



MORE LIGHT

## Policy statement on compliance with human rights and environmental due diligence obligations

### Commitment to respect human rights

Acting responsibly and creating value together with our business partners form the foundation of our business activities as a globally operating photonics group. We are convinced that our business model, which is geared towards long-term and profitable growth, is in line with responsible behavior towards society and the environment. The observance of human rights is a fundamental component of our actions.

Jenoptik is committed to respecting human rights and protecting the environment. This applies both to its own business and to its global supply chains.

Responsibility for compliance with the human rights and environmental due diligence obligations described in this declaration lies with the Chairman of the Executive Board of JENOPTIK AG. The entire Jenoptik Group adheres to this declaration of principles and implements its requirements.

As a signatory of the UN Global Compact, we are committed to the social, ecological and economic principles and underpin our understanding of our responsibility for human rights.

Jena, May 2023

Handwritten signature of Dr. Stefan Traeger in black ink.

Dr. Stefan Traeger  
Chairman of the Board

Handwritten signature of Dr. Prisca Havranek-Kosicek in black ink.

Dr. Prisca Havranek-Kosicek  
Chief Financial Officer

Handwritten signature of Dr. Ralf Kuschnereit in black ink.

Dr. Ralf Kuschnereit  
Member of the Board



## Principles of human rights and environmental protection

Jenoptik conducts its business activities in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and is committed to the following internationally recognized human rights and environmental reference instruments:

- Principles of the United Nations Global Compact (UNGC)
- International Covenant on Civil and Political Rights (Civil Covenant - ICCPR)
- International Covenant on Economic, Social and Cultural Rights (Social Covenant, ICESCR)
- Core Labor Standards of the International Labor Organizations (ILO) on Labor and Social Standards
- Charter of Diversity
- Minamata Conventions
- Basel Convention
- Stockholm Convention

## Human rights content

We are committed to respecting all recognized human rights, in particular:

- **Prohibition of child labor**  
Jenoptik prohibits any form of child labor within the meaning of ILO Convention 138. All employer practices must at least comply with these ILO Conventions. This includes compliance with the minimum age for employment and the protection of the physical and mental development of children and young people.
- **Prohibition of slavery and forced labor**  
Employment relationships are always based on voluntariness and can be terminated with reasonable notice. Jenoptik rejects any form of forced or compulsory labor and opposes any form of slavery, including modern forms and human trafficking. All our employer practices are to be aligned at least with ILO Convention 105.

- **Prohibition of discrimination**

Jenoptik is committed to equal opportunities and equal treatment of all employees in accordance with ILO Convention 111. We reject any form of discrimination, harassment or disadvantage. This includes, but is not limited to, exclusion or preference on the basis of origin, skin color, gender, religious affiliation, political opinion, national origin or social origin, sexual orientation, health status, age, marital status, pregnancy/parental status and trade union membership.

Jenoptik recognizes that every employee has the right to a working environment free of violence or harassment, including gender-based violence and harassment (ILO Convention 190).

- **Reasonable remuneration for work performance and preservation of working hours**

We are committed to appropriate remuneration and the principle of equal pay for equal work or work of equal value, irrespective of gender, in accordance with ILO Convention 100.

Remuneration shall amount to at least the specified minimum wage in accordance with applicable law. If there are no statutory or collectively agreed regulations available, the remuneration shall be based on the industry-specific, local and collectively agreed remuneration which at least ensures a livelihood.

- **Preservation of the right to form a coalition, association and collective action**

In accordance with ILO Convention 87, we recognize the fundamental right of all employees to form and join trade unions or employee representative bodies. In this context, Jenoptik also undertakes to maintain neutrality and excludes any form of discrimination based on trade union activities (ILO convention men 135).

We recognize the right to collective bargaining in accordance with ILO Convention 98 and respect the right to strike, insofar as this is exercised in accordance with the respective national legal regulations.

## Environmental protection

As an international technology group focusing its range of services on the photonics market, Jenoptik offers a highly specialized product portfolio of OEM and standard components, modules and subsystems through to complex solutions, production facilities and services.

Holistic environmental management is an integral part of our corporate activities.

We comply with legal requirements and ensure that our products are manufactured in a resource-conserving and energy-efficient manner to minimize the impact on and risks to the environment.

Furthermore, Jenoptik comprehensively obligates its suppliers, service providers and other contractors through the Business Partner Code of Conduct to protect the environment and minimize environmental risks as well as to comply with the above-mentioned environmental agreements. Jenoptik business partners must act in conformity with all legal norms and international standards in the area of environmental protection.

## Codes of conduct for employees and business partners

Our Code of Conduct is a binding guideline for all employees. It is based on our fundamental principles of trust, honesty and integrity and formulates responsible dealings with one another. It obliges all employees to implement defined values in their daily activities and in their dealings with our business partners. Training sessions on the Code of Conduct and other relevant topics are held at regular intervals and are made available and followed up by the Compliance & Risk Management department.

Our Business Partner Code of Conduct, which defines ethical and legal standards for responsible behavior, is binding for our business partners. In this way, we want to ensure that our business partners and their business partners in the supply chain comply with the same requirements that are binding for us. Our Business Partner Code of Conduct essentially includes the following core principles: Human rights

and labor standards, environmental protection, corporate integrity and fair competition.

We expect our business partners to comply with these standards and to pass them on to their own business partners.

## Risk analysis and risk management

With the help of our annual risk analysis and assessment of our suppliers, service providers and other contractors, we systematically check which business units or activities may pose an increased risk of possible human rights violations or environmental damage. In addition, risk assessments are carried out on an ad hoc basis in the event of significant changes in the risk situation (e.g., because of the integration of new business units) or if breaches of duty by suppliers with responsibility become known.

The risk analysis is based on a country-specific assessment that we have compiled with the help of various human rights and environmental indices and keep it up to date on an ongoing basis. Our suppliers, service providers and other contractors are assessed and regularly monitored based on various risk categories. Our risk analysis has shown that we are only exposed to increased risk from our suppliers in a few areas due to the goods and services we procure. We initiate additional monitoring measures for suppliers, service providers or other contractors who require a case-by-case review based on our analysis. If necessary, preventive or remedial measures are derived and implemented in cooperation.

## Prevention and remedial measures

Jenoptik defines measures to prevent violations of human rights and environmental protection. These include raising sensitivity and awareness of the relevance of human rights and environmental protection, as well as offering training courses for our employees.

If human rights violations or environmental violations come to our attention, remedial measures are drawn up and implemented in cooperation with our business partners.

### Awareness and complaints procedure

To prevent or counteract violations and minimize risks, we have established a barrier-free, publicly accessible whistleblower system. This reporting channel is accessible both internally and externally at the following link:

<https://jenoptik.integrityline.com/frontpage>

Employees, customers, direct and indirect suppliers, as well as other business partners or other persons involved in Jenoptik's supply chain can use the portal to report irregular behavior or express concerns in connection with human rights violations or environmental violations. The reports are treated confidentially and, if requested, anonymously. Each reported case of possible misconduct is carefully investigated, and any violations identified are followed up appropriately where necessary.

For a description of the complaints procedure and other reporting channels at Jenoptik, please refer to the "Procedural Description for Complaints within the Whistleblower Protection Act/Supply Chain Due Diligence Act. It is published on our website under "Responsible corporate governance".

Jenoptik has appointed a human rights officer. This officer is responsible for reviewing this process and regularly checking its effectiveness, and reports to the executive board. The other tasks and responsibilities are set out in the respective process descriptions.

### Continuous further development

This policy statement will be reviewed annually and on an ad hoc basis as necessary to reflect current changes and adjustments to processes.

We are aware that addressing human rights and environmental challenges in our global supply chains is an ongoing, dynamic task that requires systemic change in addition to our corporate initiatives. We regularly report on our website about additional projects, initiatives and progress on the topics of human rights and environmental protection.

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