CODE OF CONDUCT
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PREAMBLE

Dear JustOn customers, partners and employees,

At JustOn, we live and work on the base of core values: to reliably deliver innovative products, to treat each other with trust, sincerity and authenticity, to find agile and simple solutions. Our products give people time – time that they can invest in good and useful projects. Our vision is to make the world a little better this way.

Our Code of Conduct follows internationally recognised standards for the protection of human and labour rights, as described in the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Fundamental Conventions of the International Labour Organization (ILO) and the Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises.

Furthermore, the Code considers the existing agreements on environmental protection. Based on our core values, the Code sets out guiding principles that help us to make the right decisions and to take the appropriate action in any situation.

With this Code of Conduct we want to help to enforce and improve human rights, labour and social standards as well as environmental guidelines. We therefore ask each of our customers, partners and employees to make the Code of Conduct the basis of their business relationship with JustOn.

Marko Fliege, CEO JustOn, und Dr. Sten Grimmer, COO JustOn
APPRECIATION, LOYALTY AND DIVERSITY

We offer our employees fair, legal and ethically correct working conditions. We promote diversity in the company and care for the well-being of the team. On the one hand, we cultivate an appreciative and loyal atmosphere and, on the other hand, we pay attention to safety and health in the working environment. This includes complying with the applicable industrial safety regulations and informing employees about them.

We do not discriminate against anyone because of gender, age, ethnic origin, social status, nationality, sexual orientation, disability or other characteristics. Furthermore, we do not tolerate any form of harassment.

The position and remuneration of our employees is based on their skills and performance.

We protect the observance of fundamental human rights and do not participate in human rights violations.

BUSINESS INTEGRITY

We conduct our business in accordance with German law and respect the laws of all countries with whose companies we maintain business relations.

We are committed to the principles of the social market economy and protect fair competition by avoiding any conduct that violates the German Competition Act (Gesetz gegen Wettbewerbsbeschränkungen). This means we follow the current standard by working with competitors:

• not sharing information on costs and prices
• not entering into any arrangements or agreements, and
• not allocating markets or customers.

We reject all forms of corruption and bribery. The success of our company is based on developing and offering high-quality products and services. Our business activities are characterised by transparency when dealing with customers, partners and public authorities. In this way, it complies with the applicable anti-corruption, extortion and bribery regulations.
RELIABLE AND TRUSTWORTHY BUSINESS PARTNER

JustOn is a fair, professional and reliable business partner. Our products, services and prices correspond to the publicly announced information. We do not discriminate against any of our customers or partners, especially when they are in competition with each other.

Accordingly, we expect our customers and partners to behave in an appreciative and responsible manner that complies with the rules of our Code of Conduct.

DATA PROTECTION

JustOn is committed to protecting the security of personal data of our customers, partners and employees. We respect the privacy of the provided information and use it solely in accordance with the applicable data protection laws, in particular with the EU General Data Protection Regulation and the German Bundesdatenschutzgesetz (BDSG, federal data protection act), as well privacy statement on our website. Personal data means any information that can identify a person, such as names, addresses, user names, e-mail addresses or telephone numbers.

In general, we collect and use all personal data only to the extent necessary to provide the functions and services we offer. Our privacy statement provides information on the type, scope and purpose of the personal data that we collect and use. We protect this data from access by unauthorized persons.

JustOn has appointed an external data protection officer in writing. He can be reached by e-mail: datenschutz@juston.com.

CORRECT ACCOUNTING AND BOOKEEPING

Our invoice data, accounting records and information correspond to factual circumstances.

We act in accordance with applicable laws and comply with the generally accepted accounting principles and the generally accepted principles of proper accounting when using information technology. In Germany, the relevant administrative regulations of the Federal Ministry of Finance include the Grundsätze ordnungsmäßiger Buchführung (GoB) and the Grundsätze zur ordnungsmäßigen Führung und Aufbewahrung von Büchern, Aufzeichnungen und Unterlagen in elektronischer Form sowie zum Datenzugriff (GoBD).
We refuse to participate in transactions that violate money laundering laws. In addition, we explicitly reject payments that could serve to finance terrorism or other criminal intentions.

**SOCIAL RESPONSIBILITY**

We contribute to society and take social responsibility. On the one hand, we maintain existing jobs at JustOn and create new ones, and on the other hand we support social, ecological and other charitable projects.

JustOn follows the principles of sustainability and is committed to environmental protection wherever possible. We are careful in the use of existing resources. When travelling we take eco-friendly transportation, and when purchasing working materials and equipment we prefer sustainable and equitably made products.