


# POLICY

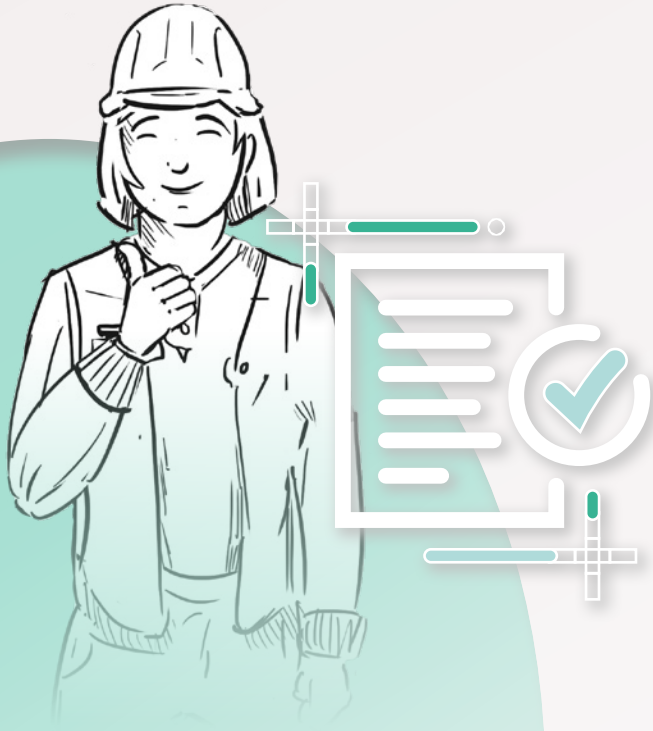
## OF THE JÄGER GROUP



This Policy defines the most important principles and requirements of the JÄGER Group and describes our worldwide binding codes of conduct for responsible action, which shall protect our employees and companies as well as our business partners.

As a global company we support the implementation and promotion of an ethical business conduct and pursue a zero tolerance policy to any form of rule violations. In addition, we regard compliance with this guideline as a basic prerequisite for a high-quality standard, economic success and sustainable corporate development.

**1****Compliance****2****Human Rights****3****Social Responsibility and Sustainability****4****Fair Competition****5****Escalation Policy****6****Data Protection**



## 1 COMPLIANCE

Rule monitoring is an integral part of the corporate philosophy of the JÄGER Group. We set the compliance with national and international legal regulations and the respect of ethical principles as our top priority. The compliance system of the JÄGER Group ensures continuous rule monitoring. Prevention and control measures, such as regular audits, the four-eyes principle or up-to-date information and implementation of new legal requirements, support the seamless implementation of our compliance process. This is also applied beyond the boundaries of our company.

We expect from our employees and business partners to comply with all national and international legal regulations and to respect ethical principles at all levels of business.

## HUMAN RIGHTS

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The JÄGER Group bears responsibility for its employees and for all business partners involved in business transactions. We do not accept in any way working conditions that violate human dignity and are inhumane. We observe the globally recognized provisions for the protection of human rights without exception and we also expect this approach from our business partners.

Any form forced labor is prohibited. We have a duty to ensure that no forced labor is used during the entire production process. We do not tolerate discrimination and we support the principle of equal treatment and equal opportunities for our employees, regardless of his/her ethnic origin, gender or sexual orientation, religion or political affiliation and age or disability. A respectful and tolerant treatment of all employees is essential for us and is also expected of our business partners.

The remunerations we pay to our employees are fair, appropriate and at least comply with the respective national legal standards. We also place these demands on our business partners.



## 3

## SOCIAL RESPONSIBILITY AND SUSTAINABILITY

In addition to the quality of our products, the safety and health of our employees is of highest priority to us and is an integral part of our responsibility.

We comply with safety and health standards by preventive occupational safety in order to avert dangers to employees or third parties. This includes, among others, the appropriate design and maintenance of production facilities, workplaces and production equipment in order to ensure appropriate noise, light and air purity values.

Besides the natural access to clean drinking water and the provision of proper sanitary facilities we are obliged to take appropriate emergency precautions for our employees. This includes adequate safety equipment, a design of the buildings in accordance with safety regulations and regular training of our employees on how to behave in emergency situations.

The health and safety policy of the JÄGER Group includes the prohibition of the use of illegal drugs and alcohol before the start of work, during working hours, at the workplace and on company premises.



The JÄGER Group has a duty of care towards its employees. We therefore offer support to employees with drug or alcohol problems who ask the company for help or who are identified as having a problem.

Environmentally friendly and sustainable production in accordance with our environmental and energy policy is very important to the JÄGER Group. We comply with the applicable environmental protection regulations and, as far as possible, strive to minimize waste and emissions beyond the minimum legal requirements in order to keep soil, air and water pollution as low as possible. This includes, in particular, to avoid as far as possible process-related waste (esp. plastic waste), chemicals or other hazardous substances and, insofar as their use is unavoidable, their proper handling and disposal.

Already in the design of the production facilities, the means of production, the development of products, the selection of raw materials and manufacturing processes, the above-described objectives for environmental protection are taken into account and implemented by considering the current state of the art.

We also expect our employees and business partners to handle environmentally hazardous substances responsibly and to use natural resources sparingly. This also includes to reduce energy requirements, waste and emissions as far as possible and to duly dispose environmentally harmful waste (esp. plastic waste) or chemicals.



## ESCALATION POLICY

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### FAIR COMPETITION

As an internationally operating company, the JÄGER Group is in constant competition with other companies. The basis of our economic success is a free and fair competition. On this basis, we conduct our business and expect our business partners to act in a manner that complies with the applicable competition laws.

Prices, conditions or capacities shall not be discussed nor agreed with competitors. In principle, agreements on the division of customers, territories or production programs are also inadmissible. A position dominating the market shall not be used unlawfully. We do not obtain competitive information in an unlawful manner or knowingly disseminate false information about a competitor or its products or services.

The JÄGER Group does not tolerate acts of corruption or other unfair business practices in any way. Any violation of the antitrust or anti-corruption law will be prosecuted and can be punished with sanctions against the responsible person. This is irrespective of whether this person pays bribes itself or associates itself with another person for this purpose or assists in breaches of antitrust or anti-corruption law.

All business relationships are maintained for objective reasons and are not influenced by private interests or advantage. Our employees are not permitted to offer or accept grants in the form of donations, services or invitations in order to influence the business relationship. We also expect this behavior from our business partners.

In this Policy we have defined the values and standards of the JÄGER Group. The aim is to create a working environment where fairness, integrity and respect are the norm. This is particularly important in difficult situations where questionable behavior or practices need to be investigated.

Should such a case occur, the company stands behind its employees and supports anyone who addresses a corresponding behavior. Our employees are provided an internal reporting process by which behaviors that could violate legal regulations can be reported to our Compliance Officer. This will trigger an internal investigation process that evaluates the reported behavior and determines appropriate consequences.

In this case, the employee does not have to fear any retaliation or disciplinary action. The main goal is to protect the principles and standards of the JÄGER Group. A discrimination of our employees is not tolerated. Great importance is attached to confidentiality and anonymity.





## 6 DATA PROTECTION

The JÄGER Group undertakes to comply with the applicable data protection regulations and thus creates the basis for a trusting cooperation with employees and business partners. This strengthens the JÄGER Group's claim to be a reliable and sustainable business partner and an attractive employer in a rapidly changing IT society.

Our globally applicable data protection concept aims to present the data protection aspects in a summary documentation. As a result, for example, compliance with the European General Data Protection Regulation (GDPR) can not only be guaranteed, but also its proof of compliance can be provided.

In particular, we want to respect the privacy of our employees and third parties. The protection of personal data is our priority. Private data

will only be used for lawful business/employment-related purposes or to comply with legal requirements.

At the same time, the introduction of securing processes and IT structures within the framework of our data protection concept serves to comprehensively protect our know-how and that of our business partners.

We require that our business partners also undertake to handle personal data responsibly and carefully and to use it exclusively for legitimate business or employment-related purposes or to comply with legal requirements. In order to protect operational interests, any unauthorized disclosure of trade and business secrets to third parties shall be prohibited.