

## **Heraeus Group Company Statement on the Prevention of Slavery and Human Trafficking under the UK Modern Slavery Act (Financial Year 2023)**

This statement is made precautionary pursuant to Section 54, Part 6 of the UK Modern Slavery Act 2015, should a Group Company fall within its jurisdiction and sets out the steps Heraeus has taken to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its business.

The foundation of all transactions at Heraeus is compliance with all binding statutory requirements at the national and international level. In doing so, Heraeus follows in particular:

- the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- the requirements of the German Supply Chain Due Diligence Act
- the EU Conflict Minerals Regulation 2017/821
- the Responsible Guidance of the London Bullion Market Association and of the London Platinum and Palladium Market and the Responsible Minerals Assurance Process of the Responsible Business Alliance
- the Responsible Jewelry Counsel standards (for those Heraeus Companies who follow that standard).

The principles for the selection and monitoring of suppliers, especially suppliers of materials containing precious metals or Tin, Tantalum, Tungsten or Gold (“3TG”), are set out in the publicly available Heraeus Supply Chain Due Diligence Policy. All Heraeus suppliers undergo an annual human rights risk assessment with respect to their specific country and sector. Based on the risk assessment, the Heraeus companies are obliged to take risk-appropriate measures in case of indications for risks or violations regarding human rights issues, including slavery, human trafficking, forced labor and child labor. Depending on the risk identified, this may include confirming the Heraeus Code of Conduct for suppliers, sending and evaluating questionnaires, obtaining external data, agreeing on measures with the supplier, or conducting an on-site audit. Or even that the Heraeus company in question decides not to work with certain suppliers or no longer to work with them.

Heraeus has also established additional risk-based processes for suppliers in particularly critical areas such as 3TG or precious metal sourcing. The sourcing of precious metals is monitored by a designated team of Precious Metals Compliance Experts (“Heraeus-PMCE”). Precious metal suppliers of Heraeus have to comply with the “Heraeus Code of Conduct for Precious Metal Suppliers”, which is focused on, but not limited to, fundamental rights of employees, the prohibition of child labor, environmental protection and the monitoring of their own supply chain. The Heraeus-PMCE Team is also auditing mining corporations within the supply chain of Heraeus which are not certified by a recognized organization such as Fairtrade.

Heraeus is committed to prevent and reject all forms of forced labor and child labor and to provide fair wages and reasonable hours of work to our employees in each country. The Heraeus Group has established a Compliance Management System (CMS) to ensure compliance with the requirements set by or set for Heraeus. Heraeus provides information and trainings for employees on the Heraeus Code

of Conduct, as well as advanced trainings within selected risk areas such as procurement and sourcing. The Heraeus companies are required to report to their management or supervisory board on the results of the risk assessment and the implementation of preventive and remedial measures. The Heraeus Group has a Compliance Hotline (internal Heraeus grievance mechanism – "Heraeus SpeakUp") that is open to employees and third parties.



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Hergen Haas (Head of Legal & Responsibility  
and member of the Group Management Committee)