#), our [EHS Policy](#), our [Conflict-Free Minerals Sourcing Policy](#), and our [Supplier Code of Conduct](#).

#### 1.2 Roles and responsibilities

At ams OSRAM, it is the responsibility of all employees, particularly those at management level to integrate this human rights commitment into daily work and behavior towards others.

Observing the law in every country where we do business is a fundamental principle for us at ams OSRAM. All employees must obey the laws and regulations of the country in which they operate, including those that support human rights and protect the environment.

Where conflicts between local regulations and internationally recognized human rights or international environmental standards arise, we seek solutions to respect those standards while complying with local regulations. If local legislation goes beyond this Human Rights Policy, the higher standard applies.

In their daily work, ams OSRAM employees must ensure that their interactions with others are consistent with the values set forth in the [Code of Conduct](#) (see section A2: “Respect for Human and Personal Rights, Mutual Respect, Honesty and Integrity”).

#### Governance and Lead Functions

The Group Human Rights Officer has been appointed by the ams OSRAM Management Board. This person is responsible for monitoring the implementation of all human rights and environmental due diligence obligations at ams OSRAM. The Group Human Rights Officer regularly reports to the Management Board and the Supervisory Board, at least once a year.

The Group Human Rights Officer collaborates with several lead functions being responsible for the operational implementation of human rights and environmental due diligence across the ams OSRAM value chain:

<sup>1</sup> “ams OSRAM” is used throughout this document, it comprises the ams-OSRAM AG including all its affiliates globally. For our minority shareholdings, we use our leverage to work towards the same or similar standards.

Value chain focus	Main human rights- and environment-related risk areas	Lead Functions
Own operations	Child labor, forced labor and human trafficking	Human Resources
	Diversity, discrimination, and harassment	
	Freedom of Association and Collective Bargaining	
	Working hours and compensation	
	Environmental protection, occupational health and safety	Environmental Protection, Health & Safety (EHS)
	Impacts of our products on human rights, the environment as well as on customers and end-users	Quality
Supply chain	identical to human rights- and environment-related risk areas as listed under “own operations”, but related to suppliers	Procurement
Merger, acquisitions, and divestitures	Impacts on human rights and the environment related to mergers, acquisitions, and divestitures at a corporate level	Mergers & Acquisition, Post Closing Management

The Board of Directors of ams OSRAM’s affiliates are responsible for ensuring that this Human Rights Policy is implemented in their area of responsibility, taking into consideration applicable local law and regulations. In addition, they are responsible for ensuring employees have received information on the Human Rights Policy and know how to report any human rights- or environment-related concerns.

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

### 2.1 Our due diligence processes

Based on this Human Rights Policy, we fulfill our responsibility towards individuals and the environment with appropriate and effective risk management measures. Human rights and environmental aspects have been embedded in our due diligence processes to identify and respond to risks, violations, and any other adverse impacts by implementing preventive and remediation measures.

- **Risk assessment:** We regularly and – if necessary, on an ad hoc basis - identify, assess, and prioritize human rights and environmental risks, violations, and adverse impacts related to our own operations, our supply chain, and M&A projects.
- **Preventive and remediation measures:** We address identified risks, violations, and adverse impacts by clearly defined mitigation and remediation measures (with corresponding implementation deadlines and clear responsibilities) to prevent, minimize or end them. We regularly roll out awareness-raising and capability-building training activities for our employees and other relevant stakeholders (e.g., our suppliers). We are also committed to providing effective remediation for violations which we have caused or to which we have contributed. Where we are directly linked to violations via our business relationships, we will work with the relevant business partner to enable effective remedy. For further information about our prevention, mitigation, and remediation measures, please consult our annual [sustainability reporting](#).
- **Grievance management:** We ensure that effective grievance mechanisms are in place for all (potentially) affected individuals. Our key grievance channel is ‘[Tell ams OSRAM](#)’, our confidential notification system for human rights- and environment-related concerns. Please have a look at ‘3. Complaints procedure’ for further information.
- **Tracking and communication:** We annually review the progress of the implementation and the effectiveness of our preventive and remediation measures as well as grievance mechanisms. We report our activities via our Group [website](#) and our annual [sustainability reporting](#).

- **Stakeholder engagement:** In conducting these processes, we integrate our internal and external stakeholders such as employees, suppliers or civil society representatives to understand the concerns and perspectives of the people (potentially) affected by our activities and business relationships. We identify potential risks and derive appropriate remediation measures to mitigate, minimize or end them. We further engage with peers via our membership in the UN Global Compact, its local networks, and the Responsible Business Alliance (RBA). By doing this, we strive to continuously improve and further develop our human rights management, our due diligence processes, and our implementation strategy.
- **Impacts to strategic business decisions, mergers, acquisitions, and divestitures:** We strengthen the integration of human rights due diligence in our strategic business decision-making as well as assess and act upon human rights and environmental risks in relation to mergers, acquisitions, and divestitures.

Human rights aspects have been integrated into the company's Enterprise Risk Management (ERM) processes as well as into the Company Level Controls (CLC) questionnaire. Corporate Audit continuously reviews the compliance, effectiveness and efficiency of the risk management system and our due diligence processes via corresponding audits.

## 2.2 Our human rights and environmental commitments

Based on our understanding of human rights and environmental risk areas, ams OSRAM is committed to upholding the human rights of the individuals affected by its operations and treating them with dignity and respect. This applies to all employees, including permanent, temporary, part-time, or migrant workers, student workers, non-employee workers (i.e., self-employed workers or workers provided by undertakings engaged in employment activities) and all other types of workers, as well as local communities surrounding our sites across the world.

### Child labor, forced labor and human trafficking

Any form of child labor, forced labor or human trafficking is strictly prohibited. ams OSRAM seeks to understand and address modern slavery and human trafficking risks and is taking precautionary measures in regions with known higher modern slavery risks.

We fully comply with the prohibition on employing a child under the age at which compulsory education ends under local law. The age of employment must not fall below the age of 15 years.<sup>2</sup> In case local regulations require a higher minimum age for employment, these need to be applied.

We ensure that workers are not subject to illegal or unethical recruitment practices, i.e., are not required to pay recruitment or any other related fees associated with recruitment, processing, placement or obtaining employment.

Employment must be freely chosen. All workers shall be free to leave work or terminate their employment with reasonable notice. Permanently confiscating or withholding worker identity documents or other documents such as work permits is not allowed unless and to the extent a legitimate exception applies.

### Diversity, discrimination, and harassment

We are committed to equal opportunities and an inclusive environment for all people working for ams OSRAM or seeking to do so. We consider the diversity of our employees as a success factor. We do not tolerate any discrimination based on a person's national or ethnic origin, social background, skin color, age, gender, sexual orientation and identity, health status, disability, culture, religion, union membership, political opinion, world view or other form of discrimination.

We do not tolerate any personal, physical, verbal, or sexual harassment, coercion or any other type of offensive behavior that is coercive, threatening, abusive or exploitative.

<sup>2</sup> Exceptions apply for certain countries subject to ILO Convention 138 or for job training and training programs which are authorized by the respective government, and which are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138.

We are committed to paying equal wages for equal work, regardless of any difference in terms of personal characteristics. These principles are detailed in the [Code of Conduct](#).

#### Freedom of Association and Collective Bargaining

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. Our workers can exercise their rights to organize in a climate free of violence, pressure, fear, and threats. We will not discriminate based on an employee's decision to join or not join a labor organization, 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 seek out and support alternative means of independent and free association and bargaining for all employees.

#### Working hours and compensation

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. All overtime must be voluntary. 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 applicable laws concerning this matter, including laws on minimum wage, overtime, and legally established social benefits, and should enable an adequate standard of living for workers and their families.

#### Environmental protection, occupational health, and safety

ams OSRAM is committed to environmental management practices that conserve resources and to developing innovative, energy-efficient products. In addition, we are committed 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 in our annual [sustainability reporting](#).

#### Human rights and environmental commitments in the supply chain

We expect our suppliers of goods and services, including public or private security forces engaged by us, to respect the human rights of all internal and external workers and surrounding local communities as well as our environmental commitments and expect them 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 [Supplier Code of Conduct](#) 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](#).

#### Product impacts

The long-term protection of people and the environment is an integral part of our product safety and quality management. We aim to make our business and products environmentally friendly and are constantly working to improve our 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 of our products in the whole life cycle including development, production, use and end of life.

#### Data Privacy

We respect the privacy of all individuals and the confidentiality of any personal data we hold about them. Further details are outlined in our [Code of Conduct](#).

### 3. Complaints procedure

ams OSRAM expects all employees to stay alert regarding potential human rights or environmental risks, violations, or other adverse impacts. Via our main reporting channel '[Tell ams OSRAM](#)', a group-wide secure electronic notification system, employees, suppliers, other business partners or individuals can submit complaints or reports about human rights and environmental related risks, violations or any other adverse impacts that might be related to ams OSRAM's own operations or its supply chain.

In addition, employees can report potential risks or violations also through various internal company channels, such as the Compliance Organization, Human Resources Organization (including respective HR Business Partner, Local HR, and Corporate HR), as well as the respective line manager.

A report can be submitted anonymously if the reporter wishes so. All reports are followed up and will be handled with strict confidentiality; if necessary, appropriate corrective measures will be taken to prevent, minimize or stop the reported risk, violation, or adverse impact.

We guarantee the protection of all whistleblowers against any form of retaliation or other adverse treatment (in particular: discrimination, intimidation, hostility, punishment, labor law measures, etc.). Reprisals against whistleblowers of any kind will not be tolerated.

For further details, please refer to the ams OSRAM [Rules of Procedure](#). We strive to continuously improve the accessibility of our complaints mechanisms, especially to (potentially) affected individuals. We will review their effectiveness annually and as required where there is a significant change in our risk profile.

### 4. Monitoring and review

In 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.

Any questions about this Human Rights Policy and its content can be directed to:  
humanrights@ams-OSRAM.com

Munich, December 18, 2024

Place, Date




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**Aldo Kamper**  
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