

**Human Rights Areas of Particular Concern to LANXESS – Selected Mitigation and Remediation Actions**

|  | <b>Plant, Process &amp; Occupational Safety</b>   | <b>Labor Standards</b>   | <b>No Discrimination</b>   | <b>Human Rights in the Supply Chain</b>  |   | <b>Communities</b>   |
|--|---|--|--|--|---|--|
|  |   |  |  | <b>Suppliers</b>   | <b>Customers</b>  |  |
| <b>Mitigation Actions/ Plans</b>             | Global Safety Initiative “Xact”; Through ongoing training of our employees and regular auditing of our health and safety management, we ensure that the requirements for health protection and safety precautions are systematically and sustainably implemented in our processes; HSEQ Committee ensures compliance with uniformly high safety standards and initiates necessary guidelines, strategies and programs.                                  | Flexible working-time models (where possible); Market rate compensation; Close cooperation with employee representatives including trade unions and employers’ associations, in line with the principle of active codetermination; Wide-ranging measures to promote health and wellbeing at our sites, e.g. medical check-ups, training on stress management and fitness or dietary options. | Diversity & Inclusion (D&I) initiatives to enhance respect and diversity at LANXESS, incl. global management training; Corporate responsibility goals with regard to gender diversity, aiming to increase the proportion of women in the management; Diversity Dashboard containing detailed key-data analyses for the diversity dimensions of age, gender and nationality, enabling us to view the respective development and to derive corresponding strategic measures; Integrity Line <sup>3)</sup> providing various means of reporting potential discrimination issues to the compliance organization. | Supplier assessments and audits (also within the context of our engagement in the TFS <sup>1)</sup> initiative); Acknowledgement of our Supplier Code of Conduct or establishment of comparable regulations and management systems in line with the UN Global Compact is essential; Our Integrity Line <sup>3)</sup> provides various ways of reporting potential issues also for externals. | Product safety management to steer observance of product stewardship; Worldwide tracking of relevant products and their application with respect to potential health and environmental impacts and to prevent dual-use; Material safety data sheets in more than 40 languages inform about safety measures when handling chemicals. | We connect with community members by fostering activities that support community life and development. At many of our larger sites, we participate in an institutionalized dialog in established forums, such as community advisory panels. There are also community touch points either run by our company or partners in the chemical parks. Our Integrity Line <sup>3)</sup> also provides community members with various means of reporting potential human rights violations. |
| <b>Coverage of Mitigation Actions/ Plans</b> | All sites   | All sites  | All sites  | All suppliers are reviewed from a risk perspective and relevant suppliers are assessed; Suppliers identified to be at risk are subject to an individual action plan.   | All relevant customers procured with hazardous and/or dual-use products   | All community members can use the LANXESS Grievance Mechanisms <sup>3)</sup> to report potential violations. At many larger sites mechanisms for a regular dialogue are in place.  |
| <b>Remediation Actions</b>                   | Remediation actions are an integral part of the Xact program. LANXESS records incidents which occur despite the extensive safety precautions in a worldwide electronic registration system and steps are then introduced to prevent repetitions. For instance, at our site in Liyang, China, a project was instigated to stabilize work processes, strengthen managerial responsibility and achieve greater awareness of safety issues among employees. | No actions required due to the non-existence of issues which would require measures beyond the already established mitigation plans.   | No actions required due to the non-existence of breaches which would require measures beyond the already established mitigation plans as we have no reports or knowledge of any systematic discrimination. In individual cases, misconduct was reported. Verified misconduct is not tolerated and will result in appropriate disciplinary measures up to and including dismissal.  | There were no remediation actions in the context of our suppliers as we did not receive any indications for human rights violations. In case of violations LANXESS reserves the right to terminate the business relationship.  | No actions required beyond the already established mitigation plans as we received no indications of non-compliance concerning the health and safety impacts of our products; Products which do not fully satisfy our sustainability requirements are examined regarding specific action plans or the termination of production.    | No actions required currently due to nonexistence of human rights issues which would require measures beyond the already established mitigation plans.   |
| <b>Where to find more information?</b>       | <u>Position on Human Rights:</u><br>• p. 6<br><br>Annual Report 2018:<br>• Xact (p. 28; 30-31)<br>• HSEQ Committee (p. 13)  | <u>Position on Human Rights:</u><br>• p. 7<br><br>Annual Report 2018:<br>• p. 27<br><br>Website:<br><a href="#">Corporate Responsibility/ Energized Employees pages</a>  | <u>Position on Human Rights:</u><br>• p. 8<br><br>Annual Report 2018:<br>• p. 21, 24   | <u>Position on Human Rights:</u><br>• p. 9<br><br>Annual Report 2018:<br>• p. 16, 30<br><br>Supplier Code of Conduct <sup>2)</sup>   | <u>Position on Human Rights:</u><br>• p. 10<br><br>Annual Report 2018:<br>• p. 17, 42   | <u>Position on Human Rights:</u><br>• p. 10<br><br>Annual Report 2018:<br>• p. 42-43   |

1) TFS: “Together for Sustainability”  
 2) Supplier Code of Conduct  
 3) LANXESS Integrity Line