

The Bodycote Group's Human Rights policy articulates our responsibility to respect and support all Human Rights in line with the UN Guiding Principles on Business and Human Rights. This policy is consistent with and derived from:

- The UN International Bill of Human Rights
- The UN Global Compact's ten principles
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises

It is the Bodycote Group's policy that all operating companies:

- adhere to all legislation relating to employment rights and equal opportunities, with particular reference to non-discrimination on the basis of ethnic origin, religion, gender, age, nationality, marital status, disability or sexual orientation;
- ensure that physical, verbal and psychological abuse, or sexual or other forms of harassment towards employees is not tolerated;
- ensure that disabled persons are, without discrimination, recruited, trained and promoted on the basis of aptitude and ability. If employees become disabled, every effort must be made to retain them and when necessary re-train them for appropriate posts;
- pay wages and benefits which meet or exceed national minimum requirements, and adhere to working time regulations where applicable;
- shall not use forced labour nor employ workers under the age of 15; The term child refers to any individual under the age of 15 or under legal minimum age, as defined by local law, whichever is higher. In case of employing young workers (15 years - 18 years), appropriate safeguards shall be implemented to prevent exposure to hazardous work and hazardous working conditions. In case of employing students or interns as part of educational trainings, legal minimum age criteria must be respected. All appropriate measures required for young workers or interns, especially related to nature of work, duration of work, compensation and maintenance of necessary records shall be strictly adhered;
- shall provide awareness training on child labour, forced labour and human trafficking;
- shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. We must also facilitate freedom of association and collective bargaining in situations where they may be restricted under law (e.g. works councils);
- shall identify access to water as a fundamental Human Right across our Group;
- provide a safe and secure workplace and promote good health and safety and environmental practices;

- shall conduct our business in an ethical manner and in a way that protects external stakeholders' human rights;
- will seek to ensure that our engagement with public and private security providers follows international standards (the Voluntary Principles on Security and Human Rights), balancing the safety of our employees and human rights, whenever Bodycote uses armed security to protect its worldwide factories or offices;
- respect the human rights of, and to develop an understanding of, the cultures, customs and values that prevail in the local communities in which we work by developing an inclusive and open dialogue with any people affected by our operations; this includes a guarantee of free, prior and informed consent (FPIC) of indigenous peoples.

The Bodycote plc Board has overall responsibility, and the Chief Human Resources Officer specific responsibility for the implementation and monitoring of this policy.

Bodycote wishes to foster an environment where there can be a full and free discussion of issues that concern our employees. Consequently, employees are encouraged to discuss with management any concerns about behaviours or decisions that conflict with the letter or spirit of this policy. We welcome this feedback and dialogue. If an employee has concerns about any non-compliance with this policy or other ethical issues in the Company's business, they can be raised in confidence with their local management, local human resources, any member of management or by using the confidential and independently hosted worldwide Open Door Line (whistleblowing) service – where, with the express permission of the caller or email correspondent, the service provider will report any matter raised to the Chief Human Resources Officer.

We also communicate our policy on Human Rights on our website.

If you have any further questions, please contact the Chief Human Resources Officer at Bodycote plc registered office +44 (0)1625 505300.

Policy owner:	Chief Human Resources Officer
Second policy owner:	Group General Counsel
Approved by:	Bodycote plc Board
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