



Policy on Human Rights

(Status: November 2021)

We believe our long-term business success will only be achieved if human rights are acknowledged, respected, and protected. Our Human Rights Policy Statement sets out the fundamental principles embedded in our business operations, values and culture to ensure Orion does not engage in activities that directly or indirectly violate human rights. It is our responsibility to uphold these principles throughout the entire company. Additionally, we expect all stakeholders, including business partners, vendors and suppliers, be aligned in upholding human rights globally.

We respect and support international standards aimed at protecting and promoting human rights, as described in:

- The United Nations Guiding Principles on Business and Human Rights;
- The United Nations Universal Declaration of Human Rights;
- The International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights; and
- OECD Guidelines for Multinational Enterprises.

Where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

Orion's Human Rights Policy Statement demonstrates our commitment to support and promote human rights that benefit all our stakeholders, including our customers, employees, shareholders, investors, and the communities in which we live and operate. We ascribe to the following principles respecting human rights:

Ethical Business Conduct - As detailed in our Code of Conduct, we are committed to the highest standards of business ethics which govern the conduct of our business operations for all employees. We require all business on behalf of Orion to be conducted with honesty and integrity in full compliance with all applicable laws and regulations.

Protection of the Rights of Workers - We believe all employees deserve to be treated with integrity and respect. Therefore, we promote a work environment of transparency and trust. We compensate our employees competitively and operate in compliance with applicable wage, work hours, overtime and benefits laws and international labor standards.



Diversity and Inclusion - We support and encourage diversity and inclusion within our business and the organizations with which we do business by maintaining workplaces that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. We are committed to the protection of women's rights. We're committed to providing equal opportunities for all employees, eliminating all discriminatory practices and promoting a work environment that is free from harassment, violence and intimidation.

Safe and Healthy Workplace - Our policy is to provide and maintain a safe, healthy and productive workplace for all our employees that complies with all applicable laws, regulations and internal policies.

Forced Labor and Human Trafficking - We're committed to preventing and prohibiting forced labor of any kind, including all forms of modern-day slavery or human trafficking.

Child Labor We do not engage in or condone the unlawful employment or exploitation of children.

Freedom of Association and Collective Bargaining - We respect the principles of freedom of association and collective bargaining. We are aligned with the International Labor Organization and its core conventions.

All employees, business partners, customers and other stakeholders should report any violations under the Human Rights Policy Statement or any applicable laws to the "Whistleblower Portal" of Orion – details of which can be found at [Orion Engineered Carbons | Support us \(orioncarbons.com\)](https://www.orioncarbons.com). Confidentiality is guaranteed within the framework of the statutory provisions.
