



MORE LIGHT

# Procedural Description for Whistleblowing under the German Whistleblower Protection Act (HinSchG) and the German Supply Chain Due Diligence Act (LkSG)

Jenoptik gives high priority to compliance, integrity and adherence to national and international legal regulations as well as internal rules. Compliance is not negotiable at Jenoptik.

To meet these requirements and protect our values, we strive to identify potential risks from violations as early as possible. Every employee and business partner can make a decisive contribution to this by reporting behavior that is incompatible with national and international laws, our internal guidelines or Jenoptik values. In this way, an early, expert and comprehensive clarification of the alleged facts is possible.

Every whistleblower makes an active contribution to protecting our company.

Any indication of possible breaches of the law or non-compliance with internal guidelines is taken seriously and dealt with internally as part of an investigation in accordance with an objective and transparent procedure, as described in the following. In this way, Jenoptik aims to ensure that anyone affected by violations has access to appropriate remedial action.

## Entitled persons

All natural and legal persons who have at least an indirect professional or business relationship with the Jenoptik Group are entitled to submit information. This includes in particular all employees within the Jenoptik Group as well as any external person who is directly or indirectly part of the supply chain of one or more companies of the Jenoptik Group. These are hereinafter referred to as "whistleblowers" and include complainants within the meaning of the LkSG.

## Reporting points and accessibility

Notices may be submitted in the following ways:

- Jenoptik whistleblower system, available at: <https://jenoptik.integrityline.com/frontpage> or
- by e-mail to [compliance@jenoptik.com](mailto:compliance@jenoptik.com) or
- by telephone or e-mail directly to
  - the Expert Compliance & Risk Management Johanna Köberle at +49 4103 18006-1476; +49 173 3876007 | [johanna.koeberle@jenoptik.com](mailto:johanna.koeberle@jenoptik.com); or
  - the Regional Compliance Officer, Chris Qu, for the Asia-Pacific region at +86 021 38252380 243 | [chris.qu@jenoptik.com](mailto:chris.qu@jenoptik.com); or
  - the Legal Counsel Almut Clasen at +49 3641 65-2334; +49 173 3509586 | [almut.clasen@jenoptik.com](mailto:almut.clasen@jenoptik.com)
- or by mail to JENOPTIK AG, Central Division Compliance & Risk Management, Carl-Zeiß-Straße 1, 07743 Jena, Germany, or
- to external reporting bodies in accordance with German Whistleblower Protection Act (HinSchG).

Whistleblowers are free to choose the language of the report. Irrespective of this, every received notice will be processed and, if necessary, translated internally.

It is essential that all relevant information on the content and the location concerned is listed on. Anonymous reports are possible but providing contact information may facilitate the assessment and follow-up by the Compliance & Risk Management department.

The voluntarily provided contact data of complainants will in any case be used confidentially and for the intended purpose.

## Notice types

Notices are generally all messages that draw attention to something. However, since this can affect a wide range of circumstances, we have classified these notices as follows:

- 1 Notice of one or more violations of law
- 2 Notice of one or more violations of internal guidelines
- 3 Notice of general grievances
- 4 Notice of one or more employees who do not fall into category 1 or 2
- 5 Imprecise or factually loose notices

Only violations falling under the following categories should be reported via Jenoptik's whistleblowing system:

- Category 1: Violations of the law
- Category 2: Violations of internal regulations (e.g., code of conduct for employees)

These include in particular:

- Corruption, antitrust violations and money laundering,
- Theft, embezzlement, and enrichment offenses of substantial scope or value,
- Serious violations of physical and psychical integrity, privacy and data protection,
- Violations of human rights (see also the policy statement on human rights and environmental protection,
- Violations of specific environmental agreements (Minamata Convention, Basel Convention, Stockholm Convention),
- Violations of the general equality law, in particular cases of sexual harassment in the workplace,
- Accounting and bookkeeping violations with a significant impact,
- Violations of rules with potentially high damage for the company,
- Violations of rules that are likely to cause serious damage to the company's reputation.

## Ensuring freedom from sanctions and whistleblower protection

Jenoptik prohibits any kind of retaliation (e.g., adverse labor law measures such as notification of a pending pay increase and disciplinary measures, threats, intimidation, or other sanctions) in response to a good faith indication of a violation or cooperation by employees in internal investigations and does not tolerate such measures in any respect.

Sometimes sanctions to punish a person for whistleblowing can take more subtle forms (e.g., transferring a person or limiting opportunities/responsibilities or any form of harassment or discrimination). If whistleblowers feel that they are affected by sanctions because of their whistleblowing, they should contact the Compliance & Risk Management department through the above-mentioned channels.

Every notice should be reported via one of the reporting channels specified by Jenoptik in this process description so that whistleblowers receive the full protection of the Whistleblower Protection Act. This is the only way that the central Compliance & Risk Management department can ensure that whistleblowers are adequately protected.

Willful misreporting with malicious intent is itself serious misconduct, which in turn will result in investigations and measures. Such measures, because of intentional misreporting, are not retaliatory measures.

## Responsibilities and process of handling incoming indications

The management of Jenoptik's whistleblower system is the responsibility of the central Compliance & Risk Management department. All employees of the Compliance & Risk Management department are objective, unprejudiced, not bound by instructions and obliged to maintain confidentiality.

Information on violations outside the core compliance topics (e.g., corruption, antitrust law, data protection, money laundering, trade compliance, general equality law) can be forwarded to the relevant departments or processed in cooperation with them, subject to an obligation of confidentiality, depending on the individual case. The central departments Supply Chain

& Procurement, Legal & IP as well as Investor Relations and the Jenoptik Human Rights Officer are always involved in the case of information in connection with violations of human rights or environmental agreements within the framework of the supply chain due diligence obligations law.

Information is disclosed exclusively on a "need-to-know" basis. The identity of whistleblowers is protected as far as legally possible.

Within seven (7) business days of receipt of the notice, whistleblowers will receive a receipt acknowledging receipt of the notice.

The processing time of a notice is generally three (3) months from the date of acknowledgement of receipt;

in the event of extensive processing work, this period may be extended to six (6) months.

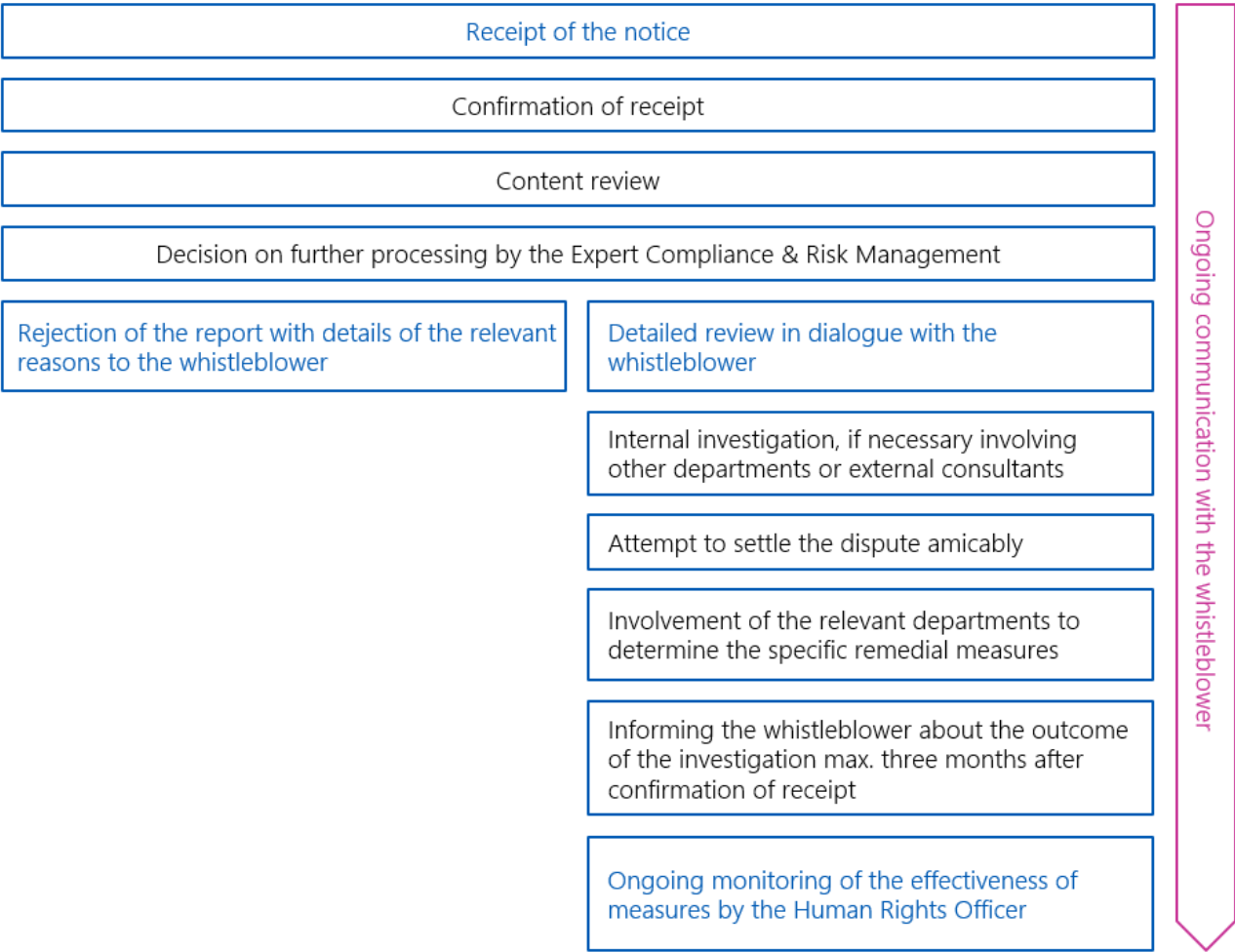
Whistleblowers are continuously and conclusively informed about the status and conclusion of the matter.

### Retention periods

All notice information will be deleted or destroyed three (3) years after a matter is closed.

### Other remedies

Other formal remedies can be used by individuals and legal entities to submit notices, such as through the Fair Labor Association (FLA) complaint procedure and the German National Contact Point for the OECD Guidelines.



### Contact

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