

# Slavery and Human Trafficking Statement for the Jenoptik Group

Jenoptik is committed to international standards of human rights and does not tolerate any form of slavery, servitude, forced or compulsory labor, human trafficking or exploitation in its own business operations or those of its supply chain.

This statement of principle is made in accordance with section 54 of the UK Modern Slavery Act 2015 for the 2023 fiscal year, setting out the steps taken by Jenoptik to combat slavery, servitude, forced or compulsory labor, human trafficking and other forms of exploitation in its own business operations and supply chain.

This statement is published for JENOPTIK AG and all companies in which it has a direct or indirect majority interest.

## The Group and its Supply Chain

The Jenoptik group has bundled its core photonics business into two divisions, Advanced Photonic Solutions (industrial customer business) and Smart Mobility Solutions (business with public clients). The non-photonic activities, particularly those aimed at the automotive

market, are managed within the Jenoptik Group under the Non-Photonic Portfolio Companies as independent brands (including HOMMEL ETAMIC and Prodomax).

The group's headquarters are in Jena, Germany. Jenoptik employs around 4,500 people internationally. Its customers primarily include companies in the semiconductor equipment industry, the automotive and automotive supplier industries, the medical technology, security and defense industries and the aviation industry.

In addition to several large sites in Germany, Jenoptik has further production and assembly locations in China, France, Great Britain, Canada, Korea, Switzerland and the US, among others.

With its international supplier relationships for a wide range of materials and services, Jenoptik has extensive and multi-level supply chains. The majority of suppliers are based in Western Europe and the USA and generally have a high level of added value.

### **Policies**

The "Code of Conduct for Jenoptik Employees" as well as the published policy statement for human rights and working conditions and environmental protection within the framework of the German Supply Chain Due Diligence Act set out principles of conduct to ensure that all Jenoptik employees around the world maintain a high level of integrity and adhere to ethical and legal standards. The Code prohibits any form of exploitation and human rights abuses, in particular forced and child labor, and enshrines guarantees of fair working conditions and statutory minimum wages. Jenoptik has a zero tolerance policy toward unequal treatment and discrimination against individuals based on race, ethnic origin, skin color, gender, religion or belief, disability, age, marital status and sexual identity.

Like all of Jenoptik's group policies, the Code of Conduct is binding for all employees. Managers assume particular responsibility in this regard. Group policies are created and reviewed on the basis of a standardized interdepartmental process. All group policies are approved by the Executive Board.

In addition, respect for and adherence to human rights standards within the Jenoptik Group and its supply chain are regulated by internal organizational provisions. These provisions establish principles relating to general working conditions and remuneration within Jenoptik, and for consideration of human rights standards in supplier management.

Jenoptik employees can report violations of statutory and internal provisions to the Compliance & Risk Management department. Violations are terminated, sanctioned and reviewed by means of a standardized process. During regular audits carried out by the Internal Audit department, operational business units and administrative departments in the Group are reviewed for compliance with law and internal provisions on a random basis. Any identified violations are documented and reported; action to end them is initiated.

# Supplier Due Diligence

Jenoptik's suppliers are systematically recorded and subjected to abstract supplier evaluations based on tools. In addition, if an abstract risk is identified, a concrete risk analysis is carried out as part of supplier assessments. As part of this, suppliers are examined with regard to their social responsibility and compliance with human rights and environmental regulations.

In addition, an extended business partner screening is carried out by an independent third party company on the basis of defined criteria, and separate approval to employ them is obtained within the company.

### Code of Conduct for Business Partner

Jenoptik expects its suppliers and other contractors ("Business Partners") to comply with and respect internationally recognized human rights standards. Business Partner of Jenoptik are contractually bound to adhere to the standards of the "Code of Conduct for Jenoptik Business Partners" by default and similarly oblige their own suppliers to adhere to them. In addition to general compliance with applicable legal provisions, this includes the adherence to and assurance of human rights by prohibiting forced and child labor as well as discrimination and unequal treatment, ensuring fair working conditions, working hours and appropriate remuneration and also respecting employees' freedom of association.

In the event of violations of the principles of the Code of Conduct by a Business Partner, Jenoptik reserves the right to take legal actions, for example by terminating the business relationship.

# Training

All Jenoptik employees around the world are obliged to participate in a web-based basic training on legal and ethical compliance standards.

For Jenoptik, correct and responsible ethical and legal conduct is an important part of its global business operations.

Particular emphasis is placed on respect for international human rights standards and the establishment of measures to ensure compliance in the context of business operations and the supply chain.

This statement of principle was approved by the Executive Board of JENOPTIK AG for JENOPTIK AG and all companies in which it has a direct or indirect majority interest.

JENOPTIK AG January 2024

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The contents of this publication address all genders equally.