

## Policy Statement on the Human Rights Strategy of Elmos Semiconductor SE

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## 1 Preamble

Elmos develops, produces and markets semiconductors, primarily for automotive use. Our products communicate, measure, regulate and control safety, comfort, powertrain and network functions. With our solutions we are already a leading supplier for applications with great potential for the future, such as ultrasonic distance measuring, ambient and rear lights as well as intuitive HMI. Elmos creates innovative solutions based on microelectronics to improve our lives. Elmos is shaping future mobility today and making the world a greener, safer and better place to live in.

Sustainable and compliant conduct is a fundamental part of our corporate culture. We align the success of our business activities not only with key financials but also connect it to social responsibility, a high level of ecological awareness and correct ethical conduct. Respect for human rights and protection of the environment are firmly anchored in the Elmos corporate culture.

Elmos is committed to preventing the violation of human rights and to protecting the environment and, if necessary, taking appropriate remedial action. Elmos demands the same from its suppliers.

## 2 Scope

This Policy Statement applies to Elmos Semiconductor SE and its affiliates, referred to in the following as Elmos.

## 3 Overview of essential standards

Elmos has issued codes of conduct for employees, suppliers and business partners based on its obligation to comply with the law and ethical principles as well as based on international standards.

- Elmos Code of Conduct for Employees
- Elmos Code of Conduct for Suppliers and Business Partners

These documents form the framework for action for all employees, suppliers and business partners. They are regularly reviewed and amended as necessary. The documents are publicly accessible on the Elmos website and are available in German and English. We require our employees, suppliers and business partners to continuously cooperate in the implementation of and compliance with all obligations stipulated in these documents. As part of our compliance management system, our employees worldwide receive regular training on the Code of Conduct and compliance.

In its business activities, Elmos is guided by international standards and principles such as the United Nations Universal Declaration of Human Rights, the fundamental principles of the International Labor Organization (ILO), the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Sustainable Development Goals (17 SDG Goals).

## 4 Principles and due diligence

Elmos aligns the success of its business not only with key financials but seeks to combine it with social acceptance, a high level of ecological awareness and correct ethical conduct. Elmos follows an integrated approach in defining and thinking about sustainability, incorporating all three pillars of sustainability: economy, ecology, and social responsibility. Growth and sustainability therefore go hand in hand at Elmos to achieve sustainable profitable growth together with a positive contribution to the environment and to society. Elmos is aware of its social and ecological responsibility, reflected in numerous activities and projects throughout the Company and along the value chain.

### 4.1 Compliance with human rights

Elmos is aware of its duty of care for the observance of human rights and demands this both in the Code of Conduct for Employees and in the Code of Conduct for Suppliers and Business Partners. Elmos acts in accordance with the internationally applicable human rights, respects employee rights in accordance with national and international standards and, in particular, does not tolerate any form of human trafficking, child labor, forced labor, or other forms of exploitation. Our suppliers and partners are required not only to comply with the rules set out in the Code themselves but also to demand the same from their respective subcontractors.

### 4.2 Anti-discrimination

Elmos aims to offer all its employees worldwide a working environment that is free from all forms of discrimination and disadvantage. Elmos does not tolerate employees, business partners or third parties being discriminated against, harassed or insulted. Elmos respects the personal dignity, privacy and personal rights of each individual. No one may be discriminated against, attacked, harassed or excluded on the basis of gender, skin color, ethnic or social origin, nationality, religion, ideology, political views, disability, age, marital status, or sexual identity or orientation, unless otherwise provided for by applicable law. Any form of sexual and non-sexual harassment, corporal punishment and coercion will not be tolerated.

These principles are anchored both in the Code of Conduct for Employees and in the Code of Conduct for Suppliers and Business Partners. Elmos encourages its employees to stand up for each other and for third parties and to oppose any form of discrimination. It goes without saying that Elmos complies with all laws and regulations relating to anti-discrimination throughout the Group. The contact person for anti-discrimination issues is, among others, the Representative for Bullying and Sexual Harassment.

### 4.3 Diversity and equal opportunity

Elmos attaches great importance to equal opportunity and employee diversity and promotes a corporate culture based on appreciation, equality and mutual respect. Male, female and diverse employees are treated equally at Elmos. There are no known differences in wages and salaries based solely on gender. All employees, regardless of gender, are promoted on the basis of their qualifications and skills. It goes without saying that Elmos complies with all laws and regulations relating to diversity and equal opportunity throughout the Group. This is ensured by various people, in particular the Inclusion Representative and the Representative Body for Severely Disabled Employees (SBV).

#### 4.4 Fair pay

Elmos offers attractive jobs at all locations worldwide, characterized by respectful and appreciative interaction at all levels. Elmos remunerates its employees fairly and appropriately and guarantees at least statutory minimum wages, applicable working time regulations and overtime regulations as well as statutory and voluntary social benefits. It goes without saying that Elmos complies with all laws and regulations relating to fair pay and equal pay throughout the Group.

#### 4.5 Occupational safety and health protection

Elmos offers its employees safe workplaces at all locations worldwide. We set the highest standards for occupational safety. The Elmos occupational health and safety management system at our Dortmund headquarters has been certified in accordance with the strict requirements of ISO 45001 since 2019.

The continuous improvement and promotion of occupational health and safety and compliance with corresponding standards and guidelines are key objectives of our Health & Safety (H&S) strategy. Successful participation in recurring training courses on occupational health and safety is mandatory for all employees.

The Occupational Health and Safety Officer coordinates all occupational health and safety measures and reports directly to the responsible member of the Management Board. Specially trained officers are responsible for compliance with all relevant legal regulations and standards as well as for the continuous improvement of occupational safety in their area. This particularly applies to areas that tend to have a higher risk potential, e.g., there are safety officers, explosion protection officers, hazardous goods officers, radiation protection officers, laser protection officers, and fire protection officers. The principles of the Elmos occupational health and safety policy are set out in the guideline "Occupational health and safety, environmental protection and energy policy of Elmos Semiconductor SE" and apply to all locations worldwide. The targets for improving occupational health and safety and their degree of fulfillment are regularly evaluated in Management Board reviews and adjusted if necessary.

#### 4.6 Freedom of association and collective bargaining

Elmos offers a unique corporate culture characterized by great team spirit, openness and mutual respect at all levels. Therefore, an open and constructive dialog with employees and employee representatives is a matter of course for us.

We respect the fundamental rights of employees to freedom of association and collective bargaining, as in the standards of the International Labor Organization (ILO) for example. Elmos employees can organize themselves and join trade unions or comparable interest groups and actively participate in them. The specific structure of co-determination and employee rights is based on respective local legal regulations. Elmos employees who make use of these rights do not suffer any disadvantages and are not discriminated against or intimidated.

In Germany, employees are represented vis-à-vis management by the works council. Based on the Works Constitution Act (BetrVG), the works council has a right to information, participation and co-determination in social, personnel and economic matters. Special committees have been set up to

exercise these rights. In accordance with the SE Participation Agreement, the employee representatives make up two of the six members of the Supervisory Board of Elmos Semiconductor SE. The employee representatives are elected by the workforce.

#### 4.7 Environmental management

Sustainability is an integral part of the Elmos corporate strategy. Environmental protection is part of the Company's entrepreneurial mindset. Elmos understands value creation in a comprehensive sense and combines business success not only with social acceptance and correct ethical behavior but particularly with a high level of ecological awareness as well. Elmos pays attention to environmental concerns, which is why the Dortmund production site is certified in accordance with both the demanding environmental management standard DIN EN ISO 14001 and the energy management standard DIN EN ISO 50001. These certifications are reviewed annually and confirmed in repeat audits. Overall responsibility for this lies with the Environmental Management Officer and Energy Management Officer, under the supervision of the Management Board.

Independently of these certificates, Elmos collects relevant consumption and emission data at its own sites. These include, e.g., energy and water consumption, emissions and waste generation. Elmos analyzes internal processes in order to generate further efficiency improvements and achieve benefits for the environment and the Company's economic base. For example, the legally compliant handling of potentially harmful substances is regularly reviewed by means of internal and external audits. Elmos is also part of the Germany-wide "Energy Efficiency and Climate Protection Networks" initiative, which has developed into one of the most successful instruments of the National Action Plan on Energy Efficiency (NAPE). Thus Elmos actively supports the German government's energy efficiency targets.

We communicate our commitment to sustainability in detail and transparency on our website. There you will find numerous guidelines and key figures on topics related to sustainability and the environment, such as water and waste management or raw materials from controversial sources, as well as other documents.

## 5 Risk analysis and risk management

Compliance with the due diligence obligations under the Supply Chain Due Diligence Act requires a risk analysis. This allows the identification, assessment and prioritization of real and potential consequences of business activities on human rights and the environment.

Elmos already has a risk management system in place for the continuous and systematic identification and analysis of risks that affect the Company in its own business area as well as within its supply chains. This includes human rights and environmental risks. Elmos takes both preventive and ad hoc countermeasures to avoid or mitigate risks.

However, due to the global scope of its business, particularly with respect to the diverse value chains in non-EU countries, Elmos sees the necessity of special due diligence. For this reason, Elmos has decided to commission an external specialized service provider to carry out a risk analysis along the value chain. The results of this risk analysis allow especially sensitive areas to be identified and are included in the further process.

## 6 Responsibilities, implementation and monitoring

The Management Board of Elmos Semiconductor SE is responsible for compliance with all human rights and environmental due diligence obligations. The Management Board delegates these tasks within the organization to the relevant division heads. The Management Board has appointed a Human Rights Officer. Together with other divisions, this officer ensures that the obligations set out in this Policy Statement are implemented.

The operational activities for compliance with and monitoring of due diligence obligations are mainly carried out in the Purchasing department in close cooperation with the Supply Chain, Legal, Human Resources/Compliance and Investor Relations/Risk Management/ESG divisions and departments. Nevertheless, each employee bears responsibility in their respective area. Observance of and compliance with the regulations by the various departments is monitored by the Internal Audit department.

Elmos conducts training courses for its employees to raise their awareness of human rights and environmental concerns. The Management Board also draws attention to these issues in employee magazines and newsletters.

Elmos formulates specific requirements for its suppliers and business partners and expects them to comply with these standards. If possible, Elmos supports its business partners in doing so.

## 7 Complaints procedure (whistleblowing)

Elmos has set up a digital whistleblower system that provides a channel specifically for reporting violations of human rights and environmental principles. This whistleblower system is accessible both on the intranet and on the Internet in German and English and can be used by employees, suppliers, business partners and other stakeholders worldwide to report any irregular behavior in relation to human rights and environmental protection. To protect the reporting person, the whistleblower system also offers the option of receiving and processing an anonymous report. In addition, a report can be submitted by phone, email or in person. The contact details of the Elmos contact person are available on the Internet.

The reporting person is informed of the receipt of their report and the processing status. The reported matter will be investigated by an internal team of experts with external support if necessary. If your report reveals a relevant violation, the necessary measures will be initiated.

## 8 Reporting

All processes related to human rights and environmental due diligence are documented. Special attention must be paid to traceability and transparency. Elmos reports annually on the implementation of the due diligence obligations and on the risk management system.

## 9 Closing remarks

This Policy Statement was adopted by the Management Board of Elmos Semiconductor SE on 05, December 2023. The Policy Statement is regularly reviewed, taking into account legal and organizational changes that may occur at any time, and revised if necessary to ensure its appropriateness and effectiveness.

Dortmund, December 2023

Elmos Semiconductor SE  
Management Board

Dr. Arne Schneider      Dr. Jan Dienstuhl      Guido Meyer