

# Jungheinrich Group Code of Conduct



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# Introduction

## Dear colleagues

As a family business and one of the world's leading solutions providers for intralogistics, we pursue long-term goals which are geared towards profitable growth. Jungheinrich stands for innovative products and intelligent solutions, and has earned an excellent reputation worldwide.

Values-based actions is in our very DNA and is perceived by our employees as well as our customers, shareholders and the public as one of Jungheinrich's core strengths. To ensure our success in the long term, our actions must therefore always be responsible, ethical and legally compliant. Violations and misconduct by individuals at home and abroad—however minor they may be—can quickly lead to serious consequences and lasting reputational damage for the entire company.

The Jungheinrich Code of Conduct applies to all employees\*. The Code of Conduct is a set of obligatory guidelines for making the right decisions in everyday working life. It helps to identify possible risks and to prevent misdemeanours. It is the responsibility of each of us to familiarise ourselves with the content and to act accordingly. By promoting the responsible behaviour of all employees, we can ensure the further successful development of our company.

Jungheinrich AG  
The Board of Management



Dr. L. Brzoska



C. Erlach



Dr. V. Hues



S. Neuß

\* In the Code of Conduct, we occasionally refer to employees; this only serves to facilitate readability and includes all genders and all hierarchical levels at Jungheinrich.

# Compliance and sustainability

As a world leader in intralogistics, our company is responsible for our products, solutions and trade in Germany, Europe and the whole world. Our understanding of sustainability helps to establish a successful balance between social and ecological responsibility, coupled with profitable growth. For Jungheinrich, compliance with all applicable external and internal rules is particularly important. At the same time, economic, ecological and social issues remain a key focus for the company. We want to create lasting value with our innovations, while at the same time meeting the requirements of our stakeholders. In doing so, we rely on all of our employees to take responsibility for understanding the company values.

Thanks to a continuous dialogue with our stakeholders, the analysis and assessment of our business activities, as well as a continuous evaluation and improvement of our sustainability performance, we continue to make steady progress.

## **Our understanding of sustainability**

- ▶ is founded on the integrity and strict business ethics of our family business
- ▶ is demonstrated to employees through mutual respect and team spirit
- ▶ is a positive contribution to society resulting in the creation of good, secure jobs
- ▶ supports responsible business practices with our business partners in the value chain
- ▶ is based on innovative products and solutions that are future-proof and lasting
- ▶ requires the constant assessment of our sustainability performance

# Compliance organisation

## **Responsibilities**

For us, compliance means adhering to the rules that are imposed externally, either by law or otherwise, or the rules that we specify internally. This goal is inherent in our business and is actively practiced by all Jungheinrich employees in their respective areas of responsibility.

When it comes to prioritising the alignment of the necessary structures and elements, this is determined by the Board of Management. Our managers are thereafter responsible for the implementation and application. In addition, Employees without a management function must be made aware of the importance of compliance with the law and regulations. We raise awareness primarily through teaching and classroom events as well as through our CAMPUS learning platform.

The corresponding framework for our compliance management policy is detailed in our corporate guidelines. Further information is available to our employees on the Intranet and to our business partners on our website under the heading ‚Corporate Governance‘.

# Compliance organisation

## Reporting channels

All employees have the opportunity to clarify questions or doubts relating to compliance at an early stage. We have developed various internal communication channels for this purpose and the requestor decides which channel is most suitable.

Either the direct supervisor or the Local Compliance Officer of the organisational unit or the site can be contacted as required. The Compliance Officer of the ZR central Compliance department in Hamburg is also available:

**Mr Frank Jastrob,**

Tel. +49 40 6948-1630

Frank.Jastrob@jungheinrich.de

If an anonymous reporting channel is required or preferred, the Jungheinrich ZR **OpenLine telephone** and **portal** is the ideal solution.

Any questions or information shared with ZR are always treated as strictly confidential. Any persons who, with the best of intentions, can provide information are protected from possible adverse effects.

## Avoidance of conflicts of interest



Conflicts can arise when the borders between private and business interests become blurred. To avoid this, we make decisions in the workplace and when dealing with business partners based solely on objective criteria.

## Dealing with external business partners



For Jungheinrich, integrity is not only the basis for close cooperation within our company, but also for cooperation with our suppliers, customers and other business partners. Our basic principles have been defined in this Code of Conduct. On this basis, we seek cooperation with partners who follow the same principles.

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## Avoidance of bribery and corruption

Jungheinrich is subject to a number of local and international laws and regulations on corruption prevention as a result of its global business activities. Therefore, we do not tolerate any form of corruption in our business relationships with third parties. This applies to all levels of the company.

We give and receive gifts only if they are material assets with a low symbolic value. Any invitations given or received must not take place in the run-up to tenders and must be appropriate to the position of the recipient. The acceptance or gifting of cash or cash equivalents, such as vouchers, is prohibited. We also do not offer business partners any intangible benefits, such as free services.

Good conduct is important to us, especially when dealing with public officials. We therefore check whether our business contacts are public officials according to the respective legal system. We avoid any form of direct influence or indirect influence over business partners.

Jungheinrich wants to actively contribute to promoting social issues. One way of doing this is through donations and sponsorships. However, in accordance with our internal guidelines we must be transparent about the allocation of the funds and ensure the correct procedure for their release and accounting. We also do not support projects or organisations (political parties, politicians and organisations) with a political background.

## Antitrust requirements



It is in line with our business policy to promote fair competition for the benefit of our clients and to pursue our corporate goals in compliance with applicable competition and antitrust laws. We expect the same from our employees, suppliers and other business partners.

When selling Jungheinrich products of any kind, as well as during procurement and development, we compete with other companies. In all cases, we specify that agreements are not entered into or concerted practices undertaken with competitors that are intended to or have the effect of preventing or restricting competition. In particular, we do not communicate with competitors about prices and other terms, offers, tenders, sales quotas, market shares, production services and assignment of customers or territories.

We do not use association meetings, trade fairs and other industry meetings to exchange confidential and market-relevant company information with competitors' employees. In this way, we avoid any implication of antitrust infringement.

We also ensure that we do not misuse a dominant market position, even if this only occurs in some areas of our corporate activities, to the detriment of our customers and other business partners.

We are aware that violations of competition and antitrust laws not only damage the reputation of our Group, but can also result in high fines, penalties and claims for damages.

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## Antitrust requirements

The acquisition of other companies may only take place following submission to the relevant antitrust authorities and approval. Jungheinrich employees can find further details on antitrust compliance on the Jungheinrich Intranet site.

In all cases of doubt, the Legal department for the Jungheinrich Group must always be involved in a timely manner.

Jungheinrich is committed to keeping its environmental impact, energy consumption and associated CO<sub>2</sub> emissions as low as possible and to continuously reduce these levels based on defined key figures. We expect every employee at Jungheinrich to support us in our efforts. As well as encouraging the responsible behaviour of our employees, the focus is on compliance with all relevant and applicable legal provisions. The company can only continue to improve if everyone plays their part. For this reason, our employees must handle energy sources and waste with care.

The proper disposal of waste, in particular, can make a significant difference. Both hazardous and non-hazardous waste can be a valuable resource for recycling or even reuse. We want to keep the proportion of waste for disposal at a permanently low level in relation to material recycling and thermal recovery or to steadily reduce the quantity of waste.

In addition to the environmental impact, there are an increasing number of requirements in the Material Compliance sector. As a result of the responsibility the company has towards its products, Jungheinrich expects all employees to adhere to all relevant and applicable statutory requirements or other provisions relating to substance prohibitions and substance restrictions and to ensure the continuous implementation of these obligations.



### Data protection

We process large quantities of customer, employee and applicant data that is personal and therefore subject to data protection regulations. Jungheinrich respects the data privacy laws and the right of each individual to control his own personal data whilst adhering strictly to the laws for the protection and security of personal data.

By always handling data with care and following the prescribed security precautions, we ensure that the data is safe and, above all, that it is not misused or lost. In order to ensure this, we have corresponding guidelines as well as detailed work instructions and a Group-wide data protection management system in place.

We protect the data entrusted to us by our customers, suppliers, business partners, applicants and our employees by only using this data for its intended purpose and within the legal framework. Data may not be passed on to unauthorised persons, either internally or externally. We store our records and documents in accordance with the statutory provisions. In accordance with data protection laws, personal data will be deleted after expiry of specified deadlines where applicable. When we use a service provider to process our personal information, the provider will be assessed and bound to comply with the applicable requirements before the commencement of their contract with Jungheinrich.

Employees at Jungheinrich are regularly informed about their due diligence obligations and given appropriate training. In the event of questions and in cases of doubt, the Group Data Protection Officer and the Data Protection Coordinators for the respective department are available.

## Data protection and information security



We also ensure that customers, business partners, applicants and employees understand what personal data is being processed by documenting our data processing activities and communicating this information. Inquiries and objections will receive an appropriate and timely response.

### **Information security**

We provide a reasonable level of security when dealing with business information and digital assets and process confidential information only when required and permitted. We ensure that our employees are familiar with the relevant information security regulations and have the necessary knowledge and tools to fulfil their obligations.

Our managers take their information security responsibilities very seriously. They must encourage all employees to prevent unauthorised disclosure or misuse of information and digital assets, and to comply with information security regulations. In the event of security breaches, our managers are informed immediately who thereafter must inform the DPO.

We have also taken technical and organisational precautions throughout the Group based on a documented risk management strategy to protect information and digital assets.



## Confidentiality and non-disclosure obligation

All former and current employees have contributed to the intellectual property of our Group. This has resulted in a wealth of technical and organisational knowledge. Thanks to our expertise and innovative solutions, we are able to stay one step ahead of the competition. Therefore, this information must be safely guarded, particularly from our competitors.

As a result, our knowledge, including the Group's strategy, business model, technology, developments, products and plans, will be subject to a certain degree of confidentiality in order to retain this information to the level of detail necessary. We will not share this information with individuals outside the Group, especially with competitors' employees.

We aim to incorporate this approach throughout the company, as we are aware that any violation of the legal requirements can result in serious claims against infringers and in some cases can even lead to criminal liability.

## Human Resources compliance



### **Respect for human rights, prohibition of child labour and/or forced labour**

Junghenrich respects and supports compliance with internationally recognised human rights and does not tolerate forced labour, child labour or punishment, slavery or human trafficking. We comply with the minimum age for employment in accordance with the applicable national regulations. If there is no national legislation in place, we follow the internationally recognised standards of the United Nations. If a national regulation provides for stricter provisions, these shall take precedence.

### **Income and benefits**

We pay wages and benefits that do not fall below the minimum legal or industry standards.

### **Working hours**

We ensure compliance with national laws and regulations or industry standards regarding working hours, breaks and holidays. This also applies to those employees who due to their role do not have a permanent position at one of our sites, for example service technicians.

### **Prohibition of abuse and harassment**

We treat all employees with dignity and respect. Any kind of physical, mental, sexual or verbal abuse, harassment or physical or mental coercion will not be tolerated.



### **Equal opportunities**

We respect the principles of equal opportunity in the selection and promotion of our employees. Any discrimination based on age, physical or mental restriction, ethnic origin, external appearance, skin colour, gender, pregnancy, sexual orientation, nationality, religion, marital status or other characteristics of employees is prohibited.

### **Protecting the health and safety of workers**

We ensure compliance with applicable health and safety laws, rules and regulations, and ensure safe and healthy working conditions for our employees. In addition, we support the continuous development of occupational health and safety measures and systems.

### **Collective rights**

We respect the right to freedom of contract and collective bargaining in accordance with applicable laws and regulations. A trusting and close relationship with the employee representatives is an important aspect of our business conduct. Mutual trust and cooperation is based on an open and constructive dialogue and respect from both parties.

## Financial compliance



Our financial figures are a reflection of our business. Financially sound and reliable figures form the basis of our decisions and thereby determine our future activities.

The accuracy of this information is a valuable asset. We are committed to providing accounting and reporting systems that internal and external partners can always rely on.

All of the applicable legal requirements and our internal values define the scope of our activities. This includes laws relating to tax and money laundering. As a trusted partner, we strive to fulfil this requirement and contribute to the long-term success of our company.



## Capital market compliance (inside information, ad-hoc publicity, statements on current business figures)

### Insider information

In the interests of fair trading of securities, we treat insider information in accordance with capital market regulations.

Insider information is internal company information, i.e. confidential information that is capable of significantly influencing Jungheinrich's share price if the information is made public. Examples include unexpected changes in key performance indicators (revenue, earnings), the acquisition of other large companies, or unexpected changes to management positions within the company (Chairman of the Board of Management or Supervisory Board).

Any insider or employee who is to be made aware of insider information must receive a relevant briefing from his/her superior. We treat such information with absolute confidentiality and do not make it accessible to colleagues or third parties. The only exception is when a superior asks us to pass on the information to a colleague who also requires the insider information to perform his duties in a specific instance. In this situation, we observe an internal procedure agreed with the Legal department of the Jungheinrich Group.

Insiders are not permitted to use their insider knowledge for the (private) purchase or sale of Jungheinrich shares. We also make no recommendations to third parties.

All questions on these topics should be directed to the Legal department of the Jungheinrich Group.

## Capital market compliance (inside information, ad-hoc publicity, statements on current business figures)



### **Ad-hoc publicity and statements on current business figures**

Jungheinrich AG is listed on the Frankfurt Stock Exchange where the company's preferred shares are traded. Therefore the company is subject to a number of capital market regulations. We are aware that failure to comply with these regulations or violation of these regulations could significantly damage the reputation of the company and could cause investors to lose confidence in Jungheinrich shares and, in turn, the Company as a whole.

Information on the unpublished business figures or on the financial position of the Jungheinrich Group and its subsidiaries is particularly sensitive. Such information may be subject to special reporting obligations under capital markets law. In addition, there is a risk that contradictory statements from different areas of the Group may lead to misunderstandings with third parties.

That is why we treat all business figures with the utmost confidentiality, unless they have already been published by the Executive Board (quarterly reports, semi-annual report, press conference). We will therefore make no statements about the net assets, financial position and profitability of the Jungheinrich Group or its units. We leave the communication of such figures solely in the hands of the Board of Management, the Corporate Communications department or Investor Relations of Jungheinrich AG, as well as to designated persons appointed by the Board of Management.

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