



Jenoptik Integrity Code - More Integrity, More Compliance, More Ethics

Corporate Center · Compliance & Risk Management

Agenda

01

Respect for human rights – a high priority and a basic prerequisite for our business activities

02

Working at Jenoptik

03

Compliance & Ethics – the benchmark for our conduct in the workplace

04

Compliance & Ethics – the benchmark for our conduct in the market

05

Compliance & Ethics – the benchmark for our conduct in the Jenoptik market environment

06

Compliance with the Jenoptik Integrity Code

07

Scope, version & contact person

Explanations

Symbol

Explanation



Further information



Our contribution as Jenoptik employees



Responsible departments for further questions



Reporting channels

Our Jenoptik Integrity Code



Making the right choice at the right moment, acting with integrity – that is what we are all about in all parts of Jenoptik. Shared values are essential to this.

Our Jenoptik Integrity Code

Our Integrity Code applies globally to all Jenoptik employees. In the following, "Jenoptik" refers to all companies in which JENOPTIK AG directly or indirectly holds at least 50% of the shares. Consequently, the term "Jenoptik employee" includes all employees of one of the companies belonging to the Jenoptik Group.

The Integrity Code sets the standard for our daily actions in Jenoptik's business environment. It defines relevant topics and provides guidance on standards of integrity, compliance and ethical behaviour.

At Jenoptik, compliance stands for adherence to legal provisions, internal company guidelines and the Jenoptik values to protect our companies and brands. At Jenoptik, acting in accordance with applicable law is a matter of course, the basis of all business activities and the top priority for all employees. The legal regulations and our own internal guidelines form the framework within which we conduct our business.

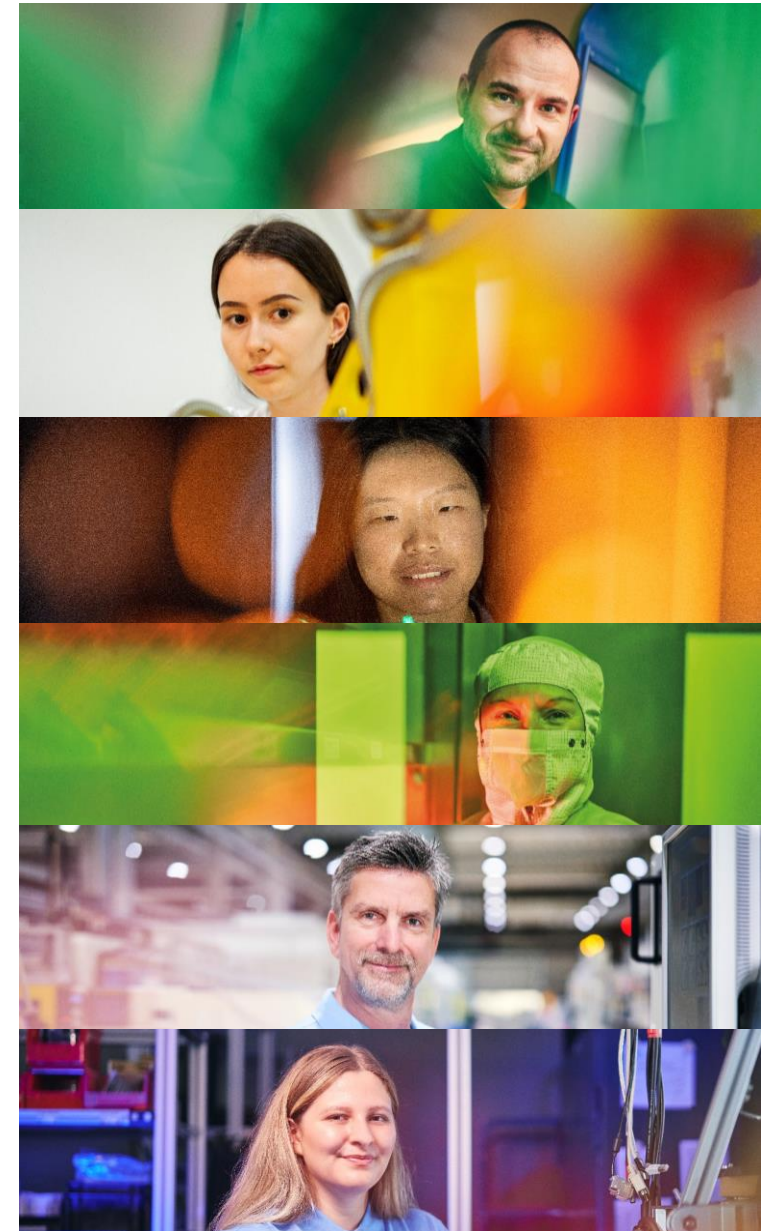
We, as Jenoptik employees, are informed about the applicable legal basis for our work as well as internal guidelines, including this Integrity Code, and we adhere to them. Our managers at all levels provide guidance and support.

Our Integrity Code brings together our rules of conduct so as to ensure a high level of integrity and high ethical and legal standards in our company and to protect the reputation of all Jenoptik companies. It is based on binding standards and values such as respect, tolerance, honesty and openness, which apply to all Jenoptik employees worldwide - from the Executive Board to trainees.

Dr. Stefan Traeger
Chairman of the
Executive Board

Dr. Prisca Havranek-
Kosicek
Chief Financial Officer

Dr. Ralf Kuschnereit
Member of the
Executive Board



1

Respect for human rights – a high priority and a basic prerequisite for our business activities

1. From the outset: The protection of human rights – a high priority and a basic prerequisite for our business activities

For us, economic success and responsibility for our actions are inextricably linked goals. Jenoptik is committed to respecting human rights and protecting the environment – in our own company and throughout our supply chain.



The published policy statement on the protection of human rights and the environment explains this in detail and is available on our website under [Sustainability / Responsible corporate management / Respect for human rights](#).



Human Rights Officer
(CC Compliance & Risk Management)



MORE LIGHT

2

Working at Jenoptik

2. Working at Jenoptik

2.1 We as a team

Together, we are a globally active technology group focussing on the photonics market with its range of products and services. Optical technologies are the foundation of our business. Our key markets primarily include semiconductor equipment and the electronics industry, life science and medical technology as well as transport and security. We are active in various sectors and markets and operate with different, strong brands (e.g. Jenoptik, TRIOPTICS, SwissOptic).

Colleagues we would like to work with are colleagues who...

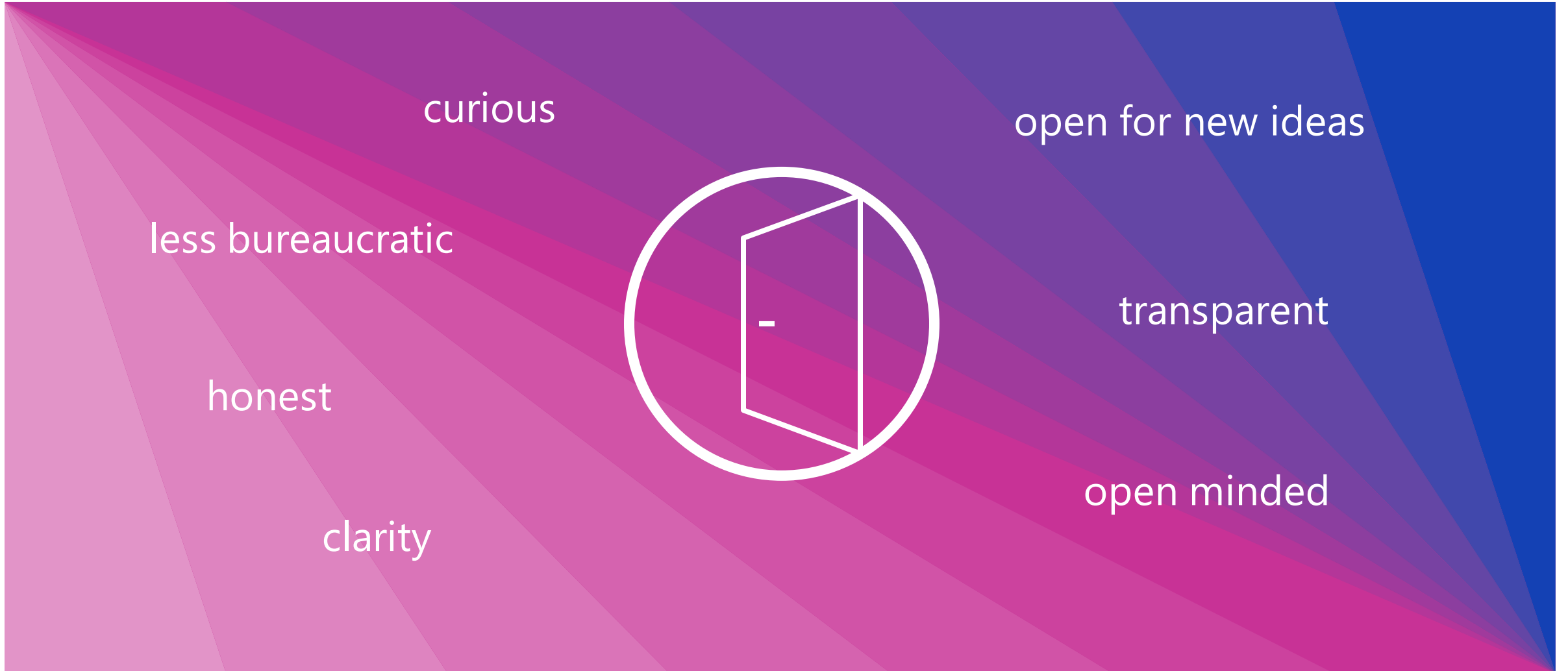
- listen,
- have a natural curiosity for their profession,
- are open to new developments,
- have the will and motivation to win,
- have the desire to make things happen,
- are dynamic,
- identify with the great products that Jenoptik manufactures,
- are convinced of their skills and experience and
- see opportunities and possibilities instead of obstacles.

Our contribution:



- **We** listen carefully.
- **We** share our thoughts and develop ideas in an open dialogue and across borders.
- **We** are open to change and better solutions.
- **We** actively promote our topics, projects and ideas.
- **We** want to be better than the competition.
- **We** want to move forward, we want to be fast, we want to win – but always in compliance with the relevant rules!
- **We** offer our employees the opportunity to give their best as part of a very good team.
- **We** are determined to break new ground.

2. Working at Jenoptik



2. Working at Jenoptik

2.2 Our Jenoptik values

	Open	Driving	Confident
Employer Brand Values	We believe that committed and curious people always excel. That's why we listen well in order to understand. We value new ideas and develop them further in an open dialogue.	Jenoptik is an innovative company. This means that we do things that have not been done before. To do this, we are actively driving things forward. To achieve our goals, we support people who want to succeed, who lead the way and who are absolutely motivated to win.	We have the courage, the conviction and the expertise to seize opportunities as they arise and to be leaders in the field of photonics. We look to the future with optimism and confidence.

2. Working at Jenoptik

2.2 Our Jenoptik values

Open

Curious

Less bureaucratic

Honest

Clarity

Open to new ideas

Transparent

Open minded

Driving

Ambitious

Speed

Will to win

Keep it simple

Proactive

Innovative

Empowered

Motivated

Confident

Inspiring

Quality

Determined

Transparent

Reliable

Responsible

Optimistic

Courageous

2. Working at Jenoptik

2.3 The principles of our conduct

Jenoptik is committed to ensuring equal opportunities, equal treatment and fair working conditions.

All employees respect the personal dignity of each individual and refrain from actions or comments that discriminate against, disadvantage or treat other persons unequally on the basis of ethnic or national origin, skin colour, gender, religion or ideology, political affiliation, disability, age, marital status, sexual identity or other personal traits or characteristics.

Interacting with others in a broad-minded, open and respectful manner is just as important as regularly communicating with colleagues. Cooperation based on trust starts with friendliness, helpfulness and reliability.

Jenoptik also expects all employees to keep their promises, carry out their work conscientiously and in a goal-oriented manner, take responsibility and actively support their colleagues.

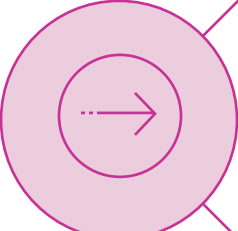
When in doubt, our leaders provide guidance and support at all levels to help us behave with integrity and in accordance with the standards and principles set out here and to make the right decisions.

Our managers are measured against the Jenoptik Leadership Principles.



Open

- Transparency always
- Helping behaviour



Driving

- Customer obsession
- Drive for Solution
- Focusing
- Individual initiative



Confident

- Organizational ownership
- Hiring & Development
- Invent and simplify
- Self development

2. Working at Jenoptik

2.4 Jenoptik feedback and error culture

Mistakes are human –
there is no doubt.
Where people work,
mistakes happen.



2. Working at Jenoptik

2.4 Jenoptik feedback and error culture

Constructive and appreciative feedback is highly valued at Jenoptik and is always welcome. In addition, there is a regular exchange of feedback between employees and managers as part of the standardised annual employee appraisal, based on our Jenoptik values.

The aim is to obtain regular feedback between employees and managers over the course of the year. The topics are selected according to current developments and needs (e.g. job description, project list, feedback to employee or manager, company values, etc.) between employee and manager and can be divided into separate feedback meetings.

Errors can and may also be communicated openly as part of constructive feedback. This applies in both directions. It is important to us that a recognised error is expressed as a criticism of behaviour ("Colleague X didn't check that") and that no criticism is made of the person themselves ("Colleague X is sloppy and unfocused").

For us, mistakes are not a stigma, but an opportunity for improvement. In this way, we are able to respond quickly and effectively to problems and adapt to changes. To stay innovative and achieve business progress, we need a healthy willingness to take risks. On the other hand, we want to avoid unnecessary risks. In order to prevent possible damage to us and Jenoptik, we point out errors directly, honestly and without reservation.

We promote a positive and open error culture and actively deal with errors without apportioning blame in order to analyse them and, if necessary, further develop skills, processes, work instructions and procedures.

Jenoptik firmly believes that in an atmosphere in which employees are not afraid to point out their own mistakes, fewer errors will automatically occur.

Our contribution:



- **We** promote a positive and open error culture and actively deal with errors free of blame in order to analyse them and, if necessary, further develop competencies, processes, work instructions and procedures.
- **We** firmly believe that in an atmosphere in which employees are not afraid to point out their own mistakes, fewer mistakes will automatically occur.



MORE LIGHT

3

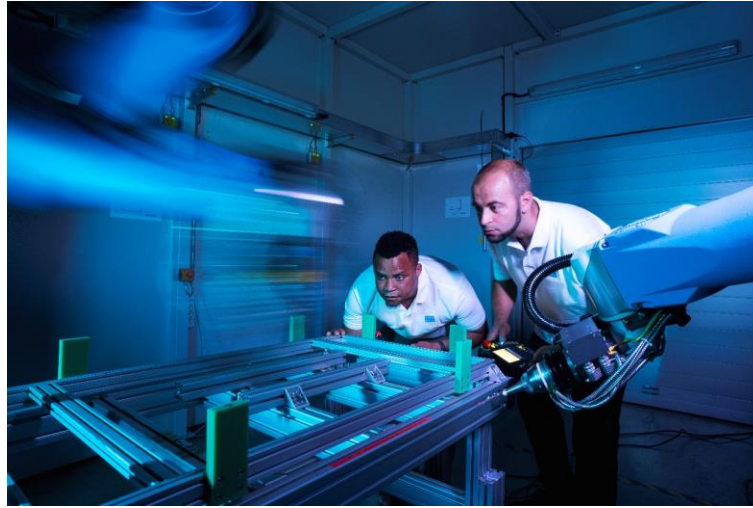
Compliance & Ethics –
the benchmark for our conduct
in the workplace



MORE LIGHT

3.1 Integrity towards colleagues and Jenoptik as an employer

3. Compliance & Ethics – the benchmark for our conduct in the workplace



We conduct ourselves ethically in our workplace and comply with all laws and internal regulations that apply to us.

3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.1.1 Diversity in the workplace – diversity, equal treatment and equal opportunities

What Jenoptik means by diversity and inclusion:

By diversity and inclusion, we mean ensuring a work environment that is free from prejudice and creates an atmosphere of openness and respect for each and every one of our employees. As an international company, we are a reflection of the diversity of our customers and business partners. We reject any form of discrimination based on age, gender and sexual identity and orientation, ethnic origin and nationality, religion and ideology or physical abilities.

Why diversity is important to Jenoptik:

Diverse teams are successful teams - that's what Jenoptik firmly believes. A positive, non-discriminatory working environment creates added value for the company, but also for each individual employee. However, this can only be achieved if everyone actively contributes.



Our contribution:



- **We** treat everyone fairly and with respect.
- **We** demonstrate an open and inclusive mindset by actively allowing for different ideas, perspectives and approaches.
- **We** comply with national anti-discrimination legislation (e.g. AGG, Civil Rights Act, Americans with Disabilities Act, etc.) in our daily activities.
- **We** pay special attention to appropriate training.

3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.1.2 Diversity in the workplace – a workplace free of discrimination and harassment

Why a workplace free of discrimination and harassment is important for Jenoptik:

Respect and team spirit are basic requirements for our corporate success. Behavior such as bullying, sexual harassment or discrimination is incompatible with our corporate principles and values and will not be tolerated under any circumstances. Any indication of such a breach of employment law obligations will be taken seriously and may result in action under employment law. We are all responsible for creating a fair, tolerant, respectful and collegial working environment.



Our contribution:



- **We** condemn all forms of discrimination and harassment.
- **We** report any case of discrimination or harassment either the manager, the HR Business Partner* or the Compliance & Risk Management Department.
- **We** act as role models when we express that we will not tolerate discriminatory behaviour.
- **We** promote a work environment free from discrimination and harassment through our way of working and interacting with each other, including the way we express ourselves.



Human Resource

3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.1.3 Legitimate conduct at the workplace

What do approval authority and power of representation mean?

The external power of representation includes the authority to conclude legal transactions in the name of and on behalf of one of the Jenoptik companies. These are based, among other things, on procurations, powers of attorney and special powers of attorney.

The authority of all Jenoptik employees to approve matters internally is regulated the [Internal Authorization Matrix \("IAM"\)](#).

Why is it important for Jenoptik to define clear internal approval and external representation regulations?

In the daily course of business, it's important that all staff members are aware of the authorities they have. This is because the conclusion of legal transactions creates rights and obligations and thus risks and opportunities for Jenoptik.



3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.1.3 Legitimate conduct in the workplace

For this reason, there are defined processes that define

- which specialist departments are to be involved before concluding legal transactions,
- which internal approvals must be obtained,
- how these are to be documented and
- which employees are entitled to conclude external legal transactions on behalf of Jenoptik.

When defining processes, we make sure that they are designed to be efficient and practical. The necessary (internal) approvals must always be obtained prior to the conclusion of corresponding legal transactions in order to avert risks for Jenoptik as far as possible and to achieve the best possible result.

Our contribution:

- **We** inform ourselves about our authority with our supervisor and by means of the authority matrices and comply with them.
- **We** observe the four-eyes and one-over-one principle that applies globally at Jenoptik.
- **We** adhere to the principle of joint representation in external legal transactions, i.e. external documents must be signed by two authorised employees throughout the Group.
- **We** always make it clear that we are not acting on our own behalf, but on behalf of a Jenoptik company when conducting business.
- **We** always involve the responsible specialist department in external legal transactions.
- **We** initiate the relevant processes in good time if certain legal transactions have to be approved in advance by committees.



- Global / Divisional Internal Authorisation Matrix
- “External Representation and Signatures” process description
- Process descriptions for committee approvals



CC Legal & IP

3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.1.4 Safety in the workplace

What does occupational health and safety comprise of?

"Occupational safety" comprises all regulations and measures taken to protect the life and health of our employees in the performance of their work. Occupational health and safety serves to prevent accidents in the workplace and to protect against work-related hazards and health risks for our employees.

Why is occupational health and safety a high priority for Jenoptik?

Jenoptik has a global responsibility for the safety and health of its employees in the workplace. Safe and decent working conditions are therefore a matter of course for us. This is why we integrate occupational health and safety into our structures and processes on a sustainable basis.

We provide a safe working environment and comply with all applicable health and safety laws and regulations relevant to the workplace.

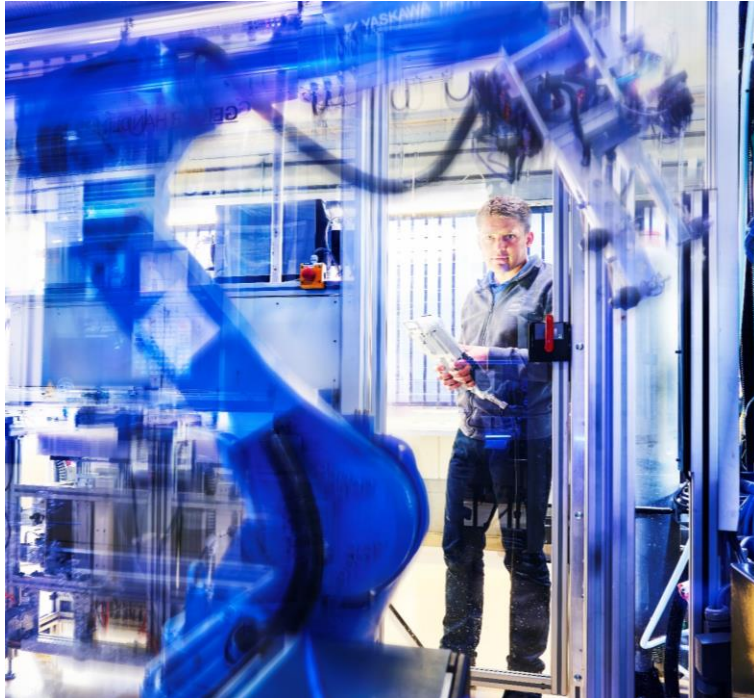
Risk and hazard assessments are carried out throughout the company/group. They are used to identify existing hazards and take suitable preventive and protective measures, but also to realise potential for improvement and improve ergonomics in the workplace. High technical and operational safety standards are the basis of our work. Our goal is to prevent work-related accidents and illnesses before they occur. Jenoptik relies on the participation of all employees.

When introducing new and changing existing technologies, materials, workplaces and work processes, the responsible Environmental, Health and Safety (EHS) management and the fire safety officers must be involved in the risk assessment.



3. Compliance & Ethics – the benchmark for our behaviour in the workplace

3.1.4 Safety in the workplace



Our contribution:

- **We** follow the instructions and specifications in order to work safely and without accidents.
- **We** always use the required personal protective equipment.
- **We** inform ourselves about local fire protection concepts and instructions at our site.
- **We** eliminate unsafe working conditions immediately if this is necessary and can be done safely.
- **We** report any unsafe working conditions to our supervisor, HR, Facility Management or Health & Safety Management and inform them of possible improvements.



The relevant regulations and measures relating to occupational health and safety and fire protection can be found here:

- Laws, rules and regulations
- Emergency plans
- Fire safety plans
- Evacuation plans



CC Health, Environment & Safety



MORE LIGHT

3.2 Integrity towards employee representatives

3. Compliance & Ethics – the benchmark for our conduct in the workplace

3.2 Integrity towards employee representatives

Employee representatives are works councils, general works councils, representatives of the severely disabled, youth and trainee representatives, the Group Works Council and the employee representatives on the Supervisory Board.



Our contribution:



- **We** always promote honest, constructive and respectful interaction with employee representatives.
- **We** discuss and develop solutions together with the company parties that serve the well-being of all employees and Jenoptik.
- **We** also adopt a solution-orientated approach in conflict situations.
- **We** ensure that every Jenoptik employee can approach the employee representatives openly and confidentially without suffering any disadvantages as a result.



- Jenoptik Intranet
- Law: Works Constitution Act
- Works agreements
- Tariff regulations



Responsible works council of the Group or the respective Jenoptik Group companies



MORE LIGHT

4

Compliance & Ethics –
the benchmark for our conduct
in the market

4. Compliance & Ethics – the benchmark for our conduct in the market

We behave in a compliant and ethical manner – to all stakeholders of Jenoptik.



4. Compliance & Ethics – the benchmark for our conduct in the market

4.1 Selection of business partners

What does Jenoptik mean by the term "business partner"?

Jenoptik defines all parties with whom it concludes legal transactions as business partners, irrespective of content and form. This includes, for example, customers, cooperation partners, suppliers and subcontractors, sales partners, agents and consultants as well as other contractors.

Why is it important for Jenoptik to select its business partners carefully?

The actions of business partners, such as suppliers, consultants, sales partners, agents or subcontractors commissioned by Jenoptik, can be attributed to our company under certain conditions. Consequently, Jenoptik can thus be held responsible for the actions of these business partners.

For example, if business partners engage in acts of corruption or other unlawful acts to the advantage of Jenoptik, it is possible that this may be assumed to have been done with Jenoptik's tolerance or even on its instructions. As a result, Jenoptik can suffer massive reputational damage but also financial consequences. Jenoptik will be able to exonerate itself in this case in particular by providing evidence of careful business partner selection.

Such evidence shows:

- the selection process,
- the instructions of the business partner, and
- the contractual organisation of the business relationship in compliance with due diligence.

This makes it possible to prove that there were no indications of acts of corruption or other relevant legal violations when the business partner was selected, and the transaction was concluded.

4. Compliance & Ethics – the benchmark for our conduct in the market

4.1 Selection of business partners



Our contribution:

- **We** adhere to the process for selecting high-risk business partners in accordance with the internally provided third-party due diligence.
- **We** carry out adequate checks to ensure that we only work with business partners who meet our compliance standards when selecting business partners.
- **We** commit business partners to our compliance standards.
- **We** avoid risky agreements by thoroughly checking the contractual provisions.
- **We** monitor critical business partners continuously, no later than three years after the last audit, and on an ad hoc basis if necessary.



"Business Partner-Compliance" process description



CC Compliance & Risk Management
CC Legal & IP
CC Supply Chain & Procurement

4. Compliance & Ethics – the benchmark for our conduct in the market

4.2 Contract conclusions

Why is it important to follow a defined process when concluding contracts?

As the conclusion of contracts entails rights and obligations which can give rise to risks for Jenoptik, it is important to adhere to a defined process for the conclusion of contracts and, if necessary, to involve the relevant specialist departments. Contract initiation starts with the first steps towards possible contract negotiations and ends with the conclusion of a contract or the termination of contract negotiations.

Contracts may, of course, only be concluded if they do not violate applicable law.

Our contribution:

- **We** conclude confidentiality agreements before contract negotiations begin.
- **We** involve CC Legal & IP as early as the contract initiation stage in accordance with the "Contracts" process description. We also check whether the contract to be negotiated requires the approval/involvement of other departments.
- **We** organise the negotiations in such a way that the Jenoptik contracting party speaks with "one voice". Contract negotiations are only conducted by authorised colleagues.
- **We** always conclude contracts in text form, unless the law stipulates a stricter formal requirement.
- **We** only conclude contracts or submit binding offers after documenting all internally required approvals (e.g. IAM) and in accordance with applicable signature authorisations.
- **We** check, before concluding a contract, whether the subject matter of the contract to be negotiated is not already the subject of other agreements that could prevent the conclusion of a contract or influence the content of the contract to be negotiated.
- **We** ensure efficient filing and archiving.



- "Contracts" process description
- Process descriptions regarding the purchasing processes



CC Legal & IP

4. Compliance & Ethics – the benchmark for our conduct in the market



Legally compliant conduct is a matter of course for us and forms the framework of our business activities.

Jenoptik expects its employees to know which laws and other legal provisions apply to their professional activities and to comply with them under all circumstances. Only legally compliant business is business that we at Jenoptik want to conduct.

If there is any uncertainty about which laws and other legal provisions apply to a specific area of work, the supervisors or the specialist departments as well as CC Compliance & Risk Management are available to provide information.

4. Compliance & Ethics – the benchmark for our conduct in the market

4.3 Protection of free competition

What is "free competition"?

Free competition means that different companies compete with each other in terms of demand. Every company is exposed to the risk that its own customers will switch to a competing company if this competitor offers comparable products, services or other services at a lower price or better quality.

In order to survive on the market under competitive conditions, companies must continuously improve their product and service quality and offer their products and services at the most attractive prices on the market. This is how innovation is driven forward.

Why is free competition important?

Restricting competition leads to a deterioration in the quality of supply and a simultaneous price increase. The legislator therefore provides for certain legal regulations to protect competition as far as possible.



4. Compliance & Ethics – benchmark for our conduct in the market

4.3 Protection of free competition



Our contribution:

- **We** are committed to upholding the principles of fair competition at all times.
- **We** do not make negative public statements about the goods, services, activities or other circumstances of a competitor.
- **We** do not exchange sensitive information with competitors.
- **We** always submit transactions that may be relevant under antitrust law to the Legal department for review. This applies in particular to authorised dealer and sales representative agreements, research and development or cooperation agreements, and enquiries by the competition authorities.
- **We** immediately consult the Legal department when assessing whether there is an abuse of a dominant market position, e.g. in the event of corresponding allegations by a supplier.



"Conduct in line with competition law" guideline



CC Compliance & Risk Management

4. Compliance & Ethics – the benchmark for our conduct in the market



Our intention is to excel against the competition on the basis of the performance and quality of our products and services.

4. Compliance & Ethics – the benchmark for our conduct in the market

4.4 Anti-corruption and conflicts of interest

What is "corruption"?

Corruption is the misuse of entrusted power for private gain. Corruption exists if the objectivity and independence of the recipient is to be influenced by the granting of an advantage. Corruption is offered, promised, granted or accepted in connection with business or official decisions.

Our contribution:

- **We** clearly distance ourselves from any form of corruption - worldwide.
- **We** regularly participate in measures to prevent corruption.
- **We** do not make any attempts to favour the conclusion of contracts through inadmissible measures, in particular, we do not offer the prospect of inadmissible advantages in favour of the other party.
- **We** adhere to the information on corruption prevention provided by the Compliance & Risk Management department, especially in our business dealings with authorities, public officials and elected representatives.
- **We** do not agree to any kick-backs ('rebates').
- **We** report suspected cases of corruption to CC Compliance & Risk Management.



"Prevent Corruption" guideline



CC Compliance & Risk Management

4. Compliance & Ethics – the benchmark for our conduct in the market

4.4 Anti-corruption and conflicts of interest

What are conflicts of interest and how do they arise?

A conflict of interest in the work environment can arise, for example, when we pursue certain interests in our private life, but these interests are in conflict with the interests of our employer and/or could even harm the company.

Basically, a conflict of interest is a situation where two or more conflicting interests clash. A conflict of interest may exist, for example, due to family relationships, secondary employment or financial interests.

Why does Jenoptik want to avoid conflicts of interest?

It is important to Jenoptik that business decisions are made on the basis of appropriate considerations and in the interests of Jenoptik. Business relationships with third parties must therefore always and exclusively be based on objective criteria, such as price, quality and reliability. The interests of Jenoptik as a company have top priority in this context. Our employees may not pursue their own private interests in this context. In order to avoid a situation in which one of our employees has to choose between Jenoptik's interests and personal interests arising from private relationships, Jenoptik is keen to avoid conflicts of interest from the outset and, if necessary, to disclose them as early as possible.

Our contribution:



- **We** avoid situations in which Jenoptik's business interests and personal interests could conflict.
- **We** disclose potential conflicts of interest to Jenoptik.
- **We** report any secondary employment, executive body participations or financial participation in an organisation or company that may affect Jenoptik's interests to the respective supervisor before taking it up and obtain prior approval.
- **We** do not participate in decisions in which there is or could be a conflict between the interests of Jenoptik and a secondary activity, executive body participations or financial participations.



4. Compliance & Ethics – the benchmark for our conduct in the market

4.5 Gifts and benefits to business partners

What does Jenoptik mean by "gifts and benefits"?

The term "gift" describes "a donation by which someone enriches another person from their own assets if both parties agree that the donation is made free of charge." Essentially, this means that there is no consideration for a gift. Non-exhaustive examples of gifts in the business environment include a bottle of wine or spirits, gift baskets, tickets to sporting or cultural events or invitations to VIP boxes.

Why does Jenoptik set rules in connection with gifts and benefits?

The granting or acceptance of gifts and benefits in national and international business transactions is only permitted within a narrow legal framework and the boundaries to corruption are fluid. For this reason, CC Compliance & Risk Management standardises globally applicable guidelines for the permissibility of gifts and benefits.

Small gifts for special occasions or for promotional purposes, hospitality and other Invitations are common in business transactions and are not per se a sign of corruption. These can therefore be given or accepted as long as they are only occasional, they are socially appropriate, and are unlikely to exert any influence or give the impression of an attempt to exert influence.



4. Compliance & Ethics – the benchmark for our conduct in the market

4.5 Gifts and benefits to business partners



Our contribution:

- **We** know that gifts and benefits are permitted to a reasonable extent, both as a recipient and as a donor.
- **We** use the workflow/self-test for assessing the admissibility of gifts and benefits on the CC Compliance & Risk Management intranet page for all gifts.
- **We** contact CC Compliance & Risk Management in case of doubt, i.e. if at least one criterion in the self-test has been answered with NO.
- **We** are aware that gifts to individual employees may not be paid for from company funds unless there is a transparent process behind it and takes all employees into account equally, e.g. gifts for anniversaries.
- **We** pay particular attention to gifts and benefits to authorities, public officials and elected representatives and are aware that the thresholds in this context are lower than in the general business environment.
- **We** comply with all tax regulations and pay tax on any gifts or benefits received.



4. Compliance & Ethics – the benchmark for our conduct in the market

4.6 Money laundering prevention

What is money laundering?

Money laundering is a process by which money from unlawful sources is redirected into lawful financial channels or lawful money is diverted off for unlawful purposes. In order to avoid any involvement in money laundering activities, it is important that Jenoptik companies comply with all regulations for the prevention of money laundering and, if necessary, support non-privileged obligated parties under the German Money Laundering Act in implementing their Know Your Customer obligation.



Our contribution:



- **We** do not conclude cash transactions, as a matter of principle.
- **We** do not enter into any transactions that contain indications of money laundering.
- **We** are all obliged to comply with the applicable money laundering regulations.
- **We** never create or maintain unofficial or unregistered Jenoptik funds, assets or liabilities ("slush funds").



"Prevent Money Laundering" guideline from CC Compliance & Risk Management



CC Compliance & Risk Management
CC Treasury

4. Compliance & Ethics – the benchmark for our conduct in the market

4.7 Prohibition of insider trading

What is insider trading?

Every employee may have access to confidential information about our company in the course of their daily work that is not generally known to the public ("insider information") and, if it becomes known, could influence Jenoptik's share price ("price-sensitive information"). Examples of insider information include:

- the conclusion, amendment or termination of important contracts
- the failure of key debtors
- the acquisition or disposal of key holdings
- key changes in or deviations from target figures and finances, including results in annual financial statements or interim reports compared to previous results or market forecasts (surprising business figures)

- significant incidents relating to product liability or environmental damage
- major claims or court action brought against Jenoptik

It would constitute insider trading if we were to buy or sell Jenoptik shares on the basis of this knowledge or instruct another person to do so or pass on this knowledge and stock market transactions were then carried out on this basis.

Why is preventing insider trading important?

Insider trading is a criminal offence in Germany and most member states of the European Union a criminal offence, as it impairs the functioning of the capital market.

Our contribution:



- **We** do not conduct or attempt to conduct business using insider information (e.g. purchase or sale of Jenoptik shares).
- **We** do not recommend the acquisition or sale of insider securities (e.g. giving their family a 'tip' to quickly buy Jenoptik shares).
- **We** consult with CC Investor Relations & Sustainability and Legal & IP if we are unsure whether a particular piece of information constitutes inside information or whether a particular purchase or sale of Jenoptik shares is prohibited.







4. Compliance & Ethics – the benchmark for our conduct in the market

4.8 Other specific regulations

Some areas of work provide for very specific regulations that are only relevant for certain groups of colleagues and specialist areas. There is no doubt that we also adhere to and comply with specific regulations that are not explicitly mentioned in this Integrity Code due to its generalised nature.

The following is an exemplary, but not exhaustive list of such topics and regulations:

Foreign trade law, export control and customs		Group Trade Compliance Policy
Data privacy		Information on data protection provided by CC Compliance & Risk Management on the intranet Data Protection Intranet Jenoptik
IT & Information security		All information provided by the IT & Information Security departments on the Intranet Information Security Intranet Jenoptik
Financial integrity		CC Finance - Accounting



For further information on these and other compliance-relevant topics, we can contact our supervisor or the specialist departments of the Corporate Center or the divisions at any time.

5

Compliance & Ethics –
the benchmark for our conduct in
the Jenoptik market environment

5. Compliance & Ethics – the benchmark for our conduct in the Jenoptik market environment

5.1 Jenoptik's external image

What does the external image of Jenoptik comprise of?

Jenoptik is in contact, day in, day out, with a wide variety of interest groups, such as people from the media, politics and the public, but also business partners or investors as well as potential future employees. It is therefore particularly important that the presentation of the company and its products to the outside world is appropriate and consistent.

Why is a coordinated external image important for Jenoptik?

Having a professional, uniform appearance is the only way to present ourselves credibly on the market as a company with a strong brand. To ensure our company profile remains consistent, coordinated specifications governing communication and corporate design are in place. These apply regardless of whom the communication is addressing (the media, investors, public authorities, customers, suppliers or other business partners) and, in addition to creating a uniform professional company profile, they also help to speed up internal processes. For example, new presentations can be prepared in a more structured fashion and business correspondence can be drafted more quickly.

Our contribution:



- **We** comply with the CC Communication & Marketing specifications for the external image of Jenoptik.
- **We** also adhere to the Jenoptik values and the specifications of this Integrity Code in our external image.
- **We** deal with others in a respectful and dignified manner, free of any discrimination.
- **We** only use the Jenoptik brand in the manner regulated in the corporate design and do not make any changes to the brand.
- **We** contact CC Communication & Marketing in the event of enquiries about the use of the brand by third parties or enquiries from the press or other media.



CC Communication & Marketing

5. Compliance & Ethics – the benchmark for our conduct in the Jenoptik market environment

5.2 Sustainability and environmental protection

What does Jenoptik mean by "sustainability"?

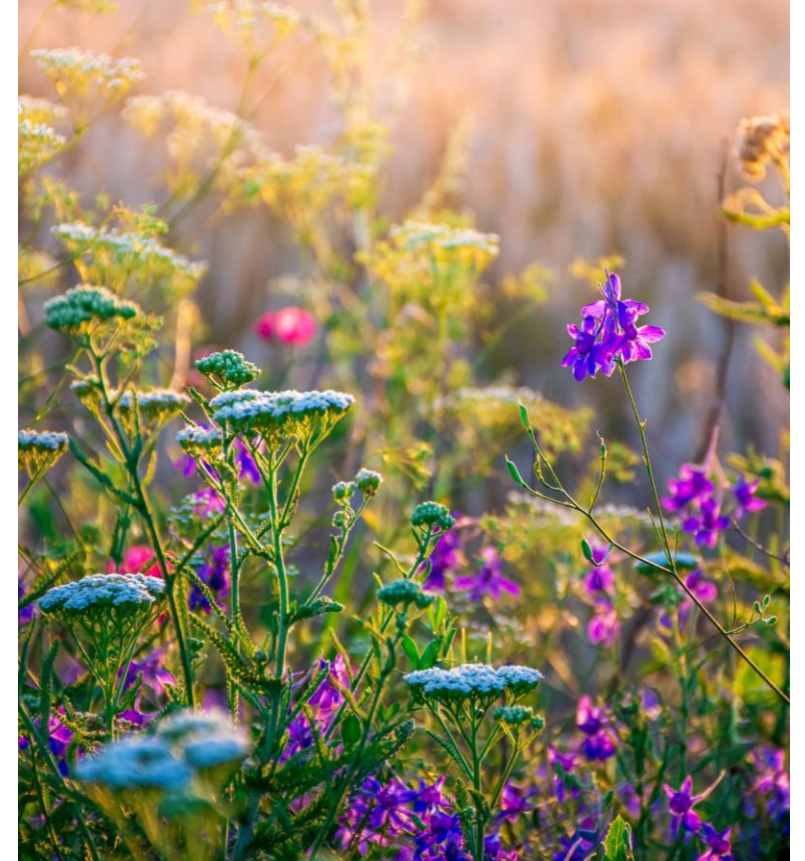
Sustainability plays a crucial role in our corporate culture and is firmly anchored in our corporate strategy. The clear commitment to greater sustainability is reflected in the wide range of sustainability targets, some of which are taken into account in Executive Board remuneration and Group financing. The diversity rate, which describes the proportion of women and international colleagues in management, the proportion of green electricity at the main sites, the CSR rate for measuring sustainability in our supply chain and the Vitality Index, which indicates the proportion of new product sales, are important key figures that we use for management and which we publish regularly.

As an enabler, Jenoptik not only enables customers to make a contribution to more resource conservation and environmental protection, but we also support the

achievement of the United Nations Sustainable Development Goals (SDGs) through our products and solutions. By joining the UN Global Compact - the world's largest initiative for responsible corporate governance - Jenoptik is committed to complying comprehensively with the ten principles in the areas of human rights, labour standards, environmental protection and anti-corruption.

Implementation of statutory and company measures to prevent air, soil, and water pollution is binding on all staff members and the use of hazardous materials must be kept to a minimum. All staff members are required to handle hazardous materials in an environmentally responsible manner and in accordance with the risks involved.

Waste is to be collected and recorded in accordance with environmental rules, and recycled where possible. Waste should always be disposed of properly as permitted by local facilities.



5. Compliance & Ethics – the benchmark for our conduct in the Jenoptik market environment

5.2 Sustainability and environmental protection

How is Jenoptik committed to protecting the environment?

The term “environmental protection” refers to all measures that are useful for the protection of nature and human health. At Jenoptik, environmental protection encompasses in particular the topics of energy and emissions management, water and wastewater management, waste management as well as contaminated sites and sustainability. We at Jenoptik also see it as our responsibility to grow sustainably in harmony with the environment and society and to use resources efficiently at all locations. As a manufacturing company, our focus is on efficient resource management in order to reduce energy consumption and corresponding greenhouse gas emissions as far as possible, to use raw materials sparingly and safely and to avoid hazardous waste as far as possible.

Why is environmental protection important at Jenoptik?

Only by acting in an environmentally conscious manner, especially in the corporate environment, can we conserve limited resources and thus preserve our natural living environment. From a business perspective, measures to save energy and resources lead to considerable cost savings in the medium and long term, even if investments have to be made first.

Our contribution:



- **We** actively operate systems for environmental management, energy management and hazardous materials management.
- **We** are required to save energy, use resources sparingly and efficiently, and to actively cooperate in corresponding controls, audits, reviews and inspections.
- **We** always consider and promote environmental compatibility in the development, manufacture, transport, use and disposal of our products.
- **We** strive to constantly minimise waste and emissions to air, water and soil and each of us makes our own individual contribution to this.
- **We** endeavour to keep the impact of our products and services on the environment as low as possible and drive forward the continuous prevention and reduction of pollution.



CC Investor Relation & Sustainability



MORE LIGHT

6

Compliance with the Jenoptik Integrity Code

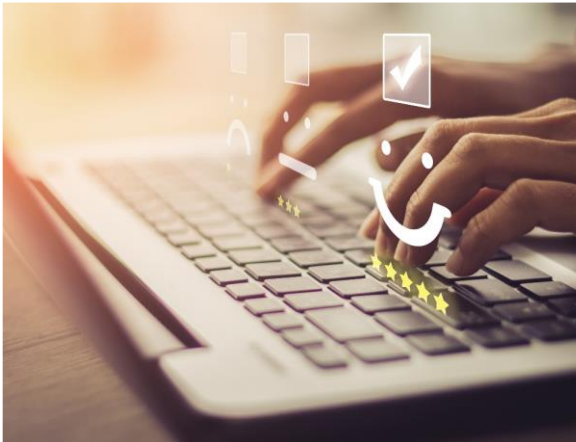
6. Compliance with the Jenoptik Integrity Code

Training



Reporting channels and contact persons

Internal control system



Consequences and follow-up measures

6. Compliance with the Jenoptik Integrity Code

6.1 Prevention: Trainings

Jenoptik firmly believes that regular training and the continuous sensitisation of our staff members to ethical and compliance-relevant topics are an investment in the future. Only those who know our guidelines and values and are regularly reminded of them will behave in accordance with them.

Jenoptik offers all staff members easy access to training programmes via its own learning management system SAP SuccessFactors, which is an ethics & compliance programme that focuses on values, culture and the learner experience. CC Compliance & Risk Management ensures that the courses offered are adapted to the needs of the target groups within the workforce. As Jenoptik employees, we are committed to regular participation in the assigned courses.



6. Compliance with the Jenoptik Integrity Code

6.2 Internal control system

The internal control system is the responsibility of Jenoptik's management.

The fulfilment of the obligations arising from this Integrity Code and from process requirements and other specifications is carried out in all companies and in all business processes by means of suitable procedures and controls that are appropriate to the respective risk and are established by management.

Managers and employees are obliged to continuously monitor the effectiveness, efficiency and safety of the processes for which they are responsible, as well as to carry out planned control measures in a timely manner and document them in a comprehensible manner.

CC Internal Audit monitors Jenoptik's internal control system independently of processes. To this end, the effectiveness and appropriateness of control measures are reviewed on a random basis, on a case-by-case basis together with internal and external expertise.



6. Compliance with the Jenoptik Integrity Code

6.3 Reporting channels and contact persons

Any staff member with questions, concerns or doubts regarding this Integrity Code can contact the relevant contact person in confidence. This also applies in the event of violations of this Integrity Code as well as laws, legal regulations and internal guidelines and process descriptions.

The responsible contact persons can be people from the immediate working environment, for example supervisors, the works council or management, as well as the Director Compliance & Risk Management or the Director Internal Audit.

If employees are unsure whether actions or behaviour could violate the principles of this Integrity Code, they can get in touch with the contact persons named in the individual sections and discuss the next steps with them.

A reporting system is also available to all Jenoptik employees on the intranet and internet for reporting significant violations where confidentiality must be maintained. The online form provided can be accessed on the intranet under the search term "[whistleblower system](#)". This reporting channel is also available externally via the [Jenoptik website](#).

Alternatively, the external reporting office of the Federal Ministry of Justice is also available at their [website](#) in the event of violations of the law. It should be noted that the protection afforded by the Whistleblower Protection Act only applies to information provided via the designated reporting offices or by contacting CC Compliance & Risk Management directly. Every report is checked and followed up consistently and confidentially.

Our reporting channels:



Reports can be submitted in the following ways:

- [Jenoptik whistleblower system](#)
- by e-mail to compliance@jenoptik.com
- or by telephone or e-mail directly to
 - the Director Compliance & Risk Management and Human Rights Officer Thomas Glasl at +49 3641 65-2235; +49 151 58771523 | thomas.glasl@jenoptik.com; or
 - the Regional Compliance Officer, Chris Qu, for the Asia-Pacific region at +86 021 38252380 243 | chris.qu@jenoptik.com; or
- by post to JENOPTIK AG, CC Compliance & Risk Management, Carl-Zeiss-Strasse 1, 07743 Jena, Germany
- to external reporting offices in accordance with the Whistleblower Protection Act

6. Compliance with the Jenoptik Integrity Code

6.3 Reporting channels and contact persons

Any pressure or other reprisals against whistleblowers or other persons who help to promote correct behaviour will not be tolerated. Until the violation has been proven beyond doubt, the persons concerned are presumed innocent.

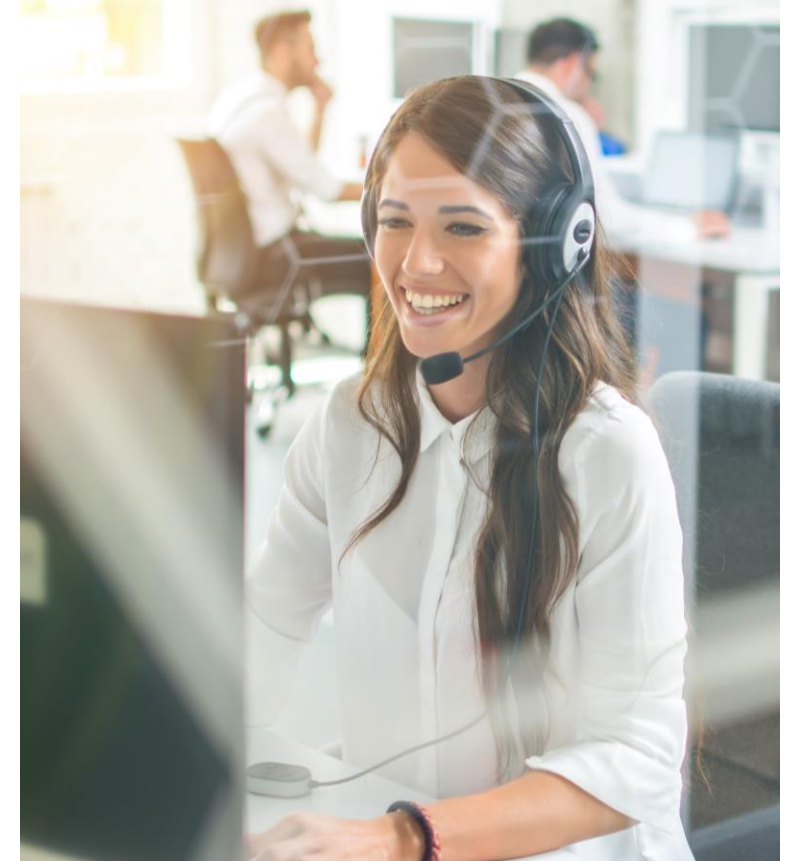
The protection and confidentiality of whistleblowers, affected persons and the employees involved in investigating the report is a priority for us. Jenoptik prohibits any form of reprisals (e.g., adverse actions under employment law, such as denial of a pending pay increase, disciplinary action, threats, intimidation or other sanctions) for good faith reporting of a violation or other cooperation by employees in internal investigations and does not tolerate such actions or in any respect.

In some cases, sanctions can also take subtle forms (e.g. transferring a person or limiting opportunities/responsibilities or any form of harassment and discrimination) aimed at penalising a person for making a report. If whistleblowers feel that they have been retaliated

against as a result of their report, they should also contact CC Compliance & Risk Management via the channels mentioned above.

Each report should be reported via one of the reporting channels specified by Jenoptik, so that whistleblowers can benefit from full protection under the Whistleblower Protection Act. Only in this way can CC Compliance & Risk Management ensure that whistleblowers are adequately protected.

Intentionally making false reports with malicious intent is itself serious misconduct, which in turn leads to investigations and measures. Such measures as a consequence of deliberate false reports do not constitute retaliation.



6. Compliance with the Jenoptik Integrity Code

6.4 Intervention: Consequences in the event of violations

Jenoptik does not tolerate any violations of this Integrity Code and necessary measures and consequences will be taken in the event of non-compliance. Jenoptik emphasises that these measures and consequences follow the principle of proportionality and are appropriate, suitable and necessary in individual cases.

The internal assessment of compliance violations is carried out by the Director Compliance & Risk Management and/or the Director Internal Audit or by authorised employees, if necessary with the support of external partners. All reports are treated with absolute confidentiality and information is only passed on a "need-to-know" basis.

A detailed description of the process can be found in the "Procedural Description for Whistleblowing under the German Whistleblower Protection Act (HinSchG) and the German Supply Chain Due Diligence Act (LkSG)", which is available both on the intranet and on the [internet](#).

Where compliance breaches are established, consequences under employment law may follow, depending on the severity of the breach. Consequences under criminal law are also possible. Staff members who report possible breaches in good faith will suffer no disadvantage, unless they themselves are involved in the breach.

Our contribution:



- **We** undertake to report serious violations of this Integrity Code or legal requirements immediately.
- **We** can contact our direct supervisor. This ensures that complaints are checked locally, taking local rules into account, and prompt measures are taken to rectify any breach of the rules or other misconduct.
- **We** can also contact the responsible HR business partner if we have any questions or are unsure.
- **We** can also contact the works council in case of concerns or uncertainties.



MORE LIGHT

7

Scope, version & contact person

7. Scope, version & contact person

Scope of application

This Jenoptik Integrity Code applies to all Jenoptik companies in which JENOPTIK AG directly or indirectly holds a majority interest. It also applies to companies or joint ventures in which Jenoptik companies hold more than 50 % of the shares or voting rights or to companies which operate in the market under a Jenoptik brand name. Representatives of Jenoptik in affiliated companies or joint ventures should ensure that any form of anti-competitive behaviour in business activities is prevented within the scope of contractual or company law possibilities.

Version

Jenoptik Integrity Code Version 1 (01/2024)

Contact person

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