



*Version 3 - December 2024*

# *Ensinger Rules of Procedure*

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# 1. Preface

The law on corporate due diligence obligations to prevent human rights violations in supply chains (LkSG – Lieferkettensorgfaltspflichtengesetz [German Supply Chain Due Diligence Act]) came into force on 01/01/2023.

The aim of the law is to improve the protection of human rights and the environment in the company's own business area and along the business supply chain. For this purpose, the law prescribes a series of due diligence obligations to be observed by the companies concerned.

Among other things, the LkSG requires that companies must have an appropriate whistleblower system, which can be used by both internal (i.e., employees) and external persons (such as suppliers and any other third parties) to contact the company to report risks or violations related to human rights and the environment. In addition, companies must publish rules of procedure that describe the procedure for reporting information.

As a family-owned enterprise that operates worldwide and considers corporate values and compliance with applicable laws to be important, Ensinger not only wants to be informed of any risks and violations relating to human rights and the environment, but also of any misconduct. The whistleblower system is a supporting tool that can be used to provide all indications of misconduct. It helps us to be informed as early as possible and to be able to react appropriately.

We will explain over the following pages in this Rules of Procedure how reports regarding misconduct can be submitted (see 2.), what the procedure looks like after the submission of a report (see 3.) and which principles apply to the procedure (see 4.).

The Rules of Procedure for the whistleblower system and the whistleblower system are reviewed annually and on an ad-hoc basis for their effectiveness. If necessary, adjustments are made to the procedure.

## 2. Submission of Reports

### Who can submit reports?

Everyone. Our **whistleblower system is open to everyone**, not just employees of the Ensinger Group. It is irrelevant whether you are affected by the possible violation or have simply become aware of it.

### What can I report?

Examples of risks to human rights and the environment that can and should be reported are

- Violations of the bans on child labor, forced labor and all forms of slavery, of the ban on discrimination in employment relationships and on the withholding of an appropriate wage, as well as of the ban on the commissioning of inadequately instructed or monitored private or public security personnel;
- The destruction of natural resources, such as soil, bodies of water, air, etc. through environmental pollution;
- Disregard of occupational safety and occupational health risks, disregard of freedom of association, the right to form associations and the right to collective bargaining;
- Unlawful violation of land rights;
- Other obvious violations of other human rights;
- Acts in violation of a ban resulting from the Minamata Convention; the Minamata Convention governs the handling of mercury;
- Acts in violation of the prohibition of production and/or use of persistent organic pollutants (POP) as well as the lack of environmentally-friendly handling of POP-containing waste;

→ Acts in violation of the ban on the import and export of hazardous waste within the meaning of the Basel Convention.

The report can relate to misconduct by Ensinger or its employees, as well as misconduct in the Ensinger supply chain.

Reports may also be submitted with respect to (potential) violations of any other laws.

### How can I submit a report?

There are various reporting channels that you can use to submit reports:

#### Compliance email address – [compliance@ensingerplastics.com](mailto:compliance@ensingerplastics.com)

Incoming information and questions are processed by Corporate Compliance. The mailbox is subject to strict, minimal access rights. A report can be made in writing 24 hours a day, 365 days a year (including anonymously). An in-person or telephone appointment can be arranged.

#### Anonymous whistleblower system – [ensinger.schindhelm-wbsolution.com](https://ensinger.schindhelm-wbsolution.com)

The web-based whistleblower system, “Schindhelm Whistleblowing Solution”, is operated as an online platform by Schindhelm Rechtsanwalts-gesellschaft mbH, Osnabrück (“Schindhelm”) commissioned by us and is subject to strict, minimal access rights. The system ensures the anonymity of the whistleblower via technical means. Corporate Compliance processes incoming reports. The login and chat function can be used to communicate with Corporate Compliance on an ongoing basis, including anonymously. Reports can be made in different languages 24 hours a day, 365 days a year.

**Mail address** – Ensinger GmbH, Compliance, Rudolf-Diesel-Straße 8, 71154 Nufringen, Germany

### What information should a report contain?

The report does **not have to be substantiated**. However, the information listed below is **helpful** for processing the report. It facilitates and accelerates processing, but is not a prerequisite for processing.

#### → What happened?

Specific description of incident and context

#### → When did the incident occur?

Date or time period, time

#### → Where did the incident occur?

Production hall, department, etc.

#### → Who is affected?

Name(s) of the injured party, name(s) of the responsible party

#### → Is there any proof?

Photos, videos, documents, emails, witnesses, etc.

We also process reports that are not in German or English after obtaining a professional translation.

### Is submission of the report free of charge?

Of course, submitting a report is **free of charge**.

## 3. Procedure After Submission of a Report

### Who processes my report?

Corporate Compliance is the central “**reporting office**” at Ensinger. It receives all reports, regardless of how they were reported. The reporting office has access to Management. The employees of the reporting office are obligated to maintain confidentiality regarding the identities of the whistleblowers and all persons named in the reports, as well as with regard to the circumstances described. When processing reports, they always act discreetly, autonomously, impartially and independently, also taking into account the principle of a fair process.

### Are all reports processed?

Yes. We take **every report** we receive seriously. The reporting office checks whether the tip or the report contains sufficient information to carry out further clarification of the facts. If the reporting office needs further information, it will contact the whistleblower if possible.

### What are the individual steps when a report is processed?

#### → Receipt of the report

Each whistleblower receives a confirmation of receipt within **seven days of receipt of the report**. If the whistleblower provides the information anonymously via the web-based whistleblower system, “Schindhelm Whistleblowing Solution”, or via email, confirmation of receipt is made via the selected channel. This channel also ensures correspondence with the whistleblower as things progress while maintaining anonymity. Therefore, in the case of anonymous information, specifying a communication channel is particularly important to enable queries from the reporting office.

#### → Review of the report

All incoming reports are first checked by the reporting office with regard to their plausibility. For this purpose, the reporting office will discuss the information with the whistleblower if a corresponding communication channel is available. If necessary, other persons are involved in reviewing the report. If employees of other departments or external experts are involved, they are also obliged to maintain confidentiality, are impartial and autonomous in their processing of the case. If it turns out during the review of the report that it is not plausible, the procedure is discontinued and the whistleblower is informed of this with a brief justification.

#### → Clarification of the facts

If the information is plausible, the reporting office takes all necessary investigative measures to clarify the facts. Relevant information required to clarify the report is obtained and evaluated for this purpose. The whistleblower can be asked for further information if necessary.

#### → Taking measures

If the information in the report is confirmed during the fact finding, appropriate follow-up measures are taken. The whistleblower is involved in the process of developing follow-up measures.

Appropriate **preventive measures** are defined if there is a risk of further corresponding misconduct. Preventive measures can be training or process adjustments, for example.

**Corrective measures** are defined and implemented to prevent, terminate or minimize the extent of the violation. For example, corrective measures can be the immediate cessation of certain in-house processes or staff-related measures.

#### → Investigation completion

If the procedure is discontinued due to a lack of evidence or for other reasons, the whistleblower is informed of this with a brief justification. If the information is confirmed, the whistleblower receives feedback on the preventive and corrective measures taken and planned, as well as justification for such, provided that neither the internal investigation nor the rights of the persons who are the subject of a report or who were mentioned in the report are adversely affected.

The measures are implemented. The whistleblower is consulted about this. Further down the line, checks are made as to whether the measures are implemented and effective.



#### → Report-related effectiveness review

The results of the investigation and the implementation of the measures are documented and incorporated into the next recurring risk analysis.

#### How long does it take to review my report?

The facts are clarified as quickly as possible in consideration of the overall circumstances. **As a rule**, the facts are clarified **within three months** after confirmation of receipt. The review of a report must not be unnecessarily extended. In the event of imminent danger, further steps must be taken immediately.

The reporting office provides the whistleblower with feedback about the result of the fact finding via the specified communication channel no later than three months after confirmation of receipt, provided that this does not impair internal investigations and the rights of the data subjects.

#### What is documented?

All incoming information and related activities are documented and stored in full in compliance with the confidentiality requirement and data protection. Anonymity is always guaranteed for anonymous information. This also applies to implausible reports. The documentation is subject to a strict access and role-based concept. Access is limited to Corporate Compliance.

#### Is the procedure free of charge?

Yes, the procedure is free of charge.

## 4. Procedural Principles

#### How is the whistleblower protected?

The **content of the report is treated confidentially** and is generally only available to the persons clarifying the information to the extent necessary.


The **confidentiality of the identity and, if applicable, also anonymity** of whistleblowers, of persons assisting with the report, and of all persons named in the report must be protected by the persons clarifying the information. In this case, legal exceptions apply, for example in the event of intentionally incorrect or grossly negligent incorrect reporting or a request for information from a law enforcement authority.

The whistleblower is **protected against disadvantage**, especially against discrimination, transfer of tasks, denial of promotion or submission of a negative performance assessment, suspension, termination or similar behavior toward the whistleblower due to the report. These and other disadvantages are prohibited. Even the threat or the attempt is prohibited. This protection also applies to persons who support the whistleblower in the submission of such a report.

Disadvantages for a whistleblower, the prevention of reports or a violation of the promised confidentiality of identity and, if necessary, anonymity of whistleblowers are not tolerated and sanctioned. The sanctions depend on the respective individual case and are proportionate and effective to rule out repeat. If a whistleblower has experienced disadvantage at work after submitting a report, the person who is accused of the disadvantage must prove that the alleged disadvantage is not related to the report. To the extent possible, Ensinger also grants this protection under the EU Whistleblower Directive outside of this Directive for any compliance-related reports.

#### What applies with regard to data protection?

The applicable data protection regulations are always observed; personal data is anonymized or pseudonymized.



*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.*