Antidiscrimination Statement

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Responsible	Human Rights Officer / Compliance
Classification	public

Antidiscrimination Statement

TROX core principles, culture and values set a foundation of an inclusive and diverse work environment where dignified, respectful working relationships are a matter of course. Free from any form of discrimination or harassment, our foundation is embedded in our Code of Business Conduct and our global Antidiscrimination Statement. TROX values are cast in the Code of Business Conduct. The basis for TROX Human Capital Management, because employees are our most valuable and greatest asset.

1. TROX Values and Leadership

At TROX, our purpose is to help to improve people's lives. This is equally true for us in our working environment and equally expected from our partners, customers and for our employees. We strive for sustainable growth while protecting our environment. We make every effort as we believe, to foster diverse and inclusive culture at TROX where every employee is valued and respected precisely due to our different perspectives and diverse characteristics. Therefore, we are respectful and inclusive to our people and our stakeholders, always aiming to make a positive impact on those societies in which we work. Our commitment and priority are to be respectful, professional, compliant, inclusive, healthy and bias-free. We value each other's integrity, dignity, rights, health and well-being. This is our foundation to create a harmonious, creative and motivating work environment where everyone can run as its best, spark innovation and drive customer success. Our values are deeply embedded in our daily business as well as in all our policies such as demonstrated in our commitment to the Human Rights included in TROX's Global Human Rights Commitment Statement, TROX's Supplier Code of Conduct. By making the right choices, based on business and people related compliance, we build trust with our people and stakeholders.

With that, we enable us to fulfill our purpose and promise to improve people's lives.

2. TROX Antidiscrimination Statement

At TROX, the Executive Board and the Human Rights Officer invented, designed and implemented TROX's global Antidiscrimination Policy as our promise and commitment to treat everyone equally with dignity and respect. Our aim with this policy is to build a solid foundation to protect our employees, our work environment and our culture. In addition, the policy is our foundation to actively define what we do not tolerate while fostering a work environment in accordance with our values. Our requirement to all our employees is to live by our policy and ensure they fully understand their obligations to respect our values, each other and to comply with this policy.

The policy itself contains definitions of discrimination and any form of harassment like sexual harassment and psychological harassment including bullying or mobbing. TROX requests from anyone to report any concern regarding discrimination and harassment inconsistent with our policy. Therefore, we implemented multiple channels to report possible policy breaches. Our Human Rights Officer is very explicit to address

our expectation towards managers and their obligation to report potential inconsistent behavior regarding TROX's Compliance Policy. Part of this policy is TROX's commitment to non-retaliation. Every employee can rest assure that reporting a concern in good faith or participating in an investigation will not lead to retaliation. The Compliance Policy applies to all employees and to all work-related settings, including both in the office and outside the office, such as during business trips and businessrelated social events, or any form of communication (such as but not limited to email, mail, phone). Finally, in case a behavior inconsistent with the policy occurs appropriate actions through consequence management will be taken by responsible TROX representatives, as part of the global investigation process.

3. Human Rights Officer

The Human Rights officer is responsible for the Antidiscrimination Policy, in a globally rolled out investigation process. The main tasks of the Human Rights Officer are to safeguard the Antidiscrimination policy, taking care of reported concerns by conducting investigations, identify any trends, identify directions and take appropriate action at an early stage, which is an instrument of prevention against discrimination and harassment. In this regard, our Human Rights officer also conduct awareness sessions globally to raise awareness about individual behavior in the context of discrimination and harassment.

In case of possible misbehavior, employees and managers should raise concerns, or potential breaches to:

- their manager,
- the local compliance manager
- the Chief Compliance Officer
- use the TROX TRUST CHANNEL
- send an Email to: compliance-helpdesk@troxgroup.com

An objective investigation will be conducted upon receipt of information, reported in good faith of behavior contrary to this commitment statement. If an investigation concludes prohibited conduct has occurred, appropriate action commensurate with the facts of the investigation will be taken.

TROX strictly prohibits retaliation against anyone who, in good faith, reports violations of this Commitment Statement or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith or otherwise abusive reports are prohibited.