Policy Statement on the Human Rights Strategy of the Diehl Group

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1. Preamble/Preliminary Remark

The Executive Board of the Diehl Group is committed to respecting human rights and environmental obligations in accordance with the Supply Chain Due Diligence Act (LkSG). Diehl aims to identify, prevent, and minimize human rights and environmental risks within its own business operations and throughout the supply chain, and to address their impacts.

This Policy Statement applies to Diehl Stiftung & Co. KG and its affiliated companies.

The Executive Board bears overall responsibility for implementing and monitoring human rights and environmental due diligence obligations within the Diehl Group. The responsibilities and processes necessary to fulfill these obligations are embedded within the organization. This Policy Statement is reviewed at least annually and as circumstances require and is amended where necessary.

The Executive Board

2. Commitment to Human Rights and Environmental Obligations

Diehl and its governing bodies are committed to respecting human rights and complying with environmental protection requirements worldwide. In addition to the German Supply Chain Due Diligence Act (LkSG), the following frameworks, principles, and conventions are particularly relevant:

- the United Nations International Bill of Human Rights,
- the UN Guiding Principles on Business and Human Rights,
- the Declaration of the International Labour Organization (ILO),
- the OECD Guidelines for Multinational Enterprises,
- the Minamata Convention,
- the Stockholm Convention,
- the POPs Convention,
- the Basel Convention

In particular, Diehl does not tolerate child labor, forced labor, discrimination, violations of occupational health and safety or environmental regulations, or any other violations of the human rights and environmental obligations specified in Section 2 of the LkSG.

Diehl complies with applicable laws and regulatory requirements in the countries in which it operates.

Diehl expects its employees and business partners, particularly its suppliers, to comply with applicable human rights and environmental requirements and to ensure that these requirements are communicated and observed throughout the supply chain. These requirements are communicated primarily through the Code of Conduct for Employees and the Supplier Code of Conduct and, where appropriate, incorporated into contractual agreements.

3. Human Rights Organizations

Diehl maintains a Group-wide human rights organization. The Human Rights Committee serves as the human rights officer within the meaning of Section 4(3), sentence 1, of the LkSG. The Human Rights Committee comprises representatives from various functions, including, in particular, Legal, Compliance, and Internal Audit. The Executive Board receives a report on the work of the Human Rights Committee once a year. In this context, representatives of the Human Rights Committee report at least once a year on compliance with due diligence obligations, the results of risk analyses, and relevant incidents.

Additional functions reporting to the Human Rights Committee include the Human Rights Coordination function and local points of contact at the subsidiaries. The Human Rights Coordination function handles all legal matters related to the Supply Chain Due Diligence Act and supports the relevant departments. The local points of contact support the implementation of human rights and environmental due diligence obligations in the subsidiaries.

4. Risk Analysis

Diehl conducts risk analyses at least annually and on an ad hoc basis as necessary with respect to its own business operations and its direct suppliers. The purpose of these analyses is to identify, assess, and prioritize human rights and environmental risks.

The initial risk analysis of Diehl's own business operations and direct suppliers takes into account relevant country- and industry-specific risks.

In a second step, Diehl Group companies and direct suppliers identified as presenting a high risk undergo an in-depth, specific risk analysis. This may include obtaining additional information, for example through questionnaires.

The subsequent prioritization of identified risks is based on the principle of proportionality. These risks are assessed and taken into account when determining appropriate preventive and remedial measures.

Where there is substantiated knowledge of a potential violation of a human rights or environmental obligation, the relevant indirect suppliers are also included in the risk analysis.

5. Priority Human Rights and Environmental Risks

The risk analysis conducted for the 2025 financial year did not reveal any systematic or structural human rights or environmental risks within our own business operations or among direct suppliers.

6. Preventive Measures Within Our Own Business Operations

Diehl takes human rights and environmental risks into account in its business processes and continuously develops the necessary measures based on identified risks. The results of the risk analysis are taken into account when assessing relevant matters and making decisions. The policy statement on Diehl's human rights strategy is communicated internally and made publicly available.

Compliance with human rights and environmental requirements is supported by existing organizational structures, internal policies, and binding codes of conduct. This includes, in particular, the Code of Conduct applicable to all employees. In addition, depending on the area of activity and risk profile, further measures, such as existing compliance training, management systems, or specific guidelines, may be implemented.

7. Preventive Measures Regarding Direct Suppliers

Diehl takes human rights and environmental risks into account as part of its supplier management processes. To this end, direct suppliers are regularly assessed against defined risk criteria. The results of these assessments help identify potential risks at an early stage and determine whether additional information is required. Suppliers may contribute to a well-founded risk assessment by providing supplementary information, for example through a self-assessment questionnaire.

Cooperation with direct suppliers is based on the Diehl Supplier Code of Conduct or the acceptance of comparable standards. These standards set out Diehl's expectations regarding respect for human rights, compliance with environmental obligations, and responsible business conduct. Compliance with these requirements forms an integral part of the business relationship.

If elevated risks are identified in individual cases, Diehl assesses appropriate risk-based measures. These may include, in particular, obtaining additional information, agreeing on appropriate measures with the supplier, or taking relevant findings into account in the ongoing management of the business relationship.

Where necessary, suppliers receive ad hoc training or further instruction on their contractual obligations under the Supplier Code of Conduct. Such training or instruction may be provided at the supplier's premises.

As part of its monitoring measures, Diehl requires suppliers to submit certificates or audit reports during the bidding process and contractually reserves the right for Diehl or an independent service provider to conduct audits.

8. Remedial Measures (Handling of Violations)

If Diehl becomes aware of a violation of human rights or environmental obligations within its own business operations or at a direct supplier, the circumstances are investigated and appropriate measures are taken to prevent, end, or minimize the violation.

Within its own business operations, identified violations are addressed in accordance with applicable processes, and appropriate measures are taken to prevent similar violations from recurring.

If violations are identified at a direct supplier, Diehl first seeks to remedy the situation in cooperation with the business partner concerned. This may include, in particular, obtaining additional information, agreeing on appropriate remedial measures, or monitoring the implementation of agreed measures with the aim of ending or minimizing the violations and preventing similar violations from recurring.

If these measures do not result in sufficient improvement, or if the violation is particularly serious, Diehl reserves the right to take further appropriate action, up to and including suspension or termination of the business relationship.

9. Complaint Procedures

Diehl provides several channels for submitting complaints and reports.

To protect complainants and whistleblowers, complaints and reports may be submitted anonymously.

Under the headings "Compliance/Human Rights" or "Compliance/Organization & Reporting Channels," website visitors are redirected to the complaints and whistleblower portal (https://diehl.integrityline.com/setup).

Reports may be submitted through the complaints and whistleblower portal in the relevant local languages. In accordance with applicable data protection requirements under Chinese law, the Diehl Group maintains a separate whistleblower system for its own business operations and suppliers located in the People's Republic of China. An independent law firm that is not subject to instructions from the Diehl Group serves as ombudsman and can be contacted at compliance-diehl-china@roedl.cn. The law firm is bound by professional obligations to protect the anonymity of complainants and whistleblowers vis-à-vis the Diehl Group.

Complaints and reports may also be submitted to an independent attorney acting as an external ombudsman. The ombudsman's contact information is published on the website under the sections "Compliance/Human Rights" and "Compliance/Organization & Reporting Channels." The ombudsman is independent of the Diehl Group and is not subject to its instructions. When handling reports, the ombudsman is bound by professional obligations to protect the identity of complainants and whistleblowers.

Diehl ensures that whistleblowers and complainants are protected against discrimination, retaliation, and other adverse consequences resulting from a report. Reports are handled confidentially and in accordance with a transparent procedure.

The Rules of Procedure are available in German and English on www.diehl.com under the "Compliance & Human Rights" section.

10. Involvement of Indirect Business Partners

If Diehl obtains substantiated knowledge of human rights or environmental violations involving an indirect business partner through existing complaints channels, information provided by a direct business partner, or publicly available sources, the relevant indirect business partner is included in the risk analysis. Taking the applicable proportionality criteria into account, Diehl takes preventive and remedial measures with respect to

the indirect business partner on a case-by-case basis and in consultation with the direct business partner. In doing so, Diehl gives preference to industry-specific or cross-industry initiatives.

11. Compliance with Documentation Requirements

Diehl documents its fulfillment of human rights and environmental due diligence obligations in accordance with applicable legal requirements.

12. Regular Review

The effectiveness of the measures described above, in particular the preventive and remedial measures and the complaints procedure, is reviewed at least annually and on an ad hoc basis as necessary.

These effectiveness reviews are conducted by the Human Rights Coordination function, which reports the results to the Human Rights Committee and recommends any necessary changes. This enables the Human Rights Committee, in its role as Human Rights Officer, to fulfill its oversight responsibility for risk management.

The results of the annual and ad hoc reviews are also used to continuously improve the human rights strategy and risk management system.