



MORE LIGHT

Code of Conduct for Jenoptik Employees

Dear employees,

As a technology company, we strive to offer products and solutions that give our customers an advantage in the market. We always aim for the highest quality – in our processes, in our conduct with business partners, and among ourselves. At Jenoptik, success in business and responsibility for our actions are therefore inextricably interlinked objectives.

Reflecting these aims, our Code of Conduct is designed to serve as a universal set of rules that governs our decisions and actions. It helps us to protect our company's reputation and ensure compliance with ethical and legal standards. The Code of Conduct applies worldwide, and is reinforced by our Group Guidelines.

Each one of us is responsible for adhering to ethical and legal rules. As you go about your daily work, all of you have a duty to ensure that Jenoptik continues to enjoy a good reputation in the market. And to make sure this remains the case, the Code of Conduct is primarily based on our Jenoptik values. Violations of ethical rules, laws, and regulations are not just incompatible with our values;

they also damage the company's reputation and may have serious legal consequences.

On the Executive Board, one of our prime concerns is making sure that you are aware of the company's rules and values. Adherence to them is central to maintaining and boosting the trust placed by our business partners and the general public in Jenoptik's conduct and integrity. Should you become aware of any violations of our values, our Code of Conduct, or our Group Guidelines, please approach the relevant contact. More detailed information can be found on page 28. Each of the issues set out in our Code of Conduct includes a brief summary, reference to the relevant Group Guidelines, and a contact person available to answer any questions you may have.

Complying with this Code means that all of you are helping to ensure that Jenoptik is not just a success as a business but also acts consistently in line with your commitment to social responsibility. We would like to thank you for your cooperation.



A handwritten signature in black ink, appearing to read 'H-D Schumacher'.

Hans-Dieter Schumacher
Chief Financial Officer

A handwritten signature in black ink, appearing to read 'Stefan Traeger'.

Dr. Stefan Traeger
Chairman of the Executive Board





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1 Responsible conduct

As a company, we see trust, honesty, and integrity as the core elements of responsible conduct and it is imperative that all employees apply these core principles in their daily work.

We treat everyone – in particular our colleagues, but also our business partners, stakeholders, and visitors – with dignity and respect, and we recognize the privacy and personal rights of every individual.

We take great care to ensure that our actions and conduct do not damage Jenoptik's reputation.

1.1 Equal opportunities and equal treatment

We do not tolerate any actions or statements that discriminate against, unfairly disadvantage, or unequally treat others based on their race, ethnic or national origin, skin color, gender, religion or belief, political affiliation, disability, age, marital status, sexual identity, or other personal traits.

1.2 Human rights

Compliance with international human rights standards is one of our key concerns. In particular, this means combating slavery, human trafficking, forced labor, other forms of exploitation, and any form of child labor.

1.3 Fair working conditions

We are also committed to ensuring fair working conditions and compliance with relevant legislation relating to minimum wages, working hours, and occupational health and safety (OHS), and we respect the dignity of every individual.



In brief

- Top priority is compliance with the law.
- We promote a culture of responsible interaction.
- Equal opportunities and respect for human rights are a matter of course for us.

Contacts

- Corporate Compliance & Risk Management
- Corporate Legal

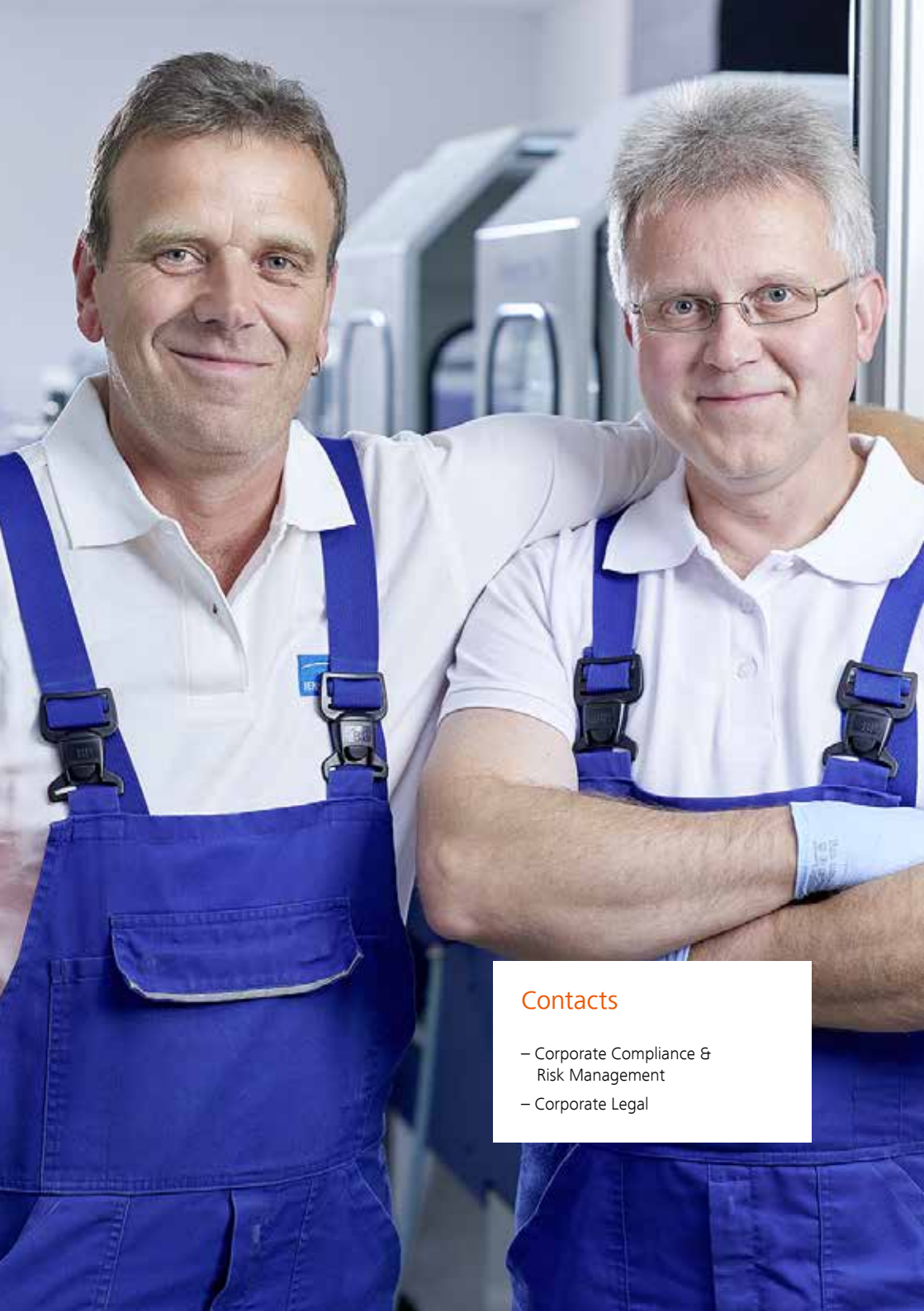
2 Compliance with the law

Compliance with national and international laws and regulations is our highest priority. The same applies to the Group Guidelines, company agreements, and collective bargaining agreements.

All employees are required to know and comply with relevant rules. In cases of doubt, they should involve their supervisors. Legal provisions always take precedence

in the event of contradictions between Group Guidelines, other internal rules, or this Code of Conduct and the law.

Harmful or illegal conduct, in particular violations of the provisions of this Code of Conduct, and other unlawful conduct will not be tolerated and may entail serious consequences for individual employees as well as Jenoptik as a company.



Contacts

- Corporate Compliance & Risk Management
- Corporate Legal

3 Fair conduct in the market

We maintain fairness, legality, and integrity in our business and act in accordance with relevant laws, appropriate business practices, and ethical principles.

3.1 Dealing with customers and competitors

Antitrust and competition laws exist to create an environment in which companies can compete fairly on a level playing field.

We comply with fair competition rules and antitrust laws, and in cases of doubt involve the relevant contacts.

We deal with our customers in an honest and fair manner. Promotional and sales materials and practices may not deceive or mislead existing or potential customers. All advertising claims must be truthful and based on facts.

Competitors are not permitted to fix prices or terms, divide up or allocate markets, regions, or customers among themselves, or collude on other supply, development, or production strategies. It is thus not only collusion that is prohibited, but also any conduct that may promote

it. Even the mere sharing of non-public information with a competitor, in particular relating to prices, costs, margins, corporate strategies, customers, and similar may constitute an antitrust violation that can result in sanctions potentially jeopardizing the existence of the company.

3.2 Export and customs control

We respect applicable national and international import and export regulations that apply in connection with the manufacture, sale, purchase, rental, and use of goods (hardware, software, technology), and with the provision of services (including technical support). All employees must comply with the applicable import and export regulations and, in cases of doubt, consult the relevant contacts.

3.3 Dealing with suppliers

Our suppliers are of utmost importance to our global success. When purchasing products and services, it is therefore important to ensure that suppliers are selected not only on the basis of price and reliability but also with regard to their compliance with applicable laws, in particular environmental concerns and adherence to international human right standards. We ensure that our suppliers commit to complying with our Code of Conduct for Suppliers and Sales Partners.

3.4 Handling contracts

We generally conclude contracts in writing, always with the involvement of the relevant departments, and after obtaining the necessary internal approvals. Legally binding statements may only be made by employees who have been granted relevant permission or authorization.

In brief

- We maintain fairness and legality in our business.
- Antitrust or export-related violations are always bad for business.

Contacts

- Corporate Compliance & Risk Management
- Corporate Legal
- Export control and customs in the divisions
- Purchasing in the divisions

Group Policies to relevant topics

- Authority to Make Decisions and Power to Represent the Company
- Conduct in the Market and in Competition
- Foreign Trade
- Compliance

4 Anti-corruption

Our aim is to stand out from our competitors based on the performance and quality of our products and services.

We do not tolerate bribery, corruption, or any other form of undue influence in business dealings and with officials. Offering or granting advantages to third parties with the intention to secure orders or advantages for Jenoptik or others and influence decision processes is prohibited.

4.1 Gifts and gratuities

Offering or providing courtesy gifts, invitations, and other gratuities in the course of normal business practices is only permitted as set out in the applicable legislation and Group Guidelines, and only to an appropriate, limited extent. They must never be provided as a form of actual or suggested influence, and must not create the impression that the recipient is obliged to conceal their acceptance.

No employee may use their position to demand, accept, or procure personal advantages for themselves or their friends and relatives. Accepting occasional gifts and invitations is also only permitted to an appropriate, limited extent and as set out in the applicable legislation and

Group Guidelines. Cases of doubt should always be discussed with supervisors or the relevant contact persons.

4.2 Dealing with officials

Dealings with officials, representatives of public contracting authorities, and in part clients in the medical sector are subject to particularly strict legislation. Occasional gifts and invitations are only permitted within very strict limits. They should only be provided to a limited extent and always as set out in the applicable legislation and Group Guidelines. Here, too, consult with supervisors or the relevant contact persons in cases of doubt.

4.3 Donations and sponsorship

We support our employees' voluntary activities and work for non-profit organizations and charities.

Donations and sponsorship activities must adhere to the relevant Group Guidelines.

They must be scrutinized to ensure they do not represent a concealed attempt at bribery.

The background of the entire page is a dark, textured wooden surface. Scattered across this surface are several white Scrabble tiles. In the center, three tiles are arranged horizontally to spell out the word 'LAW'. The 'L' tile has a small '1' in the bottom right corner, the 'A' tile has a small '1' in the bottom right corner, and the 'W' tile has a small '10' in the bottom right corner. Other tiles are scattered around, including one with a blank space, one with a yellow circular mark, and others with letters like 'I', 'E', and 'N'.

L A W

In brief

- We do not tolerate any form of undue influence.
- We achieve success with our products and services, not with gifts.

Contacts

- Corporate Compliance & Risk Management
- Corporate Legal
- Corporate Communications & Marketing
- Purchasing in the divisions

Group Policies to relevant topics

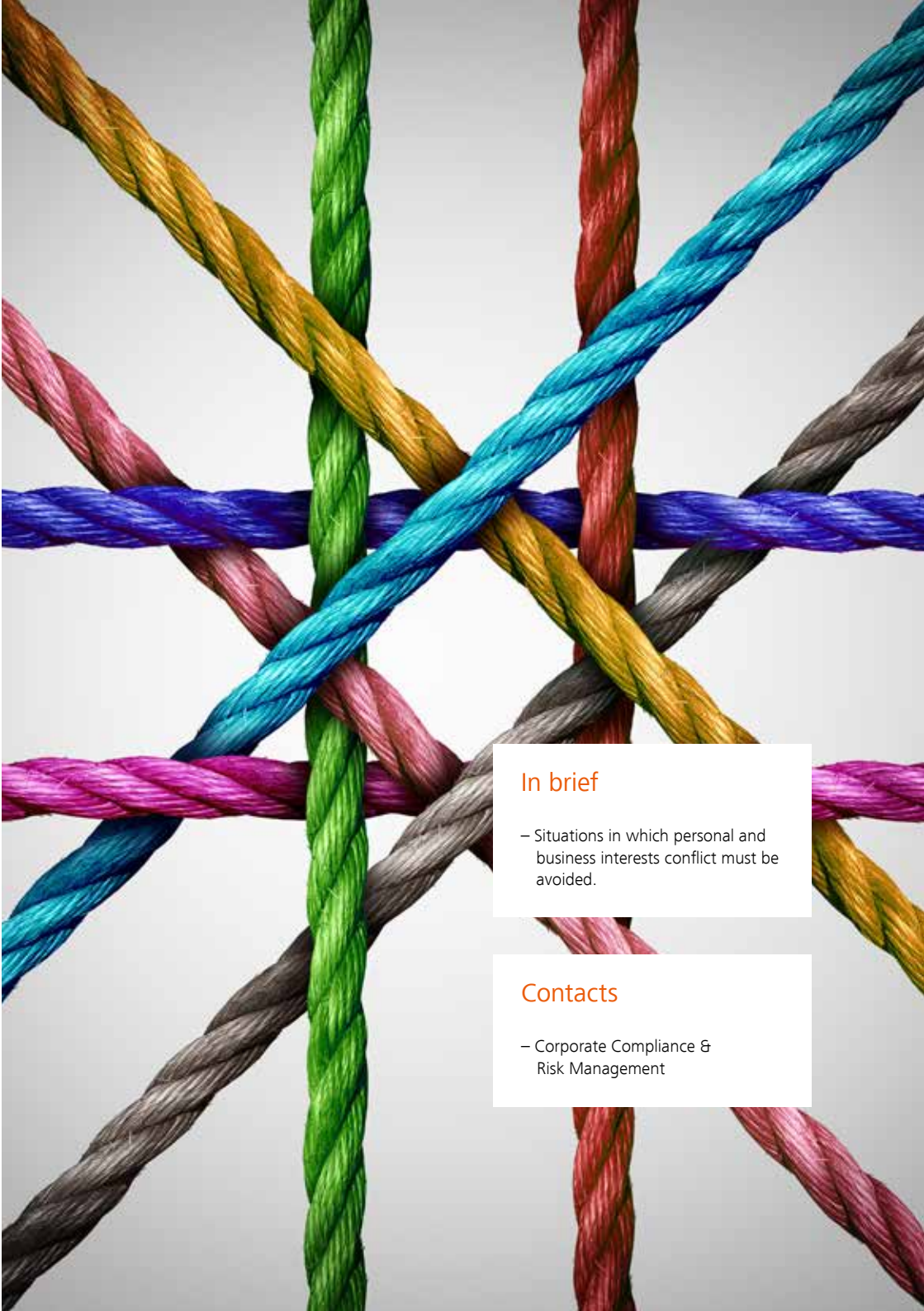
- Compliance
- Conduct in the Market and in Competition
- External Company Profile

5 Avoidance of conflicts of interests

We make all our decisions based on objective considerations. Situations in which Jenoptik's business interests may conflict with employees' personal interests must be avoided.

A conflict of interests may exist in the form of family ties, second jobs, or financial involvements. We are committed to promptly disclosing potential conflicts of interests to our supervisors and not taking part in decisions that involve a conflict of interests. We support private voluntary work, as long as the principles set out above are adhered to at all times.

Consequently, all secondary employment, positions of responsibility, or financial involvement in an organization or company that may damage the interests of Jenoptik must be disclosed to the relevant supervisor prior to commencement and require their approval. We do not participate in decisions that involve or may involve a conflict between Jenoptik's interest and a second job, position of responsibility, or financial involvement.



In brief

- Situations in which personal and business interests conflict must be avoided.

Contacts

- Corporate Compliance & Risk Management

6 Financial integrity

We endeavor to make our financial reporting transparent and dependable for open and effective communication to investors, customers, suppliers, other business partners, the general public, and all government agencies.

All records, reports, and other documents must therefore be accurate and objective, truthful, and in the due form. We take care to ensure that documents are managed and maintained in accordance with statutory requirements and retention periods. We are also committed to compliance with all applicable legislation relating to accounting and other financial reporting requirements, and further comply with applicable tax regulations.

We do not enter into any business that involves a suspicion of money laundering. All of us have a duty to comply with applicable money laundering regulations. Under no circumstance may unofficial or unregistered Jenoptik funds, assets, or liabilities (“slush funds”) be created or maintained.

Payments on behalf of Jenoptik may only be made in accordance with applicable authorizations, subject to the relevant approval processes, and only on the basis of the proper documents.



In brief

- We endeavor to make our financial reporting transparent and dependable.

Contacts

- Corporate Compliance & Risk Management
- Corporate Accounting
- Corporate Controlling
- Corporate Treasury Management

Group Policies to relevant topics

- Authority to Make Decisions and Power to Represent the Company
- Financial Integrity

7 Handling company property

We are responsible for handling Jenoptik's material and immaterial company property in a careful and appropriate manner. In particular, we ensure that Jenoptik property is only used for authorized business purposes and is not damaged or subject to unauthorized use.

7.1 Use of equipment

Private use of company property (e.g. computers, laptops, or communications systems) is only permitted in accordance with the relevant Group Guidelines and/or internal regulations. Under no circumstances may Jenoptik property be used for unlawful or improper purposes (e.g. visiting illegal websites).

7.2 Protection of intellectual property

Jenoptik's intellectual property is of vital importance to our business success and includes, in particular, patents, proposals for technical improvements, trademarks, copyrights, expertise, and other intellectual property rights. It is crucial that these valuable assets are protected from misuse or unauthorized disclosure.

Jenoptik's intellectual property may only be used by third parties if an agreement to this effect has been concluded in advance. This also applies if Jenoptik wishes to use the intellectual property of third parties. We take care that no third-party intellectual property rights are infringed.

Unless otherwise specified in contractual agreements, Jenoptik is the holder and generally the owner of all rights to intellectual property created by employees in the course of their work for Jenoptik or created by third parties for Jenoptik. Employees may not privately apply for registration or otherwise use any intellectual property created by them as employees of the company without Jenoptik's written consent.



In brief

- We handle company property with care.
- As a technology company, the protection of intellectual property is one of our key priorities and helps to secure our success in the long term.

Contacts

- Corporate Compliance & Risk Management
- IT
- Corporate Legal

Group Policies to relevant topics

- Handling Company Property
- Information Security, Data Privacy and IT

8 Protection of information

Commercial information is our property and key to our success in business. There is a particular need to protect this information.

8.1 Handling trade and business secrets

We are committed to protecting trade and business secrets and other information that is not publicly known, to treating it confidentially, and using it as required exclusively for Jenoptik's business purposes. Sensitive information that must be protected includes financial and cost data, business plans and strategies, price information, marketing and sales data, information from and on our business partners and employees, M&A projects, research and development, and expertise. Trade and business secrets may only be disclosed to third parties following conclusion of a written NDA by the relevant departments.

8.2 Data protection

We are committed to protecting personal data. This may concern both business partners and employees and include, for example, names, addresses, contact infor-

mation, and dates of birth. We are responsible for careful handling of personal data, which may only be collected, processed, used, or disclosed in accordance with applicable legislation and internal guidelines. The person responsible for processing this data must also take appropriate action to ensure the protection of personal data from accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure, or unauthorized access.

We are further committed to compliance with given IT standards, thereby ensuring the confidentiality and integrity of personal data.

8.3 Handling insider trading

We are committed to handling insider information in a responsible and confidential manner and to compliance with applicable regulations relating to insider trading.

Put simply, insider trading refers to any use of insider information to trade insider securities, incite third parties to trade insider securities, or disclose or otherwise make accessible insider information to third parties. With regard to Jenoptik, insider information is deemed to include, in particular, any (hitherto) unpublished specific information or circumstances relating to a company in the Jenoptik Group that is liable to significantly influence the stock exchange or market prices of the insider securities in the event of its becoming publicly known. Information from and on business partners may also constitute insider information with regard to the business partners.

In brief

- All employees must protect trade and business secrets.
- We are committed to handling data, in particular personal data, with care.
- As a listed company, we handle insider information in a responsible manner.

Contacts

- Corporate Compliance & Risk Management
- Corporate Legal
- Local data protection officer
- Corporate Investor Relations

Group Policies to relevant topics

- Conduct in the Market and in Competition
- Information Security, Data Privacy and IT

9 Environmental protection and OHS

We take responsibility for protecting the environment and ensuring safety in the workplace. Our daily business decisions are guided by the principles of environmental awareness and the guarantee of good health and safety at work.

9.1 Environment and technical safety

Long-term protection of the environment is one of our top priorities. Our environmental management ensures compliance with national and international legislation and sets standards for the resource-friendly and energy-efficient manufacture of our products. Technical safety and health protection are fixed targets in the development of our products. In addition, we pay attention to an environmentally friendly design during the development process. The sparing use of resources and managed recycling and disposal processes allow us to minimize impacts on humans, the environment, and nature. We attach particular importance to ongoing monitoring and continuous quality improvement of our products. We notify the relevant authorities of any product risks.

Business trips cause emissions. To protect the climate, we always weigh up their need. All employees can make use of modern communications media that aim to help minimize the number of business trips undertaken.

9.2 Occupational health and safety

We take responsibility for OHS. Ensuring occupational safety and maintaining and promoting the health of employees are important company objectives, which we help to achieve by making continuous improvements in the work environment. OHS is therefore a key element of all operations and is part of all concerns from the outset, i.e. at the planning stage and in technical, economical, and social considerations. All employees are also obliged to devote their attention to safety and comply with applicable statutory and internal rules relating to OHS, fire protection, and environmental protection so as to avoid endangering their own health. Each supervisor is responsible for the protection of their employees and must train and supervise them accordingly. OHS shortcomings must be reported without delay.



In brief

- Protection of the environment is one of our top priorities.
- We ensure a safe work environment to protect our employees from accidents.

Contacts

- Corporate Compliance & Risk Management
- Safety & Health Protection / Security department

Group Policies to relevant topics

- Health & Safety at Work and Protecting the Environment

10 Consequences of violations of this Code of Conduct

10.1 Training

Jenoptik organizes regular compliance training to inform and refresh its employees on the principles of the Code of Conduct. Our approach is to offer specific training targeted to employee groups for individual job profiles. Each employee is obliged to take part in these specific trainings.

10.2 Consequences of violations

Jenoptik does not tolerate any misconduct or violations of this Code of Conduct and will take the necessary steps on discovery of any impropriety. The company considers it important to apply the principle of proportionality with regard to such actions and consequences and make sure they are appropriate, suitable, and necessary on a case-by-case basis.

It is imperative that all employees constantly review their own conduct to determine whether it accords with the principles set out above.

Employees who provide evidence of violations in good faith will not be subjected to any prejudice. The company will protect whistleblowers who give tips given in good faith.

10.3 Contacts and whistleblower system

All Jenoptik employees can speak confidentially to the contacts given if they have questions, concerns, or doubts regarding this Code of Conduct. This also applies to violations of this Code of Conduct and of laws, regulations, and Group Guidelines.

The relevant contacts may be persons from the immediate work environment, for example a supervisor, an employee representative, the business management, the Director Compliance & Risk, or the Head of Internal Audit.

If there is uncertainty as to whether actions or conduct may violate the principles of this Code of Conduct, employees can get in touch with the contacts listed for the different topics to coordinate a further course of action. All employees can also use the whistleblower system on the intranet to report significant violations that demand confidential. Searching for "whistleblower system" will return the online form provided on the intranet for this purpose.

10.4 Publication of the Code of Conduct

All employees are given the Code of Conduct together with their employment contract and are obliged to comply with its principles. It is imperative that all employees constantly review their own conduct to determine whether it accords with the principles set out above.

Managers are expected to lead by example and take particular care to comply with the Code of Conduct. They are always the first point of contact in cases of doubt and must ensure that the employees for which they are responsible are familiar with this Code of Conduct.

Contacts

Corporate Compliance & Risk Management

P +49 3641 65-2235 | compliance@jenoptik.com

Carl-Zeiss-Strasse 1 | 07743 Jena | Germany

You can report any concerns you may have by searching for the “whistleblower system” on the Intranet.

Corporate Internal Audit

P +49 3641 65-2302 | audit@jenoptik.com

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Photos: jeibmann fotografik, Fotolia, Pexels.com

The contents of this publication address all genders equally. For better readability, the masculine forms are used normally.