

Code of Conduct of Joma-Polytec GmbH

Fundamental principle: We, as a company, and each of us individually, are responsible for complying with binding commitments and internal guidelines

All employees of Joma-Polytec GmbH are personally responsible in their working environment for compliance with all binding obligations and internal guidelines. The observance of binding obligations and internal guidelines, as well as the resulting lawful and integral conduct, has the highest priority at Joma-Polytec GmbH.

We are responsible for our products, our work and their impact on our employees as well as on society, our business partners and the environment. In order to live up to this responsibility, we must all act in accordance with the law, with honesty and responsibility.

Within their area of responsibility, our managers, in particular, ensure that legal requirements and the principles of our company are observed. We expect all employees to comply with the law.

We also expect our business partners to comply with the binding obligations and guidelines listed here, and to communicate these to their business partners and demand their compliance with them.

Social and corporate responsibility

Human rights

We respect and support internationally recognised human rights. Between our employees and when in contact with our business partners, we value a climate characterised by mutual respect, trust, tolerance and fairness. We respect the dignity, privacy and personal rights of each individual.

No forced labour and no child labour

We reject all forms of forced labour, as well as child labour. All work undertaken within Joma-Polytec GmbH must be performed voluntarily. In doing so, we are committed to the abolition of slavery, forced labour and exploitative child labour. The minimum age for admission to employment in accordance with state regulations is observed at Joma-Polytec.

Equal treatment and equal opportunities

We do not tolerate discrimination on the basis of skin colour, gender, religion, age, nationality, social and ethnic origin, disability, ideology, sexual orientation or political or trade union activity.

These principles apply to the recruitment of new employees, to employees in existing employment relationships and to the professional advancement of our employees. Only performance, personality, abilities and aptitude are decisive in this respect.

Remuneration and working conditions

We are aware of our social responsibility vis-à-vis our employees and are committed to rates of pay and benefits that are competitive and which comply with local laws, including laws on minimum wages, overtime pay and statutory benefits.

We ensure that working hours, including overtime, are in accordance with local laws that regulate working hours.

Collective bargaining

We are not a member of the employers' association ("Arbeitgeberverband"), but we are guided by the collective wage agreements reached within the industry.

Welfare, health and safety of employees

Safety at the workplace, the maintenance and promotion of health, performance and job satisfaction of our employees are central to our corporate activities.

At Joma-Polytec GmbH, we pay close attention to the applicable legal regulations and standards for a safe and health-promoting working environment and take appropriate measures to ensure this. In their work, our employees are obligated to implement the statutory regulations and internal guidelines on occupational health and safety.

Freedom of assembly

Our employees are able to communicate openly with management about working conditions without fear of reprisal, intimidation or harassment. Workers have the right to assemble freely in order to join workers' organizations or a works council in accordance with local law.

Principle of sustainability

We respect the natural basis of life on our planet and are committed to conserving resources and reducing the environmental pollution of air, water and soil. This commitment to sustainable environmental protection is the basis for our work.

To this end, we are guided by the applicable principles, we develop and design our products in an environmentally compatible manner, we constantly strive to reduce the negative environmental impact of our operating processes and continuously improve our energy and environmental performance, thus establishing ourselves as a global role model. In addition thereto, the environmental and energy policy of Joma-Polytec GmbH applies.

Sustainable and responsible purchase of commodities and materials

We are committed to ensuring that all our sourced commodities and materials comply with applicable legislation, such as REACH and RoHS, and that we comply with industry regulations. Prohibited or restricted substances are handled in accordance with these regulations and communicated within the supply chain in compliance with the law.

When using so-called "conflict minerals" and their derivatives, we ensure that these materials are sourced responsibly.

Business ethics of Joma-Polytec GmbH

Fair competition and antitrust law

All employees of Joma-Polytec GmbH are obligated to comply with the relevant regulations of antitrust and competition law. Joma-Polytec prohibits any conduct that pursues (or has the objective) of hindering, restricting or distorting free and fair competition.

Our competitive position is based solely on our entrepreneurial success factors, in particular, our innovative ability, quality, reliability and fairness. For this reason, we always act in compliance with antitrust law when dealing with competitors, business partners and end customers. In particular, the following shall not be tolerated:

- Contracts, agreements or understandings with actual or potential competitors for the purpose of fixing prices and premiums, limiting the nature or quantity of products or services supplied or sharing markets;
- Abuse of a leading position in a given market;
- Agreements or contracts on a vertical integration level (with suppliers or customers), if they pursue the intention (or have the effect) of preventing or restricting free and fair competition, contrary to the applicable laws.

Prohibition of all forms of corruption

We do not tolerate any form of corruption or bribery in our global business activities. Corruption is prohibited by international conventions, national laws and internal guidelines. Joma-Polytec GmbH does not tolerate any forms of bribery or business conduct that could create the impression of undue influence on employees and business partners.

All employees of Joma-Polytec are prohibited from directly or indirectly demanding, accepting, offering or granting advantages in business dealings if this is intended to influence business processes in an inadmissible manner, or if such an impression could be created. Especially in business dealings with public officials and authorities at home and abroad, we ensure that our employees behave with integrity.

Facilitation payments are generally not tolerated. Facilitation payments are payments to an official that are not provided for by law and which are intended to induce the official to expedite or perform a service to which an entitlement, in principle, exists.

Gifts, invitations and other benefits

When dealing with benefits, such as gifts or invitations, we take strict care to avoid any appearance of dishonesty or impropriety. We do not tolerate any benefits that could raise doubts concerning our integrity or influence business decisions.

Factual decision-making and conflicts of interest

We make decisions after proper consideration and in the interest of the company. We assume that business decisions are not influenced by private or personal interests. At Joma-Polytec GmbH, we make decisions only on the basis of appropriate considerations and in the interest of the company. We take care to avoid even the appearance of extraneous considerations. We expect our employees to remain objective in all circumstances and to ensure that their judgement is not influenced by personal or family interests.

Import and export controls, as well as economic sanctions

In all our international business relations, we adhere to the currently valid principles underpinning global foreign trade. We comply with all applicable export and import control regulations and rules, as well as temporary restrictions on foreign trade, such as economic sanctions or embargoes.

Complete and truthful documentation and financial responsibility

We undertake to comply with all our documentary obligations. The documentation must be complete, truthful, timely and correct. Any reporting, whether digital, verbal or written, must follow the same rules of integrity.

The obligatory retention periods (or those otherwise agreed with the customer) for data must be guaranteed by suitable storage and backup for the guaranteed period.

We prepare complete and accurate reports on all financial transactions, processes and data and make them available to the responsible auditors.

Protection of information and personal data

Joma-Polytec GmbH applies a principle of confidentiality when using sensitive data. We, therefore, ensure that sensitive information and company secrets are adequately protected by our employees and are not passed on to unauthorised individuals. To the same extent, this principle of confidentiality applies to our business partners and their sensitive data.

We also respect and are committed to protecting the privacy of our employees and business partners. The use of (and access to) personal data will only occur for specific purposes in accordance with applicable law and by authorised personnel.

Protection against counterfeit and substandard parts

We take reasonable care to ensure that our components do not fall into the hands of unauthorised third parties and cannot be distributed by unauthorised means. In this way, we support our endeavour that only original, tested and qualitatively perfect goods reach the end customer.

Compliance with the Code of Conduct and whistleblowing

The Code of Conduct has been drawn up and written by Executive Management. The employees of Joma-Polytec GmbH must comply with the binding obligations and internal rules listed. Violations of this Code of Conduct must be reported internally to Executive Management for review and follow-up. The company's Executive Directors assure all whistleblowers of their full protection.

Bodelshausen, 08.02.2022