

**KOMAX GROUP
HUMAN RIGHTS POLICY**

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1 Process Owner

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2 Introduction

Our Komax Group Code of Conduct (“Code”) establishes founding principles, who we are and how each of us does business, every day. A founding principle of our Code is how we treat our employees, customers, suppliers, contractors, other stakeholders, and third parties in our value chain. People and respect for human rights are at the core of Komax’s culture and values and one of our main Corporate Business Principles. As a globally active market leader in its field, Komax Group (“Komax”) takes this responsibility very seriously.

The purpose of this Komax (the “Company”) Human Rights Policy (“Human Rights Policy”) is to set clear rules regarding our interactions as a company and as employees towards colleagues and other individuals, in particular in respect of human rights.

3 Scope, Purpose and Application

The objective of this Human Rights Policy is to provide a common framework for the Company’s responsibility to respect human rights that is globally valid and underlies all its business activities and relationships.

It introduces a more effective and proactive management approach on human rights due diligence (HRDD) for the Komax Group. This Policy clarifies:

- The Company’s commitment to respecting human rights;
- The relevant international human rights frameworks that Komax subscribes to;
- The Company’s salient human rights issues;
- The Company’s HRDD Framework and governance to implement its human rights commitment.

The Policy covers fully consolidated operations of Komax worldwide, including those of direct and indirect subsidiaries and applies to all Komax employees and managers, including part-time and temporary workers, casual workers (e.g., day labor workers) as well as subcontracted staff. The Company’s commitment to respect human rights also extends to all individuals throughout the upstream and downstream value chain and Komax expects its customers, suppliers, business partners, and other parties directly linked to its operations, products, and services to respect human rights.

The Company recognizes that Komax’s business, wherever it is conducted, may potentially have an impact on human rights through its own operations or through business relationships along the value chain. This Human Rights Policy formalizes and specifies the commitment of the Company to support and respect human rights for all people, as set out as a founding principle of our Code. Through this Policy and the HRDD Framework, Komax aspires to lead by example in adopting responsible business practices in line with internationally proclaimed human rights and labor standards.

This Policy applies to all individuals working for Komax companies worldwide irrespective of their position or their relationship with them (hereinafter “Employee(s)"). This includes regular employees, dispatched

employees, and employees on temporary or part time basis as well as officers, directors, and management positions irrespective of the specific contract governing their work at Komax.

4 International Reference Framework

Komax is committed to maintaining high standards of business ethics and integrity in accordance with the law, as well as with recognized human rights and labor standards as outlined in international human rights frameworks such as:

- Universal Declaration of Human Rights (UDHR)
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- International Labor Organization (ILO) – Core Labor Conventions
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- UNICEF’s Children’s Rights and Business Principles (CRBP)
- ISO 45001 Occupational Health and Safety Management (OHS) Standard
- ISO 14001 Environmental Management

The Company complies with applicable laws and regulations in all locations where it conducts business. In case of conflict between applicable national laws and international standards, the more protective of human rights applies. Komax expects its suppliers and business partners to also follow these standards and principles.

5 Salient Issues

The Company is committed to respecting all internationally recognized human rights. However, for the implementation of this Human Rights Policy, the Company prioritizes those rights that are most salient to its business according to the scale, scope, and remediability of impacts on potentially affected people considering their vulnerability. The following human rights issues have been identified in accordance with the UNGPs:

- Access to healthcare
- Child labor
- Customer safety
- Fair employment/employment practices
- Freedom of association and collective bargaining
- Information security and data privacy
- Modern slavery and forced labor
- Non-discrimination
- Occupational health and safety

The Company recognizes that the evaluation of the severity of potential impacts on people may change and that other issues may grow in importance over time. We may therefore regularly reevaluate the key

issues based on further assessments and regular dialogues with internal and external stakeholders. Human rights topics are governed by this Human Rights Policy as well as function-specific standards, including the Komax Group Code of Conduct for Suppliers and Business Partners and the Komax Group Supply Chain Policy, to cover all relevant aspects, including fair working conditions, professional practices, and responsible supply chain management.

6 Komax Human Rights Framework and Principles

This Human Rights Policy outlines the Komax's commitment to follow the key elements of Human Rights Due Diligence (HRDD) aligned with other international standards and consists of the following steps.

6.1 Commitment

As stated in its Code of Conduct and Human Rights Policy, Komax is committed to respect the dignity and human rights of all people. Through its Human Rights Policy and Human Rights Due Diligence Framework, Komax adopts responsible business practices in line with internationally proclaimed human rights and labor standards. This means continuously taking steps to identify, mitigate, and address human rights risks and impacts, embedding responsible business conduct in business processes, tracking and communicating performance, and allowing access to grievance and remedy for potentially affected people.

Other human rights-related governance documents at Komax include, but are not limited to:

- Code of Conduct
- Human Rights Policy
- Code of Conduct for Suppliers and Business Partners
- Policy on Conflict Minerals
- Policy on Health, Safety and Environment

6.2 Human Rights Risk and Impact Assessment

To assess actual and potential human rights impacts, the Company regularly conducts human rights risk assessments and identifies its salient human rights issues. The following key elements are considered when assessing and prioritizing the human rights issues:

- Scope: considering the Company's own operation and the entire upstream and downstream value chain;
- Risk to people: taking the point of view of the potentially affected groups (rights-holders);
- Human rights focus considering all internationally recognized human rights;
- Sources of information: using relevant internal and external sources and consulting human rights experts;
- Prioritization: identifying salient issues considering the severity (scale, scope, and remediability) of an impact.

Komax acknowledges the need to conduct heightened due diligence in high-risk areas through human rights impact assessments (HRIA). This includes consultation and meaningful engagement with potentially affected groups. Human rights risk assessments are conducted at Group level. The risk assessments will be reviewed and updated on a regular basis, as well as when conditions change or when new products or markets are introduced, as both value chain and specific risks and contexts can change over

time. To assess potentially severe human rights risks in more depth, meaningful engagement with potentially affected stakeholders is required.

6.3 Risk Based Measures to Cease, Prevent, or Mitigate Adverse Human Rights Impacts
Based on the human rights risks and impacts identified and in consultation with relevant stakeholders or their legitimate representatives, the Company defines and implements appropriate measures to cease, prevent, or mitigate adverse human rights impacts across the value chain. Where Komax's ability to influence human rights issues is limited, it strives to enhance leverage through collaboration with other actors. While all identified risks and impacts are considered when implementing measures, Komax concentrates its primary efforts on the most salient issues.

To address the identified impacts along the value chain, Komax adopts a shared responsibility approach with suppliers and business partners, which is based on collaborative and long-term business relationships. Komax seeks to engage in an open and constructive dialogue about human-rights related challenges in the upstream and downstream value chain and to work together with Komax's value chain partners to achieve continuous improvement.

6.4 Embed and Integrate Respect for Human Rights

A human rights roadmap, outlining key measures, targets, and responsibilities is approved by the Executive Committee. The Executive Committee will review progress on the roadmap and approve any changes annually to address potential new human rights risks and to continuously improve Komax's HRDD Framework. Updates or revisions to the roadmap will be notified to the Board of Directors.

To the extent possible, human rights-related prevention and mitigation measures are integrated into the Company operations, training programs, policies, management systems, and decision-making mechanisms. Komax continues to enhance its internal governance structure for human rights due diligence with responsibilities at different hierarchical levels. Responsibility for human rights-related aspects is embedded into the business and integrated into existing functions, such as sustainability, procurement, human resources, legal and compliance, health, safety and environment, and security.

The Executive Committee, together with Group Legal & Compliance, is responsible for implementing Komax's HRDD Framework and its related steps described in Komax's Human Rights Policy. These steps include ensuring that Komax employees and subcontractors have access to the Komax Human Rights Policy and HRDD Framework.

The Audit Committee of the Board of Directors is responsible for overseeing Komax's HRDD Framework and associated work programs, including regular reviews of progress of the Group human rights roadmap.

With respect to supply chain due diligence, the Audit Committee is responsible for overseeing alignment of responsible sourcing work programs with Komax's sustainability approach and ambitions, including regular reviews of performance against targets.

Komax considers and addresses any inconsistencies between this Policy and other operational policies, procedures, and guidance. Where reasonably possible, Komax will make the necessary adjustments to resolve inconsistencies in line with its Human Rights Policy.

6.5 Track and Communicate Compliance

The implementation of the human rights roadmap is tracked based on appropriate qualitative and quantitative indicators and feedback from relevant internal and external stakeholders. This monitoring is used to inform and support continuous improvement and to ensure the effectiveness of the Company's HRDD Framework. Where possible, the Company strives to measure the impacts of its actions on the human rights of potentially affected people. The Company communicates transparently about its actual and potential impacts and how it deals with them. It also reports on the progress and further actions of the HRDD Framework at least annually in its publicly available ESG Report.

- To assess actual and potential human rights impacts, Komax will regularly conduct systematic human rights risk assessments and identify its salient human rights issues.
- Komax defines and implements appropriate measures to cease, prevent, or mitigate adverse human rights impacts along its full value chain.
- A cross human rights working group (Integrity Committee) in coordination with the Group Legal & Compliance and Group Procurement will develop a human rights roadmap outlining key measures, targets and responsibilities to be approved by the Executive Committee and notified to Komax's Board of Directors.
- Each business unit is responsible for implementing the approved human rights roadmap within its business unit and divisions.

7 Reporting, Access to Grievance and Remedy

Komax strives to maintain a culture where its stakeholders feel free to raise concerns in good faith about potential violations of the Code of Conduct, Komax policies or the law without fear of retaliation or other adverse consequences.

When adverse human rights impacts are found to be caused or contributed to by Komax, the Company is committed to taking timely and transparent action to remediate those impacts in a fair and equitable manner in line with the UNGPs. If Komax finds impacts directly linked to its business relationships, it will use its influence to encourage suppliers and business partners to respect human rights, whether through collaboration and support, corrective action plans or termination of the business relationship on a case-by-case basis.

Komax employees, contractors, suppliers, and other stakeholders must speak up and report any suspected or observed violations of the law or the Code of Conduct, including issues related to human rights. Komax encourages all external stakeholders to feel empowered to raise such concerns so that they can be appropriately addressed and remediated if necessary.

Anyone who witnesses a violation of this Policy is strongly encouraged to report the observed incident to Komax Integrity Line (www.komaxgroup.com/Integrity).