

TROX HUMAN RIGHTS COMMITMENT STATEMENT

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TROX[®] TECHNIK
The art of handling air

Responsible	Human Rights Officer / Compliance
Classification	public

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1 INTRODUCTION

As a signatory of the UN Global Compact in 2022, TROX believes that companies have a responsibility to respect human rights in all their activities. In our role as a company, we strive for profitable growth. We have decided to follow the path of sustainable value creation. We want to make a positive contribution to the realisation of human rights and the well-being of people. We want to set an example for safe and responsible behaviour, live up to our social responsibility and be a reliable partner for everyone. TROX is aware of its responsibility to be part of the global community and wants to shape the future responsibly.

We furthermore recognize that as a global company across 29 countries all over the world, our technology can help to advance – or be used to impede – human rights. Respecting human rights is a core element of realizing our improve people's lives.

2 PURPOSE

The purpose of this Human Rights Commitment Statement is to ensure the respect of human rights at the TROX GROUP and across our value chain.

3 SCOPE

The Human Rights Commitment Statement has a global scope and therefore applies to TROX operations worldwide. We also expect our business partners (e.g. suppliers, partners, customers) to respect human rights.

4 COMMITMENT STATEMENT CONTENT

4.1 TROX commitment to human rights and fair labor standards

- We respect and support the values of the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work by integrating human rights considerations into our standard business practices.
- We welcome and support the UN Guiding Principles on Business and Human Rights to Implement the United Nations “Protect, Respect and Remedy” Framework and seek to continuously embed them in our policies and processes.
- We respect government policies in the countries where we operate and sell. We will abide by our own policies or local law, whichever sets higher standards. If the implementation of these international standards is restricted by local law, we will develop innovative approaches to adhere in our actions to the principles proclaimed in the international standards.

- Respecting human rights is a baseline expectation of our stakeholders. We also seek to actively contribute to advancing human rights, for example, through our commitment to the UN Sustainable Development Goals and the UN Standards of Conduct for Business on Tackling Discrimination against LGBTI People as well as through corporate social responsibility initiatives or partnerships.
- We also expect our business partners to share our commitment to human rights.

4.2 Governance, Due Diligence and Remediation

- Our Human Rights Officer oversees the Human Rights Commitment Statement while our sustainability department has the responsibility to ensure its overall fulfillment. The team works with colleagues from various board areas to manage an integrated approach.
- Recognizing the UN Guiding Principles, we have implemented a human rights due diligence process in order to identify, prevent and mitigate salient human rights risks. In this process, we are closely engaged with (potentially affected) stakeholders within and outside of the company.
- TROX regularly reviews and updates its efforts and communicates the results of the due diligence process and the labor audits in its annual integrated report.

4.3 Human rights of our employees

As an innovation driven business, TROX depends on hiring the most talented employees in the industry. We are committed to respecting our employees' fundamental rights at work.

1. We do not accept forced, bonded, or involuntary prison labor. In TROX's recruiting and hiring processes we ensure that employees are entering their working contracts with TROX voluntarily, that they are not required to lodge deposits, identity papers, or any other documents that might limit the worker's legal status/ compliance, their freedom to travel or the ability to leave their job temporarily or permanently upon commencing employment with TROX.
2. We prohibit discrimination and harassment based on personal factors including but not limited to culture, race, ethnicity, age, gender, sexual orientation, gender identity or expression, and physical or mental disability by the implementation of a Global Anti-Discrimination Policy. Employees are encouraged to promptly report any concern of behavior contrary to our Policy. Retaliation for reporting or participating in an investigation of the same is strictly prohibited.
3. We respect the rights of our employees to organize and to be represented by trade unions and other bona fide representatives of employees in accordance with local laws, and we engage in a constructive dialogue with employee representatives.

4. We comply with local minimum age laws and requirements and do not employ child labor. We ensure this via our HR recruiting and hiring processes and governance.
5. We ensure that our workers are compensated with wages and benefits that meet or exceed the legally required minimum. Laws relating to pay, employment benefits, hours of work, time off, leaves of absence and other terms and conditions of employment vary from country to country. We are expected to comply with all applicable employment-related laws. This is ensured via TROX HR processes and governance.
6. We prohibit any form of physical and verbal abuse, harassment, or the threat of either in the workplace, as defined in our Global Anti-Discrimination Policy. This means that
 - a. All employees and managers are expected to treat everyone with dignity and respect.
 - b. Employees and managers are expected not to bully, threaten, intimidate or harm another person or their property through either verbal behavior (written or oral) or non-verbal behavior (such as gestures, expressions, or physical contact).
7. We ensure our employees' right for recovery and leisure time in accordance with local labor laws as defined by local law and related ILO standards.
8. We provide a safe and health-promoting workplace for our employees in line with our Global Health & Safety Policy. This means that
 - a. All employees and managers are expected to perform their work in compliance with the health and safety laws, regulations, policies and procedures of their locations.
 - b. Managers shall ensure that their employees receive regular health and safety training.
 - c. Local senior management representatives need to ensure that systematic policies and procedures are established to prevent workplace hazards and risks at their source and to seek continual improvement.
9. We invest in education to maintain and improve our employees' long-term employability.

4.4 Human rights in our global activities

We expect all our business partners to respect human rights and to avoid complicity in human rights abuses.

1. The TROX Supplier Code of Conduct requires suppliers to uphold human and labor rights and to provide a safe and healthy work environment to workers. In case of severe breaches, the relationship with the partner shall be reviewed and/or terminated.
2. We encourage our customers to comply with the Ten (10) Principles of the UN Global Compact. We would like to encourage our customers to jointly with us embrace their ethical responsibilities and share our commitment to the UN Global Compact. We will use customer interactions to actively discuss mutual positions towards the UN Global Compact as well as potential next steps depending on our customers' approach to these general principles.
3. We engage with our stakeholders on the respect and support of human rights. We actively collaborate with stakeholders and listen to their views regarding human rights.

4.5 Human rights related to TROX products and services

TROX GROUP as component supplier and system partner for air conditioning, ventilation and safety technology, we are committed to respecting human rights throughout the lifecycle of our products and services from design through development to use. Artificial intelligence (AI) is transforming our economy and society. This trend is expected to accelerate in the coming years, bringing new opportunities and challenges for society and human rights and freedoms. The emergence of AI is also generating legitimate concerns. This includes ethics, commercial/business practices, data protection, societal impact of technology on the labor market and skills, liability, cybersecurity, economic modelling, and human rights and freedoms. TROX is committed to address these concerns.

1. We develop innovative solutions helping customers embed human rights into their business and supply chain strategies.
2. To support inclusion efforts worldwide, we follow the recommendations of the current versions of the Web Content Accessibility Guidelines.
 - We uphold internal standards for the protection of personal information and privacy rights as defined in the TROX Privacy Policy.
 - All employees are required to complete a mandatory training covering Information Security Fundamentals as part of the TROX Security Policy.

- In the context of a mandatory compliance baseline training for all employees, topics such as intellectual property, compliance, and principles of data protection privacy are covered, including how to identify and mitigate certain security risks.

4.6 Grievance Process: Reporting a Violation of Human Rights and Non-Retaliation

Employees and managers should raise any questions, concerns, or potential breaches to:

- their manager,
- the local compliance manager
- the Chief Compliance Officer
- use the TROX TRUST CHANNEL: [Whistleblowing 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.