



SCHOTT
glass made of ideas

Declaration of Principles on Human Rights

SCHOTT – A history of responsibility

Pioneering. Responsibly. Together.

These attributes characterize SCHOTT as a manufacturer of high-tech materials for special glass. Our company founders Otto Schott and Ernst Abbe thus became pioneers of an entire industry. A pioneering spirit and passion for constantly opening up new markets and applications and acting responsibly – this is what has driven SCHOTT for over 130 years. Our [SCHOTT Spirit](#) is our anchor and compass.

We can proudly claim: The principle of sustainability has been deeply anchored in SCHOTT's DNA since the time of our company's founders – long before sustainability concepts gained greater importance. Corresponding goals, principles and guidelines were already laid down in our corporate constitution, the [statute of the Carl Zeiss Foundation](#), in 1896.

Even at that time, our foundation model focused on sustainable values, special social rights for all employees and the promotion of scientific and social institutions.

Today, these principles remain at the heart of our trade and form a strong foundation for assuming responsibility for human rights at SCHOTT and along our value chains.

This Statement of Principles on Human Rights formalizes our efforts to act ethically and responsibly and complements our existing frameworks for fulfilling legal due diligence obligations.



1 Basics

“Compliance is a must, not an option” – this is the guiding principle for the compliance program at SCHOTT and shows that compliance with rules and laws is more than just a matter of course for us.

This applies even more to the fundamental rules of the Universal Declaration of Human Rights ([UDHR](#)) and the European Convention on Human Rights ([ECHR](#)).

Similarly, we are committed to complying with the International Labor Organization’s ([ILO](#)) Five Fundamental Principles and Rights at Work.

In the course of our business activities, we comply with the [OECD Guidelines](#) for Multinational Enterprises on Human Rights (IV. Human Rights) and expect a corresponding commitment also from our business partners.

We are joining the [UN Global Compact](#) and thus support its ten principles with the aim to making our contribution to a more inclusive and sustainable economy for the benefit of all people, communities and markets.

In addition, we support the United Nations’ 2030 Agenda for Sustainable Development and aim to contribute to the achievement of the Sustainable Development Goals ([SDGs](#)) through our actions.

In the context of our [strategy](#), we have placed an emphasis on four focus topics of the UN Sustainable Development Goals (SDGs), which are steered by a central sustainability body (ESG Board).

The focus is on the sustainable development goals with the greatest materiality for business operations and the greatest possible impact for a measurable contribution to overall sustainable development:



SDG 13:
Climate Action



SDG 12:
Responsible
Consumption & Production



SDG 3:
Good Health and Well-Being



SDG 5:
Gender Equality

These are complemented by robust corporate governance and a risk-oriented Compliance Management System.

While the issue of [climate neutrality](#) is a high priority for an energy-intensive company in the specialty glass industry, our responsibility for human rights and ethical business practices is omnipresent in all subject areas and finds its way directly into our regulations and publications:

- [SCHOTT Code of Conduct](#)
- [Supplier Code of Conduct](#)
- Anti-Corruption Guideline to combat corruption as an expression of abuse of power and oppression
- Data Protection regulations to safeguard the personal rights and privacy of SCHOTT employees and external persons by establishing uniform global standards
- Rules and regulations for the EHS Management System to ensure the safety of our employees as well as the environment

As a company, we take our responsibility for our employees around the world and our responsibility for employees along our value chains very seriously. We believe that respecting and protecting human rights is an important building block for the long-term economic viability of our company. Accordingly, this Declaration of Principles is authoritative for our global business operations. Where international human rights standards and national laws diverge, we are committed to working with our local partners to develop solutions and minimum standards in line with this declaration in order to further promote compliance with human rights standards.

2 Our approach to human rights



As part of our human rights strategy, we regularly assess the risk situation of our own business operations and our supply chain. A dedicated assessment of human rights risks takes place in group-wide risk management, which also covers the requirements of the German Supply Chain Due Diligence Act, among other things.

2.1 Human rights risks & risk analysis

A key component of our human rights strategy is regular risk analysis and raising awareness among all stakeholders of how to deal with human rights risks. We have defined a group-wide process for structured analysis:

At the beginning of each fiscal year, a regular screening of our sites and supplier portfolio takes place. This screening is based on risk scores from recognized institutions:

- [Transparency International Corruption Perception Index](#)
- [ITUC Global Rights Index](#)
- [Study by the German Federal Ministry of Labor and Social Affairs \(BMAS\) "Respect for Human Rights along Global Value Chains – Risks and Opportunities for Sectors of the German Economy"](#)
- [Fact Sheets of the FIRST for Sustainability Initiative of the World Bank](#)



Together with internally available data, a classification is made according to country, industry and volume risks with reference to human rights in the context of our business activities. The risk values of high-risk suppliers are further specified through specific supplier surveys. Finally, suppliers are assigned to a final risk category and appropriate measures are derived.

Our approach to dealing adequately with human rights risks is to prevent them and constructively improve existing abuses along our value chains. Accordingly, we encourage all employees and suppliers to report violations of human rights and environmental regulations. For this purpose, we provide a [whistleblower system \(SCHOTT Integrity Helpline\)](#), which is integrated into our Compliance Management System and the corresponding processes.

As a result of our risk analysis, the following human rights risks are currently the particular focus of our measures:

- **Prevention of child labor and modern slavery**

We observe the prohibition of child labor and reject all forms of child labor, forced labor, slavery and practices similar to slavery, human trafficking, as well as recruitment, placement or offering for illicit activities. Corresponding regulations have always characterized our Code of Conduct. With a view to our value chain, we now need to pursue this commitment even more actively as part of our Compliance Management System.

- **Inclusion and non-discrimination**

In addition, we at SCHOTT demand and encourage the establishment of interdisciplinary and intercultural teams. Diversity is at the heart of our [corporate culture](#) and is reflected in our teams. Different values and perspectives are just as important as nationality, gender and experience. In this culture, discrimination, insult and harassment have no place under any circumstances. We will continue to drive forward our efforts to date in this regard and continuously improve our prevention work.

2.2 Preventive measures

In the above-mentioned areas, we take special measures to identify and avert corresponding risks at an early stage, in the interests of human rights and beyond.

To avoid systematic misconduct and to manifest ethical behavior at SCHOTT, company-specific systems, processes and controls have been established by SCHOTT's Compliance Office as part of the Compliance Management System, which also have a preventive effect. In order to create an effective and sustainable understanding of applicable regulations, laws and internal rules, SCHOTT offers both traditional classroom training and online training. Our Integrity Helpline and the confidential transmission of information associated with it also enable us to act at an early stage in the best case and to be able to take further preventive measures to avoid violations or their far-reaching consequences. In addition, our internal rules and regulations are suitable for mitigating compliance risks. These rules are binding for all employees, have been rolled out adequately throughout the Group, and are continuously monitored for compliance.

This Compliance Management System already actively contributes to protecting human rights at SCHOTT through the implementation of the SCHOTT Code of Conduct. It is continuously being reviewed and extended to include the prevention of identified human rights risks. In addition to the aforementioned risk analysis, this means in particular the implementation of appropriate regulations and training for our employees as well as clear processes for identifying, remedying and punishing possible deviations.

This also includes a real-time evaluation of events and potential risk profiles along our value chains using intelligent tools and the expansion of our process landscape with a view to sustainable procurement.

As part of our EHS (Environment, Health & Safety) program, we also take preventive measures to protect our employees in terms of physical integrity and respect for fundamental rights. We strive to achieve high standards in accordance with ISO 45001 (occupational safety) and ISO 14001 (environmental protection), which are supplemented by internal minimum standards applicable worldwide. Our Zero Accidents program and our responsibility within the framework of our preventive health care program round off the preventive measures in our own business area.

2.3 Remedial measures

If we become aware of human rights violations in our own business area or along our supply chain as a result of our own measures and processes or via the whistleblower system, our Compliance Management System enables us to immediately initiate appropriate measures to investigate and clarify the relevant facts. In justified cases, we take corrective action and rely on partnership-based approaches to solutions together with our suppliers. In the event of willful and gross violations, we act decisively and adequately in terms of the protection of human rights and the obligations of this Statement of Principles.

Depending on the severity of the deviation, we have established clear escalation processes with adapted measures. In the spirit of trusting cooperation with our business partners, the priority is supplier development, i.e., supporting the supplier in appropriately addressing the relevant risks or violations. This includes discussions with all internal and external stakeholders as well as training on "best practice" approaches. In serious cases, however, we also reserve the right to impose contractual sanctions – up to and including the separation from business partners who repeatedly or particularly seriously endanger or violate our principles.



Anti-Corruption

Fighting corruption has always been successfully anchored as a core topic in SCHOTT's Compliance Management System. Corruption prevention is effectively and efficiently integrated into SCHOTT's business processes to both prevent systematic corrupt behavior and violations due to lack of better knowledge by our employees worldwide. In this respect, the handling of this core topic is the benchmark for the attention paid to a globally significant compliance topic at SCHOTT.

3 Governance & Structures

The Board of Management of SCHOTT AG as well as the management of the corporate functions and business units are responsible for the implementation of this Declaration of Principles. It is controlled by the group wide ESG & Sustainability Program and its decision-making body, the ESG Board. It consists of the members of the Board of Management of SCHOTT AG as well as responsible persons for the key sustainability issues.

Responsibility for content and operations has been transferred to the Compliance & Security corporate function, which is responsible for the Governance section of the ESG Board. A Human Rights Officer is appointed there to coordinate human rights issues centrally. This person is supported by a steering committee made up of the HR, Purchasing, EHS and ESG corporate functions.

Monitoring and reporting in relation to this Declaration of Principles is incorporated into the existing reporting formats of the Compliance Management System and is the subject of regular meetings of the ESG Board. We will also report on our due diligence obligations and corresponding measures as part of our reporting obligations at Group level.

This Declaration of Principles on Human Rights was adopted by the Board of Management of SCHOTT AG on December 21, 2022 and applies to SCHOTT employees worldwide together with the existing SCHOTT regulations.



Dr. Andrea Frenzel

Member of the
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since 2023

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Dr. Torsten Derr

Chairman of the
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Dr. Heinz Kaiser

Member of the
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