

Company objectives and vision

Excelitas Germany respects the human rights of employees in its supply chain and treats them with dignity.

Environmental responsibility is an integral part of our business practices. Negative impacts on the community, the environment and natural resources are minimized.

The executive management of the German Excelitas units is responsible for the actions set out in this policy statement to comply with our human rights and environmental due diligence obligations.

The human rights strategy set out in this policy statement applies to the German Excelitas companies:

- Excelitas Deutschland GmbH with the sites in Goettingen, Feldkirchen and Regen
- Excelitas PCO GmbH with the Kelheim site and
- Excelitas Technologies GmbH & Co. KG with the Wiesbaden site

Our Core Values

Integrity: **Do What's Right**

- Embrace safety
- Honest and reliable
- Act with courage

Customer Focused: **Trusted Partner**

Enabling Success

- Agile and responsive
- Transparent and accountable
- Intellectually curious
- Meet or exceed commitments

Collaboration: **Working Together Achieving Goals**

- Value and encourage teamwork
- Trust and respect each other
- Communicate openly and listen actively
- Align and act decisively

Responsible: **Own Our Actions**

- Care for our people, communities and environment
- Act with compassion and respect
- Create value through diversity and inclusion
- Embrace sustainability

Expectations on employees, suppliers and business partners

We expect our employees, suppliers and business partners to comply with our standards.

Our standards are based on international conventions and are defined in the following documents:

- [Standards of Business Conduct](#)
- Human and Environmental Rights Code Excelitas Germany
- Supplier Code of Conduct

Implementation of due diligence obligations

We implement our due diligence obligations with the following processes:

Risk management	Excelitas Germany has introduced a risk management system for human rights and environmental risks. As part of risk management, a risk analysis is conducted in two stages once a year and as required: • Firstly, an abstract risk analysis is conducted using freely available sources. We use the CSR risk check provided by the German Agency for Business and Development for this purpose. • In the second step, we use data to assess the risk of our own business area and the direct suppliers exposed to risk in the specific risk analysis.
Preventive measures	We have implemented the following preventive measures: • Adaptation of our HR management and purchasing processes to address human rights and environmental risks. • Our HR and purchasing departments and our auditors are regularly trained in relevant risks and internal procedures. • We incorporate the results of the risk analysis into the selection of our suppliers. • We contractually oblige all high-risk suppliers to comply with the standards defined in our Supplier Code of Conduct. • Where appropriate, we train and review our suppliers regarding our Supplier Code of Conduct. We review the effectiveness of the preventive measures and compliance with our due diligence obligations as part of our audit program.
Remedial action	If we discover that human rights violations have actually been caused by our business activities, we will take effective remedial action. These remedial measures must take effect promptly and lead to an end to the grievances. If an immediate end is not possible, we will develop a concept with a schedule for ending or minimizing the violation.
Complaints procedure	Excelitas has established a whistleblower system in which internal and external stakeholders can report violations. The reporting channels and our rules of procedure can be found on our website at: https://www.excelitas.com/reporting-compliance-violation
Indirect suppliers	If there are indications that human or environmental rights violations are being committed by an indirect supplier, the following is conducted on an ad hoc basis • a risk analysis and • preventive measures and remedial actions.
Report	Once a year, we report on the fulfilment of our due diligence obligations in the format provided by BAFA. The reports can be downloaded from the Excelitas website: https://www.excelitas.com/regional-legislation-compliance

The effectiveness of the stated processes is monitored by our Human Rights Officer, who informs the managing directors at least once a year about his activities and the process results.

Priority human rights and environment-related risks

As a German company in the optics industry, we are aware of the country- and industry-specific risks associated with our business activities. As part of our risk analysis, we have identified the following risks for our own business area and our supply chain, which we consider to be a priority due to their potential severity and (irreversibility) as well as our ability to influence them:

Climate &	Germany is one of the world's largest emitters of greenhouse gases (GHG).	Our measures: • The Excelitas company Excelitas Deutschland GmbH has been climate neutral since 2021. • Excelitas Germany strives to reduce its eCO2 emissions through energy-related measures and the optimization of the electricity mix.
	In PwC's Women in Work Index, Germany is in the bottom half of the countries surveyed. It was assessed according to criteria such as the pay gap between men and women.	Our measure: Every year, we review the pay of all employees and balance out any pay gaps within the budget.
Discrimination	According to studies, around 10% of all employees in Germany were affected by sexual harassment in the workplace. Women were affected twice as often as men.	Our measures: In accordance with our Standards of Business Conduct , we expect all employees to accept and respect each other as equals. Excelitas Germany does not tolerate behavior from employees that discriminates, harasses or offends. Our standards are regularly trained. We reaffirm our commitment to diversity and inclusion as a strategic imperative. We pass on our expectations to our suppliers in the form of our Supplier Code of Conduct.
	The rate of racial discrimination against people of African origin when looking for work (>50%) is particularly high in Germany (compared to the rest of the EU).	
	A study by the European Union Agency for Fundamental Rights found that around 20% of LGBTIQ people in Germany have experienced discrimination in the workplace or when applying for a job.	
	Foreign employees are overrepresented in the German low-wage sector and often work under precarious conditions.	Our measures: This priority risk only applies to suppliers with employees in the low-wage sector. Relevant suppliers are identified in the risk analysis and measures are taken if necessary.