Global Occupational Safety and Health Policy

Content

1. Opening Statement from Presidents of HA Group

Dear colleagues,

Safety and health at work are a priority corporate objective. HA Group is committed to providing a safe and healthy environment for its employees, customers, suppliers and anyone else who works on or otherwise visits its offices or production facilities worldwide. HA Group therefore manages its business in a way that is designed to ensure that we maintain the highest standards of health and safety at all our sites worldwide to minimize the risk of any impairment to occupational health and safety at the workplace. Our goal is to promote the well-being of our employees, customers, suppliers and visitors and to prevent work-related absenteeism. Accordingly, occupational safety and health as well as environmental protection are considered equal-ranking corporate goals alongside economic success, efficiency and quality, whereby economic considerations must never take precedence over safety and health.

Prevention instead of aftercare. Our commitment to occupational safety and health (OSH) includes the following:

- Complying with all legal and statutory obligations relating to occupational safety and health.
- Having processes, procedures and governance arrangements in place to identify, evaluate and control significant health and safety risks which may arise throughout our business.
- A desire to work in partnership with anyone we are engaged in business with, to ensure the highest standards of occupational safety and health are maintained.
- Ensuring employees and contractors receive sufficient occupational safety and health related training and information.
- Ensuring appropriate resources are made available for occupational safety and health, including access to specialist advice and assistance.
- Ensuring that all health and safety incidents are promptly recorded, reported and investigated to, amongst other things, prevent recurrence through appropriate action.
- Setting annual occupational safety and health objectives and targets, supported by a safety management system and programs aimed at continually improving performance in this area and which will be subject to continual review.

Responsibility of our management. Occupational safety and health is a particular responsibility of managers. They are obligated to behave in an exemplary manner and ensure that all employees are fully informed about instructions, legal requirements, hazards and protective measures.

Our employees make a decisive contribution. In addition to our managers, however, every employee is also obligated to act responsibly. We expect each employee to respect internal rules including the usage of appropriate personal safety protection equipment and actively contribute to the execution of this Global OHS Policy during any activity, regardless of the employee's position, rights and/or responsibilities. Safety and health protection is a personal commitment that everyone is responsible for. It is about doing the right things for the right reasons, looking out for each other and speaking up when potential hazards are identified. We involve our employees thoroughly in improving occupational health and safety and promote open communication and a constructively critical feedback culture.

Continuous improvement. We regularly check the status of occupational safety and health as well as compliance with external and internal standards through inspections and audits. We eliminate deficiencies and deviations as part of our continuous improvement process.

A safe and healthy business environment is important to the long-term sustainable growth of our business. Your personal commitment to occupational health and safety management and to compliance with this policy is an important contribution to leading the HA Group safely into a successful future.

Thank you for your support.

Best regards

Franz Friedrich Butz
President

Christoph Koch
President

2. Purpose of the Policy

HA Group is committed to Occupational Safety & Health (OSH). Everyone working for HA Group is expected to share this commitment by taking care of themselves and looking out for others. This policy supports the Code of Conduct, the Sustainable Sourcing Policy and Suppliers Code of Conduct, the Global Employee Handbook as well as the Corporate Social Responsibility (CSR) Policy with its commitments to occupational safety and environment compliance, as well as environmental sustainability.

3. Scope and Applicability of the Policy

The scope of this Policy is global. It is applicable to all employees as well as customers, suppliers and anyone else who works on or otherwise visits HA Group offices or production facilities worldwide.

Due to local laws and regulations additional local amendments to this Policy may exist.

4. Roles & Responsibilities

Role	Responsibility
Employees	▪ Awareness and compliance with this Policy.
Managers	▪ Accountable for OSH performance (including compliance, resourcing and controls) within their respective area of responsibility. ▪ Promotes awareness of this OSH policy and awareness of OSH risks in their area of responsibility. ▪ Escalates material breaches of compliance to appropriate leadership and Local and Global OSH.
Local EHS	▪ Implements HA Group and/or local OSH programs locally. ▪ Demonstrates leadership and champions company values in matters pertaining to OSH.
Global EHS	▪ Establishes and maintains overall OSH governance process including controls, conformance reviews and compliance audits ▪ Owns and maintains OSH documentation framework and KPI queries.
Human Resources	▪ Provide guidance and support for OSH measures and trainings.

5. Principles & Objectives

HA Group is committed to providing a safe and healthy environment for its employees, customers, suppliers and anyone else who works on or otherwise visits its offices or production facilities worldwide. Our EHS standards for the HA Group therefore define minimum standards that are applicable and mandatory throughout the HA Group in order to ensure the protection of the above-mentioned group of people from recognized hazards while working or visiting a company of our Group. Each company in the HA Group must ensure that managerial duties relating to OSH are properly delegated to managers in accordance with local regulations and requirements, and that managers receive appropriate training. In addition, HA Group is committed to the following **principles** and, together with its managers and employees, pursues the related listed **objectives**:

5.1. Protecting the safety and health of our employees

by:
- Promoting and supporting the implementation of programs to maintain and improve the physical, mental health, and social well-being of our employees and contractors.
- Providing our employees, contractors and third parties with safe working conditions to protect them from potential health hazards and injuries.
- Completing risk assessments before conducting any potentially hazardous work. Appropriate protective measures including the usage of personal protective equipment if necessary according to the assessment result must be taken as needed to ensure the work can be completed safely.

5.2. Complying with local laws and regulations, and conformance to internal requirements

by:
- Establishing a HA OSH Management System and supporting documents and regularly conducting audits, reviews and self-inspections to ensure conformance to internal requirements, as well as compliance with applicable local laws and regulations.
- Complying with internal and external requirements as part of our culture.
- Having a company culture in which protecting the health and safety of employees, contractors, neighbors, others, and the environment is considered a core value.
- Participating in industry networks to exchange best practices.

5.3. Considering OSH implications in the development of products, processes, and technologies

by:
- Ensuring that OSH considerations are integrated into product and process development, procurement, manufacturing, and capital investment projects at an early stage.
- Including sustainable chemistry in product development processes.

5.4. Building a network of responsible business partners

by:
- Requiring business partners to meet the OSH requirements outlined in the HA Group Code of Conduct and HA Group Suppliers Code of Conduct.

5.5. Driving continual improvement in our OSH management systems and performance

by:
- Obtaining annual management endorsement of OSH objectives and targets with regular measurement of performance against these objectives and targets.
- Drawing lessons learned from incidents and events and implementing appropriate actions to achieve the set goals and to prevent a reoccurrence, including for incidents and events from outside HA Group where appropriate.
- Ensuring OSH competence through appropriate recruitment, training and development.

5.6. Communicating transparently

by:
- Sharing OSH results openly both through internal and external communication channels.
- Reporting our OSH performance consistently with international public reporting standards.
- Engaging proactively with internal and external stakeholders, including local communities, and obtaining feedback about OSH matters.

5.7. Engaging all employees to support OSH principles

by:
- Understanding local OSH requirements, completing all assigned training, and following requirements.
- Reporting any OSH incidents/unsafe conditions.

- Working in a safe and compliant manner and taking early action if deviations occur.
- Participating in relevant OSH hazard identification and risk assessment processes relevant to their job duties.
- Looking out for their colleagues and speaking up respectfully if they observe unsafe behaviors or conditions.
- Reporting OSH key performance indicators accurately.

6. Breach of this Policy

Breaches of this policy can result in remedial, corrective, or disciplinary actions up to and including termination of employment. Actual or suspected incidents of misconduct should be reported as described in Section 7 - Reporting & Contact Persons.

7. Reporting & Contact Persons

Employees who believe they are aware of a violation of HA Group's Code of Conduct, HA Group´s Sustainable Sourcing Policy and Suppliers Code of Conduct, HA Group´s Corporate Social Responsibility (CSR) Policy, HA Group´s Global Employee Handbook or this Global OSH Policy 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 or Local/Global EHS responsible.

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), Legal Department and EHS organization (global and local) 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 policies listed above. 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

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.

HA GROUP