



Labor & Human Rights Policy

1. Objectives

Delfort is committed to ensuring that all its national and international activities are conducted in accordance with our Labor and Human Rights Policy.

2. Scope of Policy

Our commitment to promoting human rights applies to all delfort locations and business operations worldwide. As a global company, we regard this as representing a social and ethical commitment as well as a key requirement for sustainably developing our business.

3. Our responsibility

3.1 General management approach

Our delfort values and our Labor and Human Rights Policy clearly define highest standards and are based on the ten principles of the UN Global Compact, the Charter of Fundamental Rights of the European Union and Chapter V (Employment and Industrial Relations) of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. These standards and rights require all employees around the world to act with fair and lawful conduct toward other employees, colleagues, business partners and local communities.

We are committed to upholding and supporting human rights and to transparently reporting about them. In particular we

- have policies, processes and monitoring systems in place to implement human rights in our own operations and
- expect our business partners to share our commitment to respect human rights, and to conduct their business in an ethical manner and act with integrity.

Human rights standards guide our decision-making and constructive engagement both internally and in our sphere of influence, while the responsibility of national governments for the protection of human rights is respected at the same time.

3.2 Our Human and Labor Rights management approach

3.2.1 Working Conditions

With our compensation and benefits we aim to provide an adequate standard of living for our employees and their families, so called living wages.

We foster a work environment where each of us can perform best, innovate and develop. We encourage our employees to fully utilize their potential by offering development opportunities and supporting a feedback culture throughout delfort.

We respect the right to rest and leisure, including vacation with pay complying with the legal regulations, and the right to family life, including parental leave and comparable provisions as applicable.



Our employees' lifestyles reflect the diversity of our people. Flexible work time arrangements empower employees to use opportunities to balance their employment with their personal or family lives by helping them to better plan their leisure time, enabling working parents to make equal use of career opportunities in the company and helping the growing number of employees who take care of close relatives.

3.2.2 Diversity & Inclusion

Fair and respectful treatment of all employees is a fundamental principle of our corporate policy.

No person is to be unfairly disadvantaged, favored or ostracized because of irrelevant characteristics such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression, political opinion or any unlawful criterion under applicable law. Harassment of any kind is forbidden.

We expect our employees to be respectful, professional, and fair in their dealings with colleagues and third parties, including customers, suppliers and officials.

Taking due account of national laws, individual qualifications and individual performance we are committed to promote equal pay for equal work and equal development opportunities.

3.2.3 Freedom of Association and Collective Bargaining

We are committed to an open and constructive dialogue with our employees and their representatives. Our employees are free to join organizations of their choice that represent them. These organizations may engage in collective bargaining according to the applicable legal regulations. At all sites worldwide, employees have the right to elect their own representatives. Employees who act as representatives are neither disadvantaged nor favored in any way. Also, we do not interfere in trade union matters.

3.2.4 Health & Safety

We ensure high health protection, safety, environmental protection and quality (HSEQ) standards at our sites and equip our employees accordingly. HSEQ regulations including delfort's life saving rules are consistently applied worldwide to minimize the occurrence of accidents and incidents. Experts on occupational safety support line management in preventing illnesses and accidents by implementing appropriate measures. Our sites offer employees a wide range of health care services, including delfort's "Think Healthy" measures that go beyond health at work. As a matter of course, we provide access to clean water and sanitation to our employees at all our facilities.

3.2.5 Forced Labor

All forms of forced and compulsory labor are strictly prohibited, further details are specified in our Forced Labor Avoidance Policy.

3.2.6 Child Labor

We prohibit the employment and exploitation of children within our sites and will not engage in or support the use of child labor as defined by the ILO, which is work that is mentally, physically, socially, or morally harmful to children, or work that interferes with their schooling. This includes depriving children of the opportunity to attend school, obliging children to leave education prematurely or requiring them to combine school attendance with excessively long hours.

We take reasonable steps to verify the age of job applicants and workers in its own operations. We are



aware that young people under 18 are entitled to work in certain defined and protected circumstances, such as government-approved apprenticeship programs. This is acceptable if it is conducted in line with the requirements of the ILO conventions and national law.

3.2.7 Business Partners

By acting responsibly in our collaboration with direct business partners – suppliers and customers – we aim to minimize risks and create stable, long-term business relationships.

a) Suppliers

We expect all our suppliers and subcontractors to share our commitment to high ethical standards and to operate in a responsible and ethical manner towards their employees and their own suppliers. Moreover, we expect our suppliers to replicate these standards further down the supply chain.

Our principles are expressed in our Supplier Code of Conduct. It forms the general base for our collaboration and comprises an important component of supplier selection and evaluation. It is made available to and confirmed by our suppliers with the goal of strengthening our mutual understanding of how social responsibility has to be practiced in day-to-day business.

The human rights topics that are specified in the Supplier Code of Conduct comprise material aspects in the areas Ethics, Labor and Health, Safety, Environment & Anti-Corruption.

We are committed to ensuring that the products delivered to us are responsibly manufactured by suppliers. Supplier assessments and audits are used to check whether the demands within the Code of Conduct are actually being implemented and complied with among our supply bases.

b) Customers

As a world-class innovation company, we focus on the needs of our customers. Our products and services are designed to benefit people and improve their quality of life.

Our commitment to the principle of social responsibility comprises our goal to protect the health and safety of everyone who comes into contact with our products.

We assess the possible health and environmental risks of a product throughout its entire lifecycle. This starts with research and development and continues through production, marketing and use by the customer through to disposal or recycling.

We do not tolerate legal violations in marketing of our products. Responsible marketing means acting ethically and morally and adhering to responsible principles.

We base our stewardship activities and decisions on ethical behavior that seeks to balance economic prosperity, environmental protection, public health and social need.

c) Local Communities

We monitor and address the impact our business has on our plant neighbors, local communities and global society.

We aim to use natural resources responsibly, promoting biodiversity and thus recognizing the diversity of species, the diversity of ecosystems and genetic diversity.

We respect the rights of indigenous people and reflect on the human rights impact our operations have on these people.



Within the scope of our social commitment, we also make contributions in the areas of science and education, health, social needs and community projects.

4. Implementation and Compliance

It is the responsibility of all delfort employees to comply with this Labor and Human Rights Policy and to ensure that none of our businesses engage in practices which infringe legal or regulatory requirements, or which fall below our standards of human rights. We are committed to train our employees in relation to Human Rights as well as the requirements of this policy. If any employee believes that the terms of this policy are not being correctly adhered, they should seek to raise any concerns with their superior or by using the Whistleblower reporting tool in accordance with the terms of our Whistleblower Policy in order that such concerns may be properly investigated.

We will not permit retaliation of any kind by or on behalf of delfort or any employee against any individual for making good faith reports of violations or suspected violations of this policy.

Failure to observe the terms of the Labor and Human Rights Policy or to co-operate fully with any investigation by delfort into alleged or suspected breaches – may result in any employee's conduct being subject to review. In the most serious cases, such review may potentially lead to the termination of their employment and / or result in personal criminal or civil liability.

5. Annual Review

This Policy will be reviewed annually by the Board of Directors and the Head Corporate HR and amended as appropriate.

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