

Modern Slavery and Human Trafficking Statement

Introduction

Rogers Corporation (“Rogers” or the “Company”) is committed to ethical and responsible practices including respecting human rights in all aspects of its business. Rogers will not tolerate any instances of human trafficking, forced labor, child labor, or other forms of modern slavery and has policies and processes in place to prevent partnerships with third parties involved in human rights abuses.

The California Transparency in Supply Chain Act of 2010 requires companies doing business in California to be transparent about their efforts to eradicate slavery and human trafficking from their supply chains. Similarly, the UK Modern Slavery Act of 2015 requires certain businesses to produce a statement setting out the steps they have taken to ensure there is no modern slavery in their own business and their supply chains. Pursuant to these requirements, this statement serves to detail the measures that Rogers, including its subsidiaries and affiliates, has in place to safeguard against modern forms of slavery.

Our Organizational Structure and Business

Rogers is headquartered in Arizona (USA) and operates manufacturing facilities in the United States, Belgium, Germany, Hungary, United Kingdom, China, and South Korea. Our global reach includes sales offices worldwide.

Rogers designs, develops, manufactures, and sells high-performance and high-reliability engineered materials and components under two strategic operating segments: Advanced Electronics Solutions (AES) and Elastomeric Material Solutions (EMS). Rogers AES operating segment designs, develops, manufactures, and sells circuit materials, ceramic substrate materials, busbars and cooling solutions for applications in automotive, aerospace and defense, renewable energy, wireless infrastructure, mass transit, industrial, connected devices, and wired infrastructure markets. Rogers EMS operating segment designs, develops, manufactures, and sells engineered material solutions including polyurethane and silicone materials used in cushioning, gasketing and sealing, and vibration management applications for a variety of applications such as general industrial, portable electronics, automotive, mass transit, aerospace and defense, and footwear.

Our Supply Chains

Rogers procures a variety of raw materials, goods, and services that are required for our operations and as inputs for the products we produce. Our global supply chain consists of direct sourcing from multiple countries, with a prevalence of local sourcing in proximity to our manufacturing locations such as in the United States, China, and several other Asian and European countries.

Our Policies, Measures, and Due Diligence

Rogers has systems in place to manage and mitigate risk in relation to modern slavery and human trafficking in our own operations and supply chains, including:

- **Policies:** Rogers maintains a [Code of Business Ethics \(“Code”\)](#) which sets forth expectations for respecting human rights, among other ethical business practices, including prohibiting human trafficking, forced labor, and other human rights abuses. Rogers actively promotes a culture where

employee health and safety is our highest priority, driven by a set of [guiding principles](#) as well as clear expectations for ethical supply chain practices, for example in our [Conflict Minerals Policy](#).

- **Assessing and Managing Risk:** Rogers seeks to develop long-term relationships with carefully selected suppliers who are committed to responsible business practices compatible with our own. Rogers evaluates risks relevant to the Company through its enterprise risk management process. For risk issues related to conflict minerals, Rogers routinely engages with its metal suppliers to ensure ethical sourcing practices.
- **Verification:** Rogers conducts internal verification of suppliers during onboarding and through routine monitoring based on its Code, among other criteria, that includes mandating a self-assessment from suppliers, executing initial due diligence screening, and conducting periodic examinations. Rogers also implements a reasonable country of origin inquiry process to support responsible sourcing of tin, tungsten, tantalum, and gold (*i.e.*, conflict minerals) and leverages third party verification of related sourcing as described in Rogers [conflict minerals disclosure](#).
- **Auditing of Suppliers:** Rogers' Supply Chain teams, quality professionals, and engineers routinely conduct audits and visits to our suppliers' facilities. Rogers does not routinely conduct independent, unannounced audits of suppliers, but may do so if we have cause to believe that any are not in compliance.
- **Certification by Suppliers:** Rogers' standard terms and conditions requires that all suppliers be in compliance with all applicable laws and regulations, including those relating to working conditions, modern slavery, and human trafficking. They also stipulate that suppliers shall adhere to the Company's Code or follow standards of conduct that are no less rigorous.
- **Accountability:** Any failure to comply with the Rogers Code and supporting policies will be fully investigated and appropriate action will be taken. Rogers will take action against suppliers who fail to meet our standard terms and conditions, including corrective action or termination of the business relationship. Rogers utilizes a confidential Ethics Hotline in all the regions in which we operate for individuals to raise concerns about potential violations of the Code.
- **Training:** Rogers employees are governed by the Code and Rogers conducts regular training related to the Code and related policies for all Rogers employees.
- **Assessing Effectiveness and Remediation:** Rogers has not identified any occurrences of modern slavery or human trafficking in its own business or supply chain in the 2024 calendar year. Rogers is committed to responsible and ethical conduct in all our business activities, and we will continue to review our policies and processes to ensure they are effective and appropriate to prevent modern slavery in our business and supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and the California Transparency in Supply Chains Act of 2010, constitutes Rogers Corporation's slavery and human trafficking statement for the financial year ending December 31, 2024, and has been approved by the Board of Directors of Rogers Corporation.



R. Colin Gouveia
President, Chief Executive Officer and Director