	Guideline	R JVU 0001en	
	Code of Conduct	Revision./Index 04 11.01.2024	Blatt/von 1 / 4

PREAMBLE

In times of globalization, which is proving to be a very dynamic development in worldwide business relations, we want to ensure that we meet social, political and economic requirements. This includes compliance with the applicable laws, ethical values and principles, and the guidelines we have imposed on ourselves.

Therefore, management has developed this Code of Conduct as part of its corporate responsibility to promote environmental responsibility, fair and healthy working conditions, and ethical and sound business practices (Environmental, Social, Governance - ESG) throughout the JVU organization.

We base our principles on the principles of the UN Global Compact, which includes the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization, the principles of the Rio Declaration on Environment and Development and the UN Convention against Corruption, as well as the ILO (International Labor Organization) Declaration.

We expect our business partners to also incorporate the listed principles into their corporate policies, enforce them and pass them on in their value chain.

WE COMPLY WITH LABOR LAWS AND RESPECT HUMAN RIGHTS.

Fair working conditions and respect for each other

Discrimination, harassment and disrespectful behavior are not tolerated at JVU. No one at JVU shall be discriminated against, excluded, favored or preferred on the basis of race, ethnic background, gender, religion or belief, disability, age or sexual identity.

Respect for human rights

JVU prohibits the use of child or forced labor. Workers employed by JVU and its suppliers must be over the legal age for compulsory education and the legal minimum age.

JVU respects the minimum wages established by law, the principle of "equal pay for equal work" and complies with the applicable labor laws of the countries regarding working hours and vacations.


JVU respects employees' freedom of association and the right to representation.

Employees are expected to respect human rights in their area of responsibility and to demand the same level of respect from the company's suppliers and other business partners.

Operational safety and health protection

Compliance with the relevant safety regulations is a matter of course at JVU. All employees are required to know and comply with applicable safety regulations.

Employees are expected to set a good example by strictly applying the safety regulations themselves and ensuring that others do the same. They are also expected to prevent

	Guideline	R JVU 0001en	
	Code of Conduct	Revision./Index 04 11.01.2024	Blatt/von 2 / 4

accidents and/or risks and to act promptly to ensure that potential hazards are reported and eliminated immediately.

INTEGRITY IS THE FOUNDATION OF OUR ACTIONS.

Anti-Corruption

JVU does not tolerate corruption or bribery in business dealings. Employees are prohibited from influencing or being influenced in the performance of their duties by offering, giving, accepting or receiving bribes. Any violations will not be tolerated and will result in consequences.

Fair Competition / Antitrust Law

JVU does not accept and does not expect its business partners to engage in price-fixing or any form of unlawful distortion of competition.

Employees who negotiate and enter into agreements with the company's customers, suppliers or competitors as part of their duties are required to know and comply with the requirements of applicable competition and antitrust laws in order to maintain ethical relationships.

Conflicts of Interest

Employees' business activities and decisions must be in the best interests of JVU and must not be influenced by personal interests and relationships with suppliers, customers, competitors, other employees or persons associated with the employee.

Intellectual Property

Intellectual property includes patents, trademarks, copyrights, designs, models, samples and business information such as expertise or other information entrusted by customers or suppliers.

All JVU employees and suppliers must ensure that JVU's intellectual property is protected from access by unauthorized employees and third parties.

International trade agreements and sanctions


Governments and international organizations may impose temporary restrictions, such as embargoes or economic sanctions, affecting certain business transactions that apply to countries or individuals. JVU respects international regulations and does not engage in transactions or business involving commodities or technologies affected by restrictions.

Responsible sourcing of raw materials

JVU and its suppliers are committed to exercising due diligence in the procurement and extraction of raw materials, including conflict minerals.

The procurement and use of raw materials obtained illegally or through ethically reprehensible or unreasonable measures must be avoided. This also applies to the procurement and extraction of raw materials as well as to environmental protection, including chemicals management, and respect for human rights.

Counterfeit products / plagiarism

	Guideline	R JVU 0001en	
	Code of Conduct	Revision./Index 04 11.01.2024	Blatt/von 3 / 4

JVU requires its suppliers to develop, implement and maintain effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into our supply chain. When detected, suppliers are expected to implement effective procedures to quarantine the product and inform recipients of counterfeit products.

OUR COMPANY'S DATA AND INFORMATION MANAGEMENT COMPANY IS CLEAR AND TRANSPARENT.

Financial responsibility

At JVU, key business processes are properly documented and relevant financial informations are recorded to faithfully reflect business operations with complete reports.

Employees who collect or transmit accounting or financial data, calculate and transmit indicators, or manage and disseminate other types of information as part of their job must ensure that such data, indicators, and information are accurate, reliable, and honest.

Disclosure of Information

JVU employees who communicate with company stakeholders about financial and non-financial information in the course of their work are required to do so openly and in accordance with applicable laws and regulations.

Confidentiality

All JVU employees and the company's suppliers are required to protect confidential information (both on paper and digital), whether it is generally known or employees have been given explicit access to it.

Employees and suppliers are expected to follow and comply with the company's information security and confidentiality policies, guidelines and contracts.

Respect and Privacy

Acts against the privacy, family, home or correspondence of an employee, as well as attacks on his/her honor or reputation, are prohibited.


JVU takes the protection of its employees' personal information very seriously. In accordance with the data protection laws of the countries, the personal data of employees are processed only to the extent necessary for the employment relationship.

NATURE AND BIODIVERSITY ARE IMPORTANT TO US AND TO FUTURE GENERATIONS.

Environmental responsibility

JVU employees and the company's suppliers must comply with the laws and regulations of the country in which they operate regarding environmental protection and energy management.

Employees are expected to observe and comply with the company's guidelines and policies on natural resource conservation, energy consumption and waste management in the performance of their duties, while ensuring that suppliers and other business partners comply with environmental protection requirements.

	Guideline	R JVU 0001en	
	Code of Conduct	Revision./Index 04 11.01.2024	Blatt/von 4 / 4

IMPLEMENTATION OF A WHISTLEBLOWER SYSTEM

Safeguarding identity and protection from retaliation

JVU's business partners, employees and other stakeholders are required to report any suspected cases and violations of this Code of Conduct without delay.

We have established a whistleblower system for this purpose. Reports can be submitted by name or anonymously. The more information we are provided with, the better we can investigate the matter and take action. An open and transparent approach to the report often helps to solve the problem. However, this decision is the responsibility of the whistleblower. Without the whistleblower's consent to a transparent handling of the report, the identity of the whistleblower will be treated confidentially. JVU protects the whistleblower from disadvantages due to a submitted report.

Reports can be made to the Compliance Officer at JVU at compliance@jvu.de. We have also set up an independent external reporting office at Gesellschaft für Datenschutz und Informationssicherheit mbH, which you can contact by e-mail at move@gdi-mbh.eu or by telephone on +49 (0)2331 5983075.

Contact:
Jörg Vogelsang GmbH & Co. KG
Spannstiftstraße 2
58119 Hagen

E-Mail: compliance@jvu.de