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Jokey
Whistleblower
System

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The Jokey Group's Code of Conduct



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Foreword

Core values such as groundedness, sustainability, social responsibility, respect and honesty are firmly embedded in our corporate culture.

These values are also reflected in our day-to-day business. Acting lawfully and responsibly are essential prerequisites for our daily work and our business success.

Our company can only thrive in the long term if respect and trust are practised by all of us. Every individual should take responsibility and internalise our values. To this end, we have developed guidelines which are set

out in the Code of Conduct below. This Code of Conduct forms the basis for the conduct of all employees, managers and directors of the Jokey Group.

By integrating the principles set out in this Code of Conduct into our day-to-day work, we strive to act responsibly in the long term and make a positive contribution to society.



#1 Groundedness

#2 Sustainability

#3 Social responsibility

#4 Respect and honesty

01 Human Rights and Working Conditions



For us, it goes without saying that human rights must be upheld and that all employees must be treated fairly and with respect.

We aim to create a working environment free from discrimination and characterised by fairness, in which all employees are treated with equal respect and given equal opportunities, regardless of gender, race, nationality, religion, disability, age or sexual orientation.

We firmly reject any form of discrimination, racist behaviour or harassment. The prohibition of

discrimination also applies to interactions between employees.

Our employees should be able to work in an environment where they can exercise their rights without fear of reprisals.

This also includes paying fair wages and ensuring that working hours comply with applicable national law.

02 Modern Slavery



Our company condemns and rejects all forms of modern slavery. By modern slavery, we mean the exploitation of people in the form of forced labour, human trafficking, debt bondage, compulsory labour and child labour, as well as any form of physical or psychological abuse.

03 Health and Safety at Work



The health and safety of our employees is our top priority. We are committed to ensuring a safe working environment in which accidents and injuries are prevented. All employees are responsible for complying with the prescribed safety measures, wearing personal protective equipment and reporting safety risks.

We provide regular mandatory training on health and safety at work to raise employees awareness of these issues.

04 Environmental Responsibility

We are mindful of our responsibility towards the environment. Acting in an environmentally responsible manner is therefore a central pillar of our corporate culture. We firmly believe that business success is not possible without sustainable environmental practices.

We therefore continually introduce new measures and review existing ones in order to minimise our negative impact on the environment. This applies not only to our business operations, but also to the actions of our employees and the direct impact on the environment at our individual sites.



05 Anti-Corruption

Jokey is committed to fair competition and rejects any form of corruption or unfair business practices.

We comply with all applicable competition laws and regulations, and transparency and integrity are fundamental to our business dealings. Corruption undermines the trust that our customers, suppliers and society place in our company, and jeopardises our integrity and reputation.

Our company prohibits any form of bribery or the acceptance of undue

advantage from public officials, customers, suppliers or other business partners. For us, this is not only a legal requirement but also an ethical principle.

Corruption often arises as a result of conflicts of interest. It is important that all employees disclose and avoid potential conflicts of interest that could compromise the integrity of our decision-making. Conflicts of interest can arise when personal interests clash with the interests of the company.



All employees must clearly separate their obligations to the company from their personal interests.



06 Anti-Money Laundering and Sanctions Compliance

We comply with our anti-money laundering obligations and do not participate in transactions designed to conceal criminal or illegally acquired assets.

Before entering into business relationships, we verify the identity and integrity of our potential partners. We also screen our business partners against applicable sanctions lists. We document business processes in accordance with our obligations.

07 Confidentiality and Data Protection



We regard the confidentiality of business information and personal data as a vital asset. Ensuring this confidentiality is the responsibility of all employees.

The protection of customer data, trade secrets and employees data is essential to maintaining trust in our Group. We therefore set out clear guidelines for handling sensitive information.

08 Respectful Behaviour



We expect our employees to behave respectfully and collegially towards all employees, customers, suppliers and business partners. Discrimination, bullying or harassment of any kind will not be tolerated.

Together, we are creating a working environment that values the diversity of our employees, customers, suppliers and business partners, and in which everyone has the opportunity to realise their full potential.

09 Compliance with Laws and Regulations

Our company is committed to complying with all applicable laws, regulations and official requirements that apply to our business.



We comply with tax regulations, employment legislation, environmental regulations and all other relevant rules and regulations.

10 Responsible Procurement

We select our suppliers and partners carefully and give preference to those who also adopt socially and environmentally responsible practices. Our choice of suppliers is based not only

on economic factors, but also on their adherence to ethical standards and their commitment to human rights and environmental protection.



11 Communication in the event of breaches

We promote a culture of open communication and encourage our employees to report any potential breaches of our principles or legal regulations.

To this end, we have set up a dedicated link on our website at www.jokey.com to a platform we have developed specifically for whistleblowers, in order to ensure effective and, if desired, completely anonymous communication.

We protect whistleblowers and have procedures in place to ensure that reports are handled confidentially and appropriately.

Open communication and dialogue between employees, managers and senior management are crucial for identifying problems and continuously improving our day-to-day work together.



Whistleblowing

Whistleblowing refers to the reporting of irregularities within an organisation. This is often done by internal employees, but other stakeholders such as customers, suppliers and business partners may also act as whistleblowers.

Reports may relate to breaches of company policies and values, as well as breaches of applicable law. However, whistleblowing systems can also be used by 'whistleblowers' to ask (anonymous) questions relating to compliance.



There are a wide variety of areas in which reports can be made. As a rule, however, the following subject areas are concerned:

Corruption

Breaches of the law and criminal offences

Data misuse

Discrimination and harassment in the workplace

Human rights violations

Corruptibility or bribery

Insider trading

Serious shortcomings in management

unethical behaviour in general

What can I do?

Contact the compliance team or submit an (anonymous) report. If you are unsure whether a problem exists, you can always ask. The same applies if you are unsure yourself about the best course of action in specific situations.

Why do we, as a company, want to receive reports?

They give us the opportunity to resolve issues internally and take proactive action against them. This ensures a healthy working environment for all employees. Furthermore, this helps prevent penalties for the company and its employees. It also helps avoid damage to our reputation.