

SONION HUMAN RIGHTS POLICY

1 Scope and Background

This Policy formalizes and specifies the commitment of Sonion to support and respect human rights for all people as stated in the Sonion Code of Conduct, including acting in compliance with laws on freedom of association, as well as laws prohibiting forced, compulsory and child labor, human trafficking, and discrimination.

With this Policy, Sonion particularly confirms our commitment to providing our employees with a work environment that is safe and conducive to good job performance, free from discriminatory practices and harassment.

This Policy applies to all individuals associated with Sonion, including but not limited to employees, directors, officers, agents, contractors, consultants, suppliers, and business partners worldwide. It extends to all business activities, operations, and relationships within and outside our organization. In Sonion, we will use our relationships with suppliers and business partners to encourage and promote the respect of human rights.

2 Our Commitment

We are committed to meeting our responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights. That means we recognize our responsibility to respect all internationally recognized human rights across our activities and business relationships. Sonion has been a signatory to the UN Global Compact and its Ten Principles since May 2023.

Sonion will treat all employees and other individuals with respect and dignity and will:

- Comply with applicable laws and regulations relating to human rights and labor practices;
- Not use child labor as defined by the International Labour Organization (“ILO”) and United Nations (“UN”) Convention and national law, whichever is more stringent;
- Not use forced or bonded labor, regardless of its form, or involuntary prison labor and ensure compliance with laws and regulations related to the elimination of slavery and human trafficking;
- Ensure that imports are free from any goods mined, produced, or manufactured wholly or in part with forced labor throughout the supply chain and, in this regard, apply necessary due diligence, effective supply chain tracing, and supply chain management measures in line with the relevant laws and regulations including to those of the EU, and the UN;
- Respect the legal rights of employees to collective bargaining and freedom of association and to join or refrain from joining worker organizations, including trade unions;
- Ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist, follow the ILO standard;
- Ensure individuals are allowed and encouraged to take reasonable breaks and rest periods;
- Comply with all applicable laws, regulations, and industry standards concerning wages; and
- Ensure fair employee treatment and equality relating to gender, race, and religion.

3 Responsibilities

Board and Management:

The Board of Directors has the overall responsibility for ensuring that this Policy complies with Sonion's legal and ethical responsibilities and obligations. The senior management team and managers at all levels must lead by example, setting the tone from the top and establishing a culture of integrity and respect for human rights throughout the organization. All managers are responsible for implementing this Policy and must actively support our commitment to upholding and respecting human rights.

Employees:

All Sonion employees must familiarize themselves with this Policy, exercise respect for human rights in daily decisions and actions and complete all mandatory compliance training. Sonion employees must raise concerns and actively report any suspected or actual breaches of this Policy through the relevant channels.

Third Parties:

Sonion expects all agents, contractors, suppliers, consultants, and business partners to support and respect the human rights standards outlined in this Policy. Sonion will, where appropriate, conduct due diligence on third parties before entering into any business relationship.

4 Breach of this Policy

Breach of this Policy will result in appropriate disciplinary action, which may include termination of employment or business relationships. In addition to internal consequences, individuals may be subject to civil or criminal penalties as prescribed by applicable laws.

5 Reporting of Breaches

Any suspected or actual breaches of this Policy must be reported immediately through your Local Managing Director or the Head of Compliance/General Counsel.

If you are not comfortable with this, or in case you have already taken action as described above, and you believe that the issue has not been handled correctly, you may report the issue to the Sonion Whistleblower Line in accordance with the Sonion Whistleblower Policy. You can access the Sonion Whistleblower Line here: <https://report.whistleb.com/en/sonion>

Any reported incidents will be promptly investigated, and appropriate actions will be taken, including implementing corrective measures and disciplinary actions. In Sonion, we will not tolerate harassment, vengeful actions, or other types of sanctions against any person who, in good faith, files a report or who assists Sonion in connection with the processing and investigation of a case. There will be no acts of retaliation taken against any employee who reports, in good faith, a violation or who assists Sonion with the investigation of a case.

6 Information

If you have any questions with respect to this Policy, contact the Head of Compliance/General Counsel.

If you are contacted by the authorities, please immediately contact the Local Managing Director or the Head of Compliance/General Counsel.

7 Policy Review

This Human Rights Policy will undergo regular reviews to ensure it meets our responsibility to respect human rights. Updates will be made as necessary to align with changes in laws, regulations, or industry best practices. The most recent version of this Policy will always apply.