

# Code of Compliance



**ENGEL**  
be the first



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ENGEL offers complete injection moulding solutions from a single source. As a leading producer of injection moulding machines, we are committed to the innovative development and production of such machines and the automation for these. With innovative technologies, state-of-the-art production facilities and sustainable service and support, we enable our customers to be competitive and successful.

Just as specific quality criteria obviously apply to our machines, clearly defined values apply to our conduct towards customers, suppliers, employees and other business partners.

This Code of Compliance represents fundamental values that apply to the entire ENGEL Group and thereby form the basis for long term, ethically sound, legally compliant business dealings.

**We consider this Code not only as a binding set of rules, but also as an integral part of our corporate philosophy and thus as a cornerstone of our continued success and our future.**

The Board of Directors

This Code of Compliance is based on UN guiding principles for business as well as the Ten Principles of the UN Global Compact governing working standards, human rights, environmental protection and the fight against corruption:  
<https://www.unglobalcompact.org>

## Binding regulations

This Code of Compliance and all regulations deriving from it constitute binding provisions for all Managing Directors, senior executives and employees of the entire ENGEL Group; they are also binding on all persons acting for ENGEL in any capacity. This notwithstanding, the regulations reflect in particular the specific responsibilities of Group and corporate management, which for its part is obliged actively to personify the values in the Code of Compliance and to communicate those values.

Non-observance of the provisions of the Code of Compliance will result in disciplinary measures and possibly legal action. Instructions that explicitly contradict the Code are not binding and do not justify acts or omissions that breach of the Code of Compliance. Our employees are encouraged to use the Integrity Helpline to report violations of these regulations to the Group legal affairs division. Overall, ENGEL's explicit aim is to report zero cases of non-compliance with this Code of Compliance.

The Code of Compliance is subject to amendments and additions as required.





## Data protection and Information Security

We at ENGEL are unreservedly committed to the principles of data protection and take appropriate steps to ensure compliance with key regulatory provisions. Personal data will therefore only be collected, processed and transmitted where an appropriate legal basis exists. Nonetheless, our technical and organisational measures are strictly guided by the principles of applicable data protection legislation.

We maintain an active information security management system (ISMS) based on recognized technical standards and have implemented appropriate technical and organizational measures. It is our goal not only to implement the three basic pillars of secure information technology - confidentiality, integrity and availability - in the best possible way for our company, but also to ensure these along the entire value chain. By 2025, we aim to have 25% of our sites certified to ISO 27001.

## Observance of the law

Mindful of the potential negative consequences, it is self-evident for ENGEL – and thus part of the corporate philosophy we implement – to do business according to all applicable legal provisions. For this reason, we do not tolerate any violation of the law.

Where a breach of the law is suspected, ENGEL will cooperate with the state authorities unconditionally.

All of our employees are obliged to observe and stay informed of relevant legal provisions. In addition, we encourage our staff to report potential breaches of regulations.



## Bribery and corruption

Any acceptance or offering of direct or indirect non-cash benefits invariably constitutes a threat to unbiased decision-making and therefore free competition. Bribery and corruption are illegal and enforced by penalties for good reason.

We at ENGEL are clearly opposed to bribery and corruption and will take all necessary measures to counter such unethical, morally reprehensible and risk-laden behaviour.

In accordance with the relevant legal provisions, all employees of ENGEL are prohibited from accepting, demanding, offering or granting non-cash benefits that could influence business decisions in any way. Exceptions with regard to promotional giveaways, low-value gifts and other standard business courtesies are always subject to internal verification and authorisation.

ENGEL employees are not permitted to offer or accept cash or direct cash equivalents in any case.

## Fraud-Prevention

Any fraudulent action to business partners or within the ENGEL-Group conflicts with the fundamental principle of ethical sound and legally compliant business practices, and thus will not be tolerated at ENGEL. All ENGEL employees are made aware of the particular risks of fraudulent business practices and are also encouraged to report any potential cases of fraud.

All reported or otherwise known cases of fraud will be investigated by ENGEL and will without exception result in disciplinary action against all involved parties. In the event of official investigations or other measures, ENGEL shall apply the principle of unconditional cooperation with the authorities.



## Conflicts of interest

Since any conflict between the private interests of an employee and the business interests of ENGEL amounts to a potential risk to our future success, such conflicts of interest should be avoided wherever possible.

Without exception, therefore, secondary employment of employees requires the approval of ENGEL. Activities that conflict with the business activity of ENGEL will not be accepted in any instance.

Employees are prohibited from using ENGEL resources for private purposes, and from linking decisions to the gaining of a personal economic advantage.

## Respect, integrity and fair working conditions

For ENGEL, people always come first. That is why we are unreservedly committed to internationally accepted human rights and do not tolerate any violations of such rights. In terms of diversity, ENGEL does not tolerate condescending, harassing or discriminatory behavior based on gender, gender identity or sexual orientation under any circumstances. We also oppose any form of discrimination related to origin and nationality, religion, ideology, political views and disabilities.

We are committed to freedom of association and assembly, the right to collective bargaining, the abolition of all forms of forced labour and child labour<sup>1</sup> and an end to discrimination in employment and occupation. In all circumstances, we abide by the UN Convention on the Rights of the Child and all compulsory national and international regulations associated with the Convention. We are also explicitly opposed to any form of vexatious or demeaning behaviour on grounds of gender or sexual orientation.

All of our employees have the right to remuneration that secures them a reasonable income and is sufficient to cover their basic needs. ENGEL invariably determines and pays wages in accordance with the legal requirements.

We offer our employees a secure and healthy working environment that seeks to prevent accidents and illnesses that can occur in the course of professional activity or the operation of equipment in the workplace. All relevant legal provisions on health and safety at work as well as environmental protection are observed in full. Our employees are required to follow all safety regulations precisely, and to report any deficiencies without delay so that they may be remedied. Managers – or anyone in a supervisory position – have a particular responsibility where this is concerned. Moreover, the observance and the effectiveness of safety regulations are subject to continual verification.

Under no circumstances will we accept non-observance of any of principles that are fundamental to ENGEL.

<sup>1</sup> In accordance with the 1973 ILO convention on the minimum age for admission to employment, a child is defined as a person below 15 years of age, unless the law of a state provides for a higher age for work or compulsory education, in which case the higher age shall apply. Where a state defines the minimum age for employment as 14 years in line with the exceptions applicable to developing nations, the lower age applies.

## Product safety, sustainability and environmental responsibility

Given that our products are subject to the highest standards of quality and safety, we continually monitor the performance and quality of our products. It goes without saying that we also work with our customers in the area of risk prevention.

As an innovative premium manufacturer, we are mindful of the challenges posed by climate change and prioritise the responsible and efficient usage of energy and environmental protection. Cost effectiveness, energy efficiency and sustainability are therefore key elements in our entrepreneurial activity. Conservation of our natural environment, the sparing use of resources and preservation of the fundamentals for the lives of future generations constitute a principle that we apply without compromise in everything from the development and the production to the transport of our products.

Environmental protection is thus a firm part of our corporate philosophy, practised by our employees and ensured by means of regular internal environmental audits and the ENGEL Process Optimisation System (EPOS). In this way we address the needs of today, without sacrificing the needs of future generations.

We are a partner to the Blue Competence sustainability initiative. Blue Competence ([www.bluecompetence.net](http://www.bluecompetence.net)) is an initiative of the VDMA ([www.vdma.org](http://www.vdma.org)) that encourages sustainability in mechanical and plant engineering while bringing to light long-term solutions for the sector. Our partnership commits us to observance of the 12 sustainability principles of mechanical and plant engineering ([www.bluecompetence.net/about](http://www.bluecompetence.net/about)).

## Foreign trade and export control

As a global Group, we are mindful of the general conditions and the risks applicable to cross-border trade. Compliance with all relevant national and international provisions is therefore a matter of course from our viewpoint.

We observe all trading and export control regulations, including applicable sanctions and embargos across all business processes – from receipt of customer enquiries to the delivery of our products.

## Compliance in the supply chain

Ensuring our business partners acknowledge and observe the fundamental principles of this Code of Compliance is a key concern. Accordingly, we expect suppliers to support our policy of corporate responsibility and observe the Ten Principles of the UN Global Compact and the OECD guidelines for multinational businesses as the basis of this Code.





## Competition and anti-trust law

ENGEL has always been synonymous with quality, innovation and customer focus – strengths that can only be fully brought to bear in a fair and regulated competitive environment.

We therefore base our business activity on fair and transparent market conduct and do not tolerate breaches of national or international competition or anti-trust laws.

ENGEL prohibits any conduct that leads (or could lead) to coordination of prices and business conditions, the division of markets or territories, the allocation of customers or the coordination of supply, development or production strategies.

We also reject any conduct that uses unfair means or measures to mislead or degrade customers or competitors.

## Responsible Marketing

ENGEL products have a strong reputation. In line with this, the principle of ethically sound and compliant conduct also applies to ENGEL's marketing activities. Marketing at ENGEL therefore follows the applicable regulatory provisions. In particular, ENGEL opposes any form of aggressive or deceptive marketing, as only responsible and honest marketing can do justice to our products.



## Privacy, Confidentiality and Intellectual Property

Expertise is the engine of our innovative capacity and one of our main assets. For this reason, ENGEL prioritises the protection of business secrets, trade secrets and all manner of confidential information including Intellectual Property. In view of the fundamental importance of such information, ENGEL is duty bound to treat such Information responsibly and in confidence – regardless of whether it is our own information or the one of our business partners that requires protection.

## Anti-Money-Laudry

Money-Laudry unfortunately is a global phenomenon. ENGEL unconditionally opposes such practices and assesses all business transactions on potential money laundering risks. This includes check ups of business partners and extends to the screening of unusual and thus suspicious payment conditions. Money laundry and any business practices related thereto are not tolerated at ENGEL. Compliance with all applicable national and international statutory provisions and unrestricted cooperation with the competent authorities are thus considered a matter of course.

## Financial Responsibility

ENGEL complies with all applicable legal requirements in its business dealings and maintains accounting records that meet the legal requirements. Financial responsibility and compliance with the legal requirements of proper accounting and disclosure requirements, especially accounting-related information, is a matter of course for ENGEL. Accurate records and reports of financial information are necessary to make responsible business decisions, but also to prevent or detect any malversations.

## Tax compliance

Needless to say, global business activity calls for a full understanding of taxation requirements. Accordingly, we apply the highest standards in tax law and reject without exception any form of tax evasion or fraud. For ENGEL, observance of fiscal law provisions and unrestricted cooperation with the responsible taxation and financial authorities is integral to proper market conduct.

## Integrity Helpline

To ensure the basic principles of this Code of Conduct are sustainably observed in the long term, an Integrity Helpline has been set up. The Helpline, which is accessed via [www.engelglobal.com/integrity-helpline](http://www.engelglobal.com/integrity-helpline) and [compliance@engelglobal.com](mailto:compliance@engelglobal.com), is ENGEL's first port of call for compliance-related enquiries and reports.

