

**Global  
Employee Handbook**

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## 1. Opening Statement from Presidents of HA Group

Dear colleagues,

As already outlined in our Code of Conduct, which forms the fundamental basis for all our business activities and behavior, economic success and good corporate citizenship are inseparable objectives of our corporation. As such, responsible and ethical behavior towards employees, business partners, society and the environment is an integral part of our company's value system.

It is a given that we conduct our business in compliance with laws and regulations. However, we are in particular aware of our social responsibility and therefore attach great importance on respecting and upholding human rights as well as global labor standards and fair working conditions. We are guided in this regard by international standards such as the UN Guiding Principles on Business and Human Rights as well as the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Ensuring the achievement of these internationally recognized standards are integral parts of our corporate culture.

We would therefore like to highlight the following points in relation to this Global Employee Handbook:

### **Human Rights:**

- HA Group does not tolerate child labor in any aspect of its business and has a zero-tolerance approach to modern slavery including forced labor and human trafficking.
- We are committed to providing our employees with a work environment free of unlawful harassment, discrimination and retaliation.

### **Global Labor Standards & Fair Working Conditions:**

- HA Group is an equal opportunity employer, values the diversity of its employees and is committed to providing a healthy and safe workplace that is free from intimidation or violence of any type.
- We promote social dialogue and uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable federal, state and local standards, laws and regulations.
- HA Group is committed to providing fair and competitive conditions of work with regard to compensation and benefits and social protection for our employees as customary in the country of operation.

- We strongly believe that the skills and knowledge of our employees are the basis for the Company's success. Therefore, HA Group is committed to ensuring that its employees have access to skill development consistent with their particular needs, trainings on Company policies and procedures, and any other training which the Company believes is necessary to reach their potential and maintain the high levels of success and performance.

It is also crucial that this Global Employee Handbook is built around HA Group's core values of mutual respect, responsibility, appreciation, trust and openness. These values are exemplified in the company and are intended to shape the attitude and behavior of our employees worldwide.

We expect from our employees to make this document a part of their daily working conduct and behavior. In doing so you set an example, spread the spirit that makes our Company unique, and enable HA Group to continue building a successful and sustainable business of which we can all be proud.

March 2022



Franz Friedrich Butz  
President



Christoph Koch  
President

## **2. Purpose of the Handbook**

This Global Employee Handbook describes the key areas of focus for the HA Group with regard to labor and human rights principles. It is intended to serve as a set of guidelines and standards with which we expect all employees globally to meet and with which HA Group intends to conduct itself. It sets forth a set of global policies which are subject to applicable local laws in the jurisdiction where an employee is employed and such applicable local laws shall control in the event of a conflict between this Global Employee Handbook and applicable local laws.

It contains general information and guidelines and does not cover every possible situation that may arise during the employment. It also does not cover specific local regulations or procedures which might be applicable to employment in the employee's jurisdiction, but rather it is intended as a global framework.

If you should have any questions regarding the applicability of a particular policy or a specific benefit, you should contact your local Human Resources representative. You should also consult your local employment policies for more specific policies and procedures applicable to your employment with the HA Group.

We have made every effort to ensure that our policies comply with international and applicable national, state and local standards, laws and regulations, however, this handbook should be considered as an evolving document and may be expanded and updated over time.

### 3. About HA Group

The roots of our Company date back more than 100 years. Over all those decades, we have been consistently serving our customers: foundries all over the world.

As a long-standing, highly successful and global family-owned Company, the HA Group has a strong international network of around 1,800 dedicated employees in more than 30 countries. It is primarily due to the successful corporate strategy over many years of achieving global growth predominantly through partnerships with already existing, mostly-family owned companies, that this diverse and multi-cultural network could emerge. We are proud of our 1,800 employees who are dedicated to providing our customers around the world with expert advice and support. Systematic expansion builds on existing business to strengthen the leading position of HA Group in the global foundry markets.

Standing still means falling behind. At HA Group, we combine tradition with innovation. We learned from our founding fathers that innovation is the decisive driving force. Therefore, we constantly continue to refine and improve our products and solutions. With such strong and stable roots, we are able to look beyond the horizon as we strive to innovate, add value for our customers and protect the environment.

Further information about the Company's origins and history is also available on our Corporate Homepage: <https://www.ha-group.com/en/who-we-are/history/>

#### 3.1. Vision

*"We want to be the most innovative company in delivering superior customer value and be the preferred partner for foundries worldwide."*

Close to the customer. Global. Sustainable.

We see ourselves as the HA family with a tradition going back over a hundred years. Our stable ownership structure gives us the necessary flexibility to grow the company. Loyalty and continuity are our most important stability factors. Our employees, customers and business partners value this reliability and security.

#### 3.2. Guiding Principles

Our Guiding Principles are based on the business principles set out in our Code of Conduct and define the value basis for all our conduct vis-à-vis employees, customers and suppliers as well as all other business partners and stakeholders. In addition, being a family business, tradition is firmly anchored in them. Our culture is characterized by stability, flat hierarchies, also in the sense of short communication channels and fast decision-making, and open communication.

We see ourselves as the HA family with a tradition going back over a hundred years. Our stable ownership structure gives us the necessary flexibility to grow the company. Loyalty and continuity are our most important stability factors. Our employees, customers and business partners value this reliability and security.

Three strong pillars, (1) Market Success, (2) Leadership & Collaboration and (3) Technology Leadership complete our Guiding Principles and create the basis for our Company’s vision.

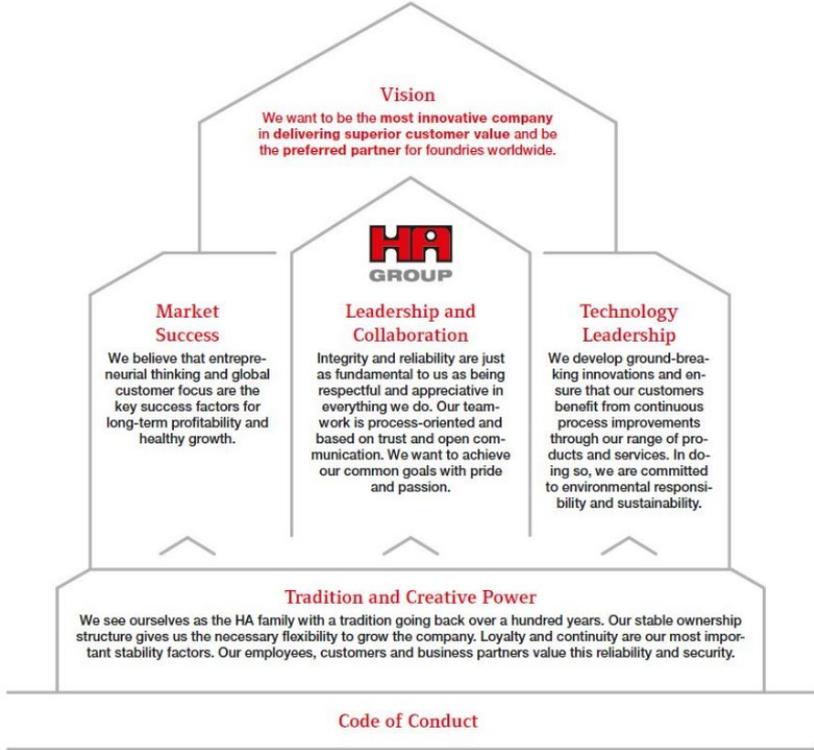


Image: HA Group’s vision & guiding principles

Our goals are:

- To be a technology leader and develop environmentally compatible solutions
- To provide first-class service and problem-solving competence
- To manage our company and resources sustainably
- To act responsibly towards our employees, customers, all other stakeholders, society and environment

In particular, the strongly and rapidly developing topic of environmental social governance (ESG) and thus sustainability, i.e. the inclusion and evaluation of ecological and social aspects in corporate decisions, will be placed even more strongly at the center of our corporate activities within the HA Group as part of the current development of a global ESG Strategy 2030.

Since its foundation, HA Group has become more international in many senses. Mergers & acquisitions, new business developments, increased regional and cultural diversity as well as rapid changes in the general business environment have challenged and will continue to

challenge the group's ability to adjust to new market needs. In the face of such changes, our core principles and values continue to provide guidance and orientation.

It is our expectation that all employees will make these principles a part of their daily working conduct and behavior. In doing so they set an example and spread the spirit that makes our company unique.

### **3.3. Commitment to Employees**

Thinking about tomorrow. With tradition. Together. Worldwide.

This is what HA Group is all about! We know that we can only achieve our goals together and are proud of our team around the world – our HA family.

Around 1,800 employees make valuable contributions to the success of our group of companies every single day – no matter what area or position they work in. Our range of activities at HA Group is as diverse and exciting as our team.

Open communication.

HA Group promotes performance, teamwork and results through open communication. We encourage communication at all locations using the communication channels appropriate to the customs of each country. HA Group also supports an “open door” management policy. Employees are encouraged to raise work-related concerns with their direct manager. If this is not the most appropriate person, they are encouraged to bring their concerns to the attention of the functional manager, Human Resources or any Senior Manager, up to and including HA Group's Presidents.

### **3.4. Code of Conduct**

Economic success and good corporate citizenship are inseparable objectives of our corporation. HA's core values are anchored in the guiding principles of acting responsibly and ethically towards employees, business partners, society and the environment. The essential principles and guidelines that determine our actions and our conduct towards business partners, the public and our colleagues are set out in the [HA Code of Conduct](#).

### **3.5. Corporate Social Responsibility**

As a globally operating family business, we are aware of our responsibility towards people and the environment and take it very seriously. We are convinced that economic success is inseparably linked to the obligation to act responsibly. This applies not only to our employees, but also to society as a whole and the environment. With our established guidelines on our Corporate Social Responsibility ([CSR](#)), we commit ourselves to adhering to clearly defined basic principles. For today and tomorrow: We not only want to live up to our responsibility every day, but also continuously strive to make the future a little better. This applies not only to our social commitment, but also to the development of increasingly resource-efficient products.

### **3.6. Business Ethics**

HA Group's successful business operations and reputation are based on the principles of fair dealing and ethical conduct of our employees. HA Group is committed to conducting its business in accordance with the highest ethical standards and expects all employees to be sensitive to ethical considerations and the consequences of their actions on the Company, its reputation and its continuing business and public relationships. Compliance with this policy is the responsibility of each HA Group employee and failure to comply with or disregard this business ethos and conduct may result in employment action up to and including termination of employment.

As part of your good judgment, based on high ethical principles, you will generally be guided by the boundaries of acceptable behavior. For further guidance please note the following principles:

- Transparency among management and with auditors with respect to financial reporting and accounting matters.
- Avoid any conflicts of interest.
- Do not use Company resources, assets or confidential information for personal benefits.
- Report suspected ethical or legal violations with your immediate manager or other Company management.
- Cooperate with ethics and legal compliance audits.
- Take corrective action upon the discovery of unethical business practices and report to management.

In the event of a situation where it appears difficult to choose the proper and appropriate course of action, you should discuss the matter openly with your immediate supervisor and, if necessary, with your Human Resources or Legal Department representative for advice and assistance. Any cover-up or failure to report such a situation is unacceptable behavior.

Please also read section 6 "Reporting & Contact Persons", especially the references to our Whistleblower Hotline, for further advice.

## 4. Human Rights

Ensuring achievement of internationally recognized standards for labor and human rights, as set out in the [International Labor Organization \(ILO\)](#) conventions and/or the [UN Guiding Principles on Business and Human Rights](#), are integral parts of our corporate culture.

Therefore, we

- are an equal opportunity organization which respects the dignity, diversity, and individual rights of employees and third parties with whom we have business relations. We are committed to fostering a workplace which is free from discrimination, bullying or harassment of any kind.
- condemn forced or child labor and any form of exploitation or discrimination and strictly comply with applicable laws.
- are committed to global human rights and labor policies, including the absolute prohibition on human trafficking, child, forced or involuntary labor in any of our global affiliates, operations, and facilities. We do not tolerate the exploitation of children or workers.

We expect all employees, consultants, contractors, suppliers and business partners with whom we do business to also comply with these standards. With regard to suppliers and service providers, this is once again explicitly anchored in our [Suppliers Code of Conduct](#).

### 4.1. Child Labor

HA Group's commitment to respecting and upholding human rights also and especially includes children's rights. HA Group recognizes that every child has the right to, among other things, a healthy and protected environment with access to education, play and recreation, an adequate standard of living and protection from abuse and harm. Although the risk of child labor in the foundry chemical industry, among its customers and along its supply chain is generally considered to be rather low, we explicitly state, that HA Group does not condone child labor in any aspect of its business.

Therefore, we

- educate our employees about youth labor laws, how to report child labor, and how to recognize suspected child labor.
- require human resources managers to ensure that they do not hire minors under the legal minimum age. We also expect them to know and follow this policy and the laws on wages and hours for older children.
- keep and review records that verify the age of our employees once they are hired. If we determine that we have hired a minor under the age of 18, we will review the applicable laws and adjust work hours as required. If we must dismiss the child, we assess his or her situation and ensure that we provide for him or her as best we can, if necessary.

- communicate our policy prohibiting child labor to organizations with which we are associated and ensure that our contracts contain the correct provisions.
- will regularly audit suppliers and partners (especially in industries with high child labor risk) to ensure they are not involved in child labor. If we discover hidden sites where children are employed, we will terminate the contract with immediate effect.
- are engaging with experts on topics such as child labor, health and safety standards, and corporate social responsibility.

#### **4.2. Modern Slavery incl. Forced Labor & Human Trafficking**

Modern slavery can take various forms, such as servitude, forced or compulsory labor and human trafficking. HA Group has a zero-tolerance approach to modern slavery. We conduct our business to the highest possible ethical standards and are committed to acting with integrity and transparency in all our business dealings and relationships.

To satisfy this commitment, we undertake a range of different steps and continue to strive to achieve the highest legal, ethical, environmental and employee-related standards within our own business and supply chains, making sure that all stakeholders (including employees, partners and suppliers) are working together to eradicate modern slavery and human trafficking. In relation to our supply chain, we are focused on working with long-term, strategic partners who demonstrate the same commitment to their people to ensure modern slavery plays no part in their or our business.

#### **4.3. Discrimination & Harassment**

As stated in HA Group's [Code of Conduct](#), the Company expects all employees to treat one another with dignity and respect. Each of us accepts responsibility and accountability for our own behavior and actions. HA Group is committed to providing all employees with a work environment free of unlawful harassment, sexual and other-wise, discrimination and retaliation.

In furtherance of this commitment, the Company strictly prohibits all employees from engaging in any forms of unlawful discrimination and harassment, including: discrimination or harassment on the basis of actual or perceived race, ethnicity, religion, color, sex, gender, gender identity or expression, sexual orientation, national origin, ancestry, citizenship status, uniform service member and veteran status, marital status, pregnancy, age, protected medical condition, genetic information, disability, or any other category protected by applicable country, state or federal law. Any such harassment will subject an employee to disciplinary action, up to and including immediate termination. The Company likewise prohibits its customers, vendors, suppliers, independent contractors, and others doing business with the Company from harassing our employees.

Examples of prohibited harassment include, but are not limited to: using ethnic slurs, racial epithets, name-calling, jokes, or gestures or any other terms or language to negatively describe, refer to, insult, or show hostility toward a person or group of people; behavior that threatens or intimidates others; posting or circulating in the workplace any written or graphic material, audio or video recordings, or other objects that attack, defame, belittle, put down, or show hostility toward a person or group of employees.

Harassment applies to the conduct of a manager toward a subordinate, an employee toward another employee, a non-employee toward an employee or an employee toward an applicant for employment. Harassment can apply to conduct outside the workplace as well as on the work site.

HA Group furthermore strictly prohibits sexual harassment in the workplace such as unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. HA Group will not tolerate sexual harassment in the workplace, whether committed by male or female, supervisory or non-supervisory personnel.

Examples of prohibited conduct include, but are not limited to: sexually suggestive looks or gestures; leering, whistling, or making obscene gestures; sexual jokes, innuendoes, or lewd comments; deliberate touching or brushing up against another employee; cornering or pinching; offensive or unwelcome sexual flirtations, advances, or propositions; continual or repeated verbal abuses of a sexual nature; display of sexually explicit pictures, greeting cards, articles, books, magazines, videos, photos, or cartoons.

If you feel that you are being or have been harassed, discriminated against, or retaliated against in violation of this policy by another employee, manager, guest, vendor, independent contractor or third-party doing business with the Company, you must immediately report it to your manager. You may also contact the Human Resources department. In addition, if you observe harassment by another employee, manager, or non-employee, please report the incident immediately as indicated above.

The Company takes all complaints of unlawful harassment seriously and will not penalize you or retaliate against you in any way for reporting a harassment problem in good faith. Substantiated acts of harassment or any employee found to be in violation of this policy will be subject to correction action, including appropriate disciplinary action up to and including termination.

## **5. Global Labor Standards & Fair Working Conditions**

Achieving internationally recognized standards for labor and human rights and ensuring fair working conditions are integral parts of our corporate culture. HA Group is an equal opportunity employer, values the diversity of its employees and is committed to providing a healthy and safe workplace that is free from discrimination, harassment, intimidation or violence of any type. We promote social dialogue and uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable federal, state and local standards, laws and regulations.

### **5.1. Diversity & Integration**

Diversity is the difference among all people. This includes age, culture, disability, gender, educational level, national origin, race, organizational levels, and any other characteristics that make us unique individuals. HA Group values the diversity of its employees and strives to be representative of today's work force by maintaining policies that encourage diversity and enable HA Group to attract, hire, retain, and leverage the best employees at all levels of the Company.

Therefore we

- make an affirmative effort to consider candidates that are reflective of today's work force when making hiring and promotional decisions.
- base employment decisions on performance, which means recruitment, hiring, training, development, and promoting employees in all job classifications regardless to race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation, or any other characteristic protected by applicable law.
- participate in the creation of a diversity friendly and a discrimination free work environment.
- take personal ownership for making day-to-day decisions that reflect our diversity principle.

### **5.2. Equal Employment Opportunity**

HA Group is an equal opportunity employer and makes employment decisions on the basis of merit. We want to have the best available person in every job. HA Group is committed to compliance with all applicable federal, state and local standards, laws and regulations providing equal employment opportunities. This commitment applies to everyone involved in Company operations and prohibits unlawful discrimination by any employee of the Company, including supervisors and co-workers.

The Company will make reasonable accommodations for known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless an

undue hardship to the company would result. Any applicant or employee who requires such accommodations should contact the Human Resources department for details of the requested accommodation. The Company will review and identify any barriers that interfere with the equal opportunity of the applicant or employee to perform his or her job. The Company will identify any possible accommodations that address the limitation. If an accommodation is reasonable and will not impose an undue hardship, the Company will make the accommodation.

If you believe you have been subjected to any form of unlawful discrimination, or if you know of another employee who has been the subject of discrimination, submit a written complaint to your supervisor or the Human Resources department. Your complaint should be specific and should include the names of the individual(s) involved and the names of any witnesses. If you need assistance with your complaint, or if you prefer to make a complaint in person, please contact a Human Resources representative. The Company will immediately undertake an effective, thorough, and objective investigation and attempt to resolve the situation.

If the Company determines that unlawful discrimination has occurred, effective remedial action will be taken commensurate with the severity of the offense, up to and including termination. Appropriate action also will be taken to deter any future discrimination. The Company will not retaliate against you for filing a complaint and will not knowingly permit retaliation by management, employees, or co-workers.

### **5.3. Employee Health & Safety**

A safe and healthy work environment for employees, customers and visitors is a top priority at HA Group. We will provide and continuously strive to improve a healthy and safe work environment for our employees by complying with all applicable health and safety laws and standards and by taking necessary measures in a continuous and planned manner in order to maintain and improve the physical and mental health of all employees. In this regard, not only internal and external audits are carried out, but regular health and safety meetings are also held at different levels. However, the success of all measures to ensure a safe and healthy work environment depends on the alertness and personal commitment of everyone. Managers in particular must ensure that appropriate health, safety and security practices and safeguards are in place to comply with applicable laws and management standards (also see section 2.4.1 of our [Code of Conduct](#)).

In accordance with local legislation, we inform our employees regularly about occupational health and safety issues through regular internal communication. Our employees and managers also receive site-specific workplace safety trainings on any topic which is applicable to each employee's role and responsibilities with the Company. The training covers potential safety and health hazards as well as safe work practices and procedures to eliminate or minimize hazards.

Some of the best safety improvement ideas come from employees. If you have an idea, concern, or suggestion for how to improve safety in the workplace, we encourage you to contact your

manager or the Environmental Health & Safety department. We want you to be assured that you can report any concerns about workplace safety without fear of reprisal.

At HA Group, employees are expected to obey all safety rules and use caution in their work activities to avoid any kind of danger. In case of danger or a near miss incident, you must immediately report any unsafe condition to the appropriate manager. If you violate HA Group safety standards, cause a dangerous situation, or fail to report, you may be subject to disciplinary action, up to and including termination of employment consistent with and subject to your applicable collective bargaining or other employment agreements. In case of an accident that results in an injury, regardless of how insignificant the injury may appear, you should immediately notify the appropriate manager and the Environmental Health & Safety department. Prompt reporting can ensure legal compliance and quick initiation of insurance and worker's compensation benefits procedures. In addition, it is mandatory to comply with the local regulations and instructions for action of the respective site as well as the statutory regulations.

#### **5.4. Workplace Violence**

HA Group is committed to preventing workplace violence and to maintaining a safe work environment for all employees. Therefore, HA Group introduced the following guidelines to deal with intimidation, harassment, or other threats of violence that may occur during hours of work. For our Company it is indispensable, that all employees, including managers and temporary employees, should be always treated with courtesy and respect.

HA Group encourages employees to bring their disputes or differences with other employees to the attention of their managers or the Human Resources department before the situation escalates into potential violence.

HA Group's employees are expected to refrain from fighting or other conduct that may be dangerous to others. Any kind of weapons or other dangerous devices or substances are absolutely prohibited from the premises of HA Group. Conduct that threatens violence, or physically intimidates, or coerces another employee, a customer, or a member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local law.

In keeping with the spirit and intent of this policy and to ensure that HA Group objectives in this regard are attained, it is the commitment of HA Group:

- to provide a safe and healthful work environment;
- to take prompt remedial action up to and including immediate termination, against any employee who engages in any threatening or intimidating behavior or acts of violence or who uses any abusive or threatening gestures or language, including e-mail, graffiti, etc.;
- to take appropriate action when dealing with customers, former employees, or visitors to HA Group's facilities who engage in such behavior. Such action includes, if necessary

and/or required by law, notifying the police or other law enforcement personnel and prosecuting violators of this policy to the maximum extent of the law;

- to strictly prohibit employees, customers, and visitors any consumption of alcohol or drugs at the workplace and on the entire company premises
- to prohibit employees, former employees, customers, and visitors from bringing unauthorized or unlawful firearms or other weapons onto HA Group's premises; and
- to establish viable security measures to ensure that HA Group's facilities are safe and secure to the maximum extent possible and to properly handle access to HA Group's facilities by the public, off-duty employees, and former employees.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to your immediate manager or the Human Resources department. This includes threats by employees, customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, you should describe it as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to your manager. Do not place yourself in peril. If you see or hear a commotion or disturbance near your workstation, do not try to intercede or see what is happening.

HA Group will promptly and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as possible, but absolute confidentiality cannot be guaranteed. In order to maintain workplace safety and investigation integrity, HA Group may suspend employees, either with or without pay, pending an investigation.

Nothing in this policy prevents or prohibits employees from exercising their rights to engage in concerted protected activities recognized by law including discussion of workplace terms or conditions of employment.

## **5.5. Social Dialogue**

Social dialogue such as information sharing, consultation, negotiation and collective bargaining, joint problem-solving and joint decision-making may take place at different levels and in various form, depending on national circumstances.

However, HA Group recognizes that employers and employees have both competing and mutual interests. We recognize therefore the importance of social dialogue and its institutions, including at international level, as well as applicable collective bargaining structures and respect the fundamental rights of freedom of association.

## **5.6. Compensation & Benefits**

At HA Group, the conditions of work, wages and other forms of remuneration comply with national laws and regulations. Where applicable, remuneration systems are transparent, including the process and criteria being used, and communicated to all impacted employees. HA Group is committed to providing fair and competitive conditions of work with regards to wages, hours of work, weekly rest, holidays, health and safety and maternity protection. HA Group provides social protection for employees as required in the country of operation and compensate employees for overtime in accordance with laws, regulations or collective agreements.

HA Group's compensation and benefits programs, which distinguishes the company and contributes to our success, is clearly linked to our fundamental employment principles and is an integral part of our overall management approach. The overall compensation approach is to balance between HA Group's need to be viable and profitable and the needs and desires of our employees. The total compensation package may consist of additional benefits or variable profit driven components in addition to the base salary. The total compensation is directed to support the ambitions of our employees to be successful and committed to the goals and objectives of our Company.

The total compensation program is managed to achieve a commercially sustainable package in full accordance with the local rules and legislation regarding social security contributions and tax withholding in the applicable countries and is ratified, for example, in individual contracts or collective labor agreements for our employees.

## **5.7. Career Management & Training**

At HA Group we strongly believe that the skills and knowledge of our employees are to the basis for the Company's success. Therefore, HA Group is committed to ensuring that its employees have access to skill development consistent with their particular needs, trainings on Company policies and procedures such as compliance and EHS trainings, and any other training which the Company believes is necessary to reach their potential and maintain the high levels of success and performance.

Therefore, we:

- promote education at all levels, and engage in actions to improve the quality of and access to education, promote local knowledge;
- provide all employees with appropriate access to skills development, training and opportunities for career advancement, on an equal and non-discriminatory basis;
- participate in local and national skills development programs, including apprenticeship and study programs;
- facilitate, for employees being made redundant, when necessary and appropriate, an access to assistance for new employment, training or counselling;
- facilitate human rights education and awareness raising; and
- promote health and well-being.

## **6. Conflicts of Interest**

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of HA Group's business dealings.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to an officer of HA Group as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Employees with a real or potential conflict of interest must disclose it to their manager or the Company's Legal Department for prompt resolution.

## 7. Reporting & Contact Persons

Employees who believe they are aware of a violation of HA Group's [Code of Conduct](#), HA Group's [Corporate Social Responsibility policy](#) or any policy stated in HA Group's Global Employee Handbook are encouraged to report their concern, complaint, or inquiry. Employees have many ways in which they can report a concern or incident related to these policies. They may discuss it with their manager or the Human Resources Department. Employees may also contact the Legal Department.

Reports should describe in detail the specific facts demonstrating the bases for the concerns, complaints, reports or inquiries. HA Group will conduct a prompt, discreet, and objective review or investigation and shall make every effort to timely acknowledge receipt of and respond to the report. Employees should recognize that HA Group may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

We prohibit retaliation by or on behalf of HA Group against employees for making good faith concerns, complaints, reports or inquiries under this reporting procedure or for participating in a review or investigation. Such prohibited retaliation includes protection against termination of employment, negative impact on promotions or compensation, unjustified negative performance assessment, transfer and change of workplace, harassment or discrimination. This protection extends to those whose allegations are made in good faith and with reasonable grounds to believe that the information reported was true at the time of report, even if ultimately proven to be mistaken. HA Group reserves the right to discipline employees who make bad faith, baseless or knowingly false complaints, reports or inquiries.

An overview of all relevant internal contacts from Human Resources (global and local) and Legal Department is available on sHAre.

As an additional communication tool for specific types of situations HA Group has established an anonymous reporting tool (also known as "whistleblower hotline") through which employees can confidentially and anonymously report perceived violations of the Global Employee Handbook. This hotline is not a substitute for routine communications within our organization between employees and their supervisors and managers, particularly as to workplace duties. Hence, regular business matters that do not require anonymity should be directed to the employee's supervisor and should not be submitted using this service. Rather, this whistleblower hotline is an additional communication tool for specific types of situations and it is provided because we believe that it is a good business practice to do so.

*Website:*

[www.lighthouse-services.com/ha-group](http://www.lighthouse-services.com/ha-group)

*Anonymous Reporting App:*

Keyword: ha-group

*Toll-Free Telephone:*

Germany: 0800-183-0724

USA: 855-400-6002

All other countries: 800-603-2869 (must dial country access code first [click here](#) for access codes and dialing instructions)

*Email:*

reports@lighthouse-services.com (must include company name with report)

*Fax:*

+1 (215) 689-3885 (must include company name with report)

After making a report an in-person meeting may be scheduled upon request.

# **HÜTTENES-ALBERTUS**

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