

The Bodycote Group's Human Rights policy articulates our responsibility to respect and support all Human Rights in line with the UN Guiding Principles on Business and Human Rights. This policy is consistent with and derived from:

- The United Nations (UN) Universal Declaration of Human Rights
- The UN Global Compact's ten principles
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises

It is the Bodycote Group's policy that all operating companies:

- adhere to all legislation relating to employment rights and equal opportunities, with particular reference to non-discrimination on the basis of ethnic origin, religion, gender, age, nationality, marital status, disability or sexual orientation;
- ensure that physical, verbal and psychological abuse, or sexual or other forms of harassment towards employees is not tolerated;
- ensure that disabled persons are, without discrimination, recruited, trained and promoted on the basis of aptitude and ability. If employees become disabled, every effort must be made to retain them and when necessary re-train them for appropriate posts;
- pay wages and benefits which meet or exceed national minimum requirements, we will meet or exceed national living wage requirements, and adhere to working time regulations where applicable;
- shall not use forced labour nor employ workers under the school-leaving age of the country of employment;
- shall identify access to water as a fundamental Human Right across our Group;
- provide a safe and secure workplace and promote good health and safety and environmental practices;
- uphold freedom of association and the effective recognition of the right to collective bargaining;
- will seek to ensure that our engagement with public and private security providers follows international standards (the Voluntary Principles on Security and Human Rights), balancing the safety of our employees and human rights, whenever Bodycote uses armed security to protect its worldwide factories or offices;
- respect the human rights of, and to develop an understanding of, the cultures, customs and values that prevail in the local communities in which we work by developing an inclusive and open dialogue with any people affected by our operations; this includes a guarantee of free, prior and informed consent (FPIC) of indigenous peoples.

This policy will be supported by training as part of the worldwide compliance and code of conduct training.

The Bodycote Group Chief Executive has overall responsibility for the implementation and monitoring of this policy.

Bodycote wishes to foster an environment where there can be a full and free discussion of issues that concern our employees. Consequently, employees are encouraged to discuss with management any concerns about behaviours or decisions that conflict with the letter or spirit of this policy. We welcome this feedback and dialogue. If an employee has concerns about any non-compliance with this policy or other ethical issues in the Company's business, they can be raised in confidence with their local management, local human resources, any member of management or by using the confidential and independently hosted worldwide Open Door line (whistleblowing) service – where, with the express permission of the caller or email correspondent, the service provider will report any matter raised to Chief Human Resources Officer.

We also communicate our policy on human rights on our website and when engaging or contracting with suppliers or vendors and work with our subcontractors and suppliers to promote the achievement of these principles.

If you have any further questions, please contact the Chief Human Resources Officer at +49 211 732780.