ANTI-DISCRIMINATION, HARASSMENT AND BULLYING

Policy No. HR-014

1.0 PURPOSE

This policy establishes rules, requirements, and expectations to ensure our company maintains a workplace free from discrimination, harassment, and bullying. Coherent strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The culture of the company is grounded in our values and should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe atmosphere. This is essential to the mission of the company.

2.0 SCOPE

This policy applies to all employees, officers, directors, independent contractors, agents, representatives, and other intermediaries of Coherent Corp. ("Coherent" or the "company") and its subsidiaries and affiliates. All covered individuals are expected to comply with this policy when performing services for or representing the company.

3.0 REQUIREMENTS

3.1 Prohibition on Discrimination, Harassment, and Bullying

Unlawful discrimination, harassment and bullying of any kind is prohibited. The company, in compliance with all applicable anti-discrimination, harassment and bullying laws and regulations, enforces this policy in accordance with the standards laid out below.

3.2 No Discrimination

The company prohibits illegal discrimination and provides equal employment opportunities to employees and applicants in the provision of employment opportunities or any other employment practices, on the basis of the person's age, race (including traits typically associated with race such as natural hair texture, and protective hair styles such as braids, locks, and twists), ethnicity, color, national origin, immigration status, or ancestry, alienage or citizenship status, religion or creed (including religious dress and grooming practices), disability status, medical condition, sex (including pregnancy, childbirth, breastfeeding, and related medical conditions), sexual orientation (actual or perceived), transgender status or identity, sexual and reproductive health decisions, gender identity/gender expression, genetic information/characteristics, marital and partnership status, familial status, arrest or conviction record, military or veteran status, union membership, political affiliation, unemployment status, caregiver status, credit history, if you have been a victim of domestic violence, stalking or sex offense, or any other status protected by applicable law. The company will not require pregnancy or medical tests except where required by applicable regulations or prudent for workplace safety and will not improperly discriminate based on these test results.

Discrimination of this kind may also be strictly prohibited by a variety of international, federal, state and local laws, such as Title VII of the Civil Rights Act 1964, the Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, the EU Equal Treatment Directives, the German General Equal Treatment Act, the Labor Law of the People's Republic of China, the Employment Promotion Law of the PRC, the Malaysian Employment Act 1955 and Industrial Relations Act 1967, and the Labor Code of Vietnam. This policy is intended to comply with, and in all cases will be interpreted in accordance with, the highest applicable standard of anti-discrimination and equal-opportunity law in every jurisdiction where Coherent operates.

3.3 No Harassment

It is a violation of this policy to engage in harassment, including sexual harassment, of any kind, and the company will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, "harassment" is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker or any person working for or on behalf of the company, including interns and non-employees, independent contractors, and those employed by companies contracting to provide services in the workplace. Verbal taunting (including racial and ethnic slurs) that, in a reasonable person's opinion, impairs his or her ability to perform his or her job is included in the definition of harassment.

The following examples of harassment are intended to be guidelines and are not exhaustive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's race, color, national origin, age, religion, disability status, gender identity/gender expression, sexual orientation, gender identity, genetic information, marital status or other protected status, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes the distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, or disrespect toward an individual or group because of race, ethnicity, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information, marital status, union membership, political affiliation, or other protected status.

3.3.1 No Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for employment decisions or such conduct has the purpose or effect of creating an intimidating, hostile or offensive working environment.

There are two types of sexual harassment:

- "Quid pro quo" harassment, where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment. Examples: A supervisor promising an employee a raise if she goes on a date with him; a manager telling an employee she will fire him if he does not have sex with her.
- A "hostile work environment" can be created by anyone in the work environment, whether it be supervisors, other employees, suppliers, guests or customers (and people in general). Hostile environment harassment consists of verbiage of a sexual nature, unwelcome sexual materials or even unwelcome physical contact as a regular part of the work environment. Texts, e-mails, cartoons or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching or fondling all fall into this category.

Sexual harassment can occur between any individuals, regardless of their sex or gender. Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment.
- Is used as a basis for an employment decision.

- Unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exhaustive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or "kidding" that is oriented toward a prohibited form of harassment, including that which is sexual in nature and unwelcome.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and Internet postings; or other form of communication that is sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and fondling and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, non-coercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

3.3.2 Consensual, Romantic, Sexual or "Family" Relationships

Coherent strongly discourages romantic or sexual relationships between a manager or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person) because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department, or other actions may be taken.

If any employee of the company enters into a consensual relationship that is romantic or sexual in nature with a member of his or her staff (an employee who reports directly or indirectly to him or her), or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must promptly disclose such personal relationship in accordance with the company's Conflicts of Interest Policy. Such disclosures will be handled in compliance with applicable privacy laws and limited to information strictly necessary for managing potential conflicts of interest.

Once the relationship is made known to the company, the company will determine whether one or both parties need to be moved to another job or department. That decision will be based on which move will be least disruptive to the organization as a whole. If it is determined that one or both parties must be moved, but no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

3.4 Bullying

It is a violation of this policy to bully. The company defines bullying as persistent, malicious, unwelcome, severe and pervasive mistreatment unrelated to an employer's legitimate business interests that a reasonable employee would find harmful, threatening, intimidating, offensive, degrading or humiliating, whether verbal, physical, online or otherwise, at the place of work and/or in the course of employment. This may include repeated infliction of verbal abuse, such as the use of demeaning or derogatory remarks, misuse of power or position, malicious rumors, unfounded threats or comments about job security, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. This definition applies at a minimum to the highest applicable standard under applicable law.

Any employee engaging in bullying may be subject to discipline, up to and including termination.

3.5 Retaliation

Retaliation is against the law and violates the company's Speaking Up and Non-Retaliation Policy. Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a discrimination or harassment claim or other activity that is protected by law, any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973; the Vietnam Era Veterans' Readjustment Assistance Act of 1974; or exercising any other right protected by other international, federal, state, or local laws or regulations regarding equal employment opportunity.

Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).

Retaliation or attempted retaliation as described above is a violation of the company's policies. Any person who is found to have violated this aspect of the policy may be subject to disciplinary action up to and including termination of employment.

3.6 Complaint Process

An individual who feels discriminated, harassed, bullied or retaliated against may initiate the complaint process by filing a complaint with their human resources leader, any member of management, or by submitting a report through the Corporate Compliance Hotline at www.Coherent.ethicspoint.com.

The company will handle all complaints as described in accordance with applicable law and the company's Speaking Up and Non-Retaliation Policy.

Employees, interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums. Refer to state-specific resources on the internet.

If a supervisor or manager becomes aware that discrimination, harassment or bullying is occurring or has occurred, the supervisor or manager must immediately report it to the senior human resources leader of the organization or location. Supervisors and managers may be subject to discipline for failing to report suspected sexual harassment or knowingly allowing sexual harassment to continue.

3.7 Confidentiality

In some locations an employee assistance program (EAP) is available and provides confidential counseling services to company employees. Individuals wishing to discuss an incident confidentially or seeking information and advice of a personal nature are encouraged to contact the EAP or a similar service. The role of the EAP in such cases will be limited to personal counseling and treatment for the

person who is then an EAP client. Contacting the EAP will not qualify as notification to the Company of a potential harassment or discrimination issue pursuant to this policy.

The identity of anyone submitting a report in good faith will be kept confidential to the fullest extent possible, unless doing so will violate the law or prevent a full and effective investigation of the report, in accordance with the company's Speaking Up and Non-Retaliation Policy.

3.8 Alternative Legal Remedies

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through governmental agencies or the courts. Employees are always permitted to pursue legal remedies outside of, or in addition to, internal company processes. An attorney or legal representative is not required to file a complaint with a governmental agency; however, individuals may seek independent legal advice if they wish. For jurisdiction not listed in this policy, please contact your local human resources professional for local reporting channels or references to equivalent agencies.

3.8.1 Criminal Conduct and Reporting to Authorities

In some cases, harassment or violence — such as unwanted physical touching, sexual assault, or physical confinement — may also constitute a criminal offense under applicable law. Individuals who believe they have been the victim of criminal conduct should seek immediate assistance and may contact local law enforcement/emergency services. Coherent will support employees who choose to pursue external legal remedies and will cooperate with law enforcement investigations to the extent permitted by applicable law, while maintaining confidentiality and protection against retaliation.

3.8.2 Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court. The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

Employees alleging discrimination at work can file a "Charge of Discrimination." The EEOC has various offices where complaints can be filed. You may contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

3.8.3 California Agency Reporting

If an employee, volunteer or intern believes the above procedures have not resolved his or her situation, that person may contact the California Department of Fair Employment and Housing ("DFEH") to file a claim. The DFEH serves as a neutral fact-finder and will attempt to assist the parties to voluntarily resolve disputes. In the event that the DFEH is unable to obtain voluntary resolution and finds that harassment or discrimination has occurred, the DFEH may award reinstatement or monetary damages. To obtain the telephone number for the most convenient DFEH office, call 800-884-1684 or visit www.dfeh.ca.gov/. The California Rights Department (CRD) provides sexual harassment online training courses at https://calcivilrights.ca.gov/shpt/.

3.8.4 New York State Human Rights Law

The Human Rights Law (HRL) (N.Y. Executive Law, art. 15, § 290 et seq.) applies to all employers in New York State with regard to sexual harassment and protects employees, paid/unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of HRL may be filed either with the State Division of Human Rights (SDHR) or in New York State Supreme Court. Complaints with SDHR may be filed any time within one year of the harassment; complaints of sexual harassment may be filed any time within three years of the harassment with SDHR. If an individual did not file at SDHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with SDHR if they have already filed a HRL complaint in state court. You do not need an attorney to file a complaint and there is no cost to file.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

3.8.5 New York City Human Rights Law

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml

4.0 CONSEQUENCES FOR POLICY VIOLATIONS

If you violate this policy, you may be subject to disciplinary action, up to and including termination.

5.0 REPORTING CONCERNS

Violations of this Policy should be reported to the Coherent Compliance Hotline (www.coherent.ethicspoint.com) or to the Chief Legal and Compliance Officer (CLCO).

6.0 ADDITIONAL RESOURCES

N/A

7.0 REVISION HISTORY

Revision	Date	Description of Change	Requested By
Original	October 15, 2018	Initial Release	Corporate Compliance
Revision 1	July 6, 2022	Add Hotline number and update wording: discrimination, bullying, investigations, and retaliation.	VP, HR – Integration Compliance
Revision 2	December 12, 2025	Update policy items, add applicable policies, remove redundant information, add compliance website, and remove NY employee acknowledgement.	Compliance and Operations Manager
Revision 3	July 23, 2026	Updated for formatting and alignment with new policy template as part of enterprise-wide effort to update Policy Center.	Corporate Compliance