

## Human Rights Commitment Statement of NORMA Group

incl. "Slavery and Human Trafficking Statement" (UK Modern Slavery Act 2015) - FY 2022



NORMA Group is an international market leader in the area of advanced and standardized joining technology and fluid handling systems headquartered in Maintal, Germany. With its 27 production sites and numerous sales offices, NORMA Group has a global network through which it supplies customers in more than 100 countries with a supply base of approximately 8,000 suppliers for direct and indirect materials.

## COMMITMENT TO HUMAN RIGHTS

As we are aware of the associated responsibilities to our global business activities, these are built on the commitment to conduct business in an ethically and socially responsible way. NORMA Group categorically rejects and does not accept any form of violation of human rights as defined in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

NORMA Group fully supports the provisions set out in the "The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015". We are not only committed to preventing slavery and human trafficking in our own corporate activities but also require all our business partners to not undertake any violation of an individual's human rights. If we become aware of any violations, we will re-evaluate the business relationship, considering a contract termination in alignment with customer requirements.

NORMA Group has published various policies in order to provide proper guidance to our employees and business partners. One of these is NORMA Group's <u>Code of Conduct</u> that clarifies the expectations towards employees and includes commitments to human rights in general and to reject forced, compulsory and child labor in specific. Our employees are trained on the basic compliance rules, paying particular attention to NORMA Group's Code of Conduct. Dedicated training on the requirements concerning purchasing activities is obligatory for selected, relevant employees.

With a clear focus on our suppliers, a globally applying <u>Supplier Code of Conduct</u> was introduced in 2015. It clearly states NORMA Group's expectations towards its suppliers' behavior. It requires, amongst other topics, to adhere to the following principles:

- Observance of and respect for human rights
- Exclusion of forced or compulsory labor
- Prohibition of child labor





It is a necessary requirement for our preferred suppliers to have signed our Supplier Code of Conduct. This consideration of human and employee rights as part of our contractual arrangements will help to ensure that all parties act responsibly throughout the entire supply chain.

NORMA Group commits to actively communicate its policies towards its employees and external stakeholders.

Supplier Code of Conduct >

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## DUE DILIGENCE AND MONITORING

NORMA Group's compliance and risk management systems are used to monitor risks and support compliance with relevant laws, regulations and internal requirements and to ensure that contractual obligations are adhered to by our business partners. NORMA Group continuously performs risk analysis, also covering potential risks of human rights violations, in order to determine and monitor the risk profile of countries, subsidiaries and functions.

We are constantly reviewing the effectiveness of our efforts in preventing any violations with regard to our defined requirements. NORMA Group sites are subject to on-site inspections by NORMA Group's Internal Audit Department in order to verify the adherence to laws, regulations and internal requirements.

NORMA Group has implemented a group-wide Compliance organization with Local Compliance Delegates serving as direct contact persons at every operatively active NORMA Group entity. In addition, a whistleblower system is in place that is available worldwide and can be used – internally and externally – for reporting suspected illegal, unethical, or improper conduct.

NORMA Group also applies sustainability criteria to the selection as well as to the continuous monitoring of suppliers. A detailed supplier evaluation process is used by our production plants each year. It measures the performance of the most important production material suppliers, monitors their development, and ensures that new business is awarded on a solid, transparent and reliable basis.

Regarding the usage of "3TG raw materials" (tin, tantalum, tungsten and gold, which bear the risk of being sourced in the Democratic Republic of Congo under severe human rights violations), NORMA Group aims to exclude these minerals from its supply chains as far as possible and create maximum transparency within the supplier base using tools developed by the Responsible Minerals Initiative.

In 2022, we had no evidence of cases indicating that NORMA Group or any of our suppliers has been involved in human rights abuses.

This statement is made pursuant of section 54 of "The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015". It constitutes NORMA Group's "Slavery and Human Trafficking Statement" for the financial year ending December 31, 2022. It has been approved by the Management Board of NORMA Group SE and will be reviewed and updated annually.

**Miguel Ángel López Borrego** Chairman of the Management Board CEO **Dr. Friedrich Klein** Member of the Management Board COO Annette Stieve Member of the Management Board CFO