



Human Rights Statement of SGL Carbon SE and SGL Carbon GmbH

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Version 1.0
English translation

Preamble

SGL Carbon is a technology-based company and a global leader in the development and production of carbon-based solutions. Its high-quality materials and products made from specialty graphite, carbon fibers and composites are used in industries that are shaping a sustainable future. These include chemical and industrial applications, automotive, aerospace, semiconductor technology, solar and wind energy, LEDs and the manufacture of lithium-ion batteries, fuel cells and other energy storage systems.

1. Human rights and environmental expectations

We consider the protection of human rights to be a central element of our corporate responsibility. As a signatory to the UN Global Compact, we base our commitment to respecting human rights on the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We are committed to respecting internationally recognized human rights and upholding them in our business activities and along our value chain. This includes, in particular, the prohibition of child and forced labor, the prohibition of all forms of slavery and discrimination and the strengthening of freedom of association.

We are committed to the observance of labor protection, the payment of appropriate wages, the prohibition of environmental pollution, the prohibition of forced evictions and the use of security forces if their deployment entails the risk of human rights being disregarded or restricted.

We are committed to the Minamata Convention banning the manufacture of products containing mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

This declaration emphasizes our fundamental commitment to respecting human rights, which has been reflected in other company guidelines for many years. These include:

- SGL Carbon Code of Conduct
- Global Human Rights Policy
- Anti-Corruption Policy
- Global Health and Safety Policy
- Global Environmental Policy
- SGL Carbon's Business Partner Code of Conduct
- Conflict Minerals Policy

The principles set out here apply to our own business activities at SGL Carbon SE and SGL Carbon GmbH and all subsidiaries. In addition, we expect our suppliers and other business partners to commit to comply with the principles set out here and to implement appropriate processes to respect human rights. This also includes providing information on how they comply with these principles upon request.

We always comply with applicable national law. In cases where international human rights are restricted by local laws, we strive to promote the principles behind the international standards

without coming into conflict with local laws. Where local laws go beyond international standards, we will comply with them.

To fulfill our commitment to respect human rights, we are working to implement appropriate due diligence processes to identify and mitigate risks and impacts. We will adapt our declaration of principles accordingly over time.

2. Human rights and environmental risk management

As a globally operating and manufacturing technology company with production sites and complex supply chains worldwide, it is important to us that we treat human rights and the environment with due care and contribute to their protection in order to avoid risks and violations.

We have been working for years to identify these risks at an early stage, minimize them through appropriate measures and react quickly and appropriately in the event of breaches. To this end, we have already taken many measures in various business processes.

We strive to gradually and regularly analyze, document and better understand our risks and their specific connection to our company through structured risk assessments in our own business activities and our supply chain in relation to our products.

3. Risk Analysis

As part of an overarching risk analysis, we already identified material influences and risks in the double materiality analysis carried out in 2023 in accordance with the Corporate Sustainable Reporting Directive (CSRD). We systematically intensified this analysis in 2024. To do this, we use the comprehensive range of solutions offered by IntegrityNext, a well-known platform for sustainability ratings and supplier assessments. We consider both abstract risks (risk disposition by country and sector) and carry out risk-based concrete risk analyses. We have evaluated and prioritized the risks identified in this way and derive appropriate preventive and, if necessary, remedial measures for our own business area and our supply chain. We have informed our relevant decision-makers about the results of the risk analysis.

Due to our industry and specific risk profile as a manufacturer of synthetic graphite, our primary focus is on avoiding human rights and environmental risks in this area:

- occupational safety,
- production, use and handling of the specific raw materials and ingredients required for the production process of synthetic graphite and
- potential effects on the health of employees involved in the manufacturing process and on the environment (air, soil, water).

4. Preventive and remedial measures

At SGL Carbon, we have been implementing various preventive measures in our own business unit and with our direct suppliers for years:

- **SGL Carbon Code of Conduct and global Human Rights Policy:** All SGL employees receive the SGL Carbon Code of Conduct and our global Human Rights Policy, which governs our principles of conduct as well as key principles in the areas of working environment and working conditions, diversity and inclusion, and respect for human rights, together with their recruitment documents and this applies to all SGL employees worldwide.
- **Measures for the health and safety of our employees:** The health and safety of our employees and all employees at our locations (temporary workers, employees of contracted companies and service providers) are our top priority. By implementing uniformly high standards at all our sites, we are continuously working to create a safe and healthy working environment. Our employees take part in regular training courses to promote safety-conscious behavior and prevent accidents.
- **Business Partner Code of Conduct:** Our Business Partner Code of Conduct includes rules of conduct to be observed with regard to integrity, anti-corruption, social, climate and environmental standards, as well as guidelines on dealing with conflict materials and a binding commitment to the principles of the UN Global Compact and respect for human rights.
- **Supplier selection and evaluation:** We take human rights, climate and environmental criteria into account when selecting and evaluating our suppliers and implement suitable control measures.
- **Mandatory human rights training for all employees:** All employees undergo mandatory human rights training and training on the Code of Conduct as part of their compliance on-boarding program.

In cases where we cause or contribute to actual human rights violations through our business activities, we are committed to implementing effective remedial measures.

5. Complaints procedure

Possible compliance violations or indications of human rights, climate and environmental risks can be reported to the Group Compliance Office of SGL Carbon SE via the confidential compliance hotline confidential-compliance@sglcarbon.com. Access is available to all employees internally via the SGL intranet and to third parties via the SGL website (www.sglcarbon.com/Compliance/Whistleblowing). Anonymous reports are also accepted. A compliance investigation will always be conducted if the report is sufficiently substantiated and based on verifiable facts.

Rules of procedure are available in all national languages of the countries in which SGL Carbon has its own production sites and can be accessed on the SGL Internet and Intranet.

6. Documentation and reporting

The documentation of compliance with human rights, climate and environmental due diligence obligations is continuous and decentralized and is kept by SGL Carbon for seven years from the date of its creation.

Based on the documentation, SGL Carbon will fulfill all applicable reporting obligations in a timely manner. The Human Rights Officer performs a supporting and coordinating function in this regard.

7. Governance-Structure

Responsibility for monitoring compliance with the human rights obligations set out here lies with the Human Rights Officer for SGL Carbon SE appointed by the Board of Management of SGL Carbon SE. The Chairman of the Board of Management of SGL Carbon SE is responsible for the topic of respect for human rights.

Responsible for the operational implementation of our human rights strategy are:

- the Head of Group Human Resources with regard to human rights standards and ILO standards in their own business area,
- the Head of Corporate Environment, Health and Safety with regard to occupational safety standards and environmental standards in our own business area,
- the Head of Global Procurement with regard to supplier management and supplier risk management,
- the Head of Group Compliance for operating the complaints procedure (central reporting office).

Wiesbaden, Oktober 24, 2024

SGL Carbon SE

Dr. Torsten Derr
Chief Executive Officer

Thomas Dippold
Chief Financial Officer

Meitingen, Oktober 24, 2024

SGL Carbon GmbH

Alexander Miehl
Managing Director

Andreas Lehner
Managing Director