

ams OSRAM Modern Slavery Statement (UK) 2024

This statement has been published in accordance with section 54 (1) of the UK Modern Slavery Act 2015. It sets out the steps ams OSRAM has taken and is continuing to take, to identify and address any kind of modern slavery and human trafficking risks. The reporting period for this statement is fiscal year 2024 (January 1 to December 31, 2024).

ams-OSRAM AG is publishing this statement on behalf of the ams OSRAM Group (ams OSRAM in the following). Although not all ams OSRAM companies are subject to the UK Modern Slavery Act 2015, ams OSRAM takes a group-wide approach to its human rights commitments.

ams OSRAM operates in the UK market mainly through its UK-based affiliates ams R&D UK Ltd., Ring Automotive Ltd. and OSRAM Ltd. All these entities are covered by the ams OSRAM policy framework and management processes outlined below.

1. ams OSRAM structure, operations and supply chains

ams OSRAM is a leading global provider of lighting and sensor technology solutions. Our product portfolio includes high-quality semiconductor-based light-emitting sources (LEDs and laser diodes), sensors, CMOS-ICs (complementary metal-oxide-semiconductors) and software, classic lighting technologies as well as LED-based lighting solutions for automotive and specialty applications. Operational implementation of our business largely takes place via the two segments Semiconductors and Lamps & Systems, which serve our end customers in the consumer, automotive, and industrial & medical technology markets. Geographically, our activities are split into three regions or regional markets: EMEA (Europe, Middle East and Africa), Americas and APAC (Asia/Pacific). The ams OSRAM Group manufactures its products at 16 locations in the three regions mentioned.

As of December 31, 2024, ams OSRAM employed 19,665 employees (December 31, 2023: 20,378 employees) and generated revenue of EUR 3,428 million (2023: EUR 3,590 million) with a large number of products and solutions.

Our supply chains are complex and involve many stages and players, e.g. from the extraction of raw materials to the delivery of prefabricated wafers or components. The main sourcing countries for 2024 were Germany, China, Taiwan, Singapore, and Malaysia. The highest-volume material categories are contract manufacturing, equipment, and pre-materials for optical semiconductors. Our global supplier network comprises just under 9,700 suppliers.

For further information on the products, company structure and supply chains of ams OSRAM, please refer to the ams OSRAM [Annual Report 2024](#) including our sustainability report.

2. Risks of modern slavery and human trafficking in our operations and supply chains

As an international company with a broad variety of products and complex global value chains, we are aware that our business activities and relationships entail a potential risk of human rights violations, including forced labor, modern slavery or human trafficking. This applies to both, our own employees and to all external persons and groups of persons especially more potentially vulnerable groups, such as migrant and temporary workers.

Specific risk factors for ams OSRAM include the following:

- **Sector and industry:** The electronics industry, where ams OSRAM operates in, is perceived as a high risk industry globally.
- **Products and services:** ams OSRAM faces a variety of supply chain risks including also social and ecological risks in the supply chain, in the production or extraction of certain materials. The ams OSRAM product portfolio requires the use of materials that could potentially be classed as conflict minerals due to their origin. This is particularly true for those that originate in the Democratic Republic of the Congo and neighboring countries, as well as for conflict-affected and high-risk areas (CAHRAs), as defined in EU Regulation 2017/821. We are aware of the associated risks and are mitigating them accordingly. A potential risk of negative impacts of supply chain management on people, the environment, or society exists for Tier 1 suppliers mainly in the case of social and environmental issues, such as possible violations of fair working conditions. As ams OSRAM procures also services such as cleaning, construction and logistics, there might be potential risks connected to modern slavery which are mitigated accordingly.
- **Geography:** We have significant production facilities in countries with higher risks of modern slavery, forced labor and human trafficking including China, Malaysia and the Philippines.

- **Workforce profile:** ams OSRAM uses recruitment agencies, labor providers and labor brokers in recruiting permanent, temporary and contract workers. Our direct and indirect workforce includes groups that are potentially more vulnerable to modern slavery such as those in low skilled roles or migrant workers. We consider the risks of modern slavery practices to be more significant for groups that are not employed directly by ams OSRAM, such as indirectly employed (contract) workers or workers employed by local service providers.

3. Policies and Governance

We do not tolerate any form of modern slavery, forced labor, human trafficking, child labor or other human rights violations, neither within our own business nor at our suppliers or business partners. We are committed to meet increasing regulatory and customer-specific requirements and have established policies, governance and due diligence processes in our own operations as well as in the supply chain that support us in identifying and addressing such risks and impacts.

We are committed to adhering to internationally recognized human rights standards at all our locations. Our approach to respecting human rights is outlined in the [ams OSRAM Code of Conduct](#) and our global [Human Rights Policy](#). Our Human Rights Policy defines our commitment to respect and uphold human rights for people affected by our operations, business relationships, supply chain and products. It is based on the UN Guiding Principles on Business and human rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the International Bill of human rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.

We expect all employees of ams OSRAM to ensure that our Human Rights Policy is adequately implemented in their area of responsibility.

We are a signatory of the [UN Global Compact](#) and an active member of the [Responsible Business Alliance \(RBA\)](#).

The [Code of Conduct for suppliers](#) ("CoC for suppliers") defines the principles and requirements for our suppliers in terms of their responsibility for adhering to human rights, fair working conditions, and environmental protection. These requirements comply with international standards such as the UN Global Compact, the Code of Conduct of the Responsible Business Alliance (RBA), and the Conventions of the International Labor Organization (ILO). The CoC for suppliers contains an explicit ban on all forms of modern slavery, forced labor and human trafficking. It also requires that no internal or external worker is subject to unethical recruitment practices such as excessive fees or costs for recruitment. It stipulates that suppliers should use reasonable efforts to identify social, human rights, environmental and climate-related risks in its own supply chain and to ensure that its suppliers comply with requirements comparable to those stipulated in our CoC for suppliers.

At ams OSRAM, various corporate and specialist departments work closely together to fulfill our human rights and environmental due diligence obligations. The Human Resources (HR) department and the Environmental Protection, Health and Safety (EHS) department are responsible for coordinating relevant due diligence activities with regards to human rights and the environment at our own operations in all our locations globally. The Procurement department is responsible for ensuring that our due diligence obligations are complied with by the Group's entire supply chain. The Compliance department is responsible for the company's whistleblowing system "Tell ams OSRAM", which is globally available and one of the main reporting channels of our complaints management system. The Audit department assesses compliance with our Supply Chain Due Diligence Risk Management System, as well as its effectiveness and efficiency. The Legal department provides legal advice to all these functions.

All departments regularly report on the company's due diligence obligations directly to the Group Human Rights Officer who has been appointed by the ams OSRAM Management Board in 2023. The Group Human Rights Officer is responsible for monitoring the compliance with all due diligence obligations on human rights and environmental activities in our own operations and the supply chain, and regularly informs the Management Board and the Supervisory Board on it, at least once a year.

4. Due Diligence processes

Assessing modern slavery risks

Modern slavery risks are primarily relevant to our identified human rights risk areas of "working conditions of employees" and "working conditions and livelihoods in the supply chain". Assessing human rights related risks, including modern slavery, forced labor and human trafficking are part of ams OSRAM's enterprise risk management (ERM) processes to identify, assess, and control risks. The process and its results are reported in our [sustainability report](#).

Assessing modern slavery risks in our supply chains

Ongoing reviews of the procurement process to identify possible risks form a core element of supplier management. The handling of supply chain risks specific to procurement and sustainability is also embedded in the company-wide risk management system.

The annual human rights and environmental risk analysis for ams OSRAM suppliers encompasses the entire purchasing volume. This process includes steps such as risk identification, risk assessment, risk prioritization, and documentation. The results of this analysis form the basis for determining preventive or mitigating measures.

As part of the risk identification process, an abstract analysis is carried out using the RBA risk assessment platform matching our information on suppliers' sourcing origin, addressed category and spend, with publicly available risk KPIs by the World Bank, ILO, UNICEF and the Walk Free Foundation, etc.

In the second step, we further evaluate identified risks using already available information like supplier certificates, self-assessments, sustainability ratings, etc. Identified supplier risks are evaluated based on their likelihood and potential impact, and are then organized into a heat map. This matrix prioritizes risks into levels: low, medium or high.

Once the results of the risk analysis are available specific actions and measures are defined - please see "Mitigation and remediation measures in the supply chains" below for further detail.

We are aware that risks of modern slavery practices exist beyond our direct suppliers. We therefore collaborate closely with our external manufacturers and only allow approved component and material manufacturers to be used.

Mitigation and remediation measures in the supply chain

As part of our procurement strategies and purchasing practices, we promote exchange and cooperation with our external suppliers, service providers and partners. In doing so, we rely on communication and training, but also on the consistent examination of the respective supply chains for potential priority risks, as well as the consistent follow-up of improvement measures.

- **Code of Conduct:** We require all suppliers with a purchasing volume of EUR 50,000 or higher to sign the [Code of Conduct for Suppliers](#) (CoC for suppliers) with its explicit ban on all forms of modern slavery, forced labor and human trafficking. The CoC for suppliers is also part of the prequalification process for new suppliers and is provided to all suppliers – irrespective of purchasing volume – when purchase orders are placed.
- **Supplier Management:** We include specific requirements in our supplier selection and qualification process to avoid risks and make sure that the supplier acts according to our code and have a solid risk management system in place. For example ISO 14001, ISO 45001, IATF, Sustainability Rating, specific questionnaires for onsite Service Providers in high risk countries.
- **Risk Assessments and Audits:** We consistently evaluate supply chains for potential risks. For instance, we use the RBA risk assessment platform to match supplier data with risk KPIs from sources like the World Bank and ILO. For all suppliers in a high risk country we require a tool based self assessment provided by leading platforms like RBA. Additionally, we conduct mandatory on-site audits to ensure compliance and develop the suppliers for keeping our values.
- **Collaboration and Training:** We work closely with suppliers and partners, emphasizing communication and training. For example, we conduct webinars and publish training documents on our Supplier Portal to ensure everyone is informed and aligned with our standards. Please see [Supplier Training on Human Rights](#) for more information.
- **Sustainability Requirements:** We integrate human rights and environmental protection clauses into contracts. This includes possible escalation steps and sanctions, ensuring compliance and accountability.
- **Conflict Minerals:** At ams OSRAM, a global [Conflict Minerals Policy](#) is in place. It is based, among others, on our commitment to the OECD's 'Due Diligence Guidance for Responsible Mineral Supply Chains'. This policy is followed by internal due diligence processes which aim to identify and mitigate supply chain risks in this area. A monthly report to show the results of our due diligence activities is published on our [Product Stewardship Website](#).
- **Industry Initiatives:** Participation in the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI) helps us enhance awareness and monitoring of human rights and environmental issues. Through these initiatives, we collectively create knowledge and improve our practices.

- **Sanctions List Checks:** We cross-check new suppliers against international sanctions lists to prevent human rights violations. This includes checking for flags on lists like the U.S. Department of Homeland Security's Entity List acc. Uighur Forced Labor Act (UFLPA).
- **Employee Training:** We provide regular training for our procurement teams to maintain effective supplier management. This includes sessions on human rights and responsible sourcing practices.

Assessing modern slavery risks in own operations

Based on our risk analysis approach from 2019, we further refined and sharpened our risk assessment methodology process to better manage the identification, evaluation and monitoring of human rights risks in our own operations for the combined company, also with regards to fulfill due diligence legislative requirements established by the German Supply Chain Act which came into force in January 2023.

The risk analysis and evaluation process for human rights related risks in own operations brings together a broad range of data from external sources as well as internal functions, enabling ams OSRAM to identify, evaluate and address both function-specific and cross-functional risks related to human rights, including forced labor, modern slavery and human trafficking. The risk analysis process follows a 4-step approach:

- **Step 1:** The abstract risk analysis takes into account externally available country and human rights related risk indices provided by credible expert organizations such as the World Bank, Transparency International or others. As a member of the RBA, we have access to the RBA's abstract country risk data base which we consider as well to assess the abstract human rights risk level for our locations and countries.
- **Step 2:** The concrete risk analysis comprises a deep dive into the respective location. By gathering and analysing data and insights from various internal stakeholders, departments, relevant local or company specific documents the objective is to identify and assess potential human rights related risks at the specific site. Identified risks are being evaluated based on the criteria likelihood, severity, the company's degree of influence and the relationship to the risk and are documented in a risk inventory file, providing a comprehensive risk profile.
- **Step 3:** Based on the comprehensive risk profile, all identified potential risks will be displayed in a heat map and are prioritized. This matrix prioritizes risks into low, medium, high or very high risks. Based on the prioritization, necessary preventive or remediation measures are defined and documented in an action plan.
- **Step 4:** The action plan is implemented and the status of the implementation monitored.

The new approach was piloted in our Malaysian site and the rollout continued in additional locations since then. In 2024, we conducted the human rights risk analysis in two legal entities in Germany. In neither entities, a risk or violation regarding modern slavery, forced labor or human trafficking was identified. In accordance with the applicable law, the risk analysis is planned to be repeated for these locations and evaluated to also be continued in other locations to identify potential human rights risks and based on these define appropriate preventive or remediation measures.

If required, any changes with regards to human rights assessment will be considered and implemented in our policies and processes accordingly. As a member of the Responsible Business Alliance (RBA) we work to the standards set out in the RBA Code of Conduct (CoC) or local law, whichever is more strict. The RBA CoC includes requirements on freely chosen employment, prohibiting forced, bonded or indentured labor as well as modern slavery, human trafficking and child labor.

Our facilities across all regions are regularly audited by customers based on the RBA Code of Conduct. In 2024, RBA audits were conducted in our locations Premstaetten in Austria, Penang in Malaysia and Wuxi in China. The Penang location became the first ams OSRAM facility that achieved the prestigious platinum rating in the RBA Validated Assessment Program, a rigorous standard for onsite compliance verification including stringent criteria related to labor practices, health & safety, environmental standards, ethics, and management systems.

In addition, in countries with known modern slavery risks, ams OSRAM has taken additional precautionary measures to address forced labor, modern slavery, human trafficking and child labor risks, e.g. in 2024 by certifying our Foshan production site in China according to the CoC of the BSCI (Business Social Compliance Initiative), a leading international standard.

5. Grievance mechanism and remedy

Our objective is to avoid human rights related abuses or violations. The global whistleblowing system "[Tell ams OSRAM](#)", introduced globally for ams OSRAM in April 2021, is a key element of the compliance management system, it is available at all times and in multiple languages. "Tell ams OSRAM" can be reached via our [Website](#) as

well as internally via our Intranet. Anyone who considers himself/herself to be harmed, violated or negatively affected by the activities of ams OSRAM, our suppliers, service providers or business partners, can report – if preferred also anonymously – a complaint of breaches of laws governing anti-corruption, competition and antitrust law, the prevention of money laundering, data protection or export controls, but also any potential human rights related concern, such as forced labor, modern slavery, human trafficking or child labor. This includes but is not limited to our employees, the employees our suppliers, service providers or business partners, including temporary workers and contractors, in any country, local communities around our sites and our suppliers' sites, as well as end users of ams OSRAM's products or services.

All reports to "Tell ams OSRAM" are treated confidential and are followed up. Retaliation against reporters will not be tolerated by ams OSRAM. If there is plausible and substantiated suspicion of a violation, an internal investigation is conducted. Regarding human rights related reports, the established responsible global or local human rights coordinator proceeds according to the Compliance Guideline to investigate the incident. Where necessary, appropriate preventive or remediation measures are implemented and their implementation is being monitored. In the event of proven violations caused by our employees, ams OSRAM may take disciplinary action in accordance with applicable labor law regulations. In the event of violations caused by our business partners, we will cooperate with them to determine necessary remediation measures and do further monitoring of their implementation and, as the case may be, even consider the termination of current contracts.

ams OSRAM reports on human rights related incidents in the [sustainability report](#). In fiscal year 2024, we received 37 reports on potential human rights and fair labor condition incidents via "Tell ams OSRAM", compared to 33 reports in fiscal year 2023. All reports were systematically recorded and analyzed. The number of incidents with proven violations amounted to 5 in 2024, all of them relating to discrimination & harassment either in our own operations, but also at one of our suppliers. Appropriate measures were implemented for all of these cases.

6. Effectiveness

"Tell ams OSRAM", our global grievance system for compliance and human rights violations serves as a key avenue for assessing the effectiveness of our policies and actions to prevent and remediate human rights related risks, including modern slavery.

In 2024, "Tell ams OSRAM" has been solidly promoted among our employees through compliance trainings and related communication activities.

A focus area for the future is to further enhance the promotion of "Tell ams OSRAM" among third parties potentially impacted by ams OSRAM's activities and business relationships.

Our continuous human rights risk monitoring and management process outlined above, will also serve to assess the effectiveness of our actions defined to address human rights and modern slavery risks or violations.

The corporate internal audit department constantly reviews the appropriateness and efficiency of our human rights risk management system on a group-wide basis and provides recommendations for further improvement.

7. Training and capability building

Raising awareness on human rights, including modern slavery, forced labor and human trafficking, is an important cornerstone of our due diligence procedures.

To raise the awareness for human rights related risks, we regularly conduct training activities for all our employees. Human rights aspects and labor conditions are incorporated in the annual ams OSRAM Code of Conduct (CoC) training. In 2024, 19,671 employees, have passed the CoC training, thereof 10,747 indirect and 8,924 direct employees.

As part of our activities, we also pursue region- and country-specific topics like the yearly human rights refresher program in Malaysia for all levels of employees.

In early 2025, we have published a poster campaign to address our commitment to human rights and encourage employees to use "Tell ams OSRAM" to report any concerns or incidents related to potential modern slavery, forced labor, human trafficking or other human rights violations.

An update of our global e-learning module on human rights including modern slavery, forced labor and human trafficking is planned for 2025.

8. Moving forward


For ams OSRAM, human rights due diligence in general and modern slavery due diligence more specifically is a process of crucial importance as well as continuous improvement and learning. To strengthen our approach, ams OSRAM strives to:

- Regularly review and where necessary adapt our Human Rights Policy, our human rights management and monitoring system and our due diligence processes to identify and address human rights and modern slavery risks to people in the ams OSRAM operations, supply chains and business relationships.
- Continuously strengthen our communication, awareness-raising and capability-building activities among employees, suppliers and business partners on human rights and in particular on modern slavery risks and their mitigation. This includes strengthening our communication on and building trust in "Tell ams OSRAM" as a globally trusted grievance channel to report human rights related incidents.
- Further strengthen our assessment and management of modern slavery risks in our supply chains, specifically considering higher risk service providers and our deeper supply chains (beyond tier 1).
- Report transparently and regularly on mitigation and remediation measures taken to address modern slavery risks and impacts; further strengthen our reporting on the effectiveness of our efforts to combat modern slavery via relevant performance indicators, e.g. the indication of breaches regarding human rights and fair labor conditions received via "Tell ams OSRAM", the number of confirmed cases of breaches regarding human rights and fair labor conditions, preventive or remediation measures taken and the number of human rights trainings conducted for ams OSRAM employees.

Premstaetten, June 16, 2025



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