

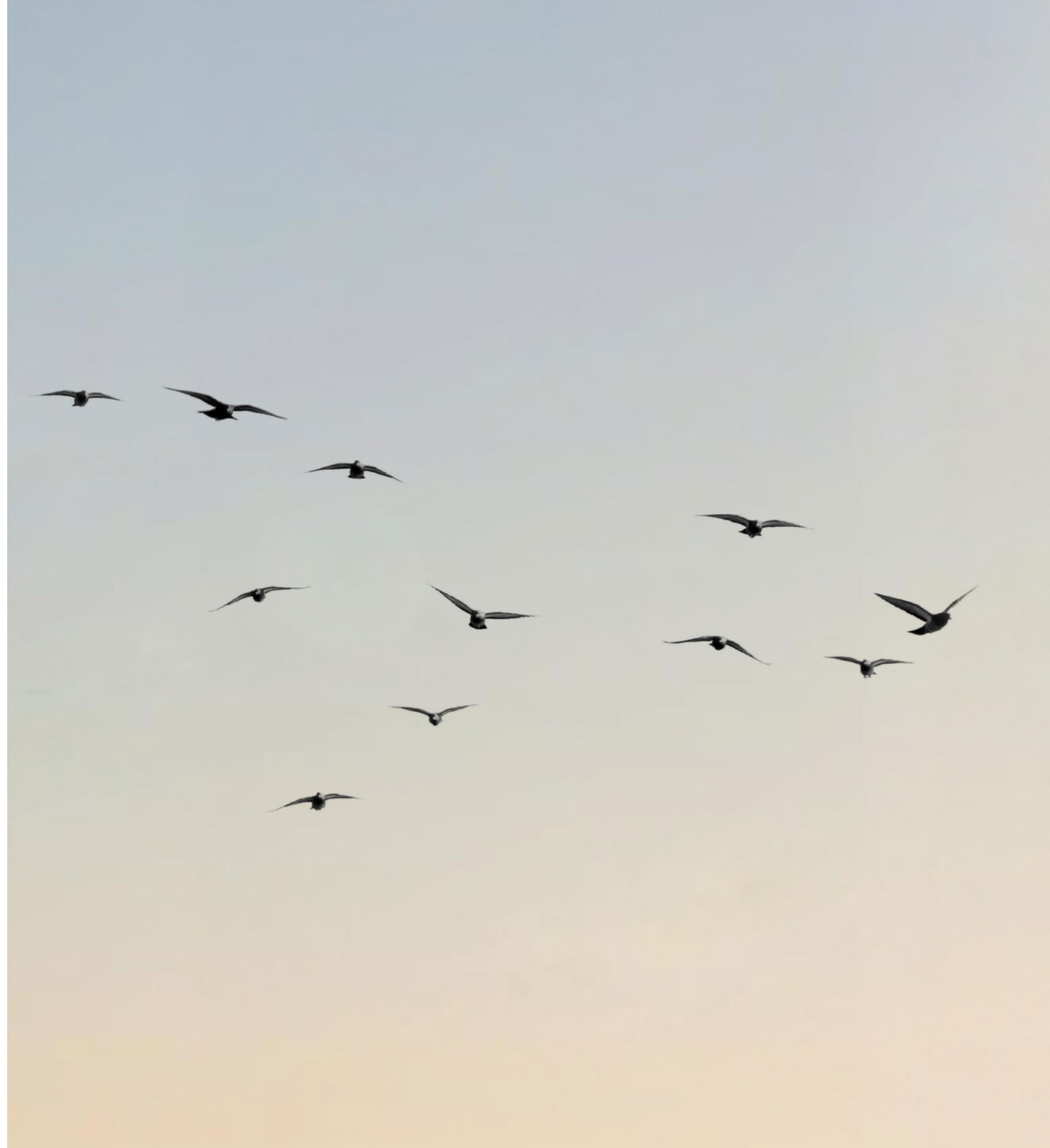


**DAETWYLER SWITZERLAND INC.**

## **Modern Slavery Statement**

## Declaration

This statement is issued in accordance with the Aluminium Stewardship Initiative (ASI) Performance Standard, the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending 31 December 2024. The information in this statement has been approved by the management of Daetwyler Switzerland Inc. While Daetwyler Switzerland Inc. does not fall in scope of any of the above mentioned laws, it discloses the following information as an act of transparency. The statement covers steps taken by the Daetwyler Group, incl. Daetwyler Switzerland Inc., to address forced and child labor. References to Daetwyler ("we", "our") are to the Dätwyler Holding Inc. Group, including Daetwyler Switzerland Inc.



## Declaration

This Modern Slavery Statement has full sign off by the Site Leadership Team of Daetwyler Switzerland Inc.



**Reto Burkart, Site Director,**  
on the behalf of the Site Leadership  
Team Schattdorf, Switzerland



**ppa. Priska Florinett, Head of HR**  
on the behalf of the Site Leadership  
Team Schattdorf, Switzerland



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## **Organizational Structure, Operations and Supply Chains**

### **Own Operations**

Dätwyler Holding Inc. can look back on more than 100 years of successful history and has been listed on the SIX Swiss Exchange since 1986. As a high-tech group, Datwyler focuses on high-quality, system-critical elastomer components and holds leading positions in attractive global markets such as Healthcare, Transportation and Electronics, General Industry and Food & Beverage. With sales in more than 100 countries and over 8'000 employees, Datwyler Group generates annual revenue of more than CHF 1'100 million. Some 60% of revenue comes from low cyclical and long-term growth markets such as Healthcare and Food & Beverage.

Daetwyler Switzerland Inc. is based in Schattdorf, Switzerland, and is one of 27 Datwyler Group locations worldwide. Approximately 550 employees work across a range of areas, including in-house elastomer mixing, mold making, aluminum deep drawing, LSR processing, as well as sales, R&D, and laboratory services.

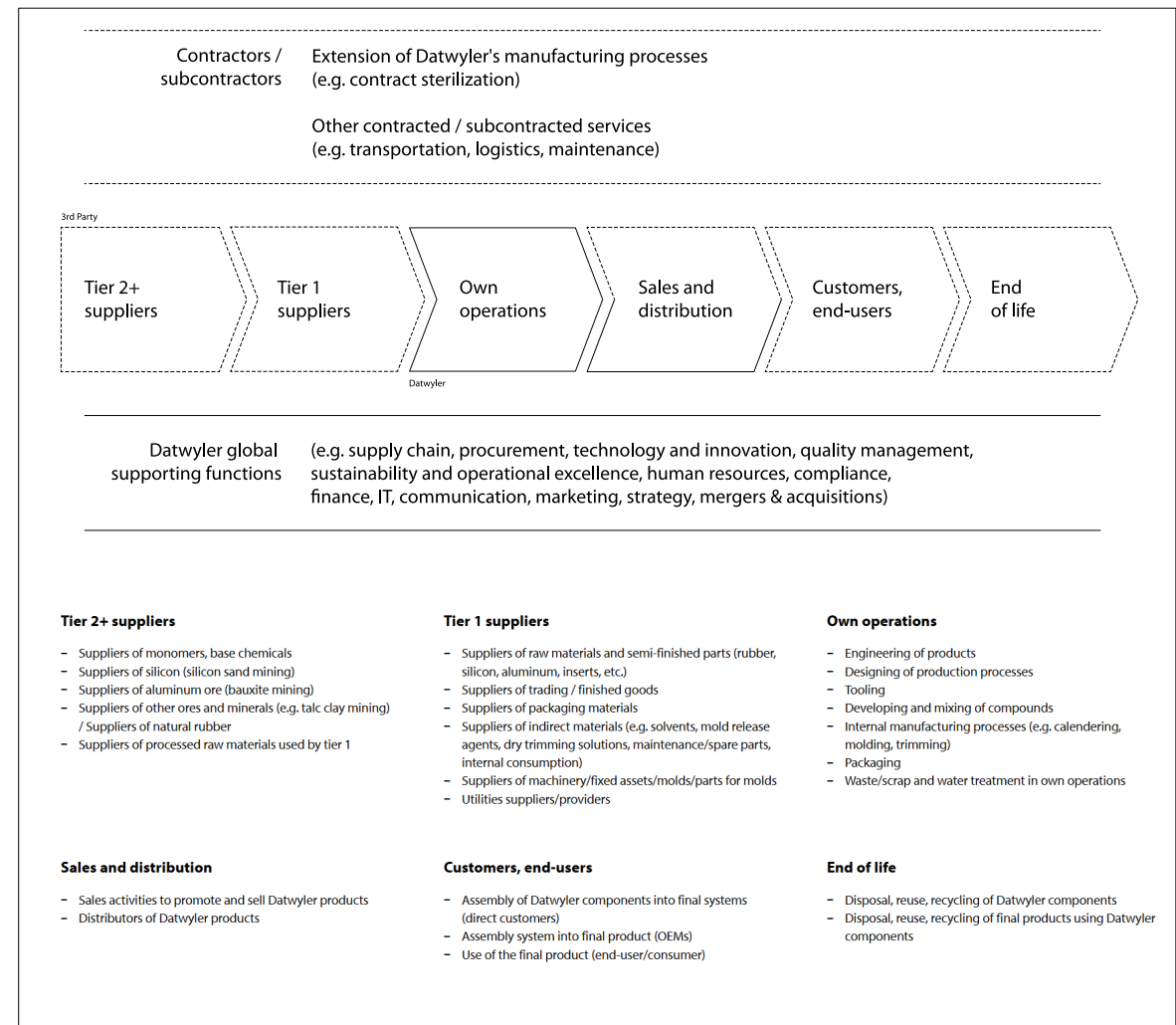
A comprehensive overview of Datwyler Holding Inc. directly or indirectly owned subsidiaries can be found in the [Financial Report 2024](#).

## Organizational Structure, Operations and Supply Chains

### Supply Chain

The value chain of Daetwyler Switzerland Inc. in Schattdorf closely reflects that of the Datwyler Group as outlined on the right. It spans the entire process from product engineering and production process design to the manufacturing of product-specific equipment such as molds, as well as compound mixing, aluminum deep drawing, and LSR application for our packaging components. These components are primarily delivered to customers across Europe, where they are assembled into complete systems or final products.

Datwyler sources raw materials like elastomeric materials, plastics, aluminum, metals and other operating supplies globally, with approximately 65% of raw materials coming from Europe, 20% from Asia and 15% from the Americas. Around one-third of the purchasing volume is sourced from the ten largest suppliers.<sup>1</sup>



<sup>1</sup> The figures mentioned in this paragraph relate to the globally active Datwyler Group.

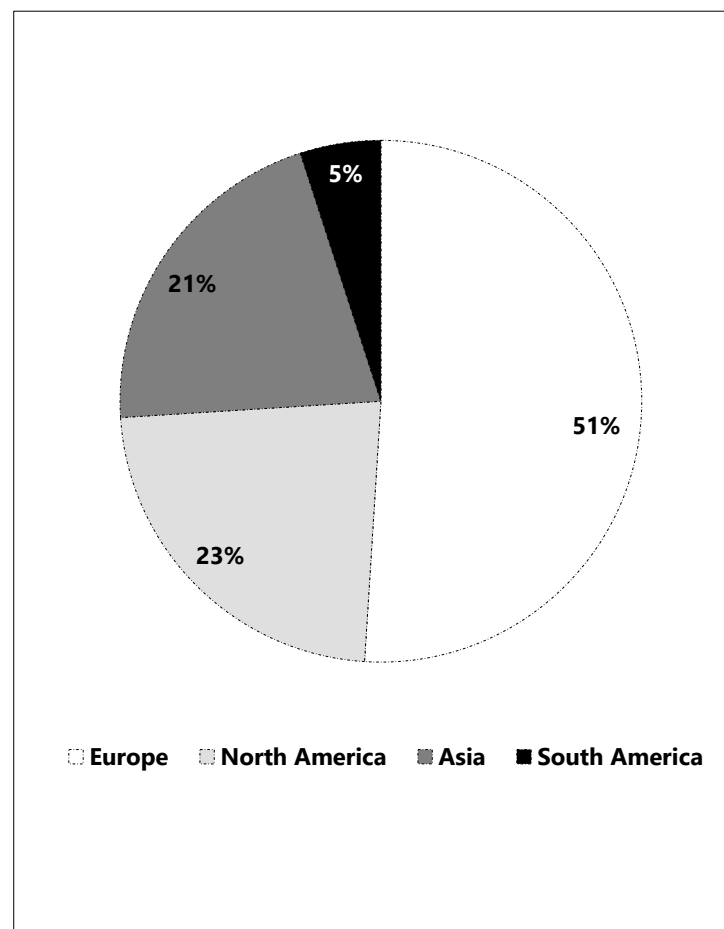
## Organizational Structure, Operations and Supply Chains

### Supply Chain

Our tier 1 suppliers are primarily located in Europe, as shown in the chart on the right.<sup>2</sup> We are also working on a more comprehensive overview of the locations of the actual manufacturing sites for the products and components that we buy from our suppliers. As part of our commitment to transparency, we will continue to refine and expand our supply chain mapping.

To ensure responsible procurement, we follow our internal *Guideline for Sustainable Procurement*. We are also planning to update our internal procedures by the end of 2025.

Datwyler values long-term partnerships with suppliers. Approximately 80% of our main suppliers – those that are quality-relevant and supply raw materials, packaging, processing aids, and external services – have been partners for at least five years, with some relationships spanning over 30 years.<sup>2</sup>



<sup>2</sup> The figures mentioned relate to the globally active Datwyler Group.



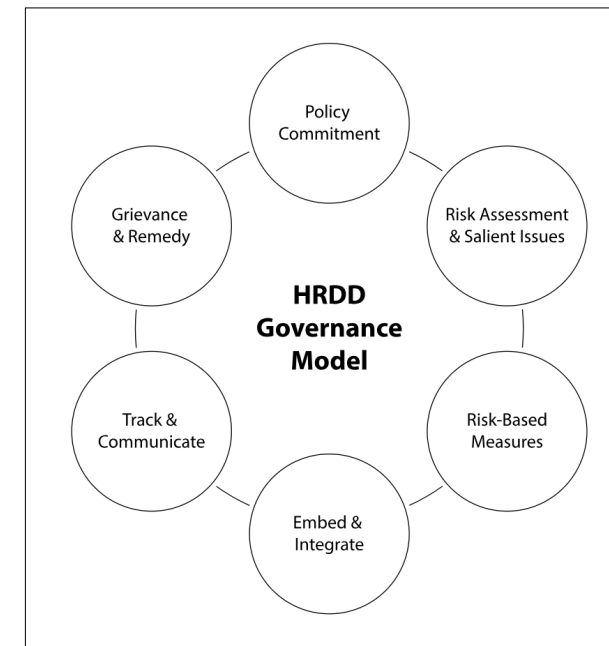
## Human Rights Due Diligence Process

Datwyler's goal is to conduct a human rights due diligence process throughout the business to proactively identify, assess, cease, prevent, or mitigate actual or potential human rights risks and impacts along the value chain, including forced labor and child labor. To this end, we are committed to align our Human Rights Due Diligence (HRDD) framework with internationally recognized standards such as the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

This HRDD framework encompasses the following six steps, as also covered by our [Human Rights Policy](#):

1. Policy commitment
2. Identify, assess, and prioritize actual and potential human rights impacts
3. Risk-Based Measures: Cease, prevent, or mitigate adverse human rights impacts
4. Embed and integrate respect for human rights
5. Track and communicate performance
6. Access to grievance and remedy

The HRDD process is carried out at Group level and the respective actions taken apply to all Datwyler subsidiaries, including Daetwyler Switzerland Inc.





## Human Rights Due Diligence Process

### Policy Commitment

Datwyler is committed to supporting and respecting human rights and labor standards and requires its business partners to do the same. By raising awareness of human rights issues and potential human rights impacts throughout its value chain, Datwyler can safeguard respect for the fundamental rights and dignity of all individuals in its workforce and throughout its value chain and minimize operational and reputational risks related to human rights and labor standards. Our commitment to human rights is reflected in our official company values and in our Code of Conduct, as well as in the fact that we joined the UN Global Compact in 2009.

The Code of Conduct contains binding rules that apply to all employees of all Datwyler companies, subsidiaries and brands worldwide. They are designed to help deal with ethical and legal challenges in our day-to-day work.

The code requires the Group's companies and employees to respect national laws, human rights, personal dignity and the privacy of each individual, and is binding for all employees across the Group. To ensure accessibility and understanding across our workforce, the Code of Conduct is available in multiple languages based on the location of our operations and integrated in onboarding kits for all new employees. At Datwyler Switzerland Inc., key topics are summarized and displayed in a short version and translated into all necessary languages to effectively reach all our employees, including blue-collar workers. The Code of Conduct was adopted at Group level by the Board of Directors, and the Executive Board provides an annual compliance report to the Board.

We recognize that business, wherever it operates, may potentially have an impact on human rights not only through its own operations but also via business relationships along the value chain. As such, Datwyler's respect for human rights extends to all individuals within its own operations and along the value chain, including all its employees, material customers, suppliers, business partners and other parties directly linked to its operations, products and services.

To this end, Datwyler has in place a Supplier Code of Conduct that applies to all suppliers, consultants, agents and partners of all companies, subsidiaries and brands of Datwyler worldwide. Datwyler, on behalf of all of its companies, subsidiaries and brands, considers the requirements of this Supplier Code of Conduct to represent a minimum standard for sustainable supplier management. Therefore, this Supplier Code of Conduct forms the basis of our business relationship.

## Human Rights Due Diligence Process

### Policy Commitment

It prohibits the use of child labor and forced labor, requiring all suppliers to comply with international and national labor laws, including the ILO Minimum Age Convention and UN Global Compact principles, while ensuring that no supplier engages in bonded, involuntary, or exploitative labor and that employees' freedom of movement is protected.

To further formalize our commitment to support and respect human rights by adopting responsible business practices aligned with internationally recognized human rights standards, we developed a dedicated [Human Rights Policy](#), which was approved by both our Board and Executive Committee at Group level in 2023. The Human Rights Policy has been developed by consulting different stakeholders, both internal and external, such as those participating in the different workshops that led to the identification and approval of the salient human rights issues in our value chain.

As part of Datwyler's risk management processes, this policy sets out an effective and proactive framework for our risk management of human rights issues through the human rights due diligence process.

To strengthen adherence to these rules and standards, the Datwyler Group provides channels to bring potential misconduct, including human rights violations, to the attention of the Group Compliance Officer. This is set out in the [Whistleblowing Policy](#), which was approved by the Board and the Audit Committee.

### Risk Assessment


Datwyler does not attribute more importance to one human right over another. Nevertheless, for the practical implementation of its human rights commitment, Datwyler focuses on the following topics (in alphabetical order), to the extent they may have adverse human rights impacts, that are the most salient to our business according to their scale, scope, and remediability:

- Child labor
- Consumer and product safety
- Corruption
- Environmental issues impacting human rights
- Forced labor
- Labor conditions
- Occupational health and safety

The whole process of identifying, assessing and prioritizing our salient human rights issues involved the consultation of over thirty internal and external stakeholders from different sectors, functions and geographies, assessing the potential severity of each issue's impact and the Group's leverage.

## Human Rights Due Diligence Process

### Risk Assessment



The group-wide human rights risk assessment has identified potential risks of forced labor and child labor across different regions and segments of our value chain. Forced labor risks are mainly linked to mining, transport services, gum production, and third-party employment in the upstream supply chain. Potential child labor risks have been primarily identified in mining activities, manufacturing processes, and material sourcing from high-risk regions in the upstream supply chain. In own operations, risks are generally lower due to existing policies and legal requirements. Switzerland pioneered child labor regulation with the 1877 Federal Factory Act, banning work for children under 14 and limiting working hours, marking one of the world's earliest labor protection laws. Over the 20th century, Swiss laws progressively raised minimum working ages (up to 15 years), prohibited night work for minors, and restricted hazardous and home-based child labor.

Switzerland ratified key international agreements including the UN Convention on the Rights of the Child (1997) and ILO Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour), integrating these into national law. Since 2023, the Swiss Due Diligence and Transparency Ordinance requires companies to identify and mitigate child labor risks in their supply chains, especially concerning the worst forms of child labor as defined by ILO Convention 182. Employers must adjust work conditions for minors under 18, with prohibitions on night and Sunday work unless authorized, plus mandatory medical examinations for night workers under 18, ensuring protection aligned with Swiss labor law.

Forced labour is forbidden in Switzerland because it violates fundamental human rights by compelling individuals to work under threat or coercion without their voluntary consent, which is prohibited under international conventions such as the Forced Labour Convention that Switzerland has ratified.

Additionally, Switzerland aligns with international and regional laws, including EU regulations, that ban products made with forced labour to uphold ethical standards and prevent human rights abuses in supply chains, maintaining compliance and access to key markets.

The salient human rights issues will be periodically reassessed via systematic human rights risk and impact assessments conducted in accordance with the UNGPs.

Also, and despite the non-attribution of more importance to one human right over another, when it comes to children's rights we commit to: (i) respect children's right to be free from child labor, (ii) permit safe work for young workers above the applicable minimum age, if such work exists, and (iii) seek to follow the higher standards, where and when feasible, whenever local laws are less stringent than Datwyler's policies and internationally recognized human rights and labor standards.

## Human Rights Due Diligence Process

### Risk-Based Measures

Based on the human rights risks and impacts identified and in a continued dialog with internal and external stakeholders, Datwyler defines and implements appropriate measures to cease, prevent, or mitigate adverse human rights impacts across the value chain, including forced labor and child labor. An important step in this process is the adequate implementation of human rights standards across the Group and the progressive embedding of these standards in different business processes.

In 2024, we focused and delivered on the following:

- Refining our grievance and whistleblowing channels for reporting suspected human rights violations
- Conducting of our first CSR supplier audits
- Promoting human rights criteria in supplier-related topics such as supplier performance monitoring, sustainable procurement guidelines, and social and environmental clauses in procurement contracts
- HRDD training for site leadership teams

In parallel, more actions were initiated and are moving forward in an orderly manner, for example embedding human rights topics in various HR processes, integration of human rights requirements in the supplier selection procedure, additional training and communication materials as well as human rights risk assessment of all operational sites and targeted suppliers.

In the next financial year, we will focus on the following:

- Continue progressively embedding human rights topics into our internal processes
- Provide training to the organization to continue building awareness on human rights
- Perform supplier risk assessment to identify those with heightened human rights risk
- Perform own operations risk assessment to identify those with heightened human rights risk
- Continue refining our grievance and whistleblowing channels
- Take measures to cease, prevent or mitigate identified human rights risks and impacts in our own operations and supplier risk assessments



## Human Rights Due Diligence Process

### Training

To further disseminate human rights-related prevention and mitigation measures, these will be, to the extent possible, progressively integrated into Datwyler Group processes, training courses and documents.

As part of our Global Onboarding training curriculum, all new employees, including temporary workers, receive training on our Code of Conduct and Whistleblowing Policy. This ensures they understand their rights and responsibilities, as well as their access to the whistleblowing hotline. In addition, all employees are required to complete a mandatory refresher training on the Code of Conduct, which covers specific topics in more detail each year.

To enhance awareness and knowledge of human rights issues, we have developed a dedicated Human Rights Policy training module within our e-learning platform. This module is accessible to all employees. While we are not yet tracking completion rates, we are actively working on improving participation.

In 2024, we have conducted two targeted human rights due diligence training sessions for site directors and leadership teams of all locations, including at Daetwyler Switzerland Inc. These sessions provided in-depth guidance on identifying, preventing, and addressing human rights risks.

Looking ahead, we are in the process of developing additional training materials specifically focused on human rights, with deep dives on salient issues such as forced labor and child labor, while also covering human rights governance and reporting.

By continuously expanding and refining our training programs, we aim to foster a culture of awareness, responsibility, and proactive engagement in combating modern slavery and child labor within our operations and supply chain.

## Human Rights Due Diligence Process

### Tracking of Effectiveness

Datwyler commits to report, in its annual sustainability report, on the progress of its efforts to address the identified and prioritized human rights issues and mitigation measures. To monitor and track the effectiveness of our defined mitigation measures, we use a management system with specific key performance indicators that allows us to have a clear view of the progress being made.

In 2024, the Datwyler Group achieved good progress with an overview of the key performance indicators below:

- Number of processes and documents in which human rights issues are included: 13 processes and documents, of which seven are completed and six are ongoing
- Number of suppliers that are assessed for human rights risks: clear criteria have been defined; the risk assessment will be carried out accordingly starting in 2025
- Number of sites that are assessed for human rights risks: all sites completed the risk assessment
- Number of human rights due diligence training sessions: two sessions were provided to site directors and site leadership team of all locations

In its supply chain, the Datwyler Group developed its own Supplier Sustainability Assessment program to increase the sustainability maturity of its suppliers and approximately 750 suppliers were assessed in 2024. The program awards points for:

- Signing Datwyler's Supplier Code of Conduct
- Sustainability certificates (ISO 14001, ISO 45001, ISO 50001)
- Sustainability reporting (in accordance with the Global Reporting Initiative (GRI)), disclosing of energy and water footprints and work-related incidents)
- Tier-1 suppliers that have a Supplier Code of Conduct for their supplier base
- A defined position responsible for sustainability



## **Human Rights Due Diligence Process**

### **Tracking of Effectiveness**

In 2024, our suppliers scored 37%<sup>3</sup> of available points (previous year: 35%), while large suppliers (representing 80% of our spend) scored 76%.<sup>4</sup>

The parameters from the Sustainability Assessment program can also be verified in on-site audits. Suppliers have to pre-fill a questionnaire on topics such as working conditions, which is then discussed during the audit. Supplier selection for planned audits is based on risk management and only targeted audits take place. Datwyler has an incident management process that not only reports quality-related matters but also deviations that could harm the environment or impact safety of workers.

<sup>3</sup> Assured by KPMG

<sup>4</sup> The figures mentioned relate to the globally active Datwyler Group.

## Human Rights Due Diligence Process

### Grievance And Remedy

Datwyler attaches great importance to living a culture of integrity and shared responsibilities. Anyone who has a legitimate concern can freely speak up, without fear of retaliation, verbally or in writing, either with the appropriate manager or via our group-wide Compliance and Whistleblowing reporting channels. This whistleblowing system ensures anonymity and data protection and is available in 10 languages. Datwyler acknowledges receipt of each report within seven days and provides an update on the status or outcome of the investigation no later than 90 days after the initial report.

At the beginning of 2025, Datwyler added a new [digital reporting channel](#) to the Whistleblowing Hotline that is publicly accessible, making it easier for third parties to report concerns. To further increase awareness, we are planning targeted campaigns to highlight this channel. Additionally, efforts are underway to integrate the new reporting channel into the Supplier Code of Conduct.

When adverse human rights impacts are uncovered due to Datwyler's business activities or from links to its operations, the company is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UNGPs. Where Datwyler finds impacts directly linked to its business relationships, to the extent possible, it will use its influence to encourage suppliers and business partners to respect human rights, whether through collaboration and support, corrective action plans or termination of the business relationship on a case-by-case basis.

In the reporting year, 26 relevant reports were received at Group level, seven of which contained substantial information. None of these cases involved forced labor or child labor. As a result, no remediation was required in 2024, and the individuals and families concerned did not lose any income due to measures taken by Datwyler.

## **Internal Consultation Process**

The development of this modern slavery statement involved an internal consultation process with key representatives from sustainability, HR, procurement, internal audit, and compliance. The draft statement was prepared, and the entire process was guided by human rights experts to ensure a comprehensive and informed approach. It was shared with these stakeholders for review, followed by a dedicated workshop to discuss its content, potential improvements, and next steps.

Datwyler remains committed to combating modern slavery by continuously improving the safeguards already in place and by collaborating across our operations and supply chain to ensure that all forms of slavery are eliminated from our operations and supply chain.



# Imprint

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## Data and Content

The content of the report is based on the information and data from the reporting period 01.01.2024-31.12.2024.

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