

# Code of Conduct for Employees and partners



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# 1 Preamble

## 1.1 Entrepreneurship

Jaeger is a medium-sized family-owned company that focuses on component development, production and sales for the shoe & leather industry (SL IN), the automotive industry (A IN) and the construction industry (CON IN). Jaeger is a niche player with a strong focus on application consulting and customised developments.

We believe in our strengths as a family-owned company in terms of agility, flexibility and speed - i.e. quick decisions, short decision-making processes and effective and efficient implementation of the same - and we want to maintain this strength. Together with a high degree of financial independence, we achieve a sustainable safeguarding of the company's existence. The Jaeger Family Code of Conduct of the shareholders explicitly supports the basis of our aspirations and the values we live by and has a decisive influence on the content of this Code of Conduct for employees and partners.

### **Our vision:**

1. our solutions are in every building, every shoe/leather goods and every vehicle.
2. our solutions are ahead of the times.
3. we are the best supplier to our customers.

### **Our values:**

- Trust.
- Reliability.
- Ready 2/4 Change.
- Performance Driven.

These four values are non-negotiable for us. From these derive the principles by which we act, develop and live and work together with each other.

## 1.2 Scope of validity

Jaeger acts as a partner at eye level with the interested parties ("stakeholders"). Every employee, service provider, supplier, but also every customer, should be guided by fundamental ecological, ethical and social standards and align their actions

accordingly. For this reason, this Code of Conduct applies equally to all parties. What we expect from our partners (service providers and suppliers), we also demand from ourselves and our employees. In line with our claim Protect - Strengthen - Innovate, the Code of Conduct covers the most important aspects to protect employees, the environment and existing minorities, to strengthen business relationships and competitive advantages and to always be one step ahead with innovative ideas.

## 2 PROTECT

### 2.1 Safe working conditions

The safety of employees is the company's top priority. Compliance with health and safety guidelines and applicable laws should be ensured at all times and continuously monitored. Managers have a role model function in this regard and should ensure a health-promoting working environment.

### 2.2 Prohibition of child labour

The company never practices and does not tolerate child labour along the entire value chain. Young workers are not allowed to work overtime, under dangerous conditions or at night, in accordance with the applicable legal situation. They are not employed to perform inappropriate activities or to be exploited. In addition, ILO Conventions 138 and 182 are mandatory. Age is checked and documented before employment.

### 2.3 Protection against discrimination

The company undertakes to check its processes and courses of action for discrimination and to prevent it completely.

Any form of discrimination or harassment of persons based on age, gender, religion, belief, colour, nationality, ethnic or social origin, disability or sexual identity and orientation is unlawful and will not be tolerated. Non-discrimination in employment means that employees are selected only on the basis of their ability to do the job and that there is no discrimination, exclusion or preference on any other grounds. All employees are treated with respect and decency. Disciplinary action will also be taken against subliminal forms of discrimination.

### 2.4 Environmental protection

We understand corporate environmental protection to mean compliance with all environmentally relevant legal regulations and, in addition, the responsible use of resources of any kind. The proper disposal of waste or taking precautions to avoid

environmentally relevant incidents are a matter of course for us and are practised in all areas of the company.

## 2.5 Data security

The topic of data protection has a very high priority for the company. The personal rights and privacy of employees and business partners are fully respected when handling personal data. All company-related and personal data are protected against data misuse in accordance with the state of the art. Data is only used with the corresponding consent.

## 2.6 Anti-Corruption Policy

We do not tolerate any form of corruption, including extortion, fraud and bribery. Corruption harms the company as well as its employees and can lead to increased business and transaction costs, distorted competition and reduced economic growth. Jaeger adheres to the highest standards of moral and ethical conduct and operates in a fair, professional and law-abiding manner. Any attempt to corrupt or to be corrupted will result in disciplinary and, where appropriate, criminal consequences. Furthermore, we are committed to implementing the EU Directive 2019/1937 on the protection of persons reporting breaches of Union law and guarantee anonymous whistleblowing, as well as comprehensive protection of the whistleblower against possible consequences.

## 2.7 Preventing forced labour

Forced labour in any form is prohibited in the company itself as well as in all affiliated companies. Each employee shall be provided with an employment contract that is understandable in his or her own language and complies with the legal provisions, and which at least communicates the nature and scope of the employment relationship, as well as the conditions for its termination.

The company undertakes to ensure along the value chain that its own products or their raw materials have not been produced using forced labour.

# 3 STRENGTHEN

## 3.1 Fair Payment

Every employee should be paid a remuneration that covers at least all basic living requirements, depending on regional needs and standards, for regular working hours

and without bonus payments. In other words, fair remuneration should allow for an adequate standard of living.

### 3.2 Appreciation

Our dealings with partners and staff are characterised by appreciation, fairness and mutual respect. The diverse approaches and different ideas of all employees and partners are equally respected and perceived. The management constantly promotes this with respect, clarity in feedback and recognition of achievements.

### 3.3 Freedom of association

Every employee shall be permitted to form or join groups voluntarily, within the framework of the law, to protect and strengthen their interests and rights in a climate free from violence, pressure, fear or threats. All parties and persons, including employers, have the right to freedom of expression and opinion within the applicable legal framework. Freedom of association includes all activities to organise interest representation, agreements, collective bargaining, as well as the freedom to take action to protect their economic and social interests.

### 3.4 Delivery reliability

Trust and reliability are essential for a competitive supply chain. On-time deliveries are the foundation of the modern production chain. For this reason, we demand 100% adherence to delivery dates from ourselves and our suppliers, and open communication if schedule deviations are imminent.

### 3.5 Preventive health care

The condition of workplaces should go beyond the minimum level of safety and also protect employees from long-term damage. The company should actively promote the prevention of occupational diseases and contribute positively to the health of employees by offering preventive care.

### 3.6 Sustainability

We always try to act sustainably and set ourselves ambitious goals to minimise our impact on the environment. Reducing the use of resources such as energy, water and raw materials is an integral part of our strategy and anchored in our corporate policy. In addition, we give preference to the use of renewable energies and strive for climate neutrality in our business activities in the long term.

### 3.7 Fair competition

The company represents a fair competitive position both nationally and internationally. Acting in a legally compliant, professional manner ensures this basic attitude. Competition law is observed and the company responds to the wishes of its customers with a competitive, innovative range of products.

## 4 INNOVATE

### 4.1 Green products

The company is committed to implementing future developments and designing products with sustainable aspects in mind,

- whose manufacture uses as few hazardous substances as necessary;
- which are recyclable wherever possible;
- which are packaged in an environmentally friendly way;
- which leave a reduced carbon footprint.

### 4.2 New technologies

The company constantly strives for technological innovations, as these form the basis for the development and production of attractive products and services.

The company should continuously improve in order to thus achieve a high performance for the customers, but also for itself. In order to secure a good market position, we are always open to technological progress and thus want to lead the way as a pioneer.

### 4.3 Quality

We pursue a high standard of quality in our work, with regard to customer satisfaction and the objective of proactive error prevention. It must be ensured that all products, raw materials and services meet the agreed requirements and specifications and are in compliance with applicable laws and regulations.

Any quality or labelling discrepancies or changes in raw materials and/or manufacturing processes are communicated immediately.

### 4.4 Chances

The company is open to change and reflects its behaviour. We grow from our challenges because we see in them not only the risks, but precisely the opportunities that need to be seized. With the willingness to change, we try to emerge stronger from

every situation. The process of continuous improvement is an important tool for achieving our goals.

## 5 Declaration of consent

### 5.1 Complaints and whistle-blower directive

#### **Suppliers:**

Should you, as a supplier, discover violations of the contents of this document on your part, on the part of companies of the Jaeger Group or on the part of other parties involved, please contact [purchasing@jaeger-ttc.com](mailto:purchasing@jaeger-ttc.com) immediately.

#### **Employees and Interested Parties:**

If you, as an employee or as an interested party, discover any violations of the contents of this document in your company, in companies of the Jaeger Group or in other parties involved, please contact [complaints-JDE@jaeger-ttc.com](mailto:complaints-JDE@jaeger-ttc.com) immediately.

If you notice a violation of valid legal regulations, you can also contact various trusted persons anonymously via our whistleblower system.

#### **Whistleblower system:**

Our employees are the most important part of our company. In order to further improve the good cooperation within the company, Jaeger has implemented a whistleblower system. Our whistleblower system enables all our employees and interested parties to draw attention to potential and actual violations of the law. Whistleblowers can remain anonymous if they wish. The system functions like a virtual mailbox and thus offers the opportunity to report potentially illegal activities at any time of the day or night.

If you have any information about illegal behaviour, please pass it on as quickly as possible. In this way, you will help us protect the company from financial damage and preserve its integrity.

#### **What may be reported?**

First of all, the following areas are legally covered by the EU: public procurement, financial services, product safety, transport safety, environmental protection, food, public health, consumer and data protection go.



Germany has covered some additional areas in its implementation of the EU directive. These include, for example, all criminal law or violations that are subject to fines, insofar as they serve to protect life, limb or health or to protect the rights of employees or their representative bodies. In addition, all violations of federal and state legislation as well as directly applicable EU legal acts in a variety of different areas, such as: Anti-money laundering regulations, product safety requirements or requirements for the transport of dangerous goods.

### **How does the reporting process work?**

A whistleblower system is nothing more than a virtual mailbox. If you become aware of a violation, you can report it via the system. Whether you choose to remain anonymous and what information and details you wish to share is entirely up to you. As soon as you have submitted your report, it will be forwarded to the persons responsible within the company. Who belongs to the circle of responsible persons is determined in advance. The whistleblower must receive confirmation of receipt of his or her report no later than seven days after it is received. Feedback to the whistleblower must be provided within a maximum period of three months from the confirmation of receipt of the report.

[Jaeger whistleblower system](#)

## **5.2 Evaluation and control**

For suppliers of the Jaeger Group, the signing of the Code of Conduct has a significant impact on the supplier's rating and can be decisive for a downgrading in the supplier rating if the signing is refused. Violations of individual aspects of the Code of Conduct have an equally negative effect on the rating and must be remedied within an individually agreed period of time between the companies in contact.

The companies of the Jaeger Group reserve the right to independently monitor compliance with the prescribed standards.

With his signature, the business partner confirms his agreement with the contents of the Jaeger Code of Conduct and understands its compliance as a necessity for a long-term cooperation.

Date, Place \_\_\_\_\_

Position \_\_\_\_\_

Signature \_\_\_\_\_