



MORE LIGHT

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

## Commitment to upholding human rights

Responsible behavior and the creation of value together with our business partners form the foundation of our business activities as a globally active photonics group. We are convinced that our business model, which is geared towards long-term and profit tables growth, is in line with responsible behavior towards society and the environment. Respect for human rights is a fundamental component of our actions.

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

Responsibility for human rights and environmental due diligence lies with the Executive Board of JENOPTIK AG. The entire Jenoptik Group undertakes to comply with this basic declaration and to implement these requirements.

As a signatory to 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, January 2025

Dr Stefan Traeger  
Chairman of the Executive Board

Dr Prisca Havranek-Kosicek  
Chief Financial Officer

Dr Ralf Kuschnerreit  
Member of the Executive 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 and environmental rights reference instruments:

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

## Content of human rights

We are committed to complying with all recognized human rights, but not exclusively:

- **Ban on 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 taking up 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 voluntary and can be terminated with reasonable notice. Jenoptik rejects all forms of forced or compulsory labor and opposes all forms of slavery, including modern forms of slavery and human trafficking. All of our employer practices must at least comply 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 therefore reject any form of discrimination, harassment, or disadvantage. This includes, among other things, exclusion, or preferential treatment based on origin, skin color, gender, religious affiliation, political opinion, national origin or social background, sexual orientation, health status, age, marital status, pregnancy/parenthood, trade union membership.

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

- **Appropriate remuneration for work performed and respect for working hours**

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

Remuneration shall be at least the amount of the minimum wage stipulated by applicable law. If there are no statutory or collectively agreed regulations, the remuneration shall be based on the industry specific, local, and collectively agreed remuneration which is at least sufficient to cover living expenses.

- **Safeguarding the right to form a coalition, organize and act collectively**

In accordance with ILO Convention 87, we recognize the fundamental right of all employees to form and join trade unions and employee representative bodies. In this context, Jenoptik is also committed to maintaining 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 therefore 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 on the photonics market with its range of services, Jenoptik offers a highly specialized product portfolio of OEM and standard components, modules, and subsystems through to complex solutions, production systems and services.

Holistic environmental management is an integral part of our business 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.

Jenoptik also obliges its suppliers, service providers and other contractors through the Business Partner Code of Conduct to protect the environment and to minimize environmental risks as well as to comply with the above-mentioned environmental agreements. Jenoptik business partners must comply with all applicable legal norms and international standards relating to environmental protection.

## Codes of conduct for employees and business partners

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

The Business Partner Code of Conduct is binding for our business partners, which defines ethical and legal standards for responsible behavior. In this way, we want to ensure that our business partners and their own business partners in the supply chain fulfil 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 & fair competitive behavior. We expect our business partners to comply with these standards and to pass them on to their own business partners.

## Risk analysis & risk management

With the help of our annual risk analysis and risk assessment of our own business area as well as our suppliers, service providers and other contractors, we systematically check which business units or activities may be exposed to an increased risk of potential human rights violations or environmental damage. In addition, ad hoc risk assessments are carried out in the event of significant changes to the risk situation (e.g., due to the integration of new business units) or if breaches of duty become known at suppliers that can be detected.

The abstract risk analysis is carried out using a tool-based, country- and sector-specific assessment once a year for existing suppliers, service providers and other contractors as well as when onboarding new contractor partners. Contractors who are categorized as "potentially risky" in the abstract risk analysis are obliged to undergo detailed self-assessments as part of the concrete risk analysis.

Our overall risk analysis has shown that we only recognize an increased risk from our suppliers in a few areas due to the goods and services we procure and the regions in which we carry out our procurement.

We assess the potential violation of occupational health and safety standards and working conditions as priority risks.

For suppliers, service providers or other contract holders who, based on our analysis, have an increased risk of violating human rights or environmental protection requirements, we initiate measures to prevent or remedy the situation, support their implementation, and monitor them on an ongoing basis.

### Preventive and remedial measures

Jenoptik defines measures to prevent violations of human rights and environmental protection. This includes increasing sensitivity and awareness of the relevance of human rights and environmental protection as well as offering training for our employees. We also contractually oblige our contractors to comply with human rights and environmental protection standards through our Code of Conduct for Business Partners.

If we become aware of human rights violations or environmental offences, remedial measures are derived and implemented in cooperation with the business partners.

### Sensitization and complaint mechanisms

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 via the following link:

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

Employees, customers, direct and indirect suppliers and other business partners can use the portal or other persons involved in Jenoptik's supply chain to report irregular behavior or express concerns in connection with human rights violations or environmental offences. The reports are treated confidentially and can also be made anonymously. Each reported case of potential misconduct will be carefully investigated and confirmed violations will be followed up appropriately where necessary.

For a description of the complaint's procedure and other reporting channels at Jenoptik, please refer to the document "Procedure description for complaints under the Whistleblower Protection Act/Supply Chain Due Diligence Act". This is also available on our website under "[Responsible corporate management](#)".

Jenoptik has appointed a Human Rights Officer. This officer is responsible for reviewing the risk analysis process, the regular review of the effectiveness of preventive and remedial measures and the complaints procedure, and reports to the Executive Board in regular cycles. The other tasks and responsibilities are defined in the respective process descriptions.

### Continuous further development

This policy statement is reviewed once a year and ad hoc if necessary and amended if necessary to take account of current changes and adjustments to processes.

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

### Contact person

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