



California Transparency in Supply Chains Act

JENOPTIK North America, Inc.

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 group is committed to respecting human rights. This applies both to our own business areas including all our majority shareholdings and to our global supply chains.

Responsibility for human rights due diligence lies at corporate level with the Executive Board of JENOPTIK AG and on level of the Jenoptik North America, Inc. with the President of the company. The entire Jenoptik Group undertakes to comply with all requirements to protect human rights, due to the group's obligation to comply with the requirements of the German Supply Chain Act as it also affects all subsidiaries and their suppliers.

As a signatory to the UN Global Compact, Jenoptik as a group is committed to the social, ecological, and economic principles and underlines our understanding of our responsibility for human rights.

Verification – With the help of our annual risk analysis 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.

Our abstract 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.

Audit – Prohibition of all forms of infringements of human right, in particular forced labor, including human trafficking and slavery, is a core element of our Jenoptik Business Partner Code of Conduct. As described above Jenoptik utilizes a consistent risk-based supplier management process to enable us to systematically identify potential risks in our supply chain and to prioritize supplier audits.

Our comprehensive supplier management systematics includes supplier selection, qualification, supplier evaluation, strategic evaluation including risk evaluation and supplier development. Strategic suppliers are evaluated for compliance with the principles of the Jenoptik Business Partner Code of Conduct on a regular basis by cross-functional teams during Supplier Quality Development audits which can include audit of social aspects. Supplier audits regarding human rights topics would be conducted by internal auditors on an announced basis. Due to current limited capacities and resources and the rapid and dynamic changes in regulatory requirements with regard to due diligence in the supply chain, we plan at the moment to conduct a limited sample of human rights audits in 2025.

For more information regarding Jenoptik audits, refer to [Jenoptik Non-Financial Report](#).

Certification – The majority of Jenoptik’s suppliers are required to accept the Jenoptik Business Partner Code of Conduct included in Jenoptik’ purchasing contracts in which suppliers make a written or digital declaration that suppliers observe and guarantee human rights, including but not limited to (1) prohibition of forced and child labor, (2) Prohibition of discrimination and unequal treatment, (3) assurance of fair working conditions and hours, (4) assurance of fair payments and (5) respect for freedom of association and right to organize.

Contractors who are categorized in the abstract risk analysis as "potentially risky" are obliged to undergo detailed self-assessments as part of the concrete risk analysis. Therefore, there is a questionnaire sent to those suppliers regarding questions related to human rights. For suppliers, service providers or other contract holders who, based on this specific analysis, have an increased risk of violating human rights, we initiate measures to prevent or remedy the situation, support their implementation and monitor them on an ongoing basis. Jenoptik evaluates this questionnaire, which is provided by the supplier, as certification in the legal sense.

For any known violations related to any human rights infringements, Jenoptik reserves the right to terminate purchasing contracts immediately upon notice. In the event of substantial deviations or an unwillingness to implement measures for improvement, we exclude suppliers from any business with Jenoptik. To be faster and more effective in reacting to major breaches with the Jenoptik Business Partner Code of Conduct requirements all Business Partners of Jenoptik and other involved people have the opportunity to confidentially report misconduct and violations of the Jenoptik Business Partner Code of Conduct for Business, e.g. potential violations of human rights their own company or at their own sales partners, suppliers or other contractors, via Jenoptik's confidential [whistleblowing system](#).

Internal Accountability – Jenoptik prohibits any form of human rights infringement and requires all of its employees to conduct themselves in accordance with all applicable laws and regulations and internal company guidelines. At Jenoptik, this directive is found in the Jenoptik Integrity Code and the Policy Statement of the Jenoptik board regarding the respect of human rights due to the German Supply Chain Due Diligence Act.

An extensive compliance organization and effective compliance management system is implemented at Jenoptik to ensure that the Jenoptik compliance program is enforced. Reliable reporting channels for internal and external stakeholders, as described above, are available to ensure that possible misconduct is reported, processed and, if necessary, grievances can be remedied as soon as possible.

Circumstances which point to a violation of law, including but not limited to infringements of human rights, of the Jenoptik Integrity Code or of Jenoptik values are to be reported to the Chief Compliance Officer and Human Rights Officer. A securely protected [whistleblower system](#) is available to all persons for reporting potential or actual human rights violations in Jenoptik's own business area or along the value chain. Further information on the processing procedure can be found on the [Jenoptik website](#). Reports can also be submitted anonymously.

Training – As part of the training concept at Jenoptik, all employees of all levels in the purchasing/ supply chain department must regularly attend training courses which includes awareness of human trafficking and slavery risks in the supply chain and are conducted partly tool-based and partly as hybrid trainings by the Jenoptik Human Rights Officer. In addition, all our employees with management responsibility will receive training regarding human rights to increase awareness throughout the whole organization. We also plan to provide appropriate training regarding human rights awareness to our suppliers in the future.



Jay Kumler
President
Jenoptik North America, Inc.