

APPENDIX 1 INFINEUM POLICIES

HSSE

The Company is committed to operations, products and practices which protect safety, health and the environment. This commitment is to employees, contractors, neighbours, customers and all others affected by its operations.

The Company will comply with all applicable laws and regulations and other standards as necessary to provide adequate protection. It will also work with others to develop responsible laws, regulations, and standards, based on sound science and assessment of risks that may be required to further safeguard the community, workplace and environment.

The Company seeks a workplace free of occupational injury and illness and an overall performance free of accidents. It also encourages preventive health programmes and safe behaviour off the job to enhance employee well-being and safety.

The Company will work to minimise risks associated with manufacturing, transportation, use, storage and disposal of its products. It pursues this objective in the design and modification of the Company's facilities, processes and products and in the way it conducts its operations. Risk will be anticipated, analysed, discussed with those affected and monitored to ensure proper control. The Company will not conduct any operation or market a product without adequate safeguards.

The Company will be prepared for emergencies and will respond quickly, effectively, and with care to incidents or emergencies associated with the manufacture, transport use, storage and disposal of its products. Each Company operating facility shall establish appropriate emergency response plans and capability.

The Company is committed to using materials and energy efficiently and to reducing waste generation and contamination of air, water and land. It will ensure that any remaining waste is disposed of in a safe and environmentally sound way. In addition, it will work with others to resolve problems created by its past handling and disposal practices.

The Company will continue to expand its knowledge of safety, health and the effect of its operations on the environment. The Company is committed to playing a leading role in promoting best practice in its industry including in promptly applying and sharing with employees, contractors, customers, the scientific community, government agencies and others potentially affected.

The Company strives to be a trusted and responsible member of every community in which it lives and works. It recognises that public trust and confidence are earned through performance, open communication and community involvement.

The Company supports the Responsible Care, health, safety and environmental improvement initiative of the chemical industry. Accordingly, the Company is committed to following the Guiding Principles and to implementing the Codes of Management Practices of the initiative.

With the active participation of all employees and contractors, who are individually and collectively responsible for its performance, and through the relentless pursuit of continuous improvement, the Company is committed to be a leader in safety, health and environmental protection. Performance in the area of safety, health and the environment will be included in the employee appraisal process. It will undertake appropriate reviews and evaluations of its operations to measure improvement and to ensure compliance with this policy.

Alcohol and Drugs

The Company is committed to a safe, healthy, and productive work place for all. The Company recognises that alcohol, drug or other substance abuse by colleagues will impair their ability to perform properly and will have serious adverse effects on the safety, efficiency, and productivity of other colleagues and the Company as a whole. The misuse of legitimate drugs, or the use, possession, distribution, or sale of illicit or unprescribed controlled drugs on Company business or premises, is strictly prohibited and is grounds for termination of employment. Possession, use, distribution, or sale of alcoholic beverages on Company premises is not allowed without prior approval of appropriate senior management. Being unfit for work because of use of drugs or alcohol is strictly prohibited and is grounds for termination of employment. While this Policy refers specifically to alcohol and drugs, it is intended to apply to all forms of substance abuse.

The Company recognises alcohol or drug dependence as a treatable condition. Colleagues who suspect they have an alcohol or drug dependencies are encouraged to seek advice and to follow appropriate treatment promptly before it results in job performance problems. Medical professional staff will advise and assist in securing treatment. Those colleagues who follow approved treatment will receive disability benefits in accordance with the provisions of established benefit plans and medical insurance coverage consistent with existing plans.

No colleague with alcohol or drug dependency will be terminated due to the request for help in overcoming that dependency or because of involvement in a rehabilitation effort. However, a colleague who has had or is found to have a substance abuse problem will not be permitted to work in designated positions identified by management as being critical to the safety and well-being of colleagues, the public, or the Company. Any colleague returning from rehabilitation will be required to participate in a Company-approved after-care programme. If a colleague violates provisions of the Alcohol and Drugs Policy, appropriate disciplinary action will be taken. Such action cannot be avoided by a request at that time for treatment or rehabilitation. If a colleague suffering from alcohol or drug dependency refuses rehabilitation or fails to respond to treatment or fails to meet satisfactory standards of effective work performance, appropriate disciplinary action, up to and including termination, will be taken. This policy does not require and should not result in any special regulations, privileges, or exemptions from normal job performance requirements.

The Company may conduct unannounced searches for drugs and alcohol on owned or controlled property. The Company may also require colleagues to submit to medical evaluation or alcohol and drug testing where cause exists to suspect alcohol or drug use. Unannounced periodic or random testing will be conducted when a colleague meets any one of the following conditions: has had a substance abuse problem or is working in a designated position identified by management, a position where testing is required by law, or a specified executive position. A positive test result or refusal to submit to a drug or alcohol test is grounds for disciplinary action, including termination.

Contractor personnel are also covered by paragraph one and the search provision of paragraph four of this policy. Those who violate this policy will be removed from Company premises and may be denied future entry.

In addition to the above policy, it is a requirement of the Company that all applicants accepting offers of regular employment must pass a drug test.

Note: This policy will be adopted globally to be effective as from July 2000 with exceptions in some areas for language differences, which have been approved by the Infineum Leadership Team.

Harassment in the Workplace

It is the Policy of the Company to foster mutual respect and to prohibit any form of unlawful harassment, based on race, colour, sex, religion, national origin, citizenship status, age or physical or mental disability (or veteran status for US only). In addition, the Company's policy prohibits any other form of harassment. Such conduct, while perhaps not unlawful is considered unacceptable in the Company's workplace. The Company specifically prohibits any form of harassment by or toward employees, contractors, suppliers or customers.

Harassment is any inappropriate conduct which has the purpose or effect of:

- Creating an intimidating, hostile or offensive work environment;
- Unreasonably interfering with an individual's work performance; or
- Adversely affecting an individual's employment opportunity

Harassment, whether it occurs in the workplace or at business-sponsored function, will not be tolerated. Forms of harassment include, but are not limited to, intimidation, unwelcome verbal or physical advances and sexually, racially or otherwise derogatory or discriminatory materials, statements or remarks.

All directors, officers and employees will be subject to disciplinary action up to and including termination for any act of harassment.