



Coherent Corp. and its subsidiaries (“Coherent” or the “Company”)

Subject: **INCLUSIVE CULTURE AND MERIT-BASED ADVANCEMENT POLICY**

Effective Date: June 16, 2022

Revision Date: December 12, 2025

Policy No.
HR-018

1.0 PURPOSE

Coherent is committed to fostering an inclusive culture where all individuals are treated with fairness, dignity, and respect. We recognize that a wide range of experiences, perspectives, and talents contributes meaningfully to business innovation and performance. Through enforcement of this policy (this “Policy”), we aim to ensure that our policies, practices, and behaviors promote inclusion, equal opportunity, non-discrimination, and advancement based on merit.

2.0 SCOPE

All employees are covered by and are expected to comply with this Policy and to take appropriate measures to ensure that prohibited conduct does not occur and, when it does occur, it is reported. Where applicable laws require a higher standard than this Policy, those laws apply in addition to this Policy. This Policy should be read together with HR-014 Anti-Discrimination, Harassment and Bullying Policy for further definitions of prohibited conduct.

3.0 RESPONSIBILITY

Adherence to this Policy is the responsibility of all employees. Beyond the Company’s operations, Coherent requires our suppliers and contractors to comply with the same or similar standards under Responsible Business Alliance (RBA) Code of Conduct. Administration of the Policy is the responsibility of supervisors, managers, employees and human resources professionals.

Manager and Human Resources Responsibilities

- Implement this Policy as part of the day-to-day management of employees and in applying policies and practices in a fair and equitable way.
- Recognize unacceptable behavior and take immediate appropriate action.
- Ensure an inclusive work environment for all employees.

Employee Responsibilities

- Implement this Policy in the day-to-day work and dealings with colleagues and customers, treating others with dignity and respect at all times.
- Notify a member of management or Human Resources of any concerns about inappropriate conduct of others with whom they interact. Everyone is expected to exhibit conduct that reflects inclusive behaviors during work, at Company functions (on or off site), and at all other Company-sponsored and participative events.

4.0 THE POLICY

All employees have a responsibility to treat others with dignity and respect. Each employee is expected to ensure that the work environment is inclusive and free of all forms of discrimination and harassment.

Coherent’s inclusion initiatives are applicable, but not limited to, our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of an inclusive work environment that encourages and enforces:

- A workplace which is free from illegal discrimination, harassment and bullying.
- Respectful communication and cooperation between all employees regardless of title or level.



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- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- A workplace culture that is inclusive, embraces differences, builds trust and cultivates a sense of belonging, which includes respect for cultural, linguistic, and regional differences in communication and collaboration.
- Equal employment opportunities based on ability, performance, and skills.
- Employee engagement practices that are inclusive and objective.
- Attraction, retention and development of a diverse range of talented people.
- Equitable frameworks and policies, processes and practices that limit potential unconscious bias.

5.0 RECORD RETENTION

The senior human resources leader of an organization or location will have accountability for proper recordkeeping as required or permitted by applicable law and in compliance with Coherent’s Records Management Policy.

6.0 ENFORCEMENT

Appropriate disciplinary action will be taken against any employee who violates this Policy. Based on the seriousness of the offense, disciplinary action may be progressive or skip steps that may include verbal or written reprimands, or the discipline may go directly to termination of employment based on the country of employment.

7.0 QUESTIONS AND REPORTS

If you believe this Policy has been violated, you should discuss the situation with your manager, your local human resources representative, the approver of this Policy, or report it using the Coherent Compliance Hotline at <https://coherent.ethicspoint.com>.

8.0 COMMUNICATION

This Policy and any future changes will be communicated by the Chief People Officer, and the senior human resources leader of an organization or location is accountable to ensure all employees are aware of this Policy.

The Company reserves the right to modify this Policy, as needed, to reflect changes in applicable laws or otherwise.

APPROVALS	APPROVALS COMPLETED DATE
Shirley Reha, Chief Human Resources Officer	June 16, 2022
Grace Lee, Chief People Officer	December 12, 2025

REVISION HISTORY



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Revision	Date	Description of Change	Requested By
Original	12/15/2021	Original	Shirley Reha
Rev1	06/16/2022	Addition of “equity” to several statements	Jessica Pastor
Rev 2	12/12/2025	Change name of policy to Inclusive Culture and Merit-Based Advancement Policy. <ul style="list-style-type: none">• Focusing on respectful workplace behavior.• Clarifying that all employment decisions are based on qualifications, performance, and conduct.	Grace Lee