



Version 3 - December 2024

Ensinger Policy Statement

Preface by the Management

Dear colleagues,

Observing and promoting human dignity and environmental protection were certainly of great importance to our founder, Wilfried Ensinger. Nothing has changed in this regard to this day.

For us, especially as a family business that thinks and acts holistically with the long term in mind, respecting human rights and promoting environmental protection are a part of responsible corporate management, both in our own business area, that is, at our own locations and in subsidiaries in which we hold a controlling interest or otherwise have a decisive influence, as well as in our supply chains. We therefore assume responsibility for our actions and make good on our motto "Today For Tomorrow." We are committed to observing human rights and promoting environmental protection in our business activities worldwide. We also expect this from our suppliers as we rely on cooperative, long-term, trust-based business relationships.

We firmly believe that exemplary corporate governance can only be successful if we look out for people and our environment. This Policy Statement reflects this conviction and contains our human rights strategy. This Policy Statement is extremely important to Ensinger. Together with our Mission Statement and our Code of Conduct, it is among our overarching commitments that shape our corporate culture and our day-to-day actions.

It documents our stance on respect for human dignity and on climate and environmental protection. It also describes what we, as a company, specifically do to implement this fundamental stance in our day-to-day actions in the best possible way.

The Policy Statement first describes the risk management process before illustrating the priority risks determined based on the risk analysis. Finally, we describe expectations for our employees and suppliers with respect to human rights and the environment.

This Policy Statement applies to all Ensinger companies. It has been made available to all employees and our business partners. The present Policy Statement is regularly reviewed and adjusted as needed.

Management of Ensinger GmbH

Ralph Pernizsak
Managing Director

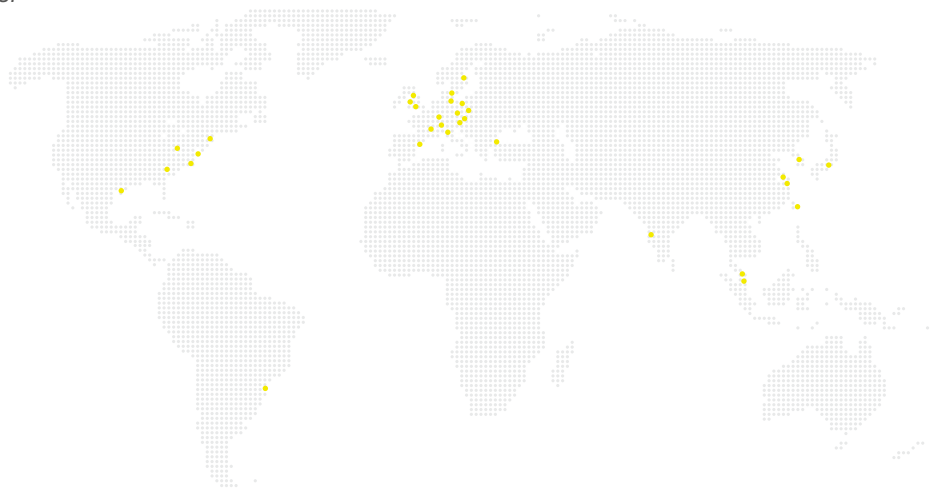
Dr. Roland Reber
Managing Director

Björn Schneekloth
Managing Director

Management of Ensinger Holding GmbH & Co. KG

Klaus Ensinger
Managing Director

Achim Lehmann
Managing Director



Our Risk Management Process



We describe below how we will put our position with regard to human rights and the environment into practice through implementing appropriate measures.

Responsibilities

We have defined clear responsibilities for our risk management with regard to compliance with human rights and environmental due diligence obligations.

Management bears the overall responsibility for risk management, that is, the implementation and monitoring of human rights and environmental due diligence obligations.

To monitor risk management with regard to human rights and environmental risks, Management has appointed two human rights officers, namely the Head of Compliance and the Head of QM (Quality Management). They are responsible for supervising the implementation of our risk management policy and for regularly reviewing its adequacy and effectiveness. The Risk & Compliance Committee, which also consults Management, obtains information about the work of the two human rights officers at least once a year, if necessary also ad hoc.

A team consisting of Purchasing, Quality Management, Legal, and Compliance is tasked with the operational implementation of risk management. The centerpiece of

risk management comprises risk analyses in our own business area and with our direct suppliers. If risks or violations are identified in our own business area with respect to observing human rights and our natural resources, the relevant department or subsidiary, under whose functional responsibility the risk or violation arises, will continue to handle it and make a decision regarding the elimination or minimization of the risk. In the event of corresponding risks or violations for our suppliers, Purchasing will make further decisions to prevent, terminate, or minimize the extent of the violation, with termination of the supply relationship being the last resort.

Risk Analysis

Ensinger conducts an annual risk analysis and assessment for its own business area as well as for its direct suppliers.

An ad-hoc risk analysis is also carried out in the event the risk situation has changed or knowledge is substantiated. This may also be necessary with regard to indirect suppliers. In this case, too, the risk analysis is performed as described below and, in the event of a risk or violation being identified, appropriate and effective measures are taken with regard to the respective indirect supplier.

As part of the risk analysis, Ensinger conducts a tiered approach:

Abstract Risk Analysis

The abstract risk analysis extends to the company's own business area as well as direct suppliers.

For each location of our subsidiaries, on which Ensinger exerts a decisive influence, a country-specific risk check was carried out as part of the abstract risk analysis in our own business area, whereby the incidence was determined according to the type of risks and country and summarized in a risk matrix. Based on the risk matrix, Ensinger further evaluated and assessed any possible risk impact.

With regard to the direct suppliers, country and industry risks are first investigated in particular. For this purpose, all direct suppliers with active business relationships across all Ensinger locations are recorded and assigned to an industry and a country. Furthermore, the respective order volume within the last fiscal year is recorded from each direct supplier. The abstract risk analysis also incorporates further data from suppliers that indicates whether suppliers are exposed to increased risk.

Specific Risk Analysis

In a second step, the risks identified in the abstract are specified.

As part of the specific risk analysis in its own business area, Ensinger is asking the Ensinger subsidiaries, for which abstract risks were identified, to undertake further plausibility checks and verification of these risks and their handling in this regard.

In the specific risk analysis, with regard to the direct suppliers, those suppliers are considered in more detail for which there is an increased risk based on the results of the abstract risk analysis. In this case, contact is made with the direct suppliers and a comprehensive assessment follows with regard to the risks to human rights and the environment. The results of the risk analysis are continuously incorporated into the business decision-making processes with regard to internal business strategies and supplier selection and management.

The risk analysis is the basis for identifying appropriate preventive and corrective measures.

Preventive Measures

If we determine a risk in the context of the risk analysis, the identified risks are assessed on this basis, which is prioritized based on the adequacy criteria if not all of the risks can be dealt with at the same time. In a subsequent step, appropriate and effective measures are immediately drawn up and implemented to respond to the risks and to prevent a breach of human or environmental rights. When

drawing up these measures, we follow in particular the catalog of Section 6 para. 3 and para. 4 LkSG (Lieferkettensorgfaltspflichtengesetz [German Supply Chain Due Diligence Act]).

Corrective Measures

If we determine that violation of a duty of due diligence towards human rights or the environment in our own business area or at a direct supplier has already occurred or is imminent, we immediately take appropriate corrective measures.

In the event of misconduct in our own business area, necessary measures are taken to terminate the violation or risk.

If a violation has occurred or is imminent at a direct supplier, we take the necessary measures in consultation with the supplier to prevent, terminate or minimize the extent of the violation. If the violation of a human-rights law or environmental duty of due diligence is such that it cannot be terminated in the foreseeable future, a concept with a specific schedule for termination or minimization is created and implemented immediately. When creating and implementing the concept, measures, such as the joint development and implementation of a plan to terminate or minimize the violation with the company that caused the violation, or the temporary suspension of the business relationship during the risk minimization efforts up to the discontinuation of the business relationship, are considered as the last resort. We aim to maintain the contractual relationship and to improve the situation locally before terminating contractual relationships with suppliers.

Complaint Procedure

Internal and external stakeholders have the option to report information (even anonymously) about risks relating to human rights and the environment as well as due-diligence violations regarding human rights and the environment via the "Schindhelm Whistleblowing Solution for the Ensinger Group" available in a variety of languages.

Whistleblower System:

ensinger.schindhelm-wbsolution.com

The whistleblower System ([Ensinger Whistleblowing Solution](#)) can be found on the Ensinger website and on the Ensinger intranet, along with further information on how reported compliance alerts are handled.

In addition, it is also possible to provide us with appropriate information via the following channels:

Email:

humanrights@ensingerplastics.com

Mail address:

Ensinger GmbH, Compliance, Rudolf-Diesel-Straße 8,
71154 Nufringen, Germany

All reported events are reviewed and assessed, and any necessary measures are initiated. A confirmation is provided to the whistleblower that the information sent has been received. In addition, the whistleblower is involved throughout the entire procedure. Ultimately, he will receive a message about the measures taken. As part of the complaint procedure, steps are of course taken to ensure confidentiality and anonymity. The persons entrusted by Ensinger with conducting the procedure are impartial, independent and not bound by instructions. They are, of course, sworn to secrecy. The systematic handling of complaints and the knowledge gained from them make it possible for Ensinger to continuously improve its own processes.

The complaint procedure itself is described in the rules of procedure published on the Ensinger website.

Effectiveness Checks

At least once a year and on an ad-hoc basis, we review how effective the risk management, the implemented preventive and corrective measures and the complaint procedure are. Efficacy is demonstrated through the audits conducted, surveys of employees and suppliers, the results of specific complaints and the results of the continuous risk analysis. If shortcomings are identified during these reviews, further necessary changes are made. Risk management is thus continuously improved and further developed.

Documentation and Reporting

The fulfillment of due diligence obligations is systematically documented. The relevant documentation is retained for at least seven years from the time of creation.

Our fiscal year ends on March 31 of each calendar year. Every year, we prepare a report on the status of our risk management regarding the respect of human rights and our natural resources at the end of the previous fiscal year and publish it on our website. This report is also sent to BAFA (Bundesamt für Wirtschaft und Ausfuhrkontrolle [German Federal Office for Economic Affairs and Export Control]).

Further information on human rights and the environment at Ensinger can be found in the Ensinger Group's [Sustainability Report](#).

Identified Priority Risks



Using the risk analysis, we determined the following priority risks in our own business area:

- Effects of climate change due to CO₂ emissions from our own value creation (Scope 1), and the purchase of energy sources, such as electricity and gas (Scope 2);
- Effects due to the CO₂ emissions generated in our upstream and downstream supply chain (scope 3).

As a result of the risk analysis with regard to direct suppliers, we have identified the following risks in the regions of Europe and Asia:

- Disregard of occupational safety and occupational health risks;
- Disregard of freedom of association;
- Discrimination in employment;
- Withholding an appropriate salary;
- Destruction of the natural resources through environmental pollution.

If we identify risks in the context of the risk analysis to be carried out by us, we will immediately take appropriate preventive measures. If, in the context of the risk analysis, any immediate or already occurring violations are identified, we will immediately take appropriate corrective measures.

Our Expectations of Employees and Suppliers



Our Expectations of Our Own Employees

We expect our own employees to strictly observe all human rights as well as to strictly comply with environmental due diligence obligations and prohibitions. These are anchored in the [Ensinger Code of Conduct](#). Every employee is required to comply with the Ensinger Code of Conduct and we expect all employees to align their actions with it. Furthermore, all employees at Ensinger must comply with the guidelines that supplement the Ensinger Code of Conduct.

Employees are regularly made aware of the content of the Ensinger Code of Conduct. Mandatory training on the content of the Code of Conduct is also planned.

Employees who are involved in procurement activities are also trained on the LkSG, as well as on the procurement strategy further developed based on statutory requirements, and are therefore also responsible for observing human rights and environmental standards in the supply chain.

At quarterly board meetings, the subsidiaries report to the Management of the Ensinger Group on topics such as compliance, occupational safety, and the environment.

Ensinger GmbH maintains the certified management systems ISO 14001 (environmental management system) and ISO 45001 (management system for health and safety

at work) and is audited on this basis by external organizations. Regardless of these certifications, Ensinger pursues a risk-based approach and conducts internal audits in the GmbH in this context. Company-wide mandatory guidelines with regard to the occupational health and safety of employees and environmental protection are intended.

Our Expectations of Our Suppliers

We have defined our human-rights and environmental principles and expectations towards our suppliers in our [Ensinger Code of Conduct for Business Partners](#). The Code of Conduct requires our suppliers to comply with the highest ethical standards, especially with respect to human rights and environmental due diligence. In addition, with this Code of Conduct, we require our suppliers to share our expectations in turn with their business partners.

The Code of Conduct for Business Partners is integrated into our supply contracts. One of the minimum requirements in the supplier approval process is signature of the Code of Conduct for Business Partners by the new supplier. The rollout of the Code of Conduct for Business Partners to Ensinger's existing direct suppliers began in the fall of 2023.

Ensinger's direct suppliers are asked to carry out training courses on human-rights and environmental due diligence

based on identified and prioritized situational risks.

Ensinger reserves the right to perform risk-based monitoring measures, such as on-site audits, with its direct suppliers.

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 almost 3,000 employees at over 30 locations, the family-owned enterprise is represented worldwide in all major industrial regions with manufacturing facilities or sales offices.