

This Code of Conduct summarises the basic rules valid throughout the ARBURG group for an ethical, as well as legal and lawful interaction both among themselves as well as in relation to business partners, public authorities and other third parties. Content and values of this Code of Conduct are not abstract specifications but represent minimum requirements relating to our daily business and offer all company members of the ARBURG group (i.e. employees, executives and Management Team) a binding aid to orientation. The content of the Code of Conduct is based in particular on the OECD Guidelines.

This Code of Conduct is reviewed on a regular basis. Should there be any changes, these will be adapted independently of a regular review cycle.

## **1. Legal compliance**

Compliance with national and international laws, regulations and industrial minimum standards as well as compliance with internal rules is a matter of course for ARBURG. Employees are encouraged to regularly inform themselves on the rules applicable in their area of responsibility and always scrutinise their actions in terms of legality and regularity.

## **2. Competition**

ARBURG and its employees agree to abide by the rules of fair and free competition, in particular the applicable competition and antitrust legislation in all business relationships. ARBURG has always been doing business solely on merit and is characterised by quality, innovation and customer focus.

## **3. Conflicts of interest**

Business decisions within ARBURG are exclusively made with the best interests of the company. All employees always act with integrity and avoid conflicts between private and business interests. In future, ARBURG employees will receive recurring compliance training, which will also raise awareness of the issue of conflicts of interest. In the event that, nevertheless, a conflict of interest arises, it will be disclosed immediately to the respective superior so that it can be solved in compliance with the law.

## **4. Corruption**

ARBURG strongly objects to any form of corrupt behaviour. Employees, customers and suppliers are prohibited to illicitly influence individuals working within the public-law sector or decision-makers in private companies at home and abroad in any form.

When dealing with business partners and public authorities, employees may only grant or accept benefits if this under no way creates an impression of influencing the business processes.

The ARBURG Anti-Corruption Policy sets out the binding principles of conduct for employees in dealing with gratuities, in particular gifts and invitations, in relation to existing and potential business partners and to authorities.

## **5. Foreign trade and export**

As a company operating on a worldwide basis, ARBURG strictly complies with all relevant national and international customs, trade and export control regulations, including any applicable sanctions and embargoes. All employees in charge of the import and export of goods and other cross-border transactions are required to familiarise themselves with the control provisions applicable under their activity and adhere to them when goods or services are purchased, provided, produced or placed on the market or if technologies are transferred or received.

## **6. Money laundering**

ARBURG complies with national and international regulations on the prevention of money laundering. All necessary measures are taken to prevent money laundering within the sphere of influence of ARBURG. The aim is to conduct business only with reputable business partners who are involved in legitimate business activities.

Employees who suspect money laundering, particularly in connection with cash transactions, are required to report their suspicions to their superiors as well as to the Managing Director Finance, Controlling and IT, or the head of auditing.

## **7. Human rights and working conditions**

ARBURG respects, protects and promotes the legislation on the protection of human rights as fundamental and universal standards worldwide, as set out in particular in the Universal Declaration of Human Rights of the United Nations (UN). In doing so, ARBURG particularly follows the OECD Guidelines for Multinational Enterprises.

ARBURG categorically rejects any form of child and forced labour and other forms of forced labour within the company, with suppliers or business partners. If child labour, forced labour or a violation of human rights is identified, or if indications of such are apparent, the respective superior must be informed immediately and all necessary measures for prevention must be initiated. All work performed is voluntary and all employees may terminate the employment relationship with reasonable notice.

## **8. Employment relationships**

ARBURG treats its employees with respect. ARBURG rejects any form of illegal punishment, abuse, harassment, intimidation or other undignified behaviour towards employees.

ARBURG complies with the applicable employment law in all employment relationships and expects the same from its business partners. ARBURG promotes cooperation and communication between employees and ARBURG in its role as employer or the respective representatives.

In order to promote social dialogue, ARBURG recognises and respects the right of all employees to join or form trade unions and representative bodies of their choice and to engage in collective bargaining on their behalf to govern working conditions. Employee representatives shall not be discriminated against and shall have the right to exercise this function in the workplace.

## **9. Equal opportunities and equal treatment**

ARBURG provides equal opportunities for all. Discrimination based on ethical or national origin, gender, religion, belief, age, disability, sexual orientation, skin colour, political opinion, social origin or any other legally protected characteristics will not be tolerated. Employees are selected, hired, promoted and paid only based on their qualifications and abilities. Employees and executives receive appropriate training.

## **10. Quality and qualification**

For ARBURG the endeavour to achieve the best possible quality and therefore continuous quality improvement are top priority economic and competitive factors. All employees deliver safe and sound products and services of the highest quality and reliability. In order to support this high level of performance and high quality work sustainably, ARBURG promotes the qualification of its employees.

The individual advancement of all employees is essential for ARBURG. ARBURG offers a wide range of training courses, which are defined together with the employees as part of the individual development plan. Employees receive an assessment of their work performance in annual performance reviews. The ARBURG development programme for executives also includes language courses, specialist training and individual further training - online and by means of external offerings.

## **11. Health and safety**

Employee health and safety are in the best interests of ARBURG. Health protection and occupational safety in compliance with the applicable regulations are therefore an integral part of all operational processes. ARBURG ensures the information of its employees through regular training. In addition, employees are encouraged to become actively familiar with the applicable safety regulations at work and at the premises of customers or business partners, to remain vigilant at all times and to use the prescribed protective clothing and equipment. With its occupational health management, the ARBURG Health Center and flexible working models, ARBURG preserves and promotes the health and safety of its employees.

Risk assessments are conducted on a regular basis to evaluate and review potential risks to employees. All ARBURG business activities are conducted in a responsible way, ensuring the health, safety and well-being of employees. The committees for occupational health and safety (Occupational Safety Committee and Health Steering Committee) deal with current issues relating to health and safety.

ARBURG not only has a great deal of responsibility at the production site, but also assumes this responsibility for the products throughout the entire supply chain, including customers. The management system and all quality assurance and risk management processes contribute to the safety and health protection of customers. ARBURG advises its customers on the correct handling of the products. If necessary, ARBURG also provides appropriate training.

## **12. Environment and energy**

Environmental protection and careful use of resources and energy are an integral part of ARBURG corporate culture. This applies particularly to the use and development of new product technologies and natural, resource efficient production processes. ARBURG's environmental and energy programme contains the strategic and operational objectives for improving environmental protection, in particular for increasing energy efficiency and energy savings.

Buildings and plant facilities are optimised and modernised with regard to energy requirement. In addition, environmental aspects are taken into account in the construction of new buildings. ARBURG focuses on sustainable resource conservation, energy storage and energy (re)generation, which is achieved through state-of-the-art technical building equipment such as geothermal energy, photovoltaics, wind power, complex control technology and the use of highly efficient systems. Thanks to the energy-efficient construction method, ARBURG has been exceeding legal requirements for years.

With numerous projects and initiatives, ARBURG is pursuing the goal of continuously increasing the production efficiency of plastics processing in all areas and reducing its carbon footprint in the long term.

A key objective of ARBURG is climate neutrality. In 2022, the development of a company-wide ESG climate protection strategy was started. This strategy takes into account both environmental and social expectations as well as the expectations of customers and employees. On the way to "Net Zero", ARBURG has committed to the Science Based Targets in 2022 and had the targets validated by SBTi.

### **13. Data protection and security**

The privacy and confidentiality of information entrusted to ARBURG have a high priority for the company. ARBURG ensures the protection of privacy, the protection of personal data and the security of all business information in accordance with legal requirements and internal regulations by obligating its employees accordingly in all business processes.

The ARBURG Information Security Management System (ISMS) sets out the basic rules of responsible information management.

As far as the technical and organisational protection of the data, in particular against unauthorised access and loss is concerned, ARBURG observes a reasonable standard with due regard of the state of the art and the risk involved.

ARBURG regularly monitors the effectiveness of the control systems for information security and uses questionnaires to ensure continuous improvement as part of the PDCA cycle. ARBURG follows the ISO 27001 standard for the implementation of information security processes.

Employees can report breaches or concerns related to information security via the report form for suspected compliance violation or by contacting the Data Protection Officer.

### **14. Business partners and sustainable procurement**

ARBURG expects all business partners to apply the contents and values of this Code of Conduct as well as environmental and social practices as the basis for a business relationship. ARBURG also expects its business partners to work towards a consistent dissemination of these standards in the supply chain to comply with the CSR principles.

The ARBURG Purchase Conditions set out the general terms and conditions for contracts with ARBURG suppliers. All suppliers are required to accept and observe these conditions, including environmental and social practices. When services are commissioned for the first time, suppliers are asked to provide information on their environmental and social practices, particularly in accordance with the provisions of the German Supply Chain Act ("Lieferkettensorgfaltspflichtengesetz" - LkSG). In order to be able to identify sustainability risks among suppliers, surveys are conducted on energy and the environment.

ARBURG involves its suppliers and respects all applicable laws, such as the EU chemicals regulation REACH and the EU directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment RoHS. If the products contain substances of concern from the SVHC list (substances of very high concern), ARBURG must be informed immediately. Suppliers are required to introduce an environmental management system, e.g. in accordance with DIN ISO 14001.

ARBURG suppliers are also requested to check their entire supply chain for the possible use of so-called "conflict minerals" such as tantalum, tin, gold and tungsten. If any use of conflict minerals is identified within the supply chain, this must be reported to ARBURG immediately.

ARBURG expects and obliges its suppliers to comply with due diligence obligations in terms of human rights and environment, within the supply chain up to the extraction of the raw materials, at least in accordance with the applicable provisions of the German Supply Chain Act ("Lieferkettensorgfaltspflichtengesetz" - LkSG).

### **15. Management responsibilities**

Executives have a special responsibility, especially the Management Team and executive level. They all act as a model for their employees and exemplify content and values of the Code of Conduct. They inform their employees about the provisions of the Code of Conduct and ensure compliance with legal and internal regulations in their areas of responsibility, in particular by providing employees with appropriate training.

## 16. Observance and compliance

Content and values of this Code of Conduct are binding for all employees. They undertake to live according to, observe and implement the indispensable values and content inherent in this Code of Conduct. Further information to strengthen compliance awareness will be provided to employees in the ARBURG Intranet. In case of questions, employees can contact the respective persons in charge at any time.

## 17. Reporting of violations and sanctions

Employees can report suspected compliance violations or express compliance concerns using the ARBURG compliance reporting form. All persons submitting reports have the right to remain anonymous. The reporting channels are communicated and employees and executives are encouraged to come forward if they are aware of or suspect potential violations.

The following channels can be used for questions about this Code of Conduct or to report suspected cases:

- Superiors (internal)
- Auditing + Compliance at ARBURG  
Telephone: +49 7446 33-4235  
E-mail: [compliance@arburg.com](mailto:compliance@arburg.com)
- Report form for suspected compliance violation

Violations of the regulations in this Code of Conduct may lead to disciplinary actions, the assertion of claims for damages and criminal penalties.

In the event of sustained violation of this Code of Conduct by business partners, ARBURG reserves the right to exclude these business partners.

*The Management Team*  
*Lossburg, December 2022*