


# Ensinger Code of Conduct

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Ensinger 

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... (V) Schutz für Außen...

# Table of contents

- 5 Foreword
- 6 About our code of conduct
- 7 Our values

## **1** Our principles of behaviour

- 10 We behave correctly
- 11 We treat each other respectfully and fairly
- 13 As managers, we have a special responsibility

## **2** We show personal commitment to

- 16 Human rights
- 17 Occupational health and safety
- 18 Environmental and climate protection, energy efficiency; sustainability
- 19 Donations and sponsoring

## **3** We are trustworthy partners

- 22 Fair competition
- 23 Anti-corruption
- 24 Avoiding conflicts of interest; secondary employment

- 25 Business partners, purchasing and sales
- 26 Compliance with tax and customs regulations
- 27 Compliance with foreign trade law and export controls
- 28 Prohibition of money laundering and terrorist financing
- 29 Product quality

## **4** We protect

- 32 Confidential company information
- 33 Personal data
- 34 Digital responsibility
- 36 Company property
- 37 Accounting and financial reporting

## **5** The right behaviour in case of doubt

- 40 Who should I contact if I have any questions?
- 41 How can I report a compliance violation?
- 42 What happens after a compliance violation is reported?
- 43 Orientation guide





# Foreword

## Dear colleagues,

Compliance concerns us all! Someone who behaves “compliantly” adheres to rules, standards and values. It is about what is right and what is wrong - that you have to adhere to certain rules because otherwise unpleasant consequences may follow.

This Code of Conduct therefore summarises our expectations for the conduct of all of us as part of Ensinger. This Code of Conduct forms the foundation for everyone at Ensinger to act with integrity; it binds us together - regardless of national borders and cultures. It summarises the basic rules for ethically impeccable behaviour in business dealings that we all have to observe. It is therefore our “guiding principle” and is intended to provide us with orientation in everyday life, especially in today’s often very dynamic, complex and therefore challenging business environment.

We firmly believe that earning and, above all, retaining the respect and trust of our employees, customers, suppliers, business partners and society is fundamental to our long-term business success. To achieve this, it is crucial that we make the right decisions every day.

The Code of Conduct is based on our mission statement, which was co-authored by our company founder Wilfried Ensinger. However, our corporate values have also been incorporated into the Code of Conduct and guide our daily behaviour.

**Ralph Pernizsak and Björn Schneekloth**

Management of the Ensinger Group

As a management team, we want our company to have a culture in which people naturally adhere to the rules, standards and values, but also openly express questions and concerns. The exemplary behaviour of our managers has an enormous influence in this context. They in particular must set a clear example in terms of compliance and ensure that our Code of Conduct and the Ensinger values are put into practice.

You may be wondering how you are supposed to know what you need to comply with? You don’t need to know all the laws or be a legal expert to be compliant. Just be vigilant and listen to your gut feeling! If you have the feeling that something is not right, speak up.

Let’s make the right decisions together by consistently adhering to our Code of Conduct - there are no compromises. This is how we maintain our compliance culture - it’s the best prevention. This Code of Conduct is not only intended to give you guidance and raise your awareness of our shared values, it also explains in each chapter what your individual contribution could look like.

As management, we thank you for choosing to do the right thing every day.

# About our code of conduct

## **Why do we have a code of conduct?**

The Code of Conduct is intended to provide guidance to each individual at Ensinger in order to avoid undesirable behaviour. It therefore sets out the essential rules of behaviour for day-to-day business. The aim is to ensure that everyone at Ensinger behaves in an ethically correct and responsible manner.

## **Who does the Code of Conduct apply to?**

Everyone at Ensinger - no matter in what function, no matter where in the world - must adhere to the principles of behaviour laid down in the Code of Conduct. This applies to the management as well as to each individual employee. In addition, all Ensinger managers must provide guidance and support so that their employees can make the right decisions and behave lawfully. The Code of Conduct is regularly reviewed and amended as necessary.

## **What happens if we do not follow our Code of Conduct?**

Our Code of Conduct is the basis of our actions and is non-negotiable. Even a seemingly minor breach of this Code of Conduct could have serious consequences for Ensinger or the individual employee. These can range from reputational damage to fines and prison sentences. In addition, violations of the Code of Conduct may result in criminal or labour law consequences (from warnings to dismissal) for the employee concerned.



# Our values

## Respect and trust

We show sincere appreciation and initially assume good intentions and good behaviour on the part of the other person.

## Technical affinity and analytics

As a technically orientated company, we see technical progress and technical plastics as an opportunity to improve our world. When solving problems, we take an analytical approach and work with the help of data and facts.

## Honesty and solidarity

We do not lie to each other and do not hide our intentions and motives. We work together across departments and help people in critical situations.



## Long-term orientation and independence

We look for sustainable and balanced solutions that do justice to the concerns of all parties involved and the environment as far as possible. If possible, the company should remain independent.

## Development and entrepreneurship

All employees should have the freedom and scope to organise themselves and take entrepreneurial risks.

## Diversity and openness

We tolerate each other and value diversity and differences between people. We lay facts and problems openly on the table and inform employees about critical issues.



**Our principles of behaviour**

1

We behave correctly

We treat each other respectfully and fairly

As managers, we have a special responsibility

## **Our principles of behaviour**

# We behave correctly

## EXAMPLE

A business partner gives you a valuable Christmas present.

## WHY COULD THIS BE CRITICAL?

It could be a bribe. Even if you believe that the gift will not improperly influence your business decision, the value of the gift should not exceed the guideline set out in the applicable policy. If in doubt, refuse the gift. If this is not possible, for example because it would be considered impolite or too costly in the specific situation, inform your manager and the local Compliance Officer or the Head of Compliance and coordinate the next steps with them. Transparency is the top priority.

## What is it all about?

Unlawful behaviour is not in Ensinger's interest because it is unethical, leads to reputational damage and can result in penalties. Employees who act unlawfully must be aware that they themselves may be at risk of prosecution. Law-abiding behaviour therefore also serves to protect employees themselves.

## Our principle

We behave in accordance with the law. We act transparently. We condemn any illegal behaviour aimed at gaining an advantage. It is in line with our fundamental values that we abide by the law - in all countries in which we operate.

## What is your individual contribution?

- Find out about the regulations that apply in your area of responsibility and comply with them.
- If in doubt, contact your manager, the local Compliance Officer or the Head of Compliance or Legal & Integrity.

## CONTACT US

- Your Manager
- Local Compliance Officer or Head of Compliance
- Legal & Integrity



# We treat each other respectfully and fairly

## EXAMPLE

A male colleague approaches one of your female colleagues. You notice that your colleague feels uncomfortable with the male colleague's approach.

## WHAT CAN YOU DO?

Don't look away! Step in and talk to your manager together with your colleague.

## What is it all about?

A working environment characterised by respectful interaction and mutual appreciation is a fundamental part of our business activities - and at the same time a prerequisite for us as a company to realise our full potential. There is no room for discrimination, bullying or harassment - neither at Ensinger nor towards our business partners. We see diversity as an enrichment. Fair behaviour, including fair pay, is a matter of course for Ensinger.

## Our principle

We treat everyone with fairness and respect.

## What is your individual contribution?

- Treat others as you would like to be treated - with fairness, respect and appreciation.
- Work together regardless of ethnic origin, culture, religion, age, disability, skin colour, gender, sexual identity and orientation and world view.
- Speak up if you witness or become aware of behaviour that may constitute bullying, harassment or discrimination.
- Address inappropriate behaviour openly and report misconduct.



## CONTACT US

- Your Manager
- HR Business Partner



# As managers, we have a special responsibility

## EXAMPLE

You have an appointment with one of your employees. Your desk is overflowing with work.

## WHAT CAN YOU DO?

Nevertheless, be on time for your appointment with your employee. You cannot demand that your employees are on time if you are late yourself. That would be inconsistent and inauthentic. It also shows a lack of respect for your employee.

## What is it all about?

Managers have far-reaching tasks: They are role models, drive change processes, implement strategic guidelines, motivate others to achieve common goals, encourage and coach teams and invest a lot of energy in improving performance.

## Our principle

As managers at Ensinger, we have a special responsibility and take our duty of care for the employees entrusted to us seriously. We live a value-orientated management culture that motivates, encourages and creates a stable framework for empowering employees. We are the first point of contact for our employees - for professional and personal concerns.

## What is your individual contribution?

- Appreciate, support and encourage others by thinking and acting like a true team player and proactively addressing risks or conflicts.
- Be authentic and humble, behave with integrity and respect other points of view.

- Promote a culture in which employees can confidently address risks and problems, but also mistakes, by taking time to listen and encouraging dialogue and the exchange of feedback.
- Make timely, well-considered decisions that serve Ensinger's interests and take personal responsibility for upholding this Code in your daily work.
- Take every indication of possible misconduct seriously, involve the responsible local Compliance Officer or the Head of Compliance and protect the identity of the person who contacted you.
- Set a good example.
- Familiarise yourself with Ensinger's management principles and adhere to them.

## CONTACT US

- Your Manager
- HR Business Partner
- Local Compliance Officer or Head of Compliance



We show personal commitment to

# 2

Human rights

Occupational health and safety

Environmental and climate protection, energy efficiency;  
sustainability

Donations and sponsoring

**We show personal  
commitment to**

# Human rights

## EXAMPLE

Your manager makes a joke to a colleague that you find racist. The colleague also seems uncomfortable with the situation.

## WHAT CAN YOU DO?

Racist behaviour will not be tolerated. Report such and similar cases to HR. Transparency is the top priority.

## What is it all about?

The United Nations Universal Declaration of Human Rights sets out the requirements and expectations of the international community with regard to respect for and observance of human rights.

## Our principle

We respect, protect and promote the globally applicable regulations for the protection of human rights. We treat everyone fairly and with respect. Of particular importance to us are:

- The right to equal opportunities and the right to non-discrimination.
- The ban on all forms of child and forced labour.
- The right to freedom of expression and information.
- The right to form and join professional organisations.
- The right to health and safety as well as labour and social standards.

This applies not only to cooperation within Ensinger, but of course also to the behaviour of and towards our business partners. Ensinger pursues a zero-tolerance approach to all violations of human rights in this respect.



## What is your individual contribution?

- Behave politely, respectfully and fairly in your dealings with one another.
- Do not discriminate, harass or bully. The zero-tolerance approach applies.
- Do not tolerate discrimination - regardless of the reason.
- Respect cultural differences.

## CONTACT US

- Your Manager
- HR Business Partner
- Human Rights Officer

# Occupational health and safety

## EXAMPLE

You realise that an electrical device in your department is obviously defective.

## WHAT CAN YOU DO?

Do not operate the appliance and inform your manager to coordinate further measures. It is not permitted and can be dangerous to repair electrical devices yourself.

## What is it all about?

The success of a company depends not only on high-quality products, but first and foremost on the people behind them: The physical and mental health of employees is the key to their performance and motivation - and ultimately to the success of the company. Healthy and safe workplaces are therefore equally important for employees and employers.



## Our principle

Health and safety in the workplace is a top priority at Ensinger.

## What is your individual contribution?

- Comply with the regulations and instructions on occupational health and safety and use the recommended protective equipment.
- Do not jeopardise your own health and safety or that of your colleagues or third parties.
- Pay attention to health and safety risks and eliminate or reduce them.
- Report unsafe situations, near misses and accidents to your manager immediately in order to avoid them in future.
- Make it your goal to prevent accidents at work or work-related illnesses altogether.

## CONTACT US

- Your Manager
- Sustainability

# Environmental and climate protection, energy efficiency; sustainability

## EXAMPLE

Do you have an idea of how resource consumption in your area could be further reduced?

## WHAT CAN YOU DO?

Inform your manager and Sustainability about your idea.

## What is it all about?

As a globally active family business that thinks and acts in a long-term and holistic manner, we see it as our core task to act in an ecologically responsible way and to avoid or reduce negative effects on the environment as far as possible - in all our activities and throughout the entire supply chain.

## Our principle

We are committed to environmental and climate protection. We set ourselves ambitious, global climate protection targets, for example to curb climate-damaging greenhouse gases. We endeavour to continuously im-

prove our environmental performance and use raw and auxiliary materials, energy and water as efficiently as possible. We also want to avoid water and air pollution and minimise the use of hazardous chemicals and the generation of waste. This was already of great importance to our founder, Wilfried Ensinger. Nothing has changed to this day.

## What is your individual contribution?

- Use resources (water, materials, energy, etc.) sparingly and carefully.
- Dispose of and recycle waste properly and in an environmentally friendly manner.
- Implement the environmental protection and energy efficiency measures relevant to your area of work while maintaining economic efficiency.
- Report potential environmental risks to prevent environmental damage.
- Inform Sustainability immediately if environmental damage has occurred.

## CONTACT US

- Your Manager
- Sustainability



# Donations and sponsoring

## EXAMPLE

An event organiser asks for sponsorship for the town's anniversary planned for the summer, or a customer asks for a donation for his sports club.

## WHY COULD THIS BE CRITICAL?

Tax, legal and Ensinger internal requirements could not be met if it is not clarified with the relevant experts before a donation or sponsorship is agreed, whether and in what way a donation or sponsorship is possible.

## What is it all about?

Ensinger is a family business that thinks long-term and acts responsibly. Based on this conviction, Ensinger makes donations, i.e. contributions on a voluntary basis without consideration, with the aim of creating added value for all of us and for society. On the other hand, Ensinger awards sponsorship money, i.e. donations on the basis of a contractually agreed consideration, with the aim of positively shaping our reputation and perception in the public eye.

## Our principle

We only grant donations and sponsorship measures in accordance with the statutory regulations and in compliance with the respective internal regulations.

## What is your individual contribution?

- Forward enquiries about a donation or sponsorship measure to the relevant experts.
- If you have any questions, please contact your manager, the local Compliance Officer, the management in your company or Marketing & Communications in GmbH.



## CONTACT US

- Your Manager
- Local Compliance Officer
- Management in your company or Marketing & Communications in GmbH



We are trustworthy partners

# 3

**We are  
trustworthy  
partners**

Fair competition

Anti-corruption

Avoiding conflicts of interest; secondary employment

Business partners, purchasing and sales

Compliance with tax and customs regulations

Compliance with foreign trade law and export controls

Prohibition of money laundering and terrorist financing

Product quality

# Fair competition

## EXAMPLE

At a trade fair, you are talking to a competitor's employee about the general market situation. The person you are speaking with tries to elicit information from you about current campaigns.

## WHY COULD THIS BE CRITICAL?

Talking to a competitor about the general market situation is not illegal in principle. However, there is a limit that must not be exceeded: the discussion or exchange of commercially sensitive information. Such an exchange would constitute a violation of the applicable competition and antitrust laws and could have drastic consequences for you and Ensinger. Make it immediately and unequivocally clear to the person you are speaking with that you will not discuss this topic with them. Cancel the conversation, document this and inform the local Compliance Officer or Legal & Integrity.

## What is it all about?

Competition and antitrust laws exist around the world to protect fair and free competition. The relevant laws prohibit discussions, agreements or arrangements between actual or potential competitors regarding prices, pricing and pricing policy, the allocation of markets, customers, territories or other market restrictions - regardless of whether they are written, verbal or implied. Violations of these prohibitions are consistently prosecuted by the antitrust authorities and can result in severe fines and penalties.

## Our principle

We do not coordinate our competitive behaviour with competitors, but conduct business exclusively on the basis of free competition. We comply with the laws protecting competition.

## What is your individual contribution?

- Limit discussions with competitors to very general topics.
- Do not exchange information on prices, pricing, profit margins, sales conditions or production capacities with competitors.
- Do not take part in meetings in which competitors exchange commercially sensitive information.

## CONTACT US

- Your Manager
- Local Compliance Officer
- Legal & Integrity



# Anti-corruption



## EXAMPLE

You work in Purchasing at Ensinger. A potential new supplier has invited you and your husband to a fancy dinner.

## WHY COULD THIS BE CRITICAL?

Invitations to dinner are not uncommon between business partners. In this case, however, there is a suspicion that the subsequent decision is being unfairly influenced. This invitation should therefore be declined.

## What is it all about?

Corruption means abusing one's decision-making authority in a professional environment in order to gain an advantage for oneself or a third party. Both the person who grants or offers the prospect of such an advantage and the person who demands or receives it may be liable to prosecution. Such an advantage is any kind of benefit. These can be monetary payments (e.g. donations), non-cash benefits (e.g. vouchers or unauthorised discounts), gifts in kind or invitations (e.g. to meals, sporting and cultural events), but also favours (e.g. an internship for a daughter). However, customary signs of courtesy, hospitality or general appreciation of a business partner are permitted.



## Our principle

We reject corruption. We do not grant or accept any unauthorised advantages to our business partners. We avoid any appearance of corruption and always act transparently. We exercise particular caution with public officials.

## What is your individual contribution?

- Familiarise yourself with the relevant guidelines and adhere to them strictly.
- Do not make a business decision dependent on whether it brings you a personal advantage.
- Reject any attempts at bribery and report them immediately to your manager and your local Compliance Officer or the Head of Compliance.
- Be extremely cautious with invitations and gifts.

## CONTACT US

- Your Manager
- Local Compliance Officer or Head of Compliance
- Legal & Integrity

# Avoidance of conflicts of interest; secondary employment

## EXAMPLE

As part of your job, you check the offers of several suppliers. You realise that the best offer comes from your good friend's company.

## WHY COULD THIS BE CRITICAL?

There is a risk here that you will put private interests before the interests of Ensinger. Inform your manager about the situation and withdraw from the decision-making process to avoid even the appearance of an improper decision.

## What is it all about?

A potential conflict of interest exists if the personal interests of an Ensinger employee are or may be in conflict with the interests of Ensinger. Conflicts of interest can arise in particular from secondary employment of an Ensinger employee or from personal relationships between Ensinger employees and business partners.

## Our principle

We act in the interests of Ensinger. We strictly separate business and personal interests and do not use our activities at Ensinger to gain personal advantages. Transparency is our top priority.

## What is your individual contribution?

- Avoid even the appearance of a personal conflict of interest and disclose any apparent or actual conflict of interest to your manager.
- Obtain approval from your manager, HR and Legal & Integrity before taking up secondary employment with a competitor or business partner.
- Obtain approval from your manager, HR and Legal & Integrity before making a financial investment in a competitor or business partner.

- Do not award contracts to relatives, partners or other people close to you, but inform your manager and withdraw from the decision-making process.
- Do not employ relatives, life partners or other persons close to you.
- Do not assume any position of corporate responsibility (e.g. board member, management, executive board, supervisory board, etc.) with a business partner without the prior consent of your manager, HR and Legal & Integrity.

## CONTACT US

- Your Manager
- HR Business Partner
- Local Compliance Officer
- Legal & Integrity

# Business partners, purchasing and sales

## EXAMPLE

You become aware that a supplier is to be commissioned without involving the responsible purchasing department.

## WHAT CAN YOU DO?

Please contact the responsible purchasing department to ensure that the most economical offer for the Ensinger Group is used.

## What is it all about?

Business relationships with our customers, suppliers and other business partners are fundamental to Ensinger. We strive for a balanced and fair relationship with our business partners and maintain long-term and solid relationships. It is therefore of particular importance that we only work with reputable partners who comply with the law.

## Our principle

We carefully scrutinise who we do business with. We do not work with business partners who do not comply with the law.

## What is your individual contribution?

- Carefully check the integrity of potential business partners in accordance with the specified processes before entering into a business relationship.
- Do not favour a business partner without an objective reason.
- Ensure that remuneration is only paid for services actually rendered. The remuneration must be commensurate with the service provided.
- Monitor the business partner throughout the entire business relationship to ensure that they fulfil the quality and integrity standards.
- When purchasing and selling products and services, we involve the relevant departments in good time in accordance with our processes.



## CONTACT US

- Your Manager
- Global Supply Chain Management
- Sales



# Compliance with tax and customs regulations

## EXAMPLE

Sales or an Ensinger Group company determines intercompany transfer prices (for commercial products, services, tools and machinery, etc.) without consulting Finance & Controlling or the tax department.

## WHY COULD THIS BE CRITICAL?

Transfer prices within the Ensinger Group companies are very relevant for tax purposes. The taxable result in both companies involved is directly influenced by the structure of intra-group transfer prices. For this reason, the tax authorities always demand the “at arm’s length” principle in these cases, according to which group companies are to be treated as independent third parties. For this reason, Finance & Controlling must always be involved in such decisions to ensure that tax correctness is guaranteed on both sides.

## What is it all about?

Taxes and customs duties make an important contribution to a functioning state. Tax regulations include regulations on corporate income tax, wage tax and VAT, while customs regulations include customs duties payable on the import of goods and import VAT. Compliance with tax and customs regulations is a matter of course and creates trust among business partners and the public. Compliance with these regulations is subject to regular inspections by the authorities. Violations can result in considerable sanctions.

## Our principle

We comply with the applicable tax and customs regulations. Taxes are essential for a functioning community. In this respect, we believe it is right to pay taxes where value is created. This requires us to declare the taxes and customs duties to be paid correctly and on time and to pay the taxes and customs duties that have been assessed.

## What is your individual contribution?

→ Have the experts responsible for customs, foreign trade and export control check whether, for example,

there are any restrictions or bans on the purchase or sale of goods, whether official authorisations must be obtained before carrying out the respective action or whether customs regulations must be complied with for import and export transactions.

- For (new) processes, check what impact they may have on tax or customs regulations or consult the relevant experts.
- If you receive information about violations of tax or customs regulations, take all possible steps to prevent or remedy these violations. If this is not possible, contact the relevant experts.

## CONTACT US

- Your Manager
- Customs, Foreign Trade & Export Control
- Finance & Controlling

# Compliance with foreign trade law and export controls

## EXAMPLE

You receive a request from a potential customer to deliver semi-finished products to a country that you know is subject to an embargo.

## WHAT CAN YOU DO?

Clarify with the responsible experts which export restrictions apply to the country to be supplied. Do not conclude any contracts that oblige Ensinger to export to this country before final clarification.

## What is it all about?

Compliance with foreign trade regulations is fundamental for a globally active company like Ensinger. Whether cross-border business processes and transactions are subject to export control prohibitions, restrictions, authorisation requirements or other monitoring measures depends fundamentally on what is being delivered, where it is being delivered to, to whom it is being delivered and for what purpose the goods are intended. In addition to goods and merchandise, this also affects technologies and software.



## Our principle

We comply with all regulations applicable to cross-border trade. This applies in particular to compliance with existing import and export restrictions (embargoes, sanctions lists and end use of dual-use goods) as well as obtaining the necessary authorisations.

## What is your individual contribution?

- Familiarise yourself with the relevant export control regulations and strictly adhere to them.
- If you recognise indications of violations of export control regulations in your professional environment, take immediate action to prevent or remedy these violations.
- If in doubt, seek advice from the relevant experts.

## CONTACT US

- Your Manager
- Customs, Foreign Trade & Export Control

# Prohibition of money laundering and terrorist financing

## EXAMPLE

Ensinger is considering working with a supplier that is based in France and also operates there, but would like payments to be transferred to a bank account in the Cayman Islands.

## WHY COULD THIS BE CRITICAL?

Bank accounts in countries that are not subject to the legal system of the country in which the supplier is based or provides services are a cause for concern - especially if the bank account is located in a tax haven. Consult with Finance & Controlling on how to proceed before entering into a business relationship with this supplier.

## What is it all about?

Almost every country in the world has laws against money laundering and terrorist financing. Money laundering is any transaction that is intended to conceal the origin of illegally acquired funds in order to allow them to flow into the legal financial and economic cycle. Illegal money is generated, for example, in connection with bribes. Terrorist financing occurs when funds or other legal assets are made available to terrorist individuals or organisations for the purpose of carrying out terrorist activities. Both money laundering and terrorist financing can result in severe penalties.

## Our principle

We adhere to the legal regulations. Our aim is to maintain business relationships only with reputable partners who also comply with the regulations on combating money laundering and terrorism.

## What is your individual contribution?

- Make sure that new customers actually exist and that their funds come from legal sources.
- Do not accept customer payments that come from accounts other than the official customer accounts.
- Do not work with customers with opaque ownership structures.
- Do not initiate refunds to third parties to an account other than the one from which the original payment was made.
- If you suspect money laundering or terrorist financing, stop the business immediately and report your suspicions to your manager, the local Compliance Officer or Finance & Controlling.

## CONTACT US

- Your Manager
- Local Compliance Officer
- Finance & Controlling

# Product quality

## EXAMPLE

You discover a fault in a part during production.

## WHAT CAN YOU DO?

Report the error immediately, no matter how small. Initiate the internal error correction process so that no faulty products reach the customer and preventive measures can be defined to avoid the error recurring.

## What is it all about?

Ensinger has stood for quality, care and reliability for more than 60 years. The impeccable quality of our products is the basis of our success. Our aim is to support the success of our customers and business partners by supplying high-quality products. In order to achieve this goal, we have established, maintain and continuously improve our business-specific quality management systems.

## Our principle

We supply high-quality products. Our customers' expectations and wishes are at the centre of everything we do.

## What is your individual contribution?

- Comply with the requirements of the quality management system. In this way, we avoid defective products that can cause major damage.
- Also address small errors. This is the only way we can continuously improve.

## CONTACT US

- Your Manager
- Quality Management





**We protect**

# 4

Confidential company information

Personal data

Digital responsibility

Company property

Accounting and financial reporting

**We protect**

# Confidential company information

## EXAMPLE

A customer has sent you confidential information for a joint project. You are on your way to this customer and intend to look at the documents again on the train.

## WHAT CAN YOU DO?

You must ensure that no unauthorised person gains knowledge of this confidential information. This would constitute a breach of the signed confidentiality agreement.

## What is it all about?

Our inventions, our trade and business secrets and our expertise are of particular importance for the long-term success of our company. However, non-technical information (e.g. sales data or purchase prices) can also constitute valuable trade secrets. For this reason, our intellectual property and all confidential information must be protected from disclosure or unauthorised access by third parties.

## Our principle

We handle sensitive information with particular care. We ensure that confidential information does not reach unauthorised third parties. This also applies to confidential information that we receive from our business partners. If special circumstances (e.g. sensitive customer development projects or company acquisitions) require special confidentiality, we also maintain this confidentiality towards colleagues.

## What is your individual contribution?

- Keep confidential information concerning Ensinger secret and do not pass it on to unauthorised persons - this includes family and friends.
- Always comply with the security regulations specified by Information Security.
- Please observe existing confidentiality agreements with our business partners.
- Only share sensitive information with people who absolutely need to know it (need-to-know principle).
- Be particularly careful when handling sensitive information in public (e.g. when travelling on business or using social media).
- Do not store any company data on private electronic devices (e.g. computers, tablets, smartphones).
- Do not connect any private electronic devices to the company network.

## CONTACT US

- Your Manager
- Local Compliance Officer
- Legal & Integrity



# Personal data

## EXAMPLE

Visitors to a trade fair took part in a competition organised by Ensinger. In this context, Ensinger has obtained the e-mail address of the trade fair visitors. Your colleague suggests contacting these trade fair visitors to introduce a new Ensinger product.

## WHY COULD THIS BE CRITICAL?

The e-mail address is personal data provided for the purpose of the competition. Ensinger may only use this personal data for the purpose for which it was provided - i.e. not to advertise products.



## What is it all about?

The aim of data protection is to protect personal data from misuse. Personal data is personal data and information of natural persons that makes them directly or indirectly identifiable, such as name and address, photo, personnel number, bank details, digital identifiers or health data. Personal data may only be collected, processed, used and stored in accordance with legal regulations.

## Our principle

We handle the personal data of our employees, business partners and other data subjects such as applicants responsibly and confidentially. We use personal data exclusively for the purposes for which it was provided to us.

## What is your individual contribution?

- Get an overview of the extent to which you deal with personal data.
- Only collect personal data to the extent that is necessary and legally permitted for the fulfilment of your task.
- Protect personal data from unauthorised access.
- Dispose of personal data when it is no longer needed in a controlled and secure manner.
- Require our business partners to adhere to the same high data protection standards.
- Report any data breaches to the relevant experts immediately.

## CONTACT US

- Your Manager
- The Experts Responsible for Data Protection
- Legal & Integrity

# Digital responsibility

## EXAMPLE

You are on a business trip and would like to send a confidential document to your manager. The SIM card provided by Ensinger has no reception. The café you are currently in offers free and unencrypted WLAN.

## WHY COULD THIS BE CRITICAL?

Be careful when using public WLAN. Use protected connections. With unprotected connections, there is a risk of data leaks, even if our data traffic is protected by VPN, a private network connection.

## What is it all about?

As a modern and globally active company, we work in a network, which is why information is stored and processed in many places. Accordingly, information security, i.e. the protection of all information against loss and misuse, must be guaranteed - in the company as well as in the cloud, in shared services or on social media platforms. At the same time, the methods of attack used by criminals in both the digital and analogue world are changing, meaning that information security is constantly required to adapt.

## Our principle

We pay attention to IT security and adhere to the guidelines for information security.

## What is your individual contribution?

- Familiarise yourself with the information security guideline and adhere to the principles and objectives contained therein.
- Protect confidential information and data from unauthorised access and disclosure.
- Make sure that information, data and files are stored securely so that only authorised persons can access them and make changes.
- Ensure that information, data and files are stored in such a way that they are available to authorised persons at all times and are backed up regularly (e.g. through IT backups).



- Report safety incidents or concerns to your manager immediately.
- Be aware of information security and share important information with your colleagues and superiors in order to improve information security. Attend regular training courses and workshops on information security to deepen your knowledge.
- If you have any uncertainties or questions about information security, please contact the relevant experts.

## CONTACT US

- Your Manager
- IT Security



# Company property

## EXAMPLE

Your friend is planning to move house at the weekend. He asks you if you, as an Ensinger employee, can organise a company vehicle from the fleet.

## WHY COULD THIS BE CRITICAL?

We only use company property such as vehicles, office materials or laptops for business purposes. Exceptions apply if company regulations explicitly permit the private use of company resources. You should therefore check whether this is permitted before using company property privately.

## What is it all about?

Tangible and intangible assets such as operating resources, products, services and expertise are essential to achieving our business objectives.

## Our principle

We treat Ensinger's tangible and intangible company property responsibly and protect it from loss, damage and theft. We do not use company property for external purposes unless this is expressly authorised.

## What is your individual contribution?

- Use the resources provided by Ensinger (e.g. vehicles, office supplies, laptop) sparingly and carefully.
- Never use company property for unauthorised purposes (for example, to visit illegal websites).

- Use company funds sparingly and adhere to the applicable travel expense guidelines when booking and invoicing business trips, for example.
- Report any damage to or loss of company property immediately.

## CONTACT US

- Your Manager
- Local Compliance Officer or Head of Compliance
- Legal & Integrity



# Accounting and financial reporting

## EXAMPLE

You work in sales. A customer has asked you for a favour and wants you to pre-date the invoice to December, even though the delivery/service took place in the following month.

## WHY COULD THIS BE CRITICAL?

This change would lead to incorrect recording and incorrect tax reporting. Reject this favour.

## What is it all about?

All business transactions must be properly reflected in accounting documents, balance sheets and tax returns. This requires all relevant facts to be recorded correctly and completely and documented and archived in a traceable manner. Any non-compliance harbours the risk of investigations into accounting manipulation, document fraud, allegations of fraud or tax offences.

## Our principle

We ensure correct and timely annual financial statements and tax returns. In concrete terms, this means that we book all business transactions completely, correctly, on time, factually allocated and in accordance with the legal framework.

## What is your individual contribution?

- Comply with tax and accounting regulations.
- Ensure that all documents relating to business transactions are carefully archived.
- Comply with the statutory retention obligations.
- Do not alter or destroy any documents relating to official investigations or legal disputes.

## CONTACT US

- Your Manager
- Finance & Controlling



**The right behaviour in case of doubt**

# 5

## **The right behaviour in case of doubt**

Who should I contact if I have any questions?

How can I report a compliance violation?

What happens after a compliance violation is reported?

Orientation guide

# Who should I contact if I have any questions?

Do you have a question about a compliance issue? If you have any doubts about your own behaviour, please contact one of the following contact points:



**Ensinger  
Compliance Organisation:  
Local Compliance Officer  
or Head  
of Compliance**

**Responsible  
Department**

**Manager**

**Legal & Integrity**

# How can I report a compliance violation?

We ask you to report possible violations of applicable law, the Ensinger Code of Conduct or compliance guidelines. By doing so, you will help to clarify and eliminate misconduct and malpractice and protect Ensinger against any risks or damage that may result.

The following channels are available to you for reporting possible violations of applicable law, the Ensinger Code of Conduct or compliance guidelines:

## Manager

Talk to your manager.

## Compliance-Officer

Contact the local compliance officer in your company.

## E-mail address

[compliance@ensingerplastics.com](mailto:compliance@ensingerplastics.com)

Write an e-mail to Compliance (as part of Legal & Integrity).

## Anonymous whistleblower system

<https://ensinger.schindhelm-wbsolution.com>

Submit a report via the electronic whistleblowing system. You can use this system to report information to Compliance (as part of Legal & Integrity) 365 days a year, at any time of day and in your national language. Reports are made in a protected area and can also be submitted anonymously if you wish.

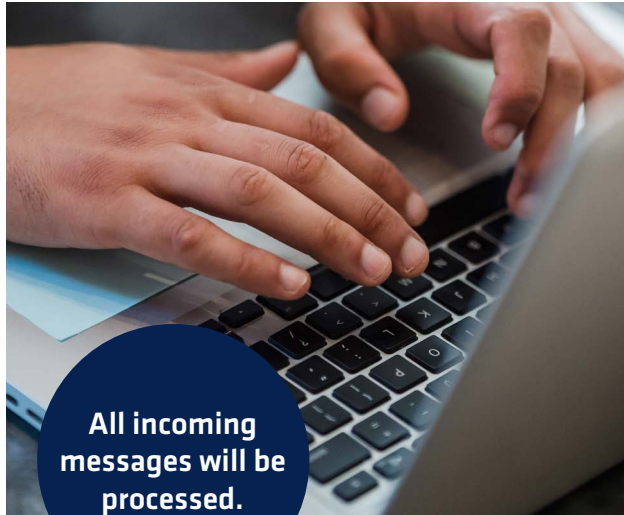
## Post

Write to us.

Ensinger GmbH, Legal & Integrity, Rudolf-Diesel-Straße 8, 71154 Nufringen, Germany



# What happens after a compliance violation is reported?



All incoming messages will be processed.

We take every report we receive seriously. All incoming reports of possible violations of laws, this Code of Conduct or compliance guidelines are investigated - regardless of whether the report comes from employees or third parties.



We are taking action.

If the possible violation is confirmed in the course of clarifying the facts, appropriate measures are taken.



We protect the whistleblower.

The contents of the report will be treated confidentially and will only be made available to the investigating persons to the extent necessary. The confidentiality of the identity and, if applicable, the anonymity of whistleblowers, of persons assisting with the report and of all persons named in the report will be maintained by the persons investigating the report. Ensinger will not tolerate any retaliation against the whistleblower - regardless of which reporting channel you have chosen. Violations of this prohibition will be penalised as compliance violations.

# Orientation guide

If you are unsure whether your behaviour is in line with our Code of Conduct, you can check your behaviour by answering the following questions:

## **What does your tummy say?**

Listen to your gut! Those who act according to their gut feeling often do everything right.

## **What if your behaviour was reported in the newspaper tomorrow?**

If you have a bad feeling about a corresponding newspaper report, you should refrain from the intended behaviour.

## **What would happen if your mother found out about your behaviour?**

If you are not comfortable with the idea of your mother finding out about your behaviour, refrain from the intended behaviour.

## **Better to ask once more than once less?**

If in doubt, please contact your manager, the local Compliance Officer in your company or the Head of Compliance.

If you follow these tips, your behaviour will be in line with Ensinger's behavioural principles.



**Contact us**

[compliance@ensingerplastics.com](mailto:compliance@ensingerplastics.com)

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Ensinger Website

The Ensinger Group is engaged in the development, manufacture and sale of compounds, semi-finished materials, composites, technical parts and profiles made of engineering and high-performance plastics. To process the thermoplastic polymers, Ensinger uses a wide range of production techniques, such as extrusion, machining, injection moulding, casting, sintering and pressing. With a total of more than 2,500 employees at over 30 locations, the family-owned enterprise is represented worldwide in all major industrial regions with manufacturing facilities or sales offices.