

# Joint statement of the RHI Magnesita Group<sup>1</sup> in accordance with the UK Modern Slavery Act and the California Transparency in Supply Chains Act

This statement was made on a consolidated basis for the RHI Magnesita Group pursuant to section 54 of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act of 2010. It was approved by the Board of Directors of RHI Magnesita N.V. in its meeting on 27<sup>th</sup> February 2024.

RHI Magnesita rejects and does not tolerate any form of slavery and human trafficking in any part of its business and expects compliance with these standards from its suppliers and contractors. The present statement provides an overview of the measures taken, including during the financial year ended 31 December 2023, to ensure that slavery and human trafficking do not occur in the Group or in the supply chain. In 2023, RHI Magnesita appointed a Human Rights Officer to oversee the human rights due diligence processes within the Group. In the coming years, we will continue to further develop our actions in line with the regulatory developments.

### RHI Magnesita's structure and business

RHI Magnesita is the leading global supplier of high-grade refractory products, systems and solutions which are critical for high-temperature processes exceeding 1,200°C in a wide range of industries, including steel, cement, non-ferrous metals and glass. With a vertically integrated value chain, from raw materials to refractory products and full performance-based solutions, RHI Magnesita serves customers around the world, with around 15,900 employees in 47 main production sites, 8 recycling sites and more than 70 sales offices. RHI Magnesita intends to leverage its leadership in terms of revenue, scale, product portfolio and diversified geographic presence to target strategically those countries and regions benefitting from more dynamic economic growth prospects.

The Group maintains a premium listing on the Official List of the London Stock Exchange and is a constituent of the FTSE 250 index, with a secondary listing on the prime segment of the Vienna Stock Exchange (Wiener Börse). The ultimate parent undertaking of the Group is RHI Magnesita N.V., a public company with limited liability, incorporated and registered under the laws of the Netherlands. The administrative seat is located in Vienna, Austria. In the previous 18 months, RHI Magnesita successfully acquired nine refractory companies in Europe, Türkiye, India, and China. The Group consists of more than 90 fully consolidated subsidiaries, six of them having their registered office in the United Kingdom.

RHI Magnesita generally concludes permanent contracts with its employees. Temporary workers are mainly hired to cover order peaks in production, while seasonal workers are only employed at the Turkish raw material and production site in Eskisehir. In India, workers in production are also employed via third-party contractors, which is common practice in this geographical area.

For more information on RHI Magnesita's structure, business and supply chain please see the <a href="mailto:company">company</a> website and the Annual Report 2023, which contains full details on our revenue and our staff base.

<sup>&</sup>lt;sup>1</sup> RHI Magnesita Group: RHI Magnesita N.V., its subsidiaries, associates and joint ventures. In the present statement also referred to as RHI Magnesita or the Group.



#### Policies<sup>2</sup>

We are committed to international standards and as participants in the UN Global Compact we pledged to integrate its principles in the areas of human and labour rights into our business strategy and operations. In our Code of Conduct we clearly commit ourselves to compliance with human and civil rights as well as applicable labour and social laws. Furthermore, we attach top priority to dealing respectfully with all people and demand respectful treatment, equal opportunities and fairness from our employees and business partners. The updated Code of Conduct was rolled out globally in 2023, supported by a refreshed e-learning on business ethics. It is valid throughout the whole Group and binding for all employees regardless of their position or type of employment. Our Human Rights Policy reinforces non-tolerance towards any form of modern slavery and human trafficking in our business and supply chain.

The <u>Supplier Code of Conduct</u> requires suppliers to respect human rights and RHI Magnesita will not tolerate human trafficking or slavery in the facilities of its suppliers. There is a strong focus on our suppliers' adherence to the Supplier Code of Conduct. This is being reinforced as part of activities and initiatives driven under the umbrella of Sustainable Procurement.<sup>3</sup>

The Global Sustainable Procurement Guideline serves as a guidance for our procurement department. It describes the processes and measures within procurement related to sustainability, which include our supplier audit process, sustainability assessments and the escalation process in case of identified breaches within our supply chain.

### Verification

The above commitment confirmed by suppliers when signing our Supplier Code of Conduct can be checked by RHI Magnesita at any time through questionnaires, on-site visits, or audits.

## Audit

We conducted 42 on-site supplier audits in 2023 at selected sites. In addition to this, we further drive our business partner due diligence process and enhance our broader approach to sustainability in our supply chain by using a third-party tool. This entails increased levels of information exchange with our supplier base.

An internal audit focused on the supply chain management and warehouses was conducted in India in 2023. No concerns related to child labour, modern slavery or human trafficking were identified.

# Certification

Suppliers and service providers are required to respect the same legal and ethical standards that RHI Magnesita stands for. Via the Supplier Code of Conduct, as a means of self-certification, they commit themselves to respect human and civil rights, comply with applicable labour and social laws, refrain from any form of forced, compulsory or child labor and remunerate employees at or above applicable minimum wages. They also commit to communicating the RHI Magnesita principles to their own suppliers, subcontractors and service providers and to demand adherence to these principles.

<sup>&</sup>lt;sup>2</sup> Disclosures on internal accountability based on The California Transparency in Supply Chains Act are covered under the sections on Policies, Verification, Audit, Certification as well as Compliance Helpline.

<sup>&</sup>lt;sup>3</sup> Our policies are available in English under: https://www.rhimagnesita.com/our-sustainability/ethics-compliance-policies/. In addition, our Code of Conduct is available in several languages under: https://ir.rhimagnesita.com/corporate-governance-2/code-of-conduct/.



## Accountability

In case of non-compliance with the provisions of the Supplier Code of Conduct, a three-step escalation process is used, focusing on addressing the root causes by setting out corrective measures. RHI Magnesita will consider the suspension or termination of its business relations with the supplier if these measures are not met. In 2023, the internal escalation process resulted in the termination of the business relationship with one of our suppliers. The incident was identified in the supply chain of a legal entity from which RHIM did not directly purchase goods or services, however business relations were ended with the whole group.

## Training

An e-learning module on specific business ethics topics was introduced globally in 2020, also covering some aspects of human rights, and was refreshed in 2023. In addition, a dedicated training on the fundamentals of human rights was added to our training portfolio in the past year. A training module on ESG-related topics for our employees responsible for procurement was also rolled out and we are planning to develop this initiative further in 2024, including putting stronger focus on human rights.

In 2023 particular focus was given to the integration of acquired entities. Extensive work was conducted as part of the overall integration plans to understand the compliance culture of each new entity and work with them to harmonise their approaches. An emphasis was placed on delivering this through face-to-face interaction and discussion and taking time to share and jointly evolve Business Ethics approaches.

# Compliance Helpline

Should there be any suspicion that human rights have been violated, the Compliance Helpline, which is operated by a specialized external service provider, provides an appropriate reporting system. All compliance violations – therefore also suspicions regarding slavery and human trafficking – can be reported (also anonymously) both by employees and external parties in more than 50 languages via various communication channels. Indications of serious misbehaviour will typically be investigated by Internal Audit, Risk and Compliance, People and Culture and other appropriate departments in the organization. There were no reported complaints related to forced or compulsory labour or human trafficking in the year 2023.

Vienna, 27th of February 2024

Stefan Borgas

Chief ∉xecutive Officer

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Chief Financial Officer