Covestro Corporate Commitment

Covestro Human Rights Policy Statement

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Purpose

With this statement, Covestro defines its position on human rights and declares its commitment to safeguard and promote human rights in all its business dealings through adequate risk management and transparent reporting. This statement is also made in relation to section 6(2) of the German Supply Chain Act. It therefore sets out the human rights strategy of Covestro to exercise proper regard for its due diligence obligations.

Covestro Commitments

The respect for human rights is an integral element of the business policies at Covestro and guides its social responsibility efforts. Covestro is committed to respecting and safeguarding human rights on the basis of the United Nations (UN) Declaration of Human Rights, "Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy" from the International Labour Organization (ILO) and the UN Guiding Principles on Business and Human Rights. Covestro is a member of the UN Global Compact and actively supports the national action plans and applicable national legislation on corporate human rights due diligence. Therefore, Covestro commits to apply due diligence to prevent violations in all its activities and throughout its global supply and value chains.

Organizational Responsibility for Human Rights Risk Management

The Board of Management of Covestro has appointed the head of the Group Quality department within the Group Innovation & Sustainability function as the Group Human Rights Officer. The Group Human Rights Officer, in its function, reports directly to the Board of Management and is responsible for overseeing the human rights risk management system. In addition, the heads of the corporate functions who are responsible for the relevant, prioritized human rights focus areas, are appointed as Human Rights Risk Owners.

To support the Board of Management, the Group Human Rights Officer, and the Human Rights Risk Owners, Covestro has established a cross-departmental working group (Human Rights Office), which is responsible for fully integrating human rights requirements into the Group's activities. The Human Rights Office works under the guidance of the Global Human Rights Officer and its human rights-related responsibilities include developing and implementing the comprehensive management approach, systematically assessing risks, prioritizing and monitoring the implementation of individual measures, planning and conducting trainings, preparing

reports for the Board of Management, and communicating about this issue in general. The involved corporate functions are responsible for, among other things, identifying and assessing risks and developing measures and monitoring their effectiveness. These measures are designed and implemented in the departments in consultation with the Human Rights Office.

Comprehensive Human Rights Due Diligence Process

Covestro has established a comprehensive due diligence process to safeguard human rights in its business activities. The overarching management approach is based on the UN's Guiding Principles on Business and Human Rights, the "Guidelines for Multinational Enterprises" from the Organization for Economic Cooperation and Development (OECD) and operates in line with applicable national legislation on corporate human rights due diligence. This overarching management approach is a continual process comprising the six core elements described below.

Covestro Policies

The principles of human rights and environmental due diligence at Covestro are delineated in its Code of Conduct, various Corporate policies, Group regulations, and its Supplier Code of Conduct. In these documents, Covestro has specified key international conventions and principles as the basis of its conduct and its expectations to business partners worldwide. These documents are published either on Covestro's website or on its internal intranet to ensure accessibility for the relevant stakeholders.

Within the supply chain, Covestro regards adherence to sustainability standards as a fundamental factor in value creation and an important lever for minimizing risks. Both current and new Covestro suppliers must meet not only economic standards but also social, ethical, and environmental standards as well as those related to corporate responsibility. All standards, also in regard to human rights, are defined in Covestro's Supplier Code of Conduct.

Human Rights Risk Analysis

The starting point for human rights due diligence at Covestro is a risk analysis that identifies and assesses actual or potential adverse impacts on human rights that Covestro could cause, contribute to, or which it could be directly linked with, as a result of its business activities. This analysis is performed annually, making use of the procedures and outcomes of the double materiality assessment (European Corporate Sustainability Reporting Directive). The relevant risks are then discussed with the respective business entities and corporate functions on an annual and on an ad-hoc basis. They are prioritized for further management, depending on the gross assessment of the severity of the potential human rights violation and its likelihood of

occurrence. On a yearly and on an ad-hoc basis, Covestro's Human Rights Risk Owners assess and prioritize the human rights risks in their focus areas. Potential human rights violations assigned the highest degree of severity based on the scale, scope, and irremediability of the potential violation, always take top priority. Findings from this risk analysis are continually updated by the Human Rights Office, taking relevant information obtained from internal and external sources into account, such as from Covestro's grievance mechanism.

For its suppliers, Covestro analyses and prioritizes human rights risks using a combination of country and industry or sector risks based on recognized external sources. In a second step, Covestro considers its ability to influence its suppliers to further prioritize these risks.

Prioritized Risks

For Covestro's own business activities, the human rights risks of child labor, forced labor and all forms of slavery, unequal treatment, the occupational health and safety of our workers, environmental pollution and violation of land rights are globally prioritized and local human rights-related risks of its water consumption in India were prioritized for further management as part of the human rights management system. Additionally, the material risks of child labor and forced labor and all forms of slavery were prioritized for certain supplier industry and country combinations.

Preventive & Remedial Measures

Covestro's Human Rights Risk Owners assess the suitability of existing preventive measures in accordance with the risk-based approach recommended in the UN Guiding Principles and, if necessary, implement appropriate new measures to prevent or mitigate adverse impacts on human rights for the prioritized human rights risks.

Own Business Area

Many measures in the areas of health and safety, product safety, compliance, human resources, and sustainable supplier management have long been implemented at Covestro and aim to prevent or mitigate adverse impacts on human rights. Most of these measures are already integrated into Covestro's existing Group-wide management systems, including the integrated Health, Safety, Environment, Energy, and Quality (HSEQ) management system, the compliance management system, the human resources process landscape, and other corporate governance frameworks.

The cross-functional Human Rights Office organizes trainings on human rights aspects that are relevant to the activities of the Group and its value chain. In addition, the Human Rights Office provides regular information about human rights in the company

and advises corporate functions on how to fully integrate the human rights requirements into Covestro's management systems.

If there are reasonable indications of human rights violations within Covestro, the local Compliance Officer investigates the facts based on Group-wide standards which are outlined in our Group compliance policy. If Covestro has directly caused a human rights violation, Covestro is committed to work quickly to stop or change the responsible business activities in order to end the violation. Any human rights violation caused by a Covestro employee is evaluated and appropriate mitigation measures may be taken accordingly.

Vis-à-vis Direct Suppliers

In the supply chain of Covestro, the Supplier Code of Conduct is integrated into the electronic ordering systems and contracts across the Covestro Group. Covestro expects its suppliers and subcontractors to agree to the principles in this Code of Conduct and implement these standards in the upstream supply chain. New and renewed supply agreements in particular contain special clauses requesting suppliers to observe the sustainability requirements contained in the Supplier Code of Conduct and entitle Covestro to review their compliance.

Covestro is a member of Together for Sustainability (TfS), a joint initiative of the chemical industry that aims to harmonize assessment methods for suppliers worldwide. Using a standardized TfS assessment process, Covestro evaluates whether the suppliers maintain the required sustainability standards. A structured prioritization process is then carried out to select the suppliers to be evaluated and either an online assessment or an on-site audit is initiated for these suppliers – provided that there are no current results. In addition, further actions are defined for suppliers where a concrete human rights risk was identified. These include targeted human rights trainings, supplier dialogues, contractual obligations, and online assessments or on-site audits.

In addition, dialogue and close collaboration are essential in enabling suppliers to successfully comply with Covestro's requirements. Covestro therefore offers its suppliers a range of opportunities for training and dialogue. This provides the foundation for building reliable relationships and enables Covestro to identify and eliminate issues at an early stage. Continuously improving suppliers' sustainability performance is a priority for Covestro and is supported by the TfS initiative, which regularly organizes annual education and training courses, for example. The TfS Academy – a knowledge-sharing platform for procurement employees and their suppliers – provides access to a large number of courses in several languages.

Trainings include introductory courses to human rights, focal courses on specific aspects such as child or forced labor, along with courses focusing on supplier human rights due diligence.

If there are reasonable indications of human rights violations in Covestro's supply chain, it investigates them carefully and consistently. Covestro expects its business partners to cooperate in clarifying the surrounding facts within a reasonable timeframe. If Covestro determines that its business activities have contributed to or are indirectly linked to human rights violations through one of its direct or indirect suppliers, Covestro is prepared to take measures to address the violation. Depending on the severity of the violation, Covestro reserves the right to respond appropriately in connection with its business partners.

Complaints Procedure

Covestro expressly encourages reporting of suspected human rights violations in the Group as well as at suppliers' companies. Suspected human rights violations can be reported using a whistleblower system consisting of a global hotline and an online tool. Covestro therefore enables employees and third parties to anonymously inform Covestro of any potential violations at its direct or indirect suppliers. Covestro investigates cases of suspected human rights violations by following a defined process based on the involvement of (potentially) affected stakeholders. To enhance the transparency of how reported complaints are handled, an operating procedure for the Group's grievance mechanism is published on Covestro's website.

Effectiveness Monitoring

Appropriate qualitative and quantitative indicators along with internal and external sources are used to assess the effectiveness of Covestro's human rights measures, in the existing management processes, at preventing adverse impacts on human rights. The corporate functions represented in the Human Rights Office report annually on the implemented measures and any potential findings regarding their effectiveness. Additionally, the effectiveness of the complaints procedure and remedial actions are reviewed annually and on an ad-hoc basis as needed. The appropriateness and effectiveness of the human rights risk management system is reviewed by the Group Human Rights Officer. In addition, the Corporate Audit function regularly reviews respective activities in objective and independent audits.

Reporting

Every year, Covestro communicates its human rights activities to the public in its Group Management Report. Moreover, the Group Human Rights Officer and the Human Rights Office report regularly (no less than once a year) to the Board of Management

on the results of the risk analysis, the status of human rights due diligence, and the systematic integration of these requirements into Covestro's management systems.

Approval for this Statement

This statement was approved by the Board of Management of Covestro AG on March, 27th 2026.



Dr. Markus Steilemann
Chief Executive Officer



Monique Buch
Chief Commercial Officer



Dr. Thorsten Dreier
Chief Technology Officer / Labor Director



Christian Baier
Chief Financial Officer