



Seeing beyond

Thinking and acting sustainably

ZEISS Group Policy Statement

on Respecting and Promoting Human Rights
and Environmental Protection

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Foreword

"Seeing beyond" – this claim by ZEISS applies not only in scientific and technological terms, but also with regard to our opportunities to contribute to strengthening human rights and protecting the environment worldwide.

More than 125 years ago, the Statute of the Carl Zeiss Foundation established the commitment to responsible corporate governance in a visionary manner. Since then, the ZEISS foundation company has grown to become a leading global technology company. We are aware of the responsibility this entails and are committed to respecting human rights and promoting environmental and climate protection as an integral part of our business activities, both in our own business and in our supply chains.

We firmly believe that economic success and a wealth of innovation are inextricably linked with sustainable value creation and respect for human rights. This Policy Statement reflects this belief and complements the group-wide ZEISS Code of Conduct, which has been an integral part of our corporate culture since 2007.

This Policy Statement applies to all ZEISS Group companies and was adopted by the Executive Board of Carl Zeiss AG on 11 September 2023.

The ZEISS Executive Board



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Commitment to respect and promote human rights and environmental protection

As an internationally active company with global supply and value chains, ZEISS takes its responsibility to people and the environment seriously.

ZEISS is expressly committed to complying with applicable law and respects the United Nations Guiding Principles on Human Rights in Business and the rights set out in the International Bill of Human Rights. The core labor standards of the International Labor Organization (ILO) and environmental protection are also of particular importance to ZEISS.

ZEISS has derived the following basic principles from this:

Prohibition of child labor

ZEISS rejects any form of child labor. The company does not employ any children under the minimum employment age applicable in the respective country of employment. Furthermore, no persons are employed who are younger than 15 years of age and/or are still of compulsory school age according to local regulations, irrespective of whether employment of younger persons is permitted according to local regulations. We employ persons who have not reached the age of 18 (typically also apprentices, interns) exclusively in compliance with the legal requirements of the respective country of employment, in particular in observance of compulsory schooling, protection of minors, working hours and regulations on working conditions.

Prohibition of forced labor and all forms of slavery

Employees perform their work at ZEISS voluntarily. ZEISS does not tolerate any form of forced labor, slavery or similar practices, modern forms of slavery, human trafficking, servitude or other forms of domination or oppression in the workplace environment (typically through economic or sexual exploitation and humiliation).

Protection against discrimination

ZEISS stands for equal opportunities and equal treatment and promotes fair and unprejudiced cooperation. ZEISS does not tolerate discrimination or unequal treatment on the basis of characteristics such as national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology, unless this is justified by the requirements of the employment. This also includes not paying unequal pay for work of equal value.

Right to health and safety at work

Occupational safety and the physical integrity of employees are a top priority for ZEISS. ZEISS undertakes to comply with all applicable occupational health and safety laws, including regulations on working hours, rest breaks and recreational leave as well as safety precautions at the workplace.

Right to adequate remuneration

ZEISS is committed to paying an appropriate and fair wage. The remuneration of employees complies with local industry and labor market standards as well as any minimum wage regulations. In all other respects, remuneration is based on collective bargaining agreements, insofar as the prerequisites for this exist.

Freedom of association and right to collective bargaining

ZEISS respects the right of employees to freely form or join trade unions within the scope of the applicable legal regulations without experiencing or fearing threats, intimidation, discrimination or other disadvantages. Furthermore, ZEISS respects the right of trade unions to operate freely within the framework of the relevant legal regulations, in particular to conduct collective bargaining and to exercise the right to strike; this also applies mutatis mutandis to the activities of employee representatives.

Deployment of security forces

ZEISS does not tolerate any unlawful behavior by security forces. If security forces are deployed, they are appropriately trained and controlled and compliance with recognized human rights standards is contractually agreed.

Environmental protection and respect for natural resources

Environmental protection and respect for natural resources are of great importance to ZEISS. ZEISS relies on sustainable and efficient technologies in its production and acts with the greatest possible care so as not to damage the environment, in particular soil, water and air, nor to use natural resources in a way that endangers the livelihood and health of people. In doing so, ZEISS complies with all applicable environmental requirements and regulations, in particular the Basel, Minamata and Stockholm Conventions.



Expectations of employees and business partners

Our principles on human rights and environmental protection are reflected in the ZEISS Code of Conduct as well as in further topic-related corporate guidelines. Every employee is obligated to comply with these regulations and we expect our employees to align their professional actions accordingly.

We require our existing and future business partners to comply with the principles set out in this Policy Statement and to implement structures and processes in order to be able to take swift and effective action in the event of identified risks or violations.



Risk management

ZEISS has a risk management system in place. This defines uniform rules and processes for the early identification, assessment and management of risks for its own business area and the supply chain. Risk coordinators in the various business units support the management responsible in each case in implementing central requirements and guidelines.

The Group Executive Board has appointed a Human Rights Officer to monitor risk management with regard to human rights and environment-related risks. The Human Rights Officer is integrated in the compliance and reporting processes of ZEISS and maintains a close exchange with the business units. Management of the respective ZEISS business unit is responsible for identifying, managing and reporting human rights and environment-related risks.

At least once a year and on an ad hoc basis, the Human Rights Officer reports the results of the risk analysis, findings from the review of complaints received, and information on the effectiveness of remedial and preventive measures to the Executive Board.



Risk analysis

ZEISS performs an annual risk analysis and assessment both for its own business area and for its direct supplier companies. In addition, event-driven risk analyses are carried out in the event of substantiated knowledge and a changed risk situation, whereby indirect supplier companies are also considered.

ZEISS uses a staged process for this: To identify risks, external data sources, mainly country-specific indices, are first used to determine whether abstract human rights and environmental risks exist in the company's own business operations or at supplier companies. In a second step, information to which ZEISS has access on a tool basis or on a case-by-case basis is added as part of a concrete risk analysis, and the resulting results are subjected to an evaluative overall assessment. The identified risks are then prioritized on the basis of the legally prescribed criteria.

As a manufacturing technology company with international sites and a large number of suppliers, ZEISS has identified risks for occupational safety and health protection as well as environmental protection as priorities both in its own business area and in the supply chains and is placing an increased focus on these. ZEISS also sees a particular challenge with regard to transparency and traceability in the supply chain. The company is therefore continuously working on further improving and systematizing the data situation.

The results of the risk analysis as well as findings from the measures and complaint management will be considered as additional data points in future risk analyses.





Preventive measures

ZEISS undertakes appropriate preventive and remedial measures with the aim of avoiding, terminating or minimizing risks in its own business area or at supplier companies. In this context, ZEISS builds on long-established processes and structures from risk management in its own business area and supplier management in the purchasing areas.

All ZEISS employees are obligated to comply with the ZEISS Code of Conduct and the additional topic-related corporate guidelines. As part of ZEISS Compliance Management, mandatory training courses are held regularly at the ZEISS companies to raise employees' awareness of the contents of the Code of Conduct. Training courses specific to areas and topics are also offered. These provide the necessary knowledge for effective implementation of human rights and environmental due diligence processes.

Furthermore, binding instructions apply throughout the Group at ZEISS – these intended to ensure occupational health and safety for employees through standardized and audited processes, among other goals. A large number of Group companies maintain a certified management system – for example in accordance with ISO 14001 (environmental management system) or ISO 45001 (management systems for occupational safety and health) – and are audited on this basis by external organizations. Irrespective of certification, ZEISS pursues a risk-based approach in monitoring its units and sites and, as part of this, carries out internal audits and internal reviews.

As part of the procurement strategy, suppliers at ZEISS undergo a comprehensive clearance check before entering into a business relationship. This also includes and takes due account of criteria concerning human rights and environmental standards. The profile is then regularly updated and reviewed. Based on the identified and prioritized risks, supplier companies are informed and trained as appropriate. ZEISS reserves the right to carry out risk-based control measures such as on-site investigations (audits). Supplier companies are obligated – on the basis of contractual assurances – to comply with ZEISS' human rights and environmental requirements, to propagate the same along their own supply chain and to cooperate in the implementation of preventive and remedial measures.

ZEISS also requires its direct supplier companies to support due diligence and traceability throughout the supply chain for conflict minerals. In doing so, supplier companies conduct due diligence on their supply chains to determine whether products sold to ZEISS contain critical minerals and from which smelters they originate. This information serves as the basis for external reporting by ZEISS and is made available to interests groups on request in the form of the "Conflict Minerals Reporting Template" (CMRT) provided by the Responsible Minerals Initiative (RMI). In a risk-based approach, supplier companies are requested to provide ZEISS with up-to-date information, such as CMRTs, and to work towards excluding non-compliant smelters from their respective supply chains.

If ZEISS obtains substantiated knowledge of a possible violation of a human rights or environmental obligation at indirect supplier companies, the measures described above will also be taken with regard to indirect supplier companies within the scope of the company's own possibilities.



Remedial action

If ZEISS determines – for example through queries, reports, audits, inspections or complaints management, – that a violation of a human rights or environmental obligation has occurred or is imminent in its own business area or at a direct supplier company, ZEISS shall immediately undertake measures to prevent or end these violations or to minimize the extent of the violation. In the event of substantiated knowledge, ZEISS shall also undertake these measures within the scope of its legal possibilities at indirect supplier companies.

Depending on the severity of the violation, ZEISS reserves the right to react appropriately in connection with the business partners. In this context, the effort is to maintain the contractual relationship and improve the situation on site before terminating contractual relationships with the supplier companies



Grievance procedure

Both internal and external stakeholders have the opportunity to report open or anonymous information on possible compliance violations – such as human rights or environmental violations – via the information system "**ZEISS Integrity Line**", which is available in a number of languages. The "ZEISS Integrity Line" can be found on the ZEISS websites and on the ZEISS intranet including further information on the procedure for dealing with addressed compliance notices.

Incoming human rights and environment-related reports are reviewed by the Corporate Compliance department in compliance with confidentiality requirements and forwarded to the Human Rights Officer for further processing. Human rights and environment-related reports can also be sent directly to the Human Rights Officer by email at humanrights@zeiss.com. The Human Rights Officer is also not bound by instructions and is obliged to maintain confidentiality.



Effectiveness control

As part of regular effectiveness checks, ZEISS examines at least once a year and on an ad hoc basis whether the established risk management effectively prevents or counteracts human rights and environmental risks. In particular, we use findings from stakeholder surveys, ZEISS internal audits, supplier audits and risk analyses to validate the effectiveness of preventive and remedial measures taken. If it is determined in the course of these audits that existing processes have not adequately identified risks or that measures introduced have failed to have the desired effect, the Human Rights Officer shall initiate the necessary changes.

The effectiveness of the complaints process and the handling of reports of human rights violations is also regularly monitored. If there are indications of a need for improvement, appropriate measures will be initiated.



Documentation and reporting

The fulfillment of due diligence obligations is systematically documented. Moreover, a report on the status quo and progress of efforts to prevent human rights and environmental violations is published annually.

Further information on human rights and the environment at ZEISS can be found in the ZEISS Group Sustainability Report.



Contact information

If you have any questions about this Policy Statement or the complex of topics relating to human rights and the environment at ZEISS, you can contact the ZEISS Human Rights Officer by email via humanrights@zeiss.com.

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As a Group company that has independently fallen within the scope of application of the Supply Chain Sourcing Obligations Act since 1 January 2023, Carl Zeiss SMT GmbH is expressly committed to this Policy Statement.

Carl Zeiss SMT GmbH Management Board



Andreas Pecher



Torsten Reitze