

ams OSRAM Modern Slavery Statement (UK) 2025

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, forced labor or human trafficking risks in its own business and supply chains.

This statement constitutes the modern slavery and human trafficking statement of the ams OSRAM group (ams OSRAM in the following) for the financial year from 1 January 2025 to 31 December 2025 and is intended to satisfy the requirements of section 54 of the UK Modern Slavery Act 2015 for the relevant ams OSRAM entities carrying on business in the United Kingdom.

ams OSRAM operates in the UK market mainly through its UK-based affiliates ams R&D UK Ltd., Ring Automotive Ltd. and OSRAM Ltd. These UK entities are subject to the ams OSRAM policy framework, governance arrangements and due diligence processes described in this statement.

ams OSRAM applies a group-wide approach to preventing and addressing modern slavery, forced labor and human trafficking. Although not all ams OSRAM entities are subject to section 54 of the UK Modern Slavery Act 2015, the human rights and modern slavery framework described in this statement is applied across the group.

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), sensor technology, 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, 2025, ams OSRAM employed 19,120 employees (December 31, 2024: 19,665 employees) and generated revenue of EUR 3,323 million (2024: EUR 3,428 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 2025 were Germany, China, Taiwan, and Malaysia. The highest-volume material categories are contract manufacturing, pre-materials, optical semiconductors and equipment. Our global supplier network comprises just under 9,500 suppliers.

Further information on the products, company structure and supply chains of ams OSRAM is available in the ams OSRAM [Annual Report 2025](#).

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

As an international company with a broad product portfolio and complex global value chains, we are aware a potential risk of human rights violations, including forced labor, modern slavery or human trafficking may arise in both our own operations and our supply chains. These risks may affect our own employees and potentially all external persons, particularly vulnerable groups including migrant workers, temporary workers, agency workers and contract 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 range of supply chain risks including social and environmental risks associated with the extraction, production and processing of certain materials and components. 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 these risks and address them through risk-based due diligence measures. 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 also procures services such as cleaning, construction and logistics, we recognize that these categories might contain heightened risks of modern slavery and related labor rights abuses and therefore require particular attention within our due diligence processes.

- **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 may be more vulnerable to modern slavery-related risks, including workers in lower-skilled roles, migrant workers, temporary workers and workers engaged through agencies or brokers. 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 are committed to preventing and addressing any form of modern slavery, forced labor, human trafficking, child labor or other human rights violations within our own business and in our relationships with suppliers and business partners.

In response to increasing regulatory and customer-specific requirements, we have established policies and governance structures in our own operations and across the supply chain to support the identification and management of potential human rights-related risks and impacts.

We adhere 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 chains 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. The CoC for Suppliers is complemented by our [Policy - Human Rights in the supply chain](#) which defines our commitment to respect and uphold human rights for people affected by our supply chain.

At ams OSRAM, various corporate and specialist departments work closely together to fulfill our human rights and environmental due diligence obligations. The Human Resources department and the Environmental Protection, Health and Safety department coordinate relevant due diligence activities relating to human rights and environmental matters in our own operations globally. The Procurement department is responsible for ensuring that our due diligence obligations are complied 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.

Oversight of our human rights due diligence framework is embedded in our governance structure. The relevant departments regularly report 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 significant developments and activities, identified risks and the effectiveness of measures.

4. Due Diligence processes

Assessing modern slavery risks

Risks of modern slavery, forced labor and human trafficking are particularly relevant to our identified human rights risk areas relating to “working conditions of employees” and “working conditions and livelihoods in the supply chain”. The assessment of these risks is 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 [Annual report 2025](#).

Assessing modern slavery risks in our supply chains

Ongoing reviews of the procurement process to identify potential risks are a core element of our supplier management process. The management of human rights-related risks and violations are integrated into our company-wide risk management system. In our supply chain and business relationships, we apply a risk-based due diligence approach to identify and address such risks and impacts.

Our annual human rights risk analysis for ams OSRAM suppliers to identify and assess possible human rights risks and violations is conducted for the entire purchasing volume. This process is based on the assumption that adverse human rights impacts may occur, and is designed to identify, prioritize, and address these impacts.

- Risk and negative impact identification: As part of the risk and negative impact 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 Key Performance Indicators (KPI) by the World Bank, ILO, UNICEF and the Walk Free Foundation, etc. The indices used provide a first supplier risk classification based on country and product risk.
- Risk Assessment: Identified risks and respective impacts are further evaluated using existing supplier information like supplier certificates, self-assessments, audits, and sustainability ratings.
- Prioritization: Supplier risks are prioritized based on their likelihood, severity and potential impact. Dependent on the risk assessment results, suppliers are categorized into a heat map with low, medium, and high risk.
- Actions and measures: Based on this prioritization, appropriate preventive, mitigating and, where necessary, remedial actions and measures are defined.

Mitigation and remediation measures in the supply chain

To proactively address human rights risks within our supply chain, we have established a comprehensive set of preventive and mitigating measures. These measures are designed to eliminate human rights violations and to prevent and mitigate risks. By integrating these practices into our procurement strategies and supplier management processes, we ensure that our operations and those of our partners uphold the highest standards of human rights and ethical conduct.

Supplier Code of Conduct: The [Code of Conduct for Suppliers](#) defines the principles and requirements for our suppliers in terms of their responsibility for adhering to human rights, fair working conditions, health and safety and environmental protection. Among other things, this code requests an explicit ban on all forms of modern slavery, forced labor, and human trafficking, the prohibition of unethical recruitment practices, such as excessive fees or costs for recruitment, and expects suppliers to use reasonable efforts to identify and mitigate social, human rights, environmental, and climate-related risks in their own supply chains. 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 Labour Organization (ILO).

Procurement strategies and practices: ams OSRAM maintains a procurement strategy which is based on the principles of responsible procurement. Sustainability is part of the ams OSRAM Supplier Management Process. Minimizing human rights risks is an integral part of ams OSRAM’s procurement sustainability strategy. The global procurement guidelines, our Code of Conduct for Suppliers, and their implication in supplier contracts as well as our supplier and risk management process constitute the framework.

Risk-based control measures: Regular self-assessments, sustainability evaluations and audits to verify compliance with the Code of Conduct are an integral part of our supplier monitoring process. Supplier self-assessments and supplier audits encompass a range of critical topics, including anti-corruption and anti-bribery measures, occupational health and safety, fair wages, sustainable labor practices, and the protection of human rights. As part of the audit process, we also verify the existence and accessibility of grievance mechanisms for supplier employees.

Responding to human rights reports: Investigation and remedial actions: Whenever we receive credible information or reports such as those submitted through our “Tell ams OSRAM” system indicating a possible human rights violation within our supply chain, we have established clear processes to manage these cases. Each case is carefully reviewed and investigated in accordance with our internal procedures. Where violations or risks are identified, we implement appropriate remedial actions to resolve the issue and prevent recurrence involving where necessary for the affected third party.

Supplier requirements: At ams OSRAM, we mandate several supplier requirements, including the Code of Conduct, Self-Assessments, Conflict Mineral Declarations, various ISO certifications, and multiple audits, to ensure supplier qualification. These measures enable us to positively impact workers throughout our supply chain. For instance, industry-standard ISO certifications such as ISO 14001, ISO 9001, and ISO 45001 are compulsory for applicable suppliers in the “direct materials” procurement category. These certifications confirm the presence of robust process infrastructures and effective management systems, facilitating not only comprehensive risk management practices but also having positive impact among others in reducing the risks in the area of health and safety and fair working conditions. Our collaboration with these suppliers significantly benefits the workers in our supply chain.

- **Supplier Engagement:** We actively collaborate with our suppliers and partners, prioritizing clear communication and comprehensive training. For instance, we host webinars and provide training materials on our Supplier Portal to ensure all business partners are well-informed and adhere to our standards. For more details, please refer to our [training documentation](#) on protecting human rights in the supply chain. We engage suppliers in continuous improvement processes and support them in implementing corrective actions.
- **Conflict Minerals:** At ams OSRAM, a global ams OSRAM [Conflict-Free Minerals Sourcing 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 like torture, cruel, inhuman, and degrading treatment, child and forced labour, war crimes or other serious violations of international humanitarian law etc. A monthly report to show the results of our due diligence activities is published on our [Product Stewardship Website](#).
- **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).
- **Industry Initiatives:** Participation in the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI) helps us enhance awareness and monitoring of human rights. Through these initiatives, we collectively create knowledge and improve our practices.
- **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

Building on our risk analysis approach established in 2019, we have further refined and sharpened our risk assessment methodology to strengthen the identification, evaluation and monitoring of human rights risks in our own operations, also with regards to fulfill due diligence legislative requirements established by the German Supply Chain Act which is into force since 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.

In 2025, we conducted a human rights risk analysis in two legal entities in Germany to fulfil our due diligence obligations according to the Germany Supply Chain Act. In neither entity, did we identify any severe risk or violation relating to modern slavery, forced labor or human trafficking. In accordance with the applicable law, the risk analysis

is planned to be repeated annually for these locations and evaluated to be rolled out 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 apply the standards set out in the RBA [Code of Conduct](#) (RBA 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 2025, a RBA audit was conducted in our location Penang in Malaysia.

In addition, in countries with known modern slavery risks, ams OSRAM is taking 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 risks, abuses or violations. Our 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. Any person who considers that they may have been harmed, violated or negatively affected by the activities of ams OSRAM, our suppliers, service providers or business partners, may submit a 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, environmental violations but also any potential human rights related concern, including forced labor, modern slavery, human trafficking or child labor. This includes among others, our employees, employees of our suppliers, service providers or business partners, including temporary or migrant workers and contractors, local communities around our sites and our suppliers' sites in any country, as well as end users of ams OSRAM's products or services.

All reports to "Tell ams OSRAM" are treated confidentially 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, corrective or remedial measures are implemented and their implementation is 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 involving our business partners, we seek to work with them to determine and implement necessary corrective or remedial measures, monitor their implementation and, as the case may be, even consider the termination of the business relationship.

ams OSRAM reports on human rights related incidents in the [Annual report 2025](#). In fiscal year 2025, we received 39 reports on potential human rights and fair labor condition incidents via "Tell ams OSRAM" (FY 2024: 37 reports). All reports were systematically recorded, analyzed and the investigation documented. During the financial year 2025, we did not receive any reports through our grievance channels relating to modern slavery, human trafficking, or inappropriate recruitment fees in our own business area or from our suppliers. The number of incidents with proven violations amounted to 8 in 2025 (FY 2024: 5), the majority of them relating to discrimination & harassment or unequal treatment in our own operations. Appropriate remediation measures were implemented for all of these cases. No financial penalties or fines were imposed.

6. Effectiveness

We assess the effectiveness of our actions to prevent and address modern slavery, forced labor and human trafficking or other human rights violations through different indicators that help us monitor implementation, identify areas for improvement and strengthen our due diligence processes over time. Relevant indicators include regular supplier risk assessments, supplier self-assessments and audits as well as participation in training and awareness-raising activities we provide for our employees and our suppliers.

In addition, "Tell ams OSRAM", our global grievance system for compliance and human rights violations serves as a key tool for assessing the effectiveness of our policies and actions to prevent and remediate human rights-related risks, including modern slavery, forced labor and human trafficking. We monitor the number of human rights-related complaints received, the number of confirmed violations and the corrective or remedial measures implemented.

"Tell ams OSRAM" is being promoted continuously 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 described above, also supports our assessment of the effectiveness of the actions taken to address human rights and modern slavery risks and impacts.

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 risks of modern slavery, forced labor and human trafficking, is an important cornerstone of our due diligence approach.

To raise awareness of 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 total, 17,997 indirect and direct employees have passed the CoC training in 2025.

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 launched a poster campaign to reinforce 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 2026.

8. Moving forward

For ams OSRAM, human rights due diligence in general and modern slavery due diligence in particular, is an important process of 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 in ams OSRAM’s own operations, supply chains and business relationships.
- Continue to strengthen our communication, awareness-raising and capability-building activities for employees, suppliers and business partners in relation to human rights, and in particular 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 and continue to strengthen our reporting on the effectiveness of our efforts through 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.

This statement was approved by the Management Board of ams-OSRAM AG on May 22, 2026, and signed on its behalf by Aldo Kamper, Chief Executive Officer, and Rainer Irle, Chief Financial Officer. It is published on the ams OSRAM website at [Society | ams OSRAM](#).

Premstaetten, May 22, 2026



Aldo Kamper
CEO



Rainer Irle
CFO