

Global Code of Conduct and Ethics of the JAEGER Group



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As an internationally active company, the JAEGER Group has the obligation and the self-image to act responsibly and lawfully. We face up to this responsibility as a company and part of society and thus secure our economic success in the long term.

The reputation and trust we enjoy among our customers, employees, business partners and in society can be severely damaged by inappropriate behavior, even by individuals. We therefore all share responsibility for the reputation of our company.

The Global Code of Conduct and Ethics of the JAEGER Group summarizes the essential principles and rules for our actions. It represents the demand on ourselves, which must be filled with life by all employees in their daily actions.

The Global Code of Conduct and Ethics of the JAEGER Group is a binding guideline for the JAEGER Group. It describes principles to which we adhere in our daily dealings with each other, customers and business partners. The companies of the JAEGER Group communicate the contents of the Code of Conduct and Ethics to employees, contractual partners and, if necessary, to third parties. It should become comprehensible to the contractual partner that compliance with the Code of Conduct and Ethics is fundamentally guaranteed.

Best Regards

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1. Scope of application

The Global Code of Conduct and Ethics of the JAEGER Group applies to all companies of the group. In addition, compliance with our standards set forth herein is an absolute requirement for our business partners and third parties acting on behalf of or in conjunction with JAEGER Group companies (e.g., suppliers, distributors, consultants, freelancers, sales representatives, etc.).

2. Basics of our cooperation in the JAEGER group

Mutual respect, communication, responsibility

We strive to create a work environment of mutual respect, communication, professionalism, honesty, courtesy and fairness. We respect the views of those who disagree with and/or challenge our opinions. Communication takes place on the basis of facts. We do not spread rumors. Each employee of the Group takes responsibility for his or her actions and deeds.

Protection against discrimination, harassment and bullying

Equal treatment of all employees is a fundamental principle of our corporate policy. The JAEGER Group does not tolerate any discrimination of its employees. No one may be discriminated against, favored or harassed on the basis of characteristics such as gender, skin color, religion, nationality, political or other convictions, ethnic origin, disability, age, sexual orientation or any other characteristics protected by local laws, such as membership of a national minority, pregnancy, former military affiliation or alternative service

Diversity

We promote multicultural cooperation and diversity and consider it a strength of our global network. We strive for a work environment free from discrimination, intimidation and harassment. We do not tolerate discrimination based on gender, racial or ethnic origin, religious belief, world view, sexual identity, age and/or disability.

Teamwork

We promote teamwork in a cooperative, open atmosphere and have highly motivated employees who are willing to learn, are highly qualified and work in international teams.

Lifelong learning

We promote the professional and personal development and career success of our employees and support individual motivation as well as lifelong learning.

We promote our employees regardless of gender, racial or ethnic origin, religious conviction, world view, sexual identity, age and/or disability.

Feedback system

We expect and provide regular, sincere and constructive feedback as part of regular employee and development reviews.



3. Cooperation with Customers, Suppliers and Business Partners

Selection of business partners

The selection of our suppliers, distributors and other business partners is based on their qualifications, experience and other legitimate business interests. Personal relationships or reasons cannot influence this selection. We behave fairly and honestly towards our customers, suppliers or third parties.

We avoid working with customers, suppliers and other third parties whose standards are inconsistent with our Code of Conduct and Ethics.

We compete fairly in compliance with international conventions, national law and internal regulations and are responsible for our actions

Bribery and improper payments

The acceptance of payments, cash, expensive gifts, invitations to major entertainment programs/events or trips and other gifts by customers, suppliers and other business partners is strictly prohibited for all employees. Similarly, our employees must not offer or give bribes, either directly or indirectly.

Any demand for or granting of bribes must be rejected by the employee and reported immediately to his or her supervisor.

Business gifts and invitations

Exempt from the regulations on "bribery and unlawful payments" are small attentions, such as invitations to meals, as long as the amounts involved are insignificant and these attentions do not influence business decisions in any way.

Other small attentions (e.g., promotional gifts before Christmas) are given at a central point in the company, where a decision is made on their further use.

Prevention of corruption - Public officials

The definition of a "public official" may vary from country to country.

This includes all persons who are in an employment relationship under public law. This includes in particular civil servants, judges and persons in other official relationships under public law, as well as persons who are appointed to perform public administration duties for public authorities or other bodies on their behalf. Employees of a public radio and television broadcaster or a (partially) nationalized company can also be public officials, as can employees in international organizations or institutions (e.g., at the European level).

We do not offer payments or other services to the above-mentioned target group with the intention of concluding or continuing a business transaction with anyone or of brokering a business transaction to third parties. Likewise, we do not instruct, authorize or support anyone to violate this principle.

Competition and competitors

We behave fairly toward our competitors. Business advantages are achieved exclusively through better performance. Illegal or unethical business practices are expressly prohibited to our employees.



We prohibit our employees from engaging in activities, discussions and contacts with our competitors or other outsiders about confidential information and data about the company. This includes, but is not limited to, anti-competitive agreements on prices, price increases, terms or capacity, including profit, profit margins, costs, sales and marketing methods. Such actions are considered by the Company to be harmful.

We do not engage in industrial espionage, bribery, theft or dissemination of knowingly false information about our competitors, their products or services.

We do not assist third parties in anti-competitive behavior.

Export controls and economic sanctions

We comply with all applicable import and export control laws, sanctions and embargoes that impose restrictions on the export or re-export of goods, software, services and technology to certain destinations, as well as prohibitions on transactions involving certain restricted countries, regions, organizations and individuals.

For our suppliers, corresponding regulations are stored in our purchasing conditions. We review any business partners that may be affected as necessary.

Plagiarism and intellectual property

The market success of our products and services is inextricably linked to their quality. Our commitment to maximum quality, which we consistently strive to deliver to all our global customers, places high demands on all employees in terms of creativity, diligence, neatness and precision. We do not tolerate deliberate or negligent behavior that results in a reduction of our quality.

For this reason, the use of plagiarized or counterfeit materials is prohibited. By sourcing our raw materials from official and certified sources/suppliers, we minimize the likelihood of introducing counterfeit materials and plagiarism into our products.

If counterfeit materials or plagiarism are nevertheless detected during one of the quality assurance measures regularly performed, they are immediately isolated and the original equipment manufacturer (OEM) and/or any existing law enforcement authorities are notified.

Sales to non-OEM customers comply with national laws. As far as we are able, we ensure that these sold products are used in accordance with the law.

We also respect intellectual property, such as inventions, literary and artistic works, designs, and symbols, names and images used in commerce, and will not use or publish them without authorization.

This applies in particular to intellectual property that is protected by patents, copyrights or trademarks.

Conflicts of interest

In order to protect the interests of the company and employees alike, we ensure that no conflicts of interest arise between the private interests of the employee and those of the company. This applies to all personal connections of employees or their relatives to competitor companies, customers, suppliers and/or service providers. Our employees report their own conflicts of interest (if known) and consult with their supervisor in case of doubt. The company will respond appropriately and fairly to conflicts of interest.

Employees must report conflicts of interest immediately to their manager. An employee may not have private orders carried out by companies with which he or she has business dealings during his or her duties if this would give him or her an advantage, particularly in the form of unreasonably high discounts.



Significant financial interests of employees or close family members of employees in a competitor, customer or supplier must be reported to the company in writing. Any direct or indirect interest of 5 percent or more in the capital is considered a material interest.

Transactions with an employee or his or her close family members on behalf of and for the account of the company are generally prohibited. In individual cases, however, they may be approved in writing by the management.

The pursuit of secondary employment by an employee with a competitor, customer or supplier is not permitted.

4. Working conditions and human rights

Ethics and human rights

Responsible, sustainable and lawful action is one of the essential values of the JAEGER Group and is firmly anchored in its ethical principles. It corresponds to the self-image of the JAEGER Group and is the declared goal to avoid violations of human rights.

The responsibility of the JAEGER Group in the field of human rights focuses on topics and fields of action in which it can exert its influence as a business enterprise.

Human rights are basic standards that serve to secure the dignity and equality of all and, as universal, inalienable and indivisible rights, are equally due to every human being. This definition is set out in the International Bill of Human Rights.

Child labor and young workers

The JAEGER Group observes the minimum age for employment and does not tolerate any form of child labor. Children must not be prevented from their education by gainful employment and in this way restricted in their development.

The dignity of children must be respected and their safety and health protected. This applies in particular to the worst forms of child labor, such as hazardous work, which may harm the health, safety or morals of children.

Modern slavery, forced labor and human trafficking

The JAEGER Group does not tolerate any form of forced or compulsory labor. In accordance with the ILO Core Labor Standards, the JAEGER Group rejects the use of forced or unlawful compulsory labor in its business activities.

Conflict materials

The JAEGER Group is committed to responsible sourcing of conflict materials in accordance with human rights, legal obligations and international standards. Suppliers to the JAEGER Group must confirm compliance with these principles for themselves and their supply chain.

Wages and benefits

The JAEGER Group offers its employees competitive and performance-based compensation, supplemented by fringe benefits.

The JAEGER Group compensates its employees fairly, both internally and externally. Uniform principles provide the basis for a globally balanced remuneration system. Where



applicable, remuneration complies with the respective legally guaranteed minimum wages or minimum standards.

At all locations of the JAEGER Group, performance and work results are a central benchmark for remuneration. The company remunerates employees for their individual or collective performance in accordance with local principles.

Working hours

The JAEGER Group complies at least with the respective valid national regulations on working and rest times, free time, vacation.

The organization of working hours and breaks takes into account both operational and individual concerns. It is based on occupational science criteria, such as medically recognized physical and mental stress parameters.

The JAEGER Group promotes the compatibility of work and private life. Within the scope of operational possibilities, it also offers its employees individualized working time models to make special personal circumstances and work compatible.

Occupational health and safety

The JAEGER Group avoids health hazards by complying with all statutory occupational health and safety regulations. We regularly inform and train our organization on regulations and codes of conduct.

Freedom of association and collective bargaining

The JAEGER Group recognizes the right of all employees to form employee representative bodies and to engage in collective bargaining to regulate working conditions. Freedom of association and the right to collective bargaining are respected. All workers, without distinction, are entitled to join or form a trade union of their choice and have the right to bargain collectively. The employer approaches the activities of the trade union and its organizational activities openly.

Employee representatives are not discriminated against and are allowed to perform their representative functions at the workplace.

If the right to free association and collective bargaining is restricted by law, the employer will allow the creation of parallel ways of independent and free association and bargaining and will not hinder them in any way

The culture of the JAEGER Group is characterized by trusting, constructive and sustainable cooperation for the benefit of the company and its employees.

Employees are neither favored nor disadvantaged based on their membership or non-membership of a trade union or employee representation. At sites which do not have an employee representative body, the JAEGER Group promotes regular dialog between employees and the company.

5. Quality, sustainability and environmental protection

Quality

We are known for excellent quality and environmentally friendly technologies.



Products and services

Our ideas and solutions set standards for quality, environment, safety and reliability. Our products must not pose a risk to people or the environment before, during or after handling.

Continuous improvement process and resource management

We strive to continuously improve our services and products by optimizing our processes, methods and appropriate use of materials and products. The reduction of waste quantities and emissions (air, water, soil) and improvement of energy efficiency are declared company goals, the development of which is regularly reported.

Environmental management

We are committed to the permanent reduction of environmental pollution and active environmental, fire, occupational and health protection in order to make our contribution to our customers, employees, fellow citizens and future generations.

We identify the environmental regulations relevant to our activities, comply with them demonstrably, continuously and sustainably, and regularly inform the organization about their effects.

We comply with regulations on chemicals management (REACH).

The JAEGER Group commits its suppliers to equally sustainable and verifiable environmental management.

6. Governance - principles and guidelines

Validity of internal policies

We recognize that additional standards of conduct apply beyond this global policy. These standards include the policies and procedures of our business units, departments and regions, including those applicable to our employees. All individuals are bound by these respective standards. In the event of a conflict between this Global Policy and another policy or procedure, the provisions of this Global Policy will govern in all cases.

Compliance with laws

We are committed to complying with all laws, regulations and policies, national and international, related to our operations and to complying with applicable privacy policies, including, but not limited to, those set forth below:

- The General Declaration on Human Rights issued by the UN in 1948 and the European Convention on the Protection of Human Rights and Fundamental Freedoms, 1950.
- International Covenant on Economic, Social and Cultural Rights, 1966
- International Covenant on Civil and Political Rights, 1966
- The OECD Convention Combating Bribery of Foreign Public Officials in International Business Transactions, 1997

We are also committed to promoting diversity in our company by signing the German corporate initiative "Charta der Vielfalt".

Financial integrity

We provide complete, accurate, timely and understandable information in all our financial reports and documents in accordance with current applicable national and international regulations, laws and standards.



Data privacy and information security

When collecting, storing, processing or transferring personal data from employees, customers or other third parties, we take the utmost care and ensure strict confidentiality and compliance with applicable laws and rules (e.g., DSGVO).

Within the scope of information security, information provided by our business partners is used exclusively for the fulfillment of tasks within the scope of service provision with and for the business partner and is protected against internal and external misuse. Accordingly, we oblige our business partners to treat information provided by the JAEGER Group in the same way.

7. Finding help - taking action

Reporting violations

Our employees will report apparent violations of this policy to their supervisor, Human Resources or management so that appropriate action can be taken.

We are committed to protecting any employee who, in good faith, has reported a violation of this Code of Business Conduct and Ethics from any retaliation and/or discrimination action.

Our employees understand that violations of this Conduct and Ethics Policy and internal regulations may result in disciplinary action, up to and including termination of employment.

Whistleblowing

A separate JAEGER Group Whistleblower Policy is designed to encourage all employees to raise their concerns regarding serious misconduct by a person holding an important position or management position in relation to this Global Code of Conduct and Ethics, as well as other Erich Jaeger policies and/or applicable law or regulations, without fear or risk of unfair treatment, discrimination or disadvantage as a result.

8. Implementation of the global code of conduct and ethics

- Overall responsibility for compliance with the Global Code of Conduct and Ethics lies with the management.
- We regularly inform our employees about the content of and changes to the global Code of Conduct and Ethics and related policies and processes.
- Our employees are regularly asked to take knowledge tests.
- Supervisors monitor correct behavior and address risks and violations directly.
- Reports of violations have top priority.
- Corporate goals are set and evaluated in accordance with the guidelines.
- All topics are managed with adequate management topics.