



THE LEONI GROUP'S POLICY STATEMENT ON RESPECT OF HUMAN RIGHTS AND THE ENVIRONMENT

Corporate Risk, Compliance & Sustainability
2024

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I. LEONI's Commitment on Respecting Human Rights and the Environment

LEONI is aware of its corporate responsibility to respect human rights and the environment as well as of the responsibility for its supply and value chain. We are therefore committed to respecting human rights and environmental concerns and to ensuring that human rights and environmental violations are prevented as well as to facilitating remedial action for anyone affected – doing so within the scope of our own business activity as well as in our global supply chains.

LEONI thus focusses its business activity particularly on the following international standards on human rights and working conditions:

- The United Nation's Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labour Organization's (hereinafter: ILO) Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The Ten Principles of the UN Global Compact, as LEONI is a member of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises

The following LEONI sets of rules furthermore form the basis for our actions as well as successful and fair business activity:

- Internal guideline on human rights and working conditions
- Code of Conduct for Employees
- Code of Conduct for Business Partners
- Internal guideline on safety, health and environmental protection

This policy statement applies to our employees throughout the entire LEONI Group in all areas of our business. With these sets of rules, we oblige all employees worldwide to conduct themselves appropriately and lawfully towards colleagues, business partners and suppliers. We expect our business partners and suppliers, who will also subscribe to respecting human rights, to commit themselves to setting up appropriate due diligence processes and to passing on this expectation to their own suppliers and business partners.

II. Commitment to Protecting Human Rights

Responsible corporate governance forms the basis of our activity. We are committed to respecting internationally recognised human rights, to observing them in our business activities and along our value chains. In so doing, we attach importance particularly to the following human rights and environmental aspects:

1. Prohibition of Child Labor

LEONI strictly rejects all kinds of child labor, especially the worst forms of child labor such as dangerous work that may harm the health, safety or morals of children. Child labor includes minors

under the age of 15 or below the age at which compulsory education ends under the national law of the respective country in which LEONI operates. A child's development must not be prevented by taking on any kind of work. Their dignity must be respected, and their health and safety must be protected. LEONI adheres to the minimum age for employment in line with the pertinent ILO Conventions and also demands compliance with them from its third-party suppliers through their commitment to the Code of Conduct for Business Partners. When recruiting, we check the minimum age by means of an identity document, among other ways.

2. Prohibition of Forced Labor

LEONI strictly rejects all kinds of forced and compulsory labor (all forms of slavery, including modern forms of slavery and human trafficking) in accordance with the ILO's Core Labour Standards. Employment relationships arise exclusively on a voluntary basis and can be terminated in compliance with agreed or statutory periods of notice. Contracts are concluded in writing and contain the legally required wage and salary provisions, payment of at least the minimum wage under law or collective rights as well as provision on overtime and working hours in accordance with the applicable statutory and collective rights requirements.

3. Right to Health and Safe Working Conditions

LEONI is committed to ensuring health and safety at work as well as to support the ongoing improvement of working conditions with the aim of preventing or avoiding accidents at work and illnesses. LEONI adheres to the applicable occupational health and safety regulations and provides the necessary protective equipment depending on the safety risk. When determining and establishing safe working conditions, LEONI endeavours to consider the needs of particularly vulnerable individuals like pregnant women, people with physical impairments and young employees. LEONI's definition of health and safety in the workplace explicitly includes issues relating to mental health. LEONI endeavours to ensure with suitable measures that its employees are better able to cope with work-related stress. As it is important to LEONI that its employees act with the requisite care, report health and safety risks as well as avoid accidents and incidents, LEONI trains its workforce on the safety risks associated with their work and the environment in which they work.

4. Appropriate Compensation for the Work Performed

LEONI pays fair wages and adheres to all the applicable wage and salary regulations worldwide, including payment of minimum wages, overtime and legally mandated benefits. The same applies to adhering to the applicable collective labor agreements on pay. LEONI is committed to paying fair wage that is at least the legally stipulated minimum wage and explicitly adheres to the principle of "equal pay for equal work". This principle is also demanded from third-party suppliers by LEONI through their commitment to the Code of Conduct for Business Partners. LEONI stands for an active social partnership. In this respect, most employment relationships are governed by collective agreements or regulations agreed with the social partners.

5. Working Times

LEONI makes sure to adhere to the applicable standards on working hours, which include at a minimum the standards of the relevant ILO conventions at the place of employment. LEONI ensures a high standard of safe and healthy working conditions and guarantees work breaks, appropriate limitations of working hours and regular, paid vacation in accordance with the locally applicable law. Timekeeping, e.g. by clocking in and out, is one of the means used to ensure that maximum working hours are not exceeded. Furthermore, we periodically and without cause run checks to ensure that the respectively applicable working time rules under the law or collective bargaining agreements are observed. Direct Managers are responsible for complying, adequately documenting, and monitoring compliance with all relevant statutory, internal and collective bargaining agreement requirements regarding working hours, break times, break times between shifts, maximum working hours, and vacation.

6. Freedom of Assembly and Association; Right to Collective Bargaining

LEONI supports freedom of association and the right to collective bargaining. Employees have the right to form interest groups to represent shared purposes and goals. They are neither favored nor disadvantaged if they do or do not belong to a trade union or employee representation. The rights of the workforce to choose to be a member of a trade union and to conduct collective bargaining as permitted by local laws and regulations must not be interfered with or restricted. In situations or countries where the right to form associations and conduct collective bargaining is restricted by law, comparably permissible means to enable freedom of association and collective bargaining, which may be legally non-binding, shall be considered and facilitated. With trade unions and works councils we give employees the opportunity to approach such associations with their concerns or to join them.

7. Protection against Discrimination and Harassment; Equal Opportunities, Diversity and Inclusion

LEONI avoids and prohibits any form of discrimination or harassment. LEONI employees shall be treated with dignity and respect at all times. We reject any unacceptable treatment of individuals, such as mental cruelty, sexual harassment or discrimination, including gestures, language and physical contact that is sexual, compulsive, threatening, abusive or exploitative. Promotion of diversity, integration and inclusion is of great importance to us. LEONI commits to non-discrimination and supports fair treatment and equal opportunities for its employees. No one may be disadvantaged, favored or harassed on the basis of characteristics such as national and ethnic origin, social origin, state of health, gender, political opinion, religion or ideology, disability, age or sexual orientation.

LEONI believes that empowering women to unreservedly participate in all areas of economic life is essential to strengthening the national economy, achieving internationally agreed development and sustainability goals as well as improving the quality of life of women, men, families and communities. For this reason, LEONI has set itself the goal of underpinning women's rights through appropriate measures. As part of LEONI's values campaign, but also as part of our ReWire sustainability program, various social campaigns are held annually at different LEONI facilities around the world.

From all of the above, LEONI strives to promote diversity within its own sphere of influence and to create programs for vulnerable groups in order to ensure equal treatment, inclusion and integration and prevent discrimination.

LEONI implements processes to comply, adequately document, and monitor compliance with all relevant statutory, internal and collective bargaining agreement requirements on discrimination and harassment, and equal opportunities. These processes shall be integrated into each company's internal shop rules or local work regulations. This includes establishing corrective and/or disciplinary measures in the event of potential violations, as well as continuous improvement actions to be implemented when allowed by local law, such as training, candidate evaluation controls, and/or employee development procedures.

8. Ethical Recruitment, Education and Training

LEONI promotes the education and qualification of all employees based on equal opportunity by recruiting, training and promoting employees in line with their individual skills. At LEONI, we support equal opportunity even before hiring through ethical recruitment. Future-oriented training and further education programs ensure a high level of performance as well as high-quality work that helps promote long-term employability of all employees.

9. Rights of Local Communities and Indigenous People as well as Prohibition of Unlawful Eviction and Confiscation of Resources which Secure Livelihoods

The diversity of local communities and indigenous people must be ensured. LEONI acknowledges the unique and important interests that they have in land, water and the environment as well as their history, culture and traditional ways. When acquiring, developing or otherwise making use of land,

forests and waters, LEONI takes care to avoid any unlawful eviction and the confiscation of resources which secure livelihoods as well as to ensure access to water.

10. Security Resources and Human Rights Protection

Unlawful conduct by third-party security resources is not tolerated. If external security officers are hired to enhance and support efforts to implement adequate security and protection at any of LEONI's sites or countries, it will be assured that they have received adequate training and instruction with respect to observing human rights, especially regarding the right to freedom of association as well as the right to collective bargaining and strikes.

11. Human Rights and the Environment

LEONI does not tolerate any harm to the environment that would compromise the ability to obtain and produce foods, access to water and sanitation or that would damage people's health.

LEONI is furthermore aware of the possible effects of its products and production on the environment and its employees. LEONI aims to minimize these effects and has processes and management systems that are aligned with the ISO 14001 and ISO 45001 standards and which specifically address these risks in a comprehensive and systematic fashion.

12. Use of Conflict Minerals

Trading in and mining of certain raw materials is increasingly associated with human rights violations and environmental damage. LEONI will ensure that the stipulations on the use of raw materials originating from conflict-affected and high-risk areas (CAHRAs) are strictly observed. LEONI furthermore ensures that its business partners make appropriate effort to avoid the use of raw materials in their products that stem from CAHRAs and that could contribute to human rights violations, corruption, funding of terrorist groups or similar, negative consequences.

III. Risk Management

Observing human and environmental rights is an ongoing process. The implementation of specific measures is subject to constant review and further development depending on continually changing conditions. To this end, we have implemented a risk management system that includes the following measures in compliance with the Act on Corporate Due Diligence Obligations in Supply Chains.

1. Structure and Responsibilities

LEONI has defined responsibilities in its risk management system for the purpose of perceiving and adhering to its due diligence obligations in relation to human rights and the environment. At the highest level, the Executive Board bears responsibility for respecting human rights and the environment. In addition, LEONI has appointed a Human Rights Officer to monitor our risk management. This officer reports to the Executive Board on the findings of risk management at least once a year.

Several departments are involved into the operational implementation of the due diligence processes relating to human rights and the environment, which provide human resources to ensure compliance with the Act on Corporate Due Diligence Obligations in Supply Chains and report on their results regularly and as required. Our risk management ensures that our human rights strategy is enshrined in all key business processes.

2. Risk Analyses in our own Business Area and in the Supply Chain

A key element of our due diligence obligations is to have knowledge of any potential and actual adverse human rights-related risks and the impact of our business activities on potentially affected parties along the entire value chain. By means of established processes, LEONI identifies and prioritizes relevant human rights and environment-related risk areas as well as persons from our own business area and direct business relationships who might potentially be affected.

In particular, this includes a structured risk analysis by means of which we systematically check in which LEONI facilities an increased risk of possible human rights violations and environmental damage might arise.

In the risk analysis of our own business area, the risks (degree of risk after considering all existing controls as well as measures and their effectiveness) are identified, weighted and prioritized based on a qualified assessment conducted at all LEONI facilities worldwide. This risk analysis is carried out annually and on an ad hoc basis in order to better identify potential risks of human rights violations in the future. This involves determining the severity of any risk as well as its probability of occurrence.

The internal risk analyses conducted throughout LEONI were completed in December 2024. No major risks were identified, but three risk areas were recognized as relevant (see IV).

LEONI furthermore performs a risk analysis of its direct supplies in the form of supplier screening based on a recognized risk mapping tool.

Initially, this involves categorization by such risk classes as country risk, sectors, product group and sales volume. Various indices and values (such as the Children's Rights in the Workplace Index and the Global Slavery Index) are used to calculate the country risk. Risk for the respective country is rated as low, medium, high or extreme based on the stored risks.

A detailed examination by the procedure set out in the LEONI supplier process must be conducted and documented in the supplier management system for business partners with a risk rating of high or extreme. A decision on the preventive measures to be applied is made based on consideration of the overall risk. Independently of this, we conduct risk assessments on an ad hoc basis and take preventive as well as remedial action based on them.

3. Preventive Measures

We rely on various preventive measures in our business areas as well as among direct suppliers to fulfil our due diligence obligations in terms of preserving human rights. The primary objective is to protect potentially affected people and to identify, prevent or at least minimise adverse human rights and environmental impacts.

LEONI has implemented various types of preventive measures and expanded them based on the risk analyses. These include, for example:

- Update of LEONI's internal [Code of Conduct](#)
- Guideline on human rights and working conditions including organisational allocation of responsibilities
- Compliance and sustainability standards for [suppliers](#) including specific processes and provisions concerning high-risk suppliers
- Contractual assurances related to sustainability and human rights implemented in all standard contracts
- LEONI's [Sustainability Report](#)
- A group-wide [incident reporting system](#) including [process instructions](#)
- Compliance Management System (CMS)
- Training for employees and business partners as well as other awareness-raising measures

These measures are particularly relevant for an effective risk management system, for instance by optimising the reporting and the exchange of information as well as awareness-raising measures. In addition, we regularly have the conformity of our internal processes confirmed by external auditors. This includes, for example, ISO 14001 (environmental management system) and ISO 45001 (occupational health and safety management system) certification.

Moreover, our commitment to respecting human rights and the environment along our supply chain is reflected in our corporate guidelines and quality management systems, such as:

- LEONI's [Code of Conduct for Business Partners](#), which contains our social, ethical and ecological requirements and commits our business partners to, among other things, respect human rights and to fulfil due diligence obligations. In addition, LEONI reserves the right to information and audit. It likewise obliges business partners to immediately and appropriately take remedial action.
- The obligation and assurance to uphold our Code of Conduct for Business Partners and passing this on along their value chain is incorporated in our contracts. Business partners are offered an online training course on our Code of Conduct for Business Partners, which calls on them to adhere to human and environmental rights.

4. Remedial Action

Where breaches are found concerning potential or actual human rights violations to which LEONI is contributing or with which it is indirectly connected, LEONI will strive to take appropriate remedial action by determining internal processes for the detection of grievances and defining appropriate remedial and redress measures in its own business area and at direct and indirect suppliers. If LEONI has a reasonable suspicion or specific indication of possible human rights violations in its own area of business, the company will immediately take action that stops the violation or the risk. Should a human rights or environmental legal position have been violated at a business partner, appropriate measures are defined. These range from ceasing the conduct to preventive action by way of training sessions and audits through to effecting appropriate remedy and must be taken by the business partner as a precondition for continued collaboration with LEONI. Depending on the severity of the violation, LEONI will take appropriate action, ranging from a request to remedy the violation immediately to legal action and termination of the business relationship.

In the event that we as a company are directly responsible for any human rights violation, we will work quickly to prevent the business activities that caused this or to ensure that they comply with human rights. If we obtain substantiated knowledge of human rights violations in our supply and value chain, we will develop an action plan with the responsible third parties and possibly in collaboration with our business partners to remedy the human rights violation. We reserve the right to appropriate action depending on the severity of the violation.

5. Complaints Procedure

An appropriate and effective complaints procedure is an important part of LEONI's human rights strategy. Complaints procedures make it possible for employees or third parties who are affected by negative impacts on human rights or feel threatened in this respect to raise their concern. Potentially detrimental effects can thereby be identified at an early stage and appropriate action can be taken to stop any violations, to avoid them in the future and to apply remedy. Via our [whistleblower system](#), everyone has the opportunity to report human rights-related risks or any violation of human rights-related obligations. This can also be done anonymously. The confidentiality of the person's identity will be preserved in each instance and they are assured of being protected against discrimination or punishment. Such third parties as the workforce of our business partners can also report information. Our whistleblower system follows clearly defined processes and contains information on the accessibility, responsibility and execution of the complaints procedure, which can be accessed on our [website](#) as well as our Intranet. All reports are treated confidentially and in compliance with national and international laws and standards. Information that reaches us in other ways will also be dealt with according to the same principles and processes. Every reported case of possible misconduct will be thoroughly checked and confirmed violations will, if necessary, be appropriately sanctioned. The department responsible for this acts independently and impartially at all times.

6. Effectiveness Review

At least once a year and on an ad hoc basis, the effectiveness of all due diligence processes is reviewed to identify, prevent, cease or minimize factors that continue to be detrimental with respect to human rights and the environment. Within the LEONI Group, we screen the effectiveness of various measures based on key figures. The effectiveness of our preventive and remedial measures as well

as of our complaints procedure just as those of our business partners are reviewed once a year and also on an ad hoc basis.

7. Documentation and Reporting

Our due diligence obligations are documented, reported and saved as stipulated by the Act on Corporate Due Diligence Obligations in Supply Chains.

As a member of the UN Global Compact, LEONI adheres to the United Nations' Guiding Principles on Business and Human Rights. Detailed information on our values, standards, guidelines and our human rights risk management is provided in our Sustainability Report, which is published annually, in our annual UN Global Compact Communication on Progress and in our annual UK Modern Slavery Act Statement as well as in this policy statement.

LEONI furthermore issues a report on the fulfilment of its due diligence obligations and communicates the identified human rights and environment-related risk and effects through action in its own area of business and in the supply chain, and describes the applied preventive and remedial measures to the German Federal Office for Economic Affairs and Export Control.

IV. Findings of the Risk Analyses

LEONI expects of its employees as well as of its business partners and suppliers that they respect human rights and commit themselves to making appropriate provision for fulfilling due diligence obligations concerning compliance with human rights-related standards. Our analyses cover all legal positions that are protected by the applicable conventions and laws as stated above and to which the Act on Corporate Due Diligence Obligations in Supply Chains expressly refers.

The analyses that we performed for our human rights and environment-related risks in our own area of business rated these as low. In the relevant weighting of this risk report, we prioritised and directed increased focus on the matters of occupational safety, discrimination and equal treatment, as well as environmental impairment. We strive by means of holistic measures to continue to keep possible risks at a minimum.

Our risk analysis of direct suppliers enables LEONI to prioritise suppliers based on their influence and risk exposure, and thus to prioritise the suppliers for further review. These were already examined more closely in 2023 and addressed with various measures. Overall, our external risk analysis conducted in 2024 established a medium-risk rating. We consider the issue of health and safety in the workplace to be a priority in the relevant area. We identified risks with regard to product-specific raw materials from LEONI and its subcontractors. We therefore pursue a risk-based approach here and strive to prioritize the raw material supply chains with a high risk of human rights violations. These are considered in more detail as part of a more specific risk analysis.

LEONI does not source copper ore directly from the mine for its value chain. However, as the raw material copper is an essential component in many of LEONI's cable products, all suppliers from whom LEONI sources copper are defined as risk business partners and are examined more closely as part of the specific risk analysis. Further information can be found on our [website](#).

We regularly check our other raw materials for relevance and are broadening our portfolio accordingly, thereby adapting our strategy and being able to react flexibly to changes.

V. Determination of Human Rights and Environment-related Expectations

We consider making our employees more aware of respecting human and environmental rights to be a key part of our due diligence obligations, and to convey to them the expertise needed to effectively implement human and environmental rights-related due diligence processes. We therefore conduct training courses for this purpose as well as embed corresponding requirements in our internal regulations (in particular the LEONI Code of Conduct).

It is our ongoing endeavor by means of holistic measures to prevent, minimize or stop any possible risks. We will continue to concentrate our present efforts on areas that are in line with our global strategy involving equal opportunities, equal treatment, diversity and inclusion.

LEONI expects its business partners to adhere to its Code of Conduct for Business Partners and supportive collaboration from them in the event of a breach to prevent, stop or minimize such a breach. LEONI expects its business partners to ensure that the specific human and environmental rights-related requirements are fulfilled and, for their part, to commit their own business partners to upholding the corresponding requirements. Violations of this standard could lead to termination of the business relationship.

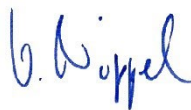
VI. Contact

Contact for questions and comments on this policy statement	Please refer to compliance@leoni.com if you have any questions or comments on this policy statement or on other human rights-related matters.	
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Nuremberg, February 2025



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