

Our Code of Ethics & Conduct



ENGEL Group ethical guidelines and
compliance principles



PREAMBLE

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 these machines and their automation. 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 certain quality standards are inherent to our machines, clearly defined values also govern our interactions with employees, customers, suppliers, and other business partners.

This Code of Conduct 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 regard this Code not only as a guideline that is binding on our conduct, but also as a key component of our corporate philosophy, and therefore a cornerstone of our continued success into the future.

The Board of Directors

Stefan Engleder
(CEO)

Gerhard Dimmler
(CTO)

Simon Zeilberger
(CFO)

Gerhard Stangl
(CPO)

SCOPE OF APPLICATION

The present Code of Ethics & Conduct contains binding rules of conduct; we expect compliance with them within the entire ENGEL Group. It applies to the Board, all managers and all employees. These regulations also apply to all individuals associated with ENGEL through other legal relationships, such as consultant, sales representative, or temporary worker contracts.

The Code of Ethics & Conduct is designed to provide us with orientation and encourage us to act responsibly and with integrity. As a common guideline for the entire ENGEL Group it communicates the essential principles of compliant and ethical behaviour. All of our employees are obliged to observe and keep up-to-date with the pertinent legal provisions.

We also expect our business partners to act in alignment with our values and principles and to adhere to lawful and ethical behaviour.

In individual countries, business areas or markets, or in dealings with business partners, stricter rules than those described in this Code of Conduct may apply. In these cases, the stricter rules must be applied.

Agreement with this set of rules is an integral part of our employment contracts. Every new employee agrees to this set of rules in writing with their signature. It is an integral part of our corporate reality and daily work life at ENGEL. Managers in particular are called upon to actively promote implementation. This includes ensuring that all employees assigned to them are aware of the Code of Conduct and are therefore able to adhere to it in practical terms.

This Code of Ethics & Conduct is regularly reviewed to ensure that it is up to date and amended where needed.

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The Code of Ethics & Conduct applies to us all. It contains binding rules of conduct that we expect **everybody who is part of our ENGEL Group** to observe.

OUR GUIDING PRINCIPLES

Our guiding principles in the Code form the fundamental basis of our corporate values, ensuring that we maintain the highest standards of integrity, responsibility, and fairness in all areas of our

business. They serve as a guide for all of us to make ethical and correct decisions and define the framework within which we align our daily actions.

WE ACT IN LINE WITH OUR VALUES

WE PROTECT HUMANS AND THE ENVIRONMENT

WE RELY ON GOOD PARTNERSHIPS

WE COMMUNICATE IN A RESPONSIBLE WAY

WE PROTECT INFORMATION



WE ACT IN LINE WITH OUR VALUES

Legal compliance and integrity

The integrity of every individual is indispensable to us, for this is the only way that we can continue to earn the trust of those around us. Additionally, this is the only way we can avoid significant legal and economic risks. Therefore, we are fully committed to acting with integrity and complying with the law. We

would rather forego a business opportunity or fail to meet an internal goal than violate applicable laws.

We comply with existing legislation, official regulations and internal company guidelines. It is a matter of course that we protect our internal assets and make careful and frugal use of them.

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We consider it essential that all individuals acting on behalf of ENGEL comply with **applicable laws and regulations** and fulfil their obligations in a reliable manner.

Rejection of corruption and money laundering

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. With this in mind, we have defined the internal goal of continuing to increase the proportion of employees taking part in anti-corruption training compared to 2023 and of training 90% of our employees in this matter by 2026.

We neither offer nor accept advantages if they are intended to improperly influence business transactions or if such an impression could arise.

Gifts and benefits may only be given or accepted in accordance with applicable laws and internal policies.

We do not condone any activities that violate money laundering regulations; we review all business transactions against the background of money laundering risks. This ranges from running checks on business partners to monitoring conspicuous modes of payment. We immediately report suspicious payments or transactions that suggest money laundering.

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We expressly reject any form of corrupt behaviour. **We do not accept or offer any gratuities** that cast doubt on our integrity!

Prevention of fraud

Any act of deception towards business partners, but also internally, contradicts our principles and will not be tolerated under any circumstances. Employees are made fully aware of the specific risks of fraudulent business practices and are encouraged to report potential cases of fraud without delay.

At ENGEL, all cases of fraud reported or discovered by other means are investigated. Without exception, they result in disciplinary action being taken against the persons involved. We cooperate unreservedly with the authorities in official investigations.

Disclosure and resolution of conflicts of interest

Our actions are always geared towards the interests of the company. Having said this, we may find ourselves in situations in our day-to-day work in which our personal interests conflict with those of ENGEL. In such situations, there is a risk that decisions may no longer be made impartially for the company, which is why they should be avoided as much as possible. If a conflict of interests arises, we disclose it immediately in order to ensure rapid clarification and an appropriate solution.

Conflicts of interest can arise in particular in the context of secondary employment, shareholdings in companies, cooperation with close relatives or the use of company property.

Secondary employment in our workforce is subject to the approval of ENGEL. Activities that conflict with the business activity of ENGEL will not be accepted in any instance. 90% of our employees will also be trained and made fully aware of the topic of conflicts of interest by 2026.

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We disclose conflicts of interests immediately and fully. They typically occur in secondary employment or when cooperating with close relatives.

Examples

- Employee E works in the Purchasing Department. She is contacted by a supplier who offers her a personal commission if she gives its products preference and helps to secure a larger order for the supplier.
What is the correct response? This is attempted bribery. The offer must be unequivocally rejected and the incident immediately reported to Legal & Compliance, who will further investigate the incident and take appropriate action. This is the only way to avoid consequences for the employee and ENGEL.
- Employee F receives a job offer for part-time employment with a competitor of ENGEL.
What is the correct response? Secondary employment must be reported to the Human Relations Department and may be prohibited if there is a conflict of interest. As this is a competitor of ENGEL, taking up this secondary employment will not be permitted.
- Head of Department G is aware that his brother is looking to apply for an open position in G's department.
What is the correct response? This is a conflict of interest that must be disclosed immediately. Head of department G must therefore inform his superior and the Human Relations Department about his brother's application and withdraw from the recruitment process. Employment decisions must be made objectively.

WE PROTECT HUMANS AND THE ENVIRONMENT

Respect for human rights, no discrimination

We view human rights as fundamental values that we always respect and observe. We are unreservedly committed to internationally accepted human rights and do not tolerate any violations of such rights. We are committed to compliance with the core labour standards of the International Labour Organization (ILO) and strictly reject all forms of forced and child labour.

It is of great importance to us that everyone can work in a discrimination-free and safe environment. Harassment and bullying of any kind are strictly unacceptable and will not be tolerated. We do not tolerate discriminatory behaviour; we treat everyone equally, regardless of their ethnicity, gender, age, religion, sexual identity or any other reasons. This also specifically applies to recruiting new employees, granting benefits, offering promotion or approving vocational training.



We are fully committed to **compliance with human rights**. We reject any form of discrimination and mobbing and do not accept sexual harassment at the workplace!

Fair and safe work conditions

We attach the greatest importance to fair and safe work conditions. We guarantee that all workplaces meet the applicable health and safety laws and standards. Through regular training and safety reviews, we ensure that our workforce is always aware of and able to apply the latest safety guidelines. For us, fair working conditions also

mean fair compensation, recognition of employee rights, and the promotion of a healthy work-life balance. We strive to maintain a work environment in which everybody feels safe and appreciated and where everybody has the opportunity to develop their career.



We guarantee a **safe and healthy working atmosphere**. We do not tolerate behaviour that is dangerous or harmful to health!

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 partners 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 therefore firmly anchored in our corporate philosophy and ensured by means of continuous internal environmental audits and the ENGEL Process Optimisation System (EPOS).

We are a partner of the Blue Competence sustainability initiative by VDMA (www.vdma.org) that encourages sustainability in mechanical and plant engineering while bringing to light sustainable solutions for the industry. Our partnership commits us to observance of the 12 sustainability principles of mechanical and plant engineering (www.bluecompetence.net).

Examples

Employee H hears a male fellow employee making derogatory remarks to a female member of staff. The male employee ignores her at every team meeting and only assigns unpleasant tasks to her.

- **What is the correct response?** Employee H should report this incident internally without delay so that steps can be taken to investigate and stop this discriminatory behaviour.

Employee A notices that a supplier is mentioned in a report on poor working conditions and suspected child labour.

- **What is the correct response?** Employee A should report this to Legal & Compliance without delay so that the supplier can be checked and steps taken, if applicable.

During a routine check, employee C determines that a product has a safety-relevant defect and could endanger consumer health.

- **What is the correct response?** Employee D should immediately report this defect to the Quality Assurance Department so that an investigation can be initiated and – if applicable – a call-back started in order to ensure customer safety.

WE RELY ON GOOD PARTNERSHIPS

Careful selection of business partners

We choose our business partners carefully to ensure that they share our values. This is why we collect sufficient information, when entering into business relations, to be able to assess the reliability and integrity of our counterparts.

This careful selection ensures that we enter into partnerships that are successful in the long term and fair for all stakeholders.

Diligence along our supply chain

We take our duty of diligence along our supply chain seriously. This means making sure that our suppliers and subcontractors observe the same high standards as we do in terms of working conditions, environmental protection, human rights and ethical business practices. Accordingly, we expect our suppliers to support our corporate responsibility policy.

Through regular audits, transparent communication, and the promotion of training, we actively work to minimise risks and foster a responsible supply chain. Our efforts cover all phases of procurement to ensure that our products and services are created in fair and ethical conditions.

Compliance with export regulations

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. This includes thorough checks on sanctions lists to ensure that we do not engage in

business with sanctioned countries, organisations or individuals. 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.

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We **choose our business partners carefully** and collect enough information to be able to evaluate their reliability. We take steps to ensure a **responsible supply chain**. And we are committed to strict **compliance with all export regulations**.

Fair and open competition

ENGEL has always been synonymous with quality, innovation and customer focus – These are strengths that can only fully thrive 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.

Any conduct that leads, or could potentially lead, to the fixing of prices and business conditions,

the assignment of markets or territories, or the coordination of supply, development or production strategies is prohibited at ENGEL.

Furthermore, we reject any behaviour that employs unfair means or measures aimed at misleading customers or undermining a competitor. We never deliberately provide misleading or false information about our products or services. We clearly oppose any form of aggressive or deceptive marketing.

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We protect the free market and respect fair competition. We do not join cartels and do not exchange confidential information capable of distorting the market.

Examples

- Employee E is planning to choose a new supplier of important raw materials. Before reaching a decision, she does thorough research and ascertains that the supplier has been reprimanded in the past due to violations of international sanctions.
What is the correct response? Employee E should reject the potential supplier due to its history of sanction violations and look for alternatives. In the event of uncertainties or borderline cases, an in-depth review by Legal & Compliance should be initiated.
- Employee D is taking part in an industry-specific conference at which informal talks on pricing and market strategies take place between competitors.
What is the correct response? Employee D should immediately steer clear of these talks. Activities of this kind should be reported to Legal & Compliance immediately.

WE COMMUNICATE IN A RESPONSIBLE WAY

Correct reporting

We place great importance on transparent and truthful reporting and properly and promptly disclose relevant information. We all pay attention to recording facts and creating other documents in a correct

and complete way. In particular, records relating to financial information must not be manipulated and must not include misleading entries.

Financial due diligence and tax compliance

Financial responsibility and compliance with the legal requirements for proper accounting and disclosure regulations, particularly regarding accounting-related information, are fundamental to our operations. Accurate records and reports relating to financial information are essential to allow responsible business decisions to be taken but also to prevent or reveal any malversation.

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.

Compliance with tax regulations and full cooperation with the relevant tax and financial authorities is, for us, an integral part of proper market conduct.



In the scope of **transparent and truthful reporting**, we disclose pertinent information in a correct and timely manner. We comply with legal requirements relating to **tax legislation and disclosure regulations**.

Examples

- Employee X is responsible for preparing the annual reports and discovers discrepancies in the financial documents during the check.
What is the correct response? Employee X should immediately report these discrepancies to the finance department and internal auditing in order to initiate a thorough investigation and ensure that the annual reports are correct and truthful.

WE PROTECT INFORMATION

Confidentiality, privacy and intellectual property

Expertise is the engine of our innovative capacity. Therefore, we place the utmost importance on protecting trade and business secrets, as well as all types of confidential information and intellectual property.

This is why we treat such data or information responsibly and in confidence – regardless of whether it is our own or the property our business partners.

Data protection and data security

We are unreservedly committed to the principles of data protection. Personal data is therefore only processed where an appropriate legal basis exists and always in compliance with the principles of data protection law.

technical and organisational policies. Our aim is to implement and safeguard the three pillars of security for information technology – confidentiality, integrity and availability – in the best possible way, not only for our company but also along the entire value chain.

We maintain an active information security management system based on recognised technical standards and have implemented appropriate

We seek to have 25% of our locations certified in line with ISO 27001 by 2026.

Examples

- Employee H accidentally sends an email to the wrong person. The attachment also includes personal information and data.
What is the correct response? This is a data incident as personal data has been disclosed to an unauthorised person (breach of confidentiality). The incident must be reported to Legal & Compliance without delay so that further essential steps can be taken.



We protect confidential information and data against unauthorised viewing and disclosure.

CONSEQUENCES OF INFRINGEMENTS

Failure to comply with legal or internal company regulations can not only cause considerable damage to our entire Group, it can also have serious consequences for the individuals involved.

For this reason, we do not hesitate, in the case of infringements of this nature, to take action and initiate suitable measures to clarify the facts of the case. Any failure to observe the provisions of this Code of Ethics & Conduct may result in disciplinary measures and possibly legal action. Serious violations can result in employment-related consequences, up to and including termination. ENGEL also reserves the

right to claim damages and take further civil action. Instructions that explicitly contradict the Code are not binding and do not justify acts or omissions that breach of the Code of Ethics & Conduct.

Wherever we gain knowledge of any violation of our values and principles of conduct by business partners, we reserve the right to terminate the business relationship immediately and, if necessary, to take legal action for any damage incurred. In all of this, the declared objective of ENGEL is to experience zero violations of this Code of Conduct.

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Violations of the principles of conduct, as defined here, can lead to serious sanctions for the individual but also for the entire ENGEL GROUP. If we have any questions or uncertainties, we can always contact our supervisors or the Legal & Compliance department. Everyone is encouraged to report perceived issues or violations internally so that we can take appropriate action.

GOVERNANCE/AUDITING

Our Code of Ethics and Conduct is applicable and must be adhered to by the entire ENGEL Group. Our international business environment, and also the state of our surroundings, are dynamic values. In line with this dynamic scenario, this Code and the objectives defined in it are subject to a regular, interdisciplinary review at least once a year, and

adapted as necessary, by the ENGEL Ethics & Compliance Committee, which is chaired by the Head of Legal Services, Compliance Management & Insurance, Christian Zoidl. Throughout the scope of the guideline, the Board is the authoritative customer and accountable recipient of the entire guideline.



CONTACT AND REPORTING POINT

At times, we may have doubts about how we should behave in certain situations. Where questions or uncertainties arise, or where misconduct is suspected or observed, it is essential to seek advice and support. In these cases, supervisors or the Legal Services, Compliance Management & Insurance (LCI) unit are here to help at all times.

A healthy culture of learning from our mistakes is important to us. Open and transparent handling of concerns and mistakes makes a decisive contribution towards correcting shortcomings at an early stage and empowers us to improve our processes.

Everyone should feel that they can turn to the appropriate internal departments even with critical

facts. Managers in particular should encourage their employees to express their concerns.

An Integrity Helpline has been set up to ensure that the basic principles of this Code of Ethics & Conduct are sustainably observed in the long term. It can be accessed on our company website or on www.engelglobal.com/integrity-helpline.

We guarantee special protection and support to anyone who reports something honestly and for good reason. Sanctions against whistleblowers solely on the basis of a report are prohibited. This also applies where reports are found to be factually incorrect, assuming that they were made in good faith.

