

**DIRECTIVE**

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Summary	This directive is a statement of Sulzer's commitment to internationally recognized human rights
Area	Sustainability, Environment, Safety, Health
Approved by	Frederic Lalanne, CEO; Armand Sohet, Chief HR & Sustainability Officer
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## Human rights directive

### 1 Purpose

Sulzer is committed to the United Nations Guiding Principles on business and human rights. It supports the UN Universal Declaration of Human Rights, the UN Global Compact, the OECD guidelines for Multinational Enterprises and the International Labor Organization declaration on fundamental principles and rights at work.

As per Sulzer's sustainability directive, we respect human rights and design processes to identify, prevent and mitigate any adverse impacts throughout our value chain. This is part of pillar 3 "engage employees and communities" and pillar 4 "govern according to best practice" of Sulzer's sustainability strategy.

### 2 Addressees

All Sulzer legal entities, employees, and organizations under Sulzer management control worldwide.

### 3 Human rights impact management

With the objective of identifying and preventing any adverse impact, Sulzer acts by:

- Identifying areas of highest probability for impact (e.g.: geographies, sectors, spent) using recognized sources,
- Performing a due diligence process covering its business partners that includes sustainability topics namely the salient issues.

The core elements to prevent Sulzer salient issues to occur are:

- workers' minimum age,
- work contracts,
- overtime,
- rest time,
- no seizure of identification documents (i.e.: passport, ID cards...),
- management of high-risk activities (safety wise),
- exposure to highly hazardous chemicals.

The due diligence process is described in detail in the Due Diligence Supply Chain (ESG) directive 2022.000095.

In case of national regulations differing from the above internationally recognized standards, Sulzer seeks to implement the highest ones,

- Regularly monitoring its own practices at a legal entity level, either via third party assessments or internal audits,
- Developing in-house skills namely by training the most exposed functions (e.g.: sales, procurement, legal, human resources, internal audit, ESH) and developing an internal network of human rights ambassadors,
- Regularly communicating on human rights to drive the ownership, awareness, and transparency.
- Complying with applicable laws and regulations.

Human rights are included into the Sulzer sustainability management system and part of the continuous improvement process reviewed by the Executive Committee. The company regularly assesses and reviews its performance to improve its processes and culture over time. Sulzer publicly reports its performance on a regular basis in compliance with recognized standards and regulations.

#### **4 Human rights salient issues**

At Sulzer, our company human rights salient issues are:

- Child labor:
  - Rights of protection for the child,
  - Right to education,
- Forced labor:
  - Right not to be subjected to slavery, servitude or forced labor,
  - Right to freedom of movement,
- Health & safety:
  - Right to life,
  - Right to enjoy just and favorable conditions of work,
  - Right to health.

Sulzer identifies the salient issues using a methodology compliant with the UN Global Compact requirements. The process uses a multidisciplinary approach and is based on scale, scope and irremediability complemented by our own experience. It is regularly reviewed and updated.

#### **5 Grievance mechanism**

Sulzer grievance mechanism is mainly made of the existing grievance processes at legal entity level and the group-wide compliance hotline, which reports are managed according to the applicable Sulzer directives. Other sources may be triggered such as: industry association, NGOs, third party complaint procedures.

The main objective of the grievance mechanism is to address problems as early as possible, prevent escalation, detect patterns over time and improve.

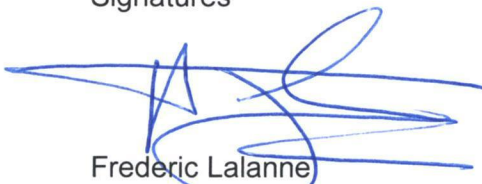
In case an adverse impact is either identified or reported, Sulzer remedy mechanism is about:

- Investigating the case while respecting confidentiality and protecting the harmed people, as per the applicable Sulzer directives,
- If confirmed, take the necessary actions to remedy and improve in close cooperation with all stakeholders.

## 6 Effective Date

September 01, 2022

Signatures



Frederic Lalanne  
Chief Executive Officer



Armand Sohet  
Chief HR & Sustainability Officer

## 7 Other related documents

None