

## Suppliers Code of Conduct

### Standards for Suppliers and Contractors of Hüttenes-Albertus (HA)

Version 2026

As a globally active, long-standing and successful family business, HA recognises its responsibility towards society and the environment. HA strives to combine economic success with social responsibility in all business activities. These principles are an integral part of HA's corporate values and must be shared and respected by all suppliers and contractors ("Suppliers").

By entering into a business relationship with HA, you, as a Supplier, commit to the following principles:

#### 1. Legal Compliance and Ethical Business Conduct

- Comply with all applicable local, national and international laws and regulations.
- Observe all applicable antitrust, competition and trading laws.
- Prohibit all forms of corruption, bribery (active or passive) and the offering of inappropriate gifts or advantages to HA employees or third parties.
- Shall avoid situations that may create conflicts of interest and shall disclose any actual or potential conflicts to HA
- Adhere to all legal requirements relating to the prevention of money laundering and take appropriate measures to protect against cyber-crime.
- Ensure that all imports and exports are processed correctly, transparently and in full compliance with applicable foreign trade and customs regulations.
- Not supply conflict minerals that directly or indirectly finance or support armed groups or contribute to human rights violations.

#### 2. Human Rights and Fair Working Conditions

- Respect and protect internationally recognised human rights, particularly those set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organization (ILO).
- Treat all employees with dignity and respect their privacy and personal rights.
- Ensure equal opportunities and prohibit discrimination based on skin colour, race, nationality, ethnic or social origin, disability, sexual orientation, political or religious beliefs, gender or age.
- Maintain a working environment free from discrimination, intimidation, bullying or harassment of any kind.
- Ensure fair, lawful and transparent employment conditions, including:
  - payment of adequate remuneration at or above the applicable statutory minimum wage;
  - compliance with legal requirements on working hours, compensation and employee data protection;
  - respect for employees' freedom of association, to the extent permitted by law, without discrimination or retaliation.

### **3. Prohibition of Forced Labor, Child Labor and Modern Slavery**

- Prohibit all forms of forced, bonded or involuntary labor and human trafficking.
- Prohibit child labor and ensure that the minimum age of employment complies with applicable laws and company guidelines.
- Not support or engage in business activities involving modern slavery or any form of exploitation.

### **4. Occupational Health and Safety**

- Provide a safe and healthy working environment in compliance with all applicable occupational health and safety laws and standards.
- Identify, assess and continuously reduce workplace risks and hazards.
- Provide suitable PPE free of charge if health hazards to employees cannot be minimized in other way (technically/organizationally)
- Provide employees with appropriate training and ensure awareness of occupational health and safety requirements.
- Implement and maintain an appropriate occupational health and safety management system.

### **5. Environmental Protection and Climate Responsibility**

- Comply with all applicable local and international environmental protection laws and standards.
- Implement and maintain an appropriate environmental management system.
- Minimise environmental pollution and the consumption of natural resources, avoid waste and promote continuous improvement in environmental performance.
- Reduce emissions to air, water and soil and define appropriate climate protection targets, including contributions towards global climate neutrality.
- Use natural resources efficiently and responsibly, including effective water management, addressing risks related to water scarcity and flooding.
- Encourage the use of sustainable and renewable resources, especially renewable energy sources.
- Protect biodiversity and ecosystems.

### **6. Responsible Supply Chain Management**

- Promote compliance with the principles of this Suppliers Code of Conduct throughout your own supply chain.
- Select, treat and manage subcontractors and business partners in a fair, transparent and non-discriminatory manner.
- Take appropriate measures to address identified risks related to human rights, labor standards, the environment and ethical business conduct within your supply chain.

### **7. Indigenous Peoples and Local Communities**

- Respect the rights of indigenous peoples.
- Act responsibly towards local communities affected by your business activities

## 8. Audits, Monitoring and Reporting

HA reserves the right to conduct audits or assessments to verify compliance with this Suppliers Code of Conduct, in consultation with the Supplier and in accordance with applicable law. HA may terminate business relationships in cases of non-compliance with applicable laws or this Code of Conduct.

Employees of suppliers and all other business partners who believe they are aware of a violation of applicable laws, or the provisions of this Code of Conduct are encouraged to report their concern, complaint, report or inquiry to the internal anonymous reporting tool established by HA.

The reporting tool can be found at the website <https://report.syntrio.com/ha-group>. In addition, you may also contact [standard-reports@miratech.com](mailto:standard-reports@miratech.com) or one of the following toll-free hotlines:

China (North / South): 400 120 1853  
Czech Republic: 00 800 31 26 4000  
France: 0805-080039  
Germany: 0800-183-0724  
India: 001 800 31 26 4000  
Italy: 800 743 075  
Korea: 00308 491 0178  
Malaysia: 1-800-81-9795  
Mexico: 800-681-5340  
Poland: 0,0 800 31 26 4000  
Spain: 00 800 31 26 4000  
Turkey: 0800 621 8888  
UK: 00 800 31 26 4000  
USA: 855-400-6002

All other countries: 800-603-2869  
(must dial country access code first)

Regardless of which reporting method you prefer, please make sure to include our company name when submitting your report. A personal meeting can also be arranged upon request for complaints submitted through the reporting tool. Suppliers shall ensure that no employee or other stakeholder who, in good faith, reports a concern, complaint or suspected violation of applicable laws or this Supplier Code of Conduct shall suffer any form of retaliation, discrimination or disadvantage because of such reporting.

## 9. Validity and Updates

Sustainable sourcing is a continuous process at HA. The principles of this Code of Conduct are reviewed and updated regularly. Suppliers agree to comply with the currently valid version of HA's sustainable sourcing policy, available at:

[Guidelines \(ha-group.com\)](https://www.ha-group.com/Guidelines)

We thank you for your support.

HÜTTENES-ALBERTUS  
Chemische Werke GmbH



Dr. Stefan Pfaffenbach  
Geschäftsführer / President



Thomas Pfeiffer  
Mitglied der Geschäftsführung / Vice President  
Einkauf / Global Sourcing

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**Confirmation of implementation by the Supplier:**

We hereby confirm that we have received the HA Suppliers Code of Conduct and, in addition to our existing contractual obligations, confirm our commitment to adhering to its principles and standards.

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Date, company stamp & signature