

Policy statement of the ATLAS ELEKTRONIK GmbH on compliance with human rights and environmental due diligence requirements

We use gender-sensitive language in our publications.

To maintain a consistent reading flow, we refrain from using the gender colon and use neutral language wherever possible to address all genders.

Wherever we refer to the thyssenkrupp Group or thyssenkrupp, we mean thyssenkrupp AG and all its affiliated domestic and foreign group companies as defined in Arts. 15 ff. AktG (German Stock Corporation Act). As a rule these are all companies in which thyssenkrupp AG directly or indirectly holds the majority of voting rights. thyssenkrupp AG has published its own policy statement which applies to the entire thyssenkrupp Group.

Insofar as we refer only to ATLAS ELEKTRONIK, without reference to the company form or to "our" Group companies, we mean ATLAS ELEKTRONIK GmbH and all domestic and foreign companies affiliated with it. These are generally all companies in which ATLAS ELEKTRONIK GmbH directly or indirectly holds the majority of voting rights.

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thyssenkrupp

Preamble

thyssenkrupp and the ATLAS ELEKTRONIK GmbH are committed to the highest sustainability standards, which include good corporate governance and environmental and social responsibility. As an international industrial and technology group we source raw materials, goods and services worldwide.

For us, the focus is on people. This applies equally to everyone - both our own employees and our suppliers.

At thyssenkrupp we have created a Groupwide compass in our to guide our actions and behavior. Our fundamental values naturally included respect for human rights and basic environmental standards.

Our values such as personal responsibility, openness and transparency, as well as conduct that complies with the law and is ethically correct at all times, play an important role in this.

Our understanding of human rights and environmental due diligence at ATLAS ELEKTRONIK

As part of the thyssenkrupp Group, we comply with all applicable laws, regulations and standards in the countries in which we operate and expect our suppliers to do the same. Where national laws contain more comprehensive regulations than those applicable at thyssenkrupp and ATLAS ELEKTRONIK, national law takes precedence. We expect both our Group companies and executives, board and management members and other employees and our suppliers to comply with the principles of the United Nations Global Compact, the United Nations International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, and the core labor standards of the International Labor Organization (ILO). Our other human rights and environmental expectations¹ are also to be noted and observed by all our employees as well as our suppliers:

¹ thyssenkrupp has also set out human rights and environmental expectations in the Code of Conduct (CoC) and the Supplier Code of Conduct (SCoC).

- **Child labour:** Compliance with the prohibition and refraining from all forms of child labour;
- **Discrimination:** Ensuring a work environment free from discrimination on the basis of gender, colour, religion, nationality, political or other opinion, ethnic origin, disability, age, sexual orientation and identity or any other characteristic;
- **Forced labour:** rejection of any form of forced or compulsory labour, slavery or trafficking in human beings;
- **Freedom of association:** the right to form workers' representative bodies and to strike and bargain collectively;
- **Remuneration and working hours:** Compliance with applicable national legislation on working hours, remuneration, minimum income and social benefits or ILO international standards in the absence of national regulations;
- **External personnel:** Irrespective of the type of contract, the applicable national law is observed in the deployment of external personnel (e.g. security personnel) in contractual and labour relations. External personnel must be sensitized and monitored through appropriate measures, particularly with regard to human rights risks;
- **Occupational health and safety:** Establish and apply appropriate occupational health and safety management to best prevent accidents and work-related illnesses;
- **Protection of freedom of expression, personal rights and privacy;**
- **No harmful soil alteration, water pollution, air pollution, harmful noise emission or excessive water consumption** likely to have a significant adverse effect on protected rights and legal interests;
- **No unlawful appropriation of land, forests and waters**, the use of which secures the livelihood of people;
- **No violation of environmental obligations²** resulting from either the use, storage, transboundary movement or disposal of mercury (compounds), persistent organic substances or hazardous waste.

² Comply with the Stockholm Convention on Persistent Organic Pollutants, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and the Minamata Convention on Mercury.

Our approach to human rights and environmental due diligence

thyssenkrupp and ATLAS ELEKTRONIK have developed a Groupwide concept and corresponding organizational structure to create a sustainable culture for compliance with human rights and environmental due diligence obligations.

This is ensured by the interdisciplinary cooperation of various specialist departments, which are responsible for implementing due diligence in our Own Business Division³ or in our supply chain with further experts. This integrated approach is also reflected in the responsibilities of our Board of Management for human rights and environmental protection.

The Human Rights Envoy manages the implementation of the approach to human rights and environmental due diligence in the ATLAS ELEKTRONIK GmbH. HE reports directly to the management of the reporting entity the ATLAS ELEKTRONIK GmbH and continuously coordinates with the SCA Council Group.

This SCA⁴ Council Group steers the implementation of the concept for compliance with human rights and environmental due diligence obligations in the thyssenkrupp Group. This body meets regularly and as required. The SCA Council Group is coordinated by the SCA Officer Group, who acts as spokesperson for the SCA Council Group and reports directly to the Executive Board of the thyssenkrupp Group. The SCA Council Group includes various corporate functions and areas as well as representatives from the segments of the thyssenkrupp Group as members.

In addition, there is a regular group-wide exchange between the SCA Council Group and experts and managers from the segments.

The Group Function Legal & Compliance is responsible for the mandatory monitoring by law of risk management at thyssenkrupp AG. The Group General Counsel and Chief Compliance Officer has been appointed to perform these tasks.

³ The "Own Business Division" comprises all our activities in Germany and abroad that are undertaken for the manufacture and exploitation of products and the provision of services.

⁴ "German Act on Corporate Due Diligence in Supply Chains", in short: Supply Chain Act.

For ATLAS ELEKTRONIK, the Human Rights Envoy is responsible for the prescribed monitoring of risk management.

Our strategy: Working together for human rights and environmental protection

thyssenkrupp and the ATLAS ELEKTRONIK GmbH work continuously to analyze the human rights and environmental impacts of our business activities in order to minimize potential risks and prevent them from occurring. To this end thyssenkrupp has created a Groupwide concept for compliance with human rights and environmental due diligence obligations which is characterized by an integrated and interdisciplinary risk management system⁵ comprising risk analyses, processes for preventive and remedial action, the definition of responsibilities, the issuing of a policy statement, the maintenance of a complaints procedure, and documentation and reporting. This system is also used by ATLAS ELEKTRONIK to comply with human rights and environmental due diligence obligations.

The main components of the thyssenkrupp concept for compliance with human rights and environmental due diligence obligations are regulated, among other things, in⁶ :

- thyssenkrupp Code of Conduct (CoC);
- thyssenkrupp Supplier of Code of Conduct (SCoC);
- International Framework Agreement (IFA);
- thyssenkrupp standards and regulations for health and safety in the workplace;
- thyssenkrupp standards and regulations for the environment and energy.

We have implemented this risk management system as part of the thyssenkrupp Group. It consists of several elements, in particular:

1. A central risk analysis⁷ for the Own Business Area as well as for the supply chain, in which risks are assessed on the basis of Group-wide sustainability criteria relating to

⁵ When we speak of a risk management system, we are referring to the risk management system for compliance with human rights and environmental due diligence obligations.

⁶ All thyssenkrupp standards and regulations are anchored in internal guidelines and policies as well as other documents.

- human rights, occupational health and safety and environmental protection ("SCA risk areas"),
2. the operational implementation of measures designed to minimise or eliminate identified risks, and
 3. a barrier-free, publicly accessible complaints procedure for reporting possible misconduct.

SCA risk fields

– Human rights:

– Occupational health and safety:

– Environmental protection:

SCA individual risks

Child labour; Forced labour; Discrimination in the workplace; Freedom of association freedom of association; remuneration and working hours; landland theft; outsourced labour; contamination; discrimination; protection of discrimination; protection of freedom of expression, personal rights personal rights and privacy

particularly due to obviously inadequate safety standards, lack of appropriate protective measures. safety standards, lack of appropriate protective measures protective equipment, lack of measures to prevent fatigue, insufficient training fatigue, inadequate training of employees, and of employees

Use / storage / disposal of chemicals and waste; generation of emissions and consumption of energy and water consumption.

With our multi-level approach we have implemented uniform minimum standards as part of the thyssenkrupp Group which we can apply and expand at ATLAS ELEKTRONIK in a targeted way to minimize risk.

The Group companies are required to compile basic information on the structure of their own company, the procurement structure and their own supply chains and business relationships and to make successive efforts to increase transparency in the supply chain.

Our risk analysis is updated continuously and at least annually. Furthermore, we conduct a new risk analysis as required (e.g. in the event of a change in the risk situation). The same

applies to the risk management system, which we continuously develop and whose effectiveness is regularly reviewed.

In addition to managing and coordinating the monitoring of the relevant risks, the Human Rights Envoy of the ATLAS ELEKTRONIK GmbH regularly reports to management of the ATLAS ELEKTRONIK GmbH on the risk management system and the results of the risk analysis performed.

The priority risks identified by the completed risk analysis have been taken into account by the Human Rights Envoy and included in this policy statement.

In our Own Business: How we conduct ourselves at ATLAS ELEKTRONIK

Risk analysis in own business area

We include in our own business operations all our activities in Germany and abroad that are carried out for the manufacture and exploitation of products and the provision of services.

The basis of the risk analysis in the Own Business Area is the annual self-assessment ATLAS ELEKTRONIK on compliance with protected human rights and environmental rights and legal assets, the contents of which are specified uniformly by the SCA Council Group of thyssenkrupp AG and made available to the thyssenkrupp Group companies.

The first abstractly identified risks, which are then analyzed in concrete terms using criteria such as the type and scope of business activities, probability of occurrence, severity of the breach in terms of degree, number of people affected and irreversibility, scope for influence or the company's contribution to causing individual risks or risk areas.

These results are evaluated and reviewed as part of the risk analysis and summarized in a risk score. In addition to the risks identified in the self-assessment, other data sources (e.g. from prevention and remediation measures) can be taken into account in the risk identification.

The evaluation of the results as well as their aggregation and consolidation takes place centrally and is assessed by the SCA Council Group of thyssenkrupp AG the Human Rights Envoy. Identified risks are mitigated by the companies with measures. According to the results of the risk analysis in the Own Business Area, no risks have been identified that need to be prioritized.

thyssenkrupp has created long-established processes in the Group which address the threat to human rights and environmental rights and legal assets. For example

- an organization: for co-determination, the Sustainability Council, the International Committee on the IFA, and the OSH Council;
- Programs / processes: the International Framework Agreement, collective agreements, the GEEP program for the development and implementation of energy saving measures, certified management systems according to ISO 14001 and ISO 50001, we care day;
- Tools: Whistleblowing tools (for compliance, for the IFA) and other internal tools to prevent violations of protected rights and legal assets.

Preventive and remedial measures in own business area

As part of the thyssenkrupp Group we have implemented a large number of preventive measures in our Own Business Area to prevent or minimize human rights or environmental risks.

In addition to the implemented rules and Groupwide standards, various other measures are being implemented in the companies.

Insofar as a possible violation of human rights and environmental rights and legal interests is imminent or has occurred, the respective remediation process must be triggered. This is ensured by implementing the remedial action process within the reporting procedures established at ATLAS ELEKTRONIK.

If an imminent or actual violation of a human rights-related or environmental obligation is identified, our portfolio of measures includes ad-hoc measures to prevent or end the violation. This also includes informing and involving key departments, the responsible persons or bodies of the respective company, up to and including the Human Rights Envoy, as well as a root cause analysis and a final effectiveness review.

Together with our partners: Identifying and avoiding risks

Risk analysis of our suppliers

Based on the individual SCA risks, we subject our direct suppliers to a basic risk analysis and identify their risk potential in relation to our "SCA risk areas". In addition to a varying weighting of individual SCA risks, our ongoing risk analysis takes into account, among other things, external risk indices, the location and industry of the suppliers, the scope of business activity (purchasing volume), the type of goods supplied, but also Probability of occurrence, severity of the breach by degree, number of people affected and irreversibility, scope for influence and contribution of the Group company to individual risks or risk areas.

Based on the results of the risk analysis for specific suppliers, an SCA risk category is defined for each supplier. We use this SCA risk category as the basis for taking suitable preventive measures to mitigate the supplier's risk. Prioritization is based on the identified risk, our contribution to causation, the degree of our influence, and the characteristics of the respective business. Findings relating to indirect suppliers are incorporated into our risk analysis on an ad hoc basis.

Preventive and remedial measures at our suppliers' premises

Based on the SCA risk areas and individual risks of the risk analysis, thyssenkrupp has developed an appropriate catalog of measures. With the help of these measures we can mitigate the risk of potential violations of human rights and environmental rights and legal assets at our suppliers.

We understand appropriate measures here to also mean that the risks identified as part of the properly conducted risk analysis are recognizable and that reasonable measures are implemented accordingly.

Our prevention measures include, for example, recognizing the thyssenkrupp Supplier Code of Conduct and conducting supplier training.

We expect all our suppliers to take note of the thyssenkrupp Supplier Code of Conduct and to meet the expectations stated therein. For suppliers where we have identified an increased risk potential, we expect them to contractually agree to meet our human rights and environmental expectations and agree on individual preventive or remedial measures, such as supplier audits.

In the event of known violations of a human rights or environmental obligation at a direct or indirect supplier, ATLAS ELEKTRONIK shall immediately initiate appropriate measures⁸ with the aim of ending these violations.

A particularly serious violation at a supplier can lead to a temporary suspension up to the immediate termination of the business relationship.

⁸ This may include a coordinated approach with the support of trade associations and industry initiatives to maximise influence on the supplier.

Our responsibility to implement this policy statement

Commitment and compliance

This policy statement applies to all Group companies as well as all executives, management members and all other employees of the entire ATLAS ELEKTRONIK. We actively promote the communication of the policies and agreements underlying our Policy Statement.

This policy statement is reviewed for validity by the Human Rights Envoy of the ATLAS ELEKTRONIK GmbH at least once a year as well as on an ad hoc basis and updated as necessary, e.g. on the basis of the annual risk analysis, and approved by the management of the ATLAS ELEKTRONIK GmbH.

This policy statement is communicated to our employees and relevant stakeholders on the intranet and through other channels, as well as to external parties via our corporate website. To raise awareness of human rights and environmental expectations, we offer training courses for employees. The training is based on the thyssenkrupp Code of Conduct and the thyssenkrupp Supplier Code of Conduct as well as this policy statement. In addition we offer specific training for our purchasing community and employees from other relevant areas.

Reporting of possible misconduct

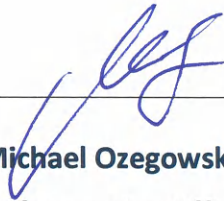
In order to counteract violations of laws and internal Group regulations or possible infringements of human rights and environmental rights and legal interests at an early stage and reduce damage to our employees and business partners, thyssenkrupp has established a complaints procedure for all Group companies. This procedure ensures that any relevant information reported by employees of the ATLAS ELEKTRONIK and external parties, such as our direct and indirect suppliers or their employees, can be received and processed.

If desired, the complaints procedure allows complaints to be submitted anonymously, without barriers and worldwide. Each whistleblower receives an acknowledgement of receipt, provided that all the necessary information has been provided. The process ensures that the identity of the whistleblower is protected. In addition, the whistleblower is protected from disadvantages and penalties as a result of submitting a complaint.


Complaints are received centrally⁹ via various reporting channels, which can be accessed via <https://www.thyssenkrupp.com/en/complaint-procedure> .

Documentation and reporting

We report annually on the fulfilment of our human rights and environmental due diligence obligations in relation to the past financial year to the competent authority and on our website¹⁰ . In addition, we document the fulfilment of our due diligence obligations on an ongoing basis within ATLAS ELEKTRONIK. The documentation of the processes described in this policy statement is kept in accordance with legal requirements.



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⁹ The persons entrusted with the management of the whistleblower system offer a guarantee of impartiality, are independent, are not bound by instructions and are sworn to secrecy.

¹⁰ Here we also report on our broader activities in the area of human rights and environmental due diligence, as well as integrated as part of our Group-wide sustainability agenda in the Annual Report.