

Date of approval:	15 January 2025
Approved by:	CEO & Executive Committee
Policy Owner:	Group HR Director
Next review date	January 2027
Version no.	2025 v1

## Human Rights policy

Morgan Advanced Materials plc Human Rights policy is based on our commitment to conduct business legally, ethically and with integrity everywhere we operate. In our daily operations, we follow this policy in dealing with employees, suppliers and others with whom we do business. Our policy is consistent with the International Labour Organisation's conventions, the United Universal Declaration of Human Rights and the European Convention on Human Rights.

### Purpose

To -respect the human rights of everyone who works for the company and all those who have dealings with us.

### Responsibility

Everyone in our organisation is responsible for having due regard for human rights. In particular:

- The Board has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Directors, managers and supervisors must provide visible leadership that promotes human rights.
- All employees, contractors and consultants are responsible for ensuring that their own actions do not impair the human rights of others. They must adhere to the Morgan Code, and report any instances where the high standards of the Code are not being met.
- Our business partners and suppliers are expected to comply to these principles with regard to their employees and third parties.

### Policy Statements

The principles of this policy cover:

- Child labour – We prohibit the use of child labour in any form. In accordance with the conventions of the International Labour Organisation (ILO) we will not employ anyone below the age of 15, even if permitted by local law. Government-authorized job training or apprenticeship programmes that clearly benefit participants are the only exception.
- Forced labour – We will not make use in any of our businesses of forced labour, including prison, indentured labour or debt-bondage labour. No employee is required to make a monetary deposit or is deprived of identity papers at the start of their employment. We are likewise committed to ethical and responsible recruitment practices. Morgan Advance Materials plc acknowledges the Modern Slavery Act 2015 and the responsibilities under this Act. The Group will make statements on this through our

normal annual reporting process. For further information, please see our Modern Slavery Act transparency statement available on our website

- Health and safety – One of our highest priorities is to provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training on health and safety issues will be provided. All managers and employees without exception, are obligated to help identify and assess any risk to a safe work environment. If there are risks of an unsafe environment, we will eliminate them.
- Freedom of Association and the right to collective bargaining – We are committed to open communication and seek to work in a consultative partnership. We respect the principles of freedom of association and collective bargaining and will ensure compliance with applicable laws.
- Diversity and Inclusion – Our goal is to create a work environment characterized by equal opportunity, inclusion and free from unequal treatment throughout the employee life cycle. We will not tolerate unequal treatment, discrimination or harassment by or of our employees. This also applies to partners acting on Morgan's behalf.
- Discipline – We will not use, or condone the use, of corporal punishment, mental or physical coercion or verbal abuse. Any disciplinary matter will be dealt through proper procedures.
- Working hours – We will comply with applicable laws as a minimum standard with regard to working hours, breaks, holidays and overtime.
- Compensation – We will ensure that wages paid for standard working hours meet local legally mandated wage levels as a minimum.
- Grievance mechanisms – We provide grievance mechanisms that are accessible to our employees. We do not retaliate against good faith reports of violations of policy or law.

### **Further information**

This policy is aligned to the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”.

### **Deviation approval**

There are no permitted deviations to this Policy.