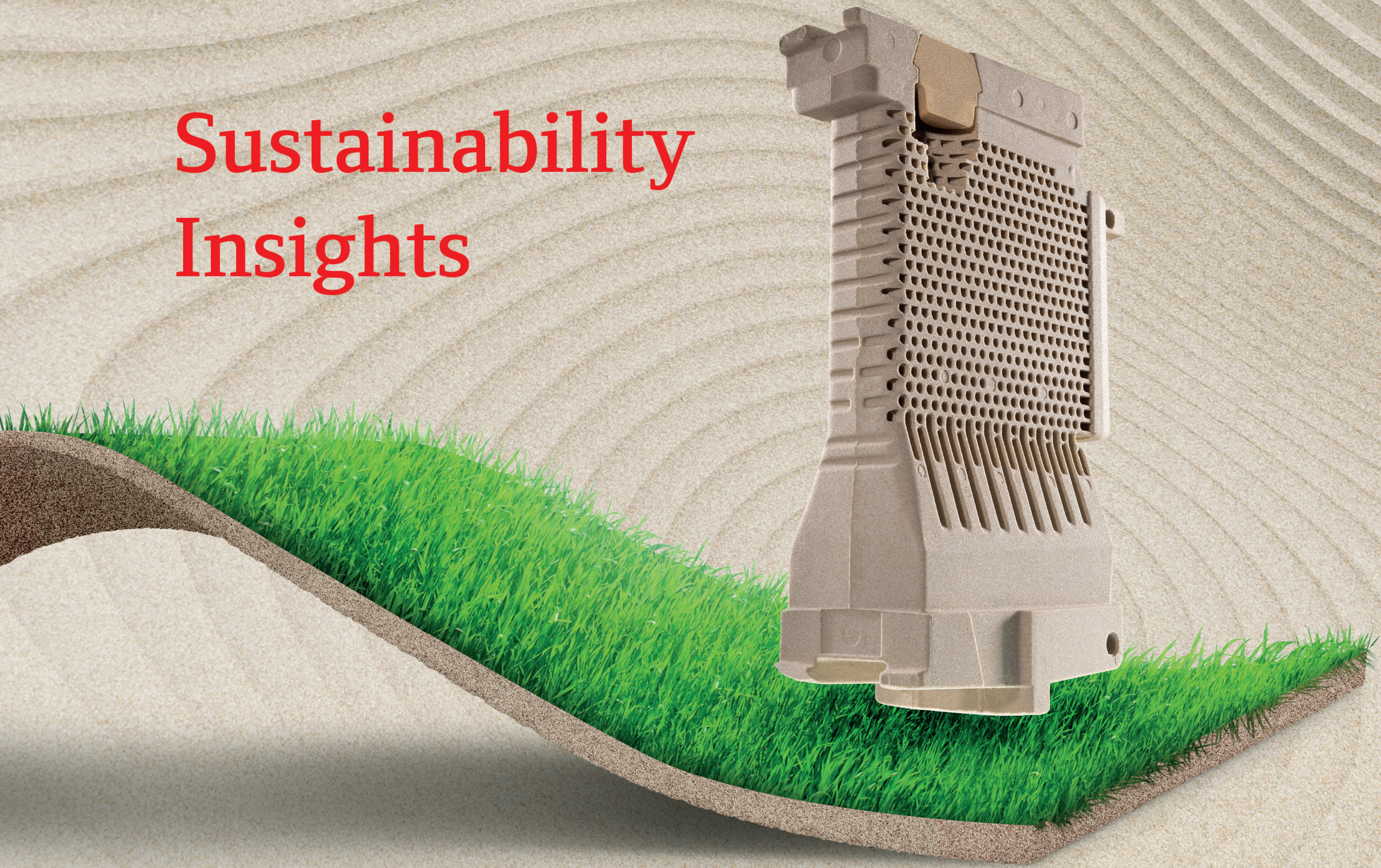
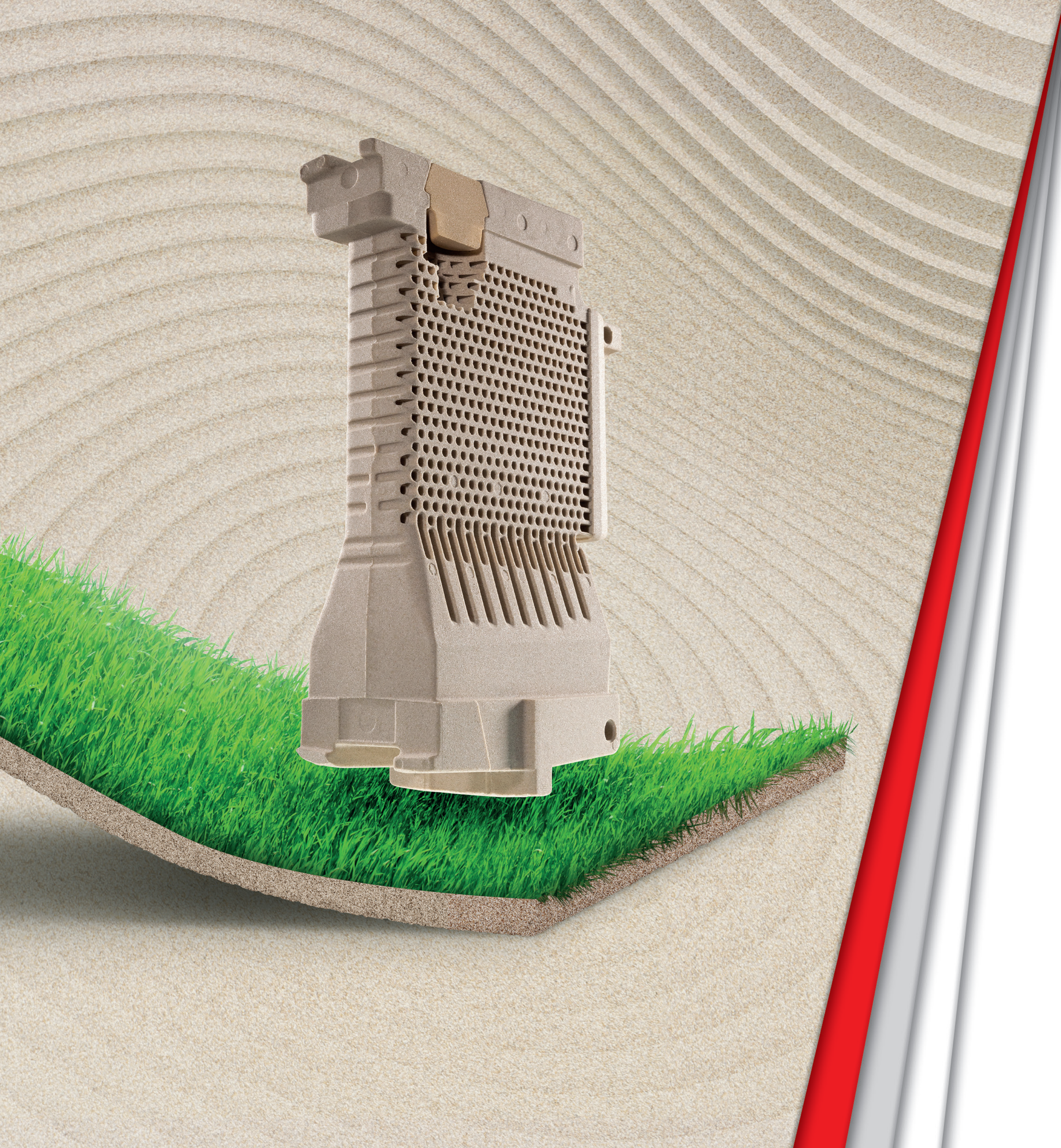
Sustainability Insights





01

General information

1.1. General information on this report (BP-1 & BP-2)

ESRS2.BP-1.4a This sustainability statement has been prepared on a consolidated basis and reflects the business activities of the HA Group as a whole, including all business areas and locations of the fully consolidated subsidiaries. The scope of consolidation corresponds to the financial reporting in the annual financial statements. This sustainability statement therefore ensures a comprehensive and transparent presentation of our sustainability performance.

ESRS2.BP-1.5 This sustainability statement applies the disclosure requirements of ESRS 1. None of the provisions listed in ESRS 2 §5 apply.

1.2. Business model, strategy, value chain and financial effects (SBM-1 & SBM-3)

ESRS2.SBM-1.17a The HA Group is described as a "full-range supplier for the foundry industry", offering foundry chemicals, water-based and alcohol-based coatings, and resins as core product categories. Our significant markets and customer groups consist primarily of global foundries, automotive suppliers, heavy industry, and industrial casting producers as the group's portfolio is developed specifically for foundry applications and industrial casting processes. The declared goal of every business decision is to achieve the highest possible quality standards in conjunction with sustainability and environmental protection. The specialist knowledge in foundry chemistry acquired over many years is combined with new research approaches in order to design even more efficient and environmentally friendly foundry processes. With regard to customer categories, we have set ourselves the goal of enabling customers to reduce environmental impacts (e.g., emissions, waste, energy) through our solutions and technical support.

ESRS2.SBM-1.17a.ii Our products are not prohibited in any markets.

ESRS2.SBM-1.17b Our main business activities can be classified under the sectors C20 (Manufacture of chemicals and chemical products) and C24 (Manufacture of basic metals / foundry-related materials). We use the NACE codes for this classification. These sectors are essential for conducting our business. At the same time, they are linked to our identified impacts, risks and opportunities, particularly due to their environmental impact (emissions from chemical processes, resource use), dependence on energy-intensive industrial customers and exposure to regulatory developments, especially related to chemical safety, circularity and emissions reduction.

ESRS2.SBM-1.17c.i, iii, iv We are not active in the fossil fuel sector.

»The HA Group is a full-range supplier for the foundry industry«

We generate no revenue from coal, oil and gas[1], nor are we involved in the manufacture or trade of controversial weapons[2]. We are also not involved in the cultivation or production of tobacco[3], however ESRS2.SBM-1.17c.ii we are involved in chemical production as defined in Regulation (EC) 1893/2006[4].

ESRS2.SBM-1.18 Our value chain is characterised upstream by the procurement of raw chemicals, resins, fillers, additives, and minerals, our collaboration with suppliers of energy, logistics, packaging materials and the technological cooperation with partners supporting R&D and formulation development.

Upstream activities and resources include chemical raw materials, energy-intensive production inputs, and specialist technology for resin and coating production.

Value creation within our own company includes in particular the manufacturing of resin systems (including phenolic, furan and silicate systems), the production of water- and alcohol-based coatings for foundry applications, the technical support and on-site optimisation services for foundries and our operating reclamation plants and circularity-supporting equipment. Our most important activities and resources consist of chemical production assets, laboratories and R&D facilities, foundry application specialists, and international distribution structures.

In the downstream value chain, the key steps include the delivery of our chemicals and coatings to foundries worldwide, the integration of our products into casting processes, the technical optimisation to improve quality, emission performance and circularity and customer projects on sand re-use, emission reduction and process efficiency. Relevant downstream resources and activities include technical expertise, customer collaboration, and application engineering.

1.3. ESG Governance (GOV-1 & GOV-2)

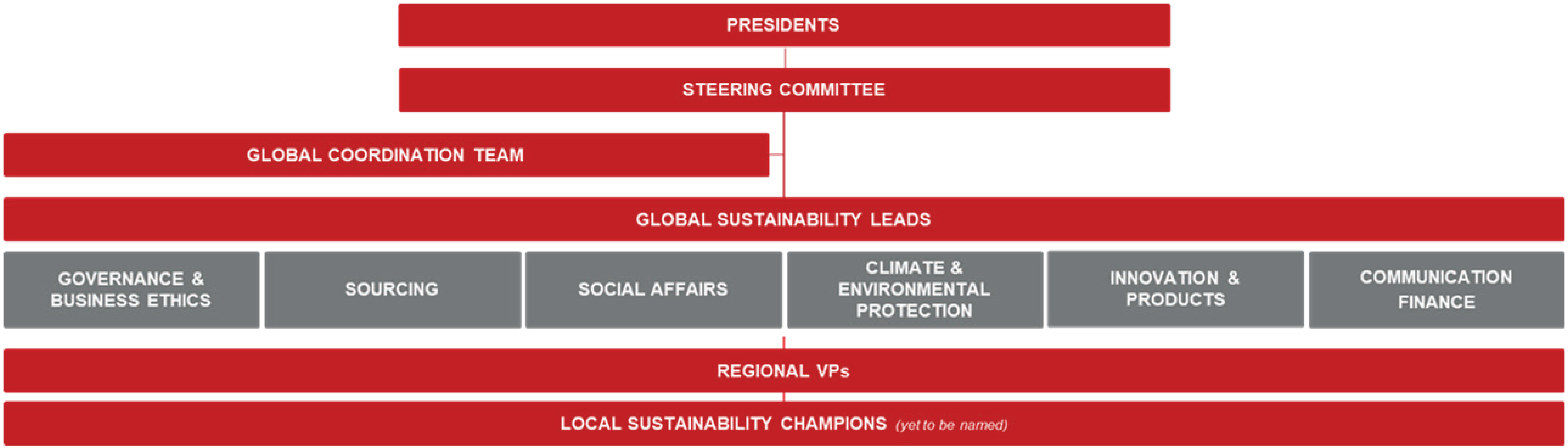
ESRS2.(GOV-1.)(9a) The administrative, management and supervisory bodies of HA Group consist of the HA Group Presidents, the Executive Leadership Team and the Supervisory Board. The HA Group Presidents and the Executive Leadership Team are responsible for running the company in the interests of the company, while taking into account

1 The disclosure of this information is also required under other disclosure obligations, including Regulation (EU) 2019/2088 (SFDR) (supplemented by (EU) 2022/1288 – Annex I, Table I, Indicator 4).
2 The disclosure of this information is also required by other disclosure obligations, including Regulation (EU) 2019/2088 (SFDR) (supplemented by (EU) 2022/1288 – Annex I, Table I, Indicator 14).
3 The disclosure of this information is also required by Regulation (EU) 2020/1818 (Article 12.1, paragraph b).
4 The disclosure of this information is also required by other disclosure obligations, including Regulation (EU) 2019/2088 (SFDR) (supplemented by (EU) 2022/1288 – Annex I, Table II, Indicator 9).

the interests of shareholders, employees and other stakeholders. The Supervisory Board advises and supervises the HA Group Presidents and the Executive Leadership Team. The Supervisory Board currently consists of five members, all of whom are male. This composition was not the result of an intentional policy, but has developed over time. Major sustainability topics are included in this governance context. Sustainability is discussed several times a year at management level, especially topics related to environment, safety and portfolio transformation.

The representation of employees and other workers is ensured by our employee representation, which currently has 19 members (HA GmbH in Germany: 31% of the members being female and 69% being male).

ESRS2.GOV-1.9b Our management team is involved in making sustainability-related decisions and monitoring them. ESRS2.AR3 If our management team does not have the necessary expertise in-house, experts from the relevant areas are consulted and involved in the deci-



sion-making process. If fundamental knowledge is lacking, knowledge building is facilitated through external training directly at management level or in the specialist departments. Our double materiality analysis has provided a reliable basis for identifying and prioritising the sustainability topics that are most relevant for HA Group. It supports the further development of our sustainability strategy and management.

ESRS2GOV-1.9c The monitoring of the IROs is the responsibility of the Presidents of the HA Group. The respective responsibilities are reflected in the sustainability governance structure of HA Group, especially through the HA Group Presidents, the Global Sustainability Steering Committee and the Global Sustainability Coordination Team. ESRS2 GOV-1.9d The HA Group Presidents and the Executive Leadership Team actively discuss sustainability topics several times a year in their meetings. All strategic sustainability activities are overseen by the HA Group Presidents. ESRS2.GOV-2.9e Our management integrates the identified impacts, risks and opportunities into strategic management and business decision-making. The Global Sustainability Steering Committee supports the consideration of sustainability aspects in business decisions. In this way, we ensure that sustainability aspects are consistently incorporated into our business decisions and that long-term value creation is reconciled with environmental and social responsibility.

ESRS2.GOV-2.11a The Supervisory Board appoints the HA Group Presidents and decides on their remuneration.

1.4. Risk management and internal control processes (GOV-3 & GOV-4)

ESRS2.GOV-3.13 Our due diligence practices[5] are reflected in the key elements of our sustainability report. ESRS2.AR5 The table below shows the chapters of our sustainability statement in which the key aspects of our due diligence process are anchored.

(ESRS2.GOV-)(5)(. (15) Risk management approaches and internal control systems have not yet been fully integrated into the sustainability reporting process. For this reason, no formal risks for reporting were identified for the reporting year. In the reporting year, only compliance risks were analysed within the compliance management system, but not sustainability topics in general. The annual compliance report provided information on the compliance organization and issues specific to the compliance management system.

5 The disclosure of this information is also required in other disclosure requirements, including Regulation (EU) 2019/2088 (SFDR) (supplemented by (EU) 2022/1288 – Table III, Indicator 10).

1.5. The process & results of the double materiality analysis (IRO-1, IRO-2)

ESRS2.IRO-1.26a In our comprehensive materiality process, we identify, assess, prioritise and monitor sustainability-related impacts, risks and opportunities (IROs).

In 2023, we introduced a systematic and participatory process for determining materiality for the first time. Where possible, we used quantitative data to assess the IROs in order to achieve an objective evaluation. Data sources included e.g. our sales volume (for impacts on employees in the value chain), the number of occupational accidents (for impacts on our own workforce (occupational safety), CO_2-emissions (for impacts on climate change), risk heat maps, benchmark analyses or external studies. Where no quantitative data was available, we used comparative values and estimates. We use the threshold values from our risk management system to assess risks and opportunities, and we use a scale of 1-5 according to severity and potential probability of occurrence to assess impacts.

ESRS2.IRO-1.26b Our materiality analysis takes our entire value chain into account equally and analyses our business activities and relationships holistically.

ESRS2.IRO-1.26e In order to identify sustainability-related risks and opportunities, we examined in particular dependencies on resources and their availability along our supply and value chain. At the same time, we examined the risks and opportunities behind the previously identified impacts. ESRS2.(IRO-26)(f) Sustainability-related risks and opportunities that were identified as material were then fully integrated into our company's overall risk management system and also used there to assess the general risk profile. Once we had identified risks and opportunities with a high probability of occurrence or potential for damage, these were prioritised. The aim is to minimise sustainability-related risks and make the best possible use of sustainability-related opportunities.

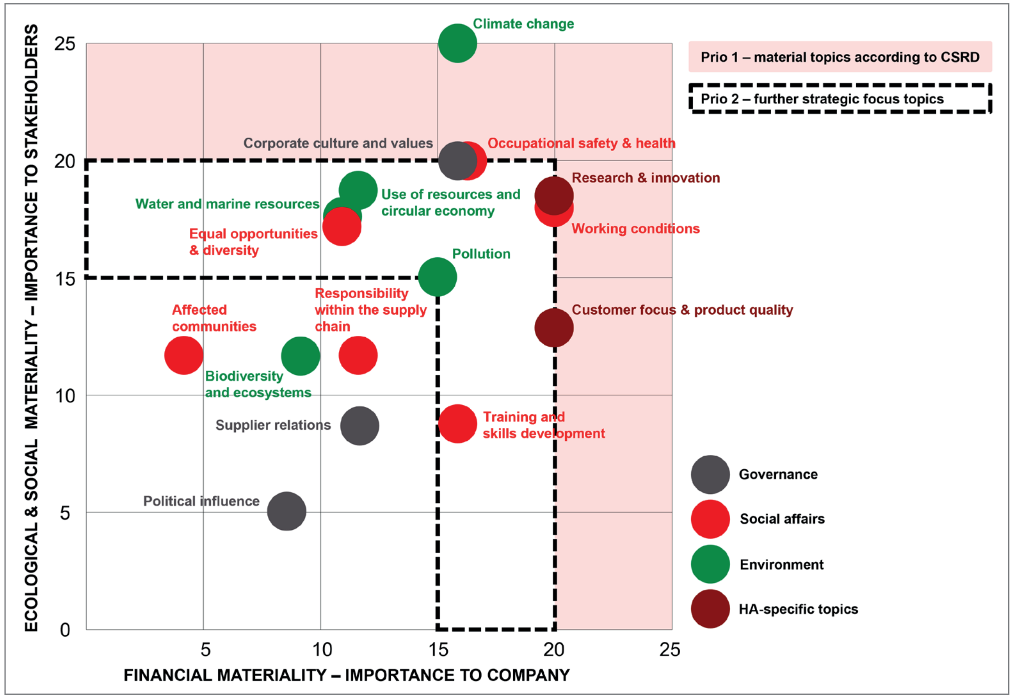
ESRS2.IRO-1.26g At the end of the materiality analysis, the materiality of the sustainability topics was finally reviewed. In the final step of the analysis, these assessments were validated in the overall context. To this end, not only was the relevance to the regulatory requirements of ESRS 1 examined, but also the relevance to the strategic orientation of the company and the relevance to key stakeholder groups. This step in the process did not change the materiality results.

ESRS2.IRO-2.28a The results of our materiality analysis are shown in the following table:

Overview of material IROs

	ESRS2.IRO-2.28a **Negative impacts**	ESRS2.IRO-2.28a **Location in WSK**
E1	Negative contribution to climate change through GHG emissions caused by use of energy-intensive raw materials in the production (Scope 3)	Upstream value chain
E1	Negative contribution to climate change through GHG emissions caused by use of non-renewable energy	Own operations
S1	Negative contribution to employees by imposing health risks due to hazardous working conditions	Own operations
G1	Negative contribution due to unfair market practices (corruption or violations of competition law)	Upstream & downstream value chain
	Positive impacts	
E1	Positive impact to climate protection through the reduction of product carbon footprints (e.g. by using more climate-friendly resources)	Own operations, downstream value chain
	Risks	
S1	Financial risks due to loss of competitiveness in the labor market	Own operations
Research and Innovation	Financial risks due to increased innovation and loss of business basis	Own operations
	Opportunities	
Customer and Products	Financial advantage due to high customer loyalty caused by high product quality	Own business activities

Materiality matrix



ESRS2.IRO-2.28e We did not identify any materiality in relation to forced or child labour. Disclosure of the increased risk of incidents of this kind is therefore not included in this sustainability statement.

02

Environmental information

2.1. Strategy in relation to climate change

Climate Transition plan, Climate Risk Analysis & Resilience Analysis

E1.1.15 We have not yet published a transition plan. We are currently in the process of developing a transition plan. The goal is to have a transition plan developed and published by end of 2027.

E1-2.17 We have not yet identified and categorised the key climate-related risks. We plan to conduct our climate risk analysis in 2027. E1-3.21a Our climate resilience analysis will be carried out in 2027 as well.

2.2. Management of impacts, risks and opportunities related to climate change

Concepts related to climate protection and adaptation to climate change

E1-4.22 We have developed clear climate policies that aim to reduce our greenhouse gas emissions. Our concepts include energy efficiency measures, the increased use of renewable energies, the implementation of certified energy management systems at all HA group production sites and increased product stewardship over the entire life cycle.

Measures and resources related to climate concepts

As part of our reporting, we set out the climate protection measures we have taken in the reporting year and those planned. E1-5(.2)(4)(a) In doing so, we make targeted use of levers for decarbonisation, including measures for energy efficiency, such as optimisation of our production processes, as well as the increased use of renewable energies, for example through measures such as switching to green electricity and generating our own electricity with solar power plants.

E1-5.24b The results of our climate protection measures include both the reductions in our greenhouse gas emissions that have already been achieved and those that are expected, as shown in the table “Overview of greenhouse gas emissions” below.

Reductions in greenhouse gas emissions

Reduction in GHG emissions	2024
Achieved reduction in GHG emissions	approx. 17% in Scope 1&2 and 10% in total CCF (Scope 1-3), respectively
Expected reduction in GHG emissions	In-line with reduction path according to SBTi

E1-5.24c As of now, there are no financial and further resources planned for the implementation of climate protection measures. High-level financial planning and allocation of resources will be derived from a Climate Transition Plan, which is in scope to be developed within 2027.

2.3. Key figures and targets related to climate change

Energy consumption and energy mix

This chapter contains information on energy consumption and the energy mix of all locations of the fully consolidated subsidiaries. To calculate the energy consumption high-quality data, with measured and/or invoiced values for the different energy sources were used. Additionally, assumptions were used especially for the consumption of energy from nuclear and renewable sources.

Energy consumption and energy mix

	Consumption in 2024
E1-7.29a Fuel consumption from coal and coal products	16.024
E1-7.29b Fuel consumption from crude oil and petroleum products	11.242
E1-7.29c Fuel consumption from natural gas	63.823
E1-7.29d Fuel consumption from other fossil sources	1.020
E1-7.29e Consumption of purchased or received electricity, heat, steam and cooling from fossil sources	51.105
E1-7.28a **Total consumption of fossil energy (MWh)**	143.214
E1-7.28b **Consumption from nuclear sources (MWh)**	2.746
E1-7.28c **Total consumption of renewable energy (MWh)**	2.076
E1-7.28 Total energy consumption (MWh)	148.035

Overview of energy production

Energy production in MWh	Amount in the reporting year in MWh (2024)
E1-7.30 Energy production from non-renewable energy (MWh)	-
E1-7.30 Energy production from renewable energy sources (MWh)	1.033

Greenhouse gas emissions (Scope 1, 2 and 3 categories and total GHG emissions)

The greenhouse gas emissions (GHG emissions) of HA group are calculated in accordance with the guidelines of the Greenhouse Gas Protocol (GHG Protocol). The accounting include all locations in our operation sites worldwide.

E1-8.AR25c As part of the analysis of significant Scope 3 categories, we have concluded that the categories 3.8, 3.11, 3.13 and 3.14 are not significant due to

3.8: Our company does not lease any significant assets from external parties
3.11: Our company does not manufacture or sell products that generate significant emissions during their use phase
3.13: All our assets are either utilized internally, or sold directly to customers, without any leasing arrangements
3.14: HA Group does not operate under a franchise model, nor do we have any franchise agreements in place

E1-(8.)(AR)(25)(d) For the calculation of the significant Scope 3 categories, we were able to determine 3% of the emissions using primary data from suppliers.

Overview of greenhouse gas emissions

Scope 1 GHG emissions	Base year	Comparison year	Reporting year	
	[2022]	[2023]	[2024]	% [2024]/[2023]
E1-8.32a Gross Scope 1 GHG emissions (tCO2eq)	23.039	22.364	22.732	+2
E1-8.32a Proportion of gross Scope 1 GHG emissions from regulated emissions trading systems (%)	0%	0%	0%	0
Scope 2 GHG emissions				
E1-8.32b Site-based Scope 2 GHG gross emissions (tCO2eq)	20.180	18.606	17.246	-7
E1-8.32b Market-based Scope 2 GHG gross emissions (tCO2eq)	20.359	18.348	13.369	-27
E1-8.32c **Significant Scope 3 GHG emissions**				
1 Purchased goods and services (incl. 3.1 services & packaging)	814.361	792.432	746.564	-6
[Optional subcategory: Cloud computing and data centre services]	-	-	-	0
2 Capital goods	6.919	7.347	7.089	-4
3 Activities related to fuels and energy (not included in Scope 1 or Scope 2)	9.384	8.740	8.457	-3
4 Upstream transport and distribution	49.146	54.027	52.029	-4

Scope 1 GHG emissions	Base year	Comparison year	Reporting year	
5 Waste generation in businesses	18.064	17.705	16.450	-7
6 Business travel	710	1.607	1.766	+10
7 Commuting employees	1.983	2.066	2.113	+2
8 Upstream leased assets	-	-	-	0
9 Downstream transport	54.129	34.581	31.638	-9
10 Processing of sold products	61.501	61.020	58.827	-4
11 Use of sold products	-	-	-	0
12 Treatment of products at the end of their service life	11.973	11.733	10.912	-7
13 Downstream leased assets	-	-	-	0
14 Franchises	-	-	-	0
15 Investments	24.183	18.064	19.243	+7
Total indirect (Scope 3) gross GHG emissions (tCO2e)	-	-		0%
Total GHG emissions				
E1-8.32 Total GHG emissions (site-related) (tCO2eq)	**1.095.773**	**1.050.291**	**995.067**	**-5,3**
E1-8.32 Total GHG emissions (market-based) (tCO2eq)	**1.095.952**	**1.050.033**	**991.190**	**-5,6**

We record and report on all significant categories of our Scope 3 greenhouse gas emissions in accordance with the requirements of the GHG Protocol.

Scope 1 & Scope 2 emissions by system boundary

E1-8.AR19 **2024**	
	Consolidated group (parent company and subsidiaries)
Scope 1 (tCO2eq)	21.611
Scope 2 Market-based (tCO2eq)	13.369
Scope 2 Site-based (tCO2eq)	17.246

There are no, or no significant emissions from biogenic source neither in Scopes 1&2, nor in Scope 3.

To calculate our greenhouse gas emissions, we use different methods and databases according to their accuracy and scientific recognition. For Scope 1&2 the calculations are based on the consumption of energy (measured or invoiced values), combined with supplier specific emission factors (e.g. for electricity) or general emission factors from databases like ecoinvent and DBEIS. Scope 3.1 is calculated on a mass-based approach and matched with emission factors from ecoinvent and DBEIS, as well as with a first set of supplier specific emission factors. The Scopes 3.4 & 3.9 are calculated with a distance-based approach (ton kilometres) matched with emission factors from DBEIS, taking into account different modes of transportation (truck, sea, rail, aircraft) within each supply chain.

Climate protection targets

E1-6.26a We have set specific targets for reducing our greenhouse gas emissions. For Scope 1, Scope 2 and Scope 3 emissions, our absolute reduction target is to reach nNet Zero by 2045 with a maximum of 109.595 tCO2eq residual emissions. Our combined target covers Scopes 1-3. Additionally, to the Net Zero target, near-term targets until 2030 were set as follows:

- Scope 1&2: 45 % reduction
- Scope 3.1 & 3.4: 25 % reduction

E1-6.26b Our GHG emission reduction targets apply the same limitations to our greenhouse gas inventory as already presented in the greenhouse gas balance under E1-8.

E1-6.26c We confirm that our GHG emission reduction targets are scientifically based and consistent with the goal of limiting global warming to 1.5 °C. In setting these targets, the company follows Science Based Targets Initiative (SBTi). The SBTi-aligned targets have been submitted to SBTi Services in February 2026 and are currently under validation. The validation is expected to be finished mid-2026.

Targets related to climate protection

		Target value		
	Base year (2022)	**2030**	**2045**	**2050**
Gross Scope 1 emissions	23.039	12.671	2.304	
Gross Scope 2 emissions (site-related)	20.180	11.099	2.018	
Gross Scope 2 emissions (market-related)	20.359	11.197	2.036	
Gross Scope 3 GHG emissions	1.052.554	836.627	105.255	
Total gross emissions	1.095.951	860.496	109.595	

Greenhouse gas removals and greenhouse gas reduction projects financed through carbon certificates

E1-9.35a We have not implemented greenhouse gas removal and storage projects, E1-9.37 neither do we use CO_2 certificates. E1-10.38a Furthermore, we apply no internal CO_2 pricing.

03

Social information

3.1. Management of impacts, risks and opportunities related to the own workforce

S1-1.11 We have clear and binding policies in place to manage the material impacts, risks and opportunities associated with our own workforce. These policies cover the entire workfocrce. S1-1.12 Our policies explicitly address issues such as human trafficking, forced or compulsory labour and child labour, and stipulate that such practices will not be tolerated or condoned. S1-1.13 In addition, we have established a comprehensive management system to ensure the health and safety of our workforce in the workplace and to prevent work-related risks.

Involvement of our own workforce and employee representatives

S1-2.15 We incorporate the perspectives of our own workforce into our decisions and activities in order to effectively manage actual and potential impacts. This is done through regular dialogue formats with employees, internal communication channels, feedback discussions, training formats and workshops, carried out both directly with employees and indirectly via local management structures and employee representation where applicable. S1-2.15b We are guided in this by international standards and internal policies, including the UN Global Compact principles, the ILO Declaration on Fundamental Principles and Rights at Work, our HA Group Code of Conduct and the Global Employee Handbook. These frameworks enable us to systematically capture and respect the perspectives of our workforce through structured communication processes, compliance mechanisms and internal reporting channels.

S1-2.15 The results of this involvement are incorporated into HR processes, sustainability initiatives, compliance management activities and operational decision-making processes, ensuring that the concerns and suggestions of our employees are appropriately considered.

S1-2.15a In order to gain insight into the perspectives of particularly vulnerable or marginalised groups within our own workforce, we take concrete steps such as confidential reporting channels, direct dialogue with HR departments, and targeted feedback opportunities for employees at different locations and functions.

S1-2.16 We provide our workforce with various channels to bring concerns, needs or issues directly to our attention and ensure that they are addressed. These include internal reporting channels, direct communication with supervisors, HR departments, compliance champions and a confidential whistleblower hotline operated by an independent external provider. We have a structured complaints mechanism in place that enables our employees to report grievances confidentially and anonymously and without fear of retaliation. We regularly evaluate the effectiveness of these channels through compliance monitoring, internal reporting and periodic reviews within the compliance management system.

S1-2.17 If we cause or contribute to negative impacts on individuals within our workforce, we follow a clearly defined approach to remedy the impacts. Reported cases are assessed by the responsible functions, in particular HR and the Legal & Compliance department, and appropriate corrective actions are implemented.

Depending on the case, these may include mediation, corrective organisational measures, disciplinary actions or other appropriate support for affected individuals.

S1-3.18 We take targeted measures and deploy appropriate resources to effectively manage material impacts, risks and opportunities related to our own workforce. These measures include employee development initiatives, occupational health and safety programmes, compliance and ethics training as well as initiatives to promote collaboration and a positive corporate culture. We ensure that the necessary human, financial and organisational resources are made available to guarantee the sustainable implementation of these measures.

S1-3.19 With regard to significant negative impacts on our workforce, we have developed concrete courses of action to prevent, mitigate and, where necessary, remedy them. These include preventive training programmes, internal compliance procedures, occupational safety measures and structured processes for investigating and resolving reported concerns. In situations where measures to protect our workforce overlap with economic requirements, we pursue a balanced approach that prioritises compliance with applicable labour standards and the well-being of our employees. We continuously measure and evaluate the effectiveness of our measures using internal monitoring processes, compliance reporting and feedback mechanisms, ensuring that our initiatives contribute to positive outcomes for our workforce.

3.2. Key figures and targets relating to our own workforce

Targets relating to our own workforce

S1-4.20 Our objectives with regard to our workforce are aligned with the material topics identified in our double materiality analysis, in particular **working conditions, occupational safety and health, and corporate culture and values.** Our overarching goal is to **provide safe, fair and attractive working conditions for our employees worldwide and to support their professional development and well-being.**

Key focus areas of our workforce-related objectives include:

- further strengthening occupational safety and health standards across all locations,
- supporting employee development through training and skills development initiatives,
- fostering a respectful, inclusive and collaborative corporate culture, and
- continuously improving working conditions and employee well-being.

These objectives form part of our broader ambition to promote **socially responsible working environments and decent workplaces throughout the HA Group.**

S1-4.21 We have implemented a structured process for setting our objectives that involves active cooperation with our own workforce and relevant internal functions. In developing our sustainability strategy and identifying material topics, internal stakeholders from different functions and regions were involved in the materiality analysis process, enabling us to consider the perspectives and needs of our employees appropriately. In setting and further developing our goals, we collaborate with internal stakeholders such as HR, compliance functions and local management, and – where applicable – employee representation bodies. This ensures that the goals set are aligned with the actual needs of our workforce.

Our objectives relate in particular to improving working conditions, promoting health and safety, supporting equal opportunities and strengthening a positive corporate culture. To monitor progress towards these goals, we use internal reporting processes, compliance monitoring, health and safety performance indicators and regular internal reviews. These procedures enable us to transparently track and continuously evaluate our measures in relation to the goals we have set.

Key figures relating to our own workforce

Characteristics of the company's employees

Our employment concept forms the basis for our human resources strategy and shapes the impact of our employment practices on our workforce. Through transparent presentation, we create a better understanding of the information reported in the context of further disclosure requirements and provide the basis for calculating relevant quantitative indicators. S1-5.23a The following table shows the composition of our workforce. S1-5.23f In the reporting year, 113 employees, or 6% of the total workforce, left the company.

Characteristics of our own workforce

Gender	S1-5.23a **Number of employees (total)**
Male	1.441
Female	401
Diverse	0
No information	1
Total number of employees	**1.843**

Number of employees in countries where the company has at least 50 employees and for the 10 largest countries

S1-5.23a **Countries** (in which the company has at least 50 employees and for the 10 largest countries)	S1-5.23a **Number of employees** (total number)
Germany	583
India	259
Italy	180
Poland	154
China	139
USA	118
Turkey	102
France	83
South Korea	72
Spain	62
Total number of employees	**1.752**

Collective agreement coverage and social dialogue

S1-7.27a We ensure that 53% of our total workforce is covered by collective agreements. S1-7.27b Within the European Economic Area, a total of 89% of our employees in [5 countries with a significant number of employees] is covered by collective bargaining agreements. S1-7.27c Outside the EEA, 5% of our employees are covered by collective agreements.

S1-7.28a In the area of social dialogue, 53% of our employees are covered by employee representatives.

Collective agreement coverage and social dialogue (S1-7.AR17)

	Collective agreement coverage		**Social dialogue**
Coverage rate	**Employees – EEA** (for countries with >50 employees and the 10 largest countries)	**Employees – outside the EEA** (for countries with >50 employees and the 10 largest countries)	**Representation in the workplace (EEA only)** (for countries with >50 employees and the 10 largest countries)
0-19		Gargi HA / India	
20-39			
40-59			
60-79	HA GmbH & Chemex / Germany		
80-100	HA Italia / Italy HA France / France HA Ilarduya / Spain HA Polska / Poland		HA GmbH & Chemex / Germany HA Italia / Italy HA France / France HA Ilarduya / Spain

Diversity indicators

S1-8.30a We disclose the gender distribution at top management level both in terms of numbers and percentages, as shown in the following table:

Gender distribution in senior management

Category	Number of employees	Percentage share (%)
Male	30	100 %
Female	0	0 %
Various	0	0 %
No information	0	0 %

Top management includes the HA Group Presidents, the HA Group Executive Leadership Team, as well as all Managing Directors of the domestic and international subsidiaries.

Appropriate remuneration

S1-9.32 All our employees receive fair remuneration in line with applicable benchmarks, so no further disclosure is required.

Social security

S1-10.34 Not all of our employees in all countries are covered against loss of earnings due to significant life events such as illness, unemployment, accidents at work or parental leave. In the USA, part-time employees (with less than 40 hours) are not covered by social security in relation to unemployment (Toledo), parental leave (Westmont), and retirement (Oregon, Toledo). In the USA (Westmont). In India, no social security scheme in relation to unemployment is in place. This is illustrated in the following table:

Social security

Life event	Countries where not all employees or non-employees are covered	Type of employees not covered
Illness	None.	
Unemployment	USA (Toledo), India	USA (Toledo): part-time employees (less than 40 hours); India: no such scheme is in place
Accidents at work and incapacity to work	None.	
Parental leave	USA (Westmont)	Part-time employees (less than 40 hours)
Retirement	USA (Oregon, Toledo)	Part-time employees (less than 40 hours)

People with disabilities

S1-11.36 As part of our efforts to promote inclusion and equal opportunities within our company, the percentage of employees with disabilities is currently 2%. This refers to all our employees, taking into account any legal restrictions on data collection.

Key figures for further training and skills development

During the reporting period, 70% of our employees participated in regular performance and career reviews, with 22% of participating employees being women and 78% being men. The coverage rate was therefore 71% for women and 70% for men.

Key figures on continuing education and skills development

Gender	S1-12.38a **Percentage of employees who participated in regular performance and career reviews**
Male	70%
Female	71%
Diverse	-
No information	0%

Key figures for health and safety

S1-13.40a During the reporting period, 100% of our employees and non-employees are covered by our health and safety management system in accordance with legal requirements and/or recognised standards or guidelines.

S1-13.40b In addition, during the reporting period, we recorded 0 deaths related to work-related injuries and 0 deaths related to work-related illnesses, affecting both our own employees and non-employees. S1-13.40c A total of 26 reportable occupational accidents were recorded, corresponding to a rate of 8.28 LTA per 1 Mio. working hours. S1-13.40d With regard to work-related illnesses, we report 0 cases of reportable work-related illnesses, subject to legal restrictions on data collection.

Incidents, complaints and serious impacts related to human rights

S1-16.46a During the reporting period, we recorded one case of discrimination in the workplace, including incidents based on discrimination or harassment on the basis of actual or perceived race, ethnicity, religion, colour, 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. S1-16.46b In addition, we identified no human rights-related incidents within our workforce that were not related to discrimination. S1-16.46c For the cases mentioned, we have reported fines, penalties and compensation payments amounting to 0€ in our financial reports.

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Governance information

4.1. Management of the impacts, risks and opportunities associated with corporate governance

The administrative, management, and supervisory bodies of the HA Group hold overall responsibility for sustainable, ethical, and compliant corporate governance. They ensure that social and environmental objectives are pursued alongside economic goals and provide the resources required to achieve them.

All members of these bodies have extensive international experience and a strong understanding of the relevance of integrity, compliance, and responsible governance. HA considers this not only an obligation but also an opportunity to build a resilient and forward-looking business.

In addition to internal compliance specialists, external experts are regularly consulted to ensure access to up-to-date knowledge and developments. This guarantees that guidelines and measures remain adequate, effective, and aligned with current standards.

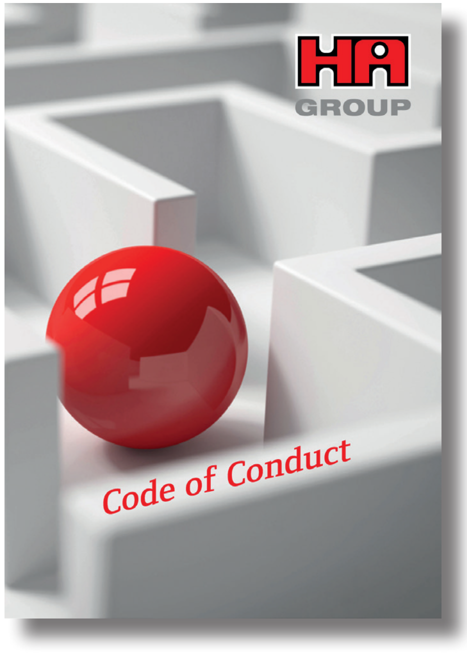
Concepts related to corporate governance

Compliance Management

G1-2.10b The HA Group operates a comprehensive compliance system designed, to prevent, detect, and address corruption and bribery. Suspicious cases are systematically monitored and reported incidents are carefully investigated.

Code of conduct

G1-1.8a All HA Group employees are required to comply with the Code of Conduct. To prevent violations regarding the Code of Conduct, HA promotes employee awareness, provides mandatory training, and systematically integrates compliance-related risks into relevant business processes.



Whistleblower System

G1-1.8b The HA Group complies with Directive (EU) 2019/1937 and has implemented a whistleblower protection policy. Employees and external stakeholders may report suspected violations of the Code of Conduct, applicable laws, or HA Group policies through various channels, including supervisors or designated contacts.

For sensitive cases, an externally operated, anonymous whistleblower system ("hotline") is available. Reports can be submitted by phone, fax, email, app, or via the website. Access to the hotline can be found through the Code of Conduct or the HA website. All reports are received exclusively by the VP HR & Legal (also General Counsel and Compliance Officer), who reports directly to the HA Group Presidents. This ensures both anonymity and organizational independence. By following this, HA group makes sure that reporting stakeholder do not have to fear any reprisals.

Risk Assessment

G1-1.8c To identify possible compliance risks at an early stage, every HA Group company is required to carry out regular risk analyses based on a standardized HA Group risk matrix. For example, a detailed risk analysis was carried out at HA GmbH in Germany. Other HA Group companies have also carried out similar analyses, adapted to local needs and legal requirements. These processes also help identify managers and other key employees with higher compliance exposure who are part of the target group for advanced compliance training.

Training

G1-2.10c All employees participate in regular training on ethical business conduct, relevant laws, regulations, and prohibited behaviors. Local Compliance Champions serve as multipliers. Trainings are tailored to local conditions, and conducted in local languages. In the 2024 reporting period, 98% of all relevant employees completed the basic training.

Advanced Training for Managers and other "Targeted Employees"

Employees with heightened compliance exposure receive additional in-depth training covering 1) Basics about Compliance Management Programs, 2) Anti-Corruption Rules, 3) Competition law and Anti-Trust Rules and 4) Export Control Rules and Sanctions Compliance. In 2024, 98% of all Targeted Employees were trained within the required three-year cycle, an increase of 7 percentage points compared to the previous year.

Train-the-Trainer for Compliance Champions

All Compliance Champions receive extended train-the-trainer instruction within a three-year interval. The most recent session took place during the Compliance Champions Conference in November 2023 (via MS Teams) with a participant's coverage of 100%.

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