

Jokey Group **Code of Conduct**



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Preface

Central values such as pragmatism, sustainability, social awareness, appreciation and honesty are embedded in the foundations of our culture and organisation. These values are also reflected in our day-to-day operations. Lawful and responsible conduct is indispensable to the performance of our daily work and to the success of our business. Our organisation can only have a long-term future if we all embrace a culture of respect and trust. We expect every single employee to be accountable for their actions and to internalise our values.

Pragmatism

Sustainability

#1

#2

This Code of Conduct sets out the guidelines we have developed as the basis for the compliant and correct conduct of all employees, managers and directors of the Jokey Group.

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

Social awareness

Appreciation and honesty

#3

#4

01

Human rights and working conditions



It is standard practice at the Jokey Group to ensure that human rights are respected and that all employees are treated fairly and with respect.

We want to create a working environment that is free of discrimination and characterised by fairness, in which all employees receive the same appreciation and the same opportunities, regardless of their gender, skin colour, nationality, religion or sexual orientation.

We resolutely reject any form of discrimination, racist behaviour or harassment. The ban on discrimination also applies to the working relationships between or employees.

We want our employees to be able to work in an environment where they can exercise their rights without fear of reprisals.

This includes our commitment to decent wages and working hours that comply with national legislation.

02

Modern slavery



Our company condemns and rejects all forms of modern slavery. We understand modern slavery to be the exploitation of people in the form of forced labour, human trafficking, debt bondage, forced labour and child labour, as well as any form of physical or psychological abuse.

03

Health and safety at work



Prioritising health and safety above all else, we strive to ensure a safe workplace that prevents accidents and injuries. All employees are responsible for following the prescribed safety measures, wearing personal protective equipment and reporting safety risks.

We offer regular (mandatory) occupational health and safety training to raise employee awareness for these issues.

04

Environmental responsibility



We are aware of our responsibility towards the environment and, for that reason, we have made environmental awareness a central component of our corporate culture. We firmly believe that our success is dependent upon sustainable and environmentally friendly business practices.

We therefore continuously implement new measures and review existing ones to limit our negative impact on the environment. This applies to our business activities, but also to the actions of our employees and their direct impact on local environment at our various production facilities.

05

Anti-corruption



Jokey upholds the principles of fair competition and rejects all forms of corruption and unfair business practices. We comply with all applicable competition laws and regulations and ensure transparency and integrity in our business dealings. Corruption undermines the trust of our customers, suppliers and workforce and jeopardises our integrity and reputation.

Our company does not tolerate any form of bribery or personal gain in relations with public officials, customers, suppliers or other business partners. For us, this is both a legal obligation and an ethical principle.

05

Anti-corruption



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 collide with the interests of the company. We expect all of our employees to distinctly separate their obligations to the company from their personal interests.

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06

Money laundering and sanctions lists



We meet our anti-money laundering obligations and refuse to do business with money that was acquired through criminal activity and is to be laundered.

Before entering into business relationships, we screen our potential partners' identity and integrity. We also check whether our business partners are included in any sanctions lists. All our business processes are duly documented.

07

Confidentiality and data protection



The confidentiality of business information and personal data is one of our top priorities and we expect all members of staff to treat such information and data as confidential.

The protection of customer data, employee data and business secrets is essential to promoting trust in our Group. We have therefore laid down clear guidelines for the handling of sensitive information.

08

Respectful behaviour



We expect our employees to behave with respect and collegiality towards colleagues, customers, suppliers and business partners. Discrimination, bullying or harassment of any kind will not be tolerated.

Together, we are creating an work environment that values diversity and offers everyone the chance to reach their full potential.

09

Legal and regulatory compliance



Our company is committed to compliance with all laws, statutory provisions and official regulations that apply to our business operations. We comply with tax regulations, labour laws, environmental requirements and all other relevant regulations.

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10

Responsible procurement



We choose our suppliers and partners carefully and give preference to those that share our socially and environmentally conscious practices. Our suppliers are selected and evaluated beyond the basis of economic criteria. We also look closely at compliance with human rights and environmental protection.

Communication of violations



We promote an open communication culture and encourage our employees to report potential violations of our principles or legal regulations.

For this purpose, we have set up a special redirect on our website at www.jokey.com to a proprietary whistleblower platform that ensures effective and, if desired, completely anonymous communication. We implement procedures to protect whistleblowers and ensure the confidential and appropriate handling of information received.

Open communication and dialogue between employees, managers and senior executives are critical to identifying issues and continuously improving our day-to-day work together.



Whistleblowing

Whistleblowing is when people report wrongdoing within an organisation. Often, the company's employees are the people who report wrongdoing, but other stakeholders, such as customers, suppliers and business partners, can also be whistleblowers.

Breaches of company policies or values and applicable law can be reported. However, whistleblower systems can also be used to (anonymously) ask compliance-related questions related.

Whistleblowing

There are many areas in which whistle-blowers can report wrongdoing. However, the incidents reported generally relate to:

- Corruption
- Discrimination and harassment at the workplace
- Legal violations and criminal offences
- Human rights infringements
- Bribery and/or corruption
- Insider trading
- Data misuse
- Serious management malpractice
- Generally unethical behaviour

What can I do?

Contact the compliance team or report the incident (anonymously). The compliance team can also be contacted if there is any uncertainty as to whether wrongdoing exists. The same applies if you are unsure about how best to act in certain circumstances.

Why do we encourage whistleblowing?

It offers us the chance to resolve wrongdoing internally and to take proactive action to prevent it happening again. This creates a healthy working environment for all employees, helps to prevent the company or its employees being penalised, and protects us against damage to our image.

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