

Human Rights Policy

1. Respect at Work

SGL Carbon respects Human Rights and aims to prevent any misconduct against our principles, as set forth in our SGL Carbon Code of Conduct as well as in this Policy. SGL Carbon maintains a workplace that is free from violence or any kind of harassment and provides a safe and healthy working environment to comply with the respective laws in place at any time.

SGL Carbon supports open and honest communication among its employees. SGL Carbon respects and abides by labor and employment laws within each country of operation.

2. Diversity at Work

SGL Carbon is a multicultural company, operating in many countries worldwide with employees from over 50 different countries. SGL Carbon provides a workplace that is free of discrimination or any kind of harassment or hostile work environment. SGL Carbon respects ethnic minorities as well as people from different nationalities, genders and of different ages, cultures, no matter from which race, sexual orientation, belief, ethnic background or religion.

3. Employment Conditions

SGL Carbon stands for reliability, fairness and appreciation. SGL Carbon is an equitable employer, offering all employees an attractive compensation scheme. Performance-based pay, attractive employee benefits and participation in the company's success are key company benefits. SGL Carbon also respects country specific minimum wages. SGL Carbon strictly prohibits any kind of child labor and rejects any forms of compulsory labor.

SGL Carbon respects the right of each employee to join or collectively bargain or form a labor union, with which the company will collaborate constructively.

4. Grievance Procedure

Any forms of complaints concerning potential violations against this Policy should be immediately reported. They can be addressed to either

- the direct supervisor,
- the local Human Resources Manager,
- the local works council,
- any officer or Director of the company,
- the Local Compliance Representative or
- by email at confidential-humanrights@sglcarbon.com

so that an investigation can be initiated and appropriate action can be taken.

SGL Carbon is committed to protecting the confidentiality of the data revealed through reporting of any such complaints as well as the identity of the reporting employee.

While the majority of cases might be solved locally, some cases might need to be brought to the attention of Group HR/Group Compliance. In any case, no retaliation against the employee who reports any misconduct in good faith is permitted.

Group HR and Group Compliance determine whether the complaint needs to be treated as a compliance violation and which further steps need to be initiated.

5. Special Terms, Definitions and Abbreviations

All references within this document apply equally to both male and female employees.

Abbreviations:

JV – Joint Venture

LCR – Local Compliance Representative

CoC- Code of Conduct