



# Code of Conduct

JANOSCHKA GROUP

# FOREWORD

Dear Colleagues and Partners,

The success of Janoschka is built on the trust of customers, suppliers and business partners. We can create and maintain this confidence by acting in an honest, legally and ethically correct way. The relationships among our employees, and with our business partners, are defined by mutual respect and trust.

Our goal is to maintain a competitive position through successful and sustainable business activities. Our company's success also depends on our compliance with laws, regulations, ethical principles and the commitment to these values by each of us.

This Code of Conduct is our reliable orientation guide for daily work life.

By committing to this Code of Conduct each Janoschka employee contributes to the long-term success of the company.

Thank you for your support.

Board of Directors  
Janoschka AG



**Alexander Janoschka**  
Chief Executive Officer; Janoschka AG



**Drazen Babic**  
Chief Financial Officer; Janoschka AG

# SINCE 1976

Janoschka is a global market leader for prepress solutions for the FMCG packaging industry (food/non-food).

With over four decades of expertise and experience in prepress, Janoschka supports brand owners, printers and converters in their packaging projects.

The second-generation family owned business, which was formed in 1976, has its headquarters in southern Germany and is represented globally through >1,700 employees at 28 subsidiaries in 15 countries today in Europe, South and Central America and South-East Asia.

The global network is characterised by exchange of capacities, common production specifications and a high and standardized quality level.



# VISION, MISSION, VALUES

Based on our **VALUES**,  
we live our **MISSION**,  
to strive for our **VISION**.

## VISION

We are the most  
customer-oriented  
company in the industry.



## MISSION

We deliver solutions.



## VALUES

We are reliable.  
We are agile.  
We are communicative.



# YOUR TEAMPRENEUR

## People take center stage.

Personal relationships with customers and close cooperation with highly qualified employees have been the hallmark of Janoschka's success for decades.

Each Janoschka employee sees him/herself as a fully integrated part of the (customer) team. Internally and externally. We understand the individual needs of our customers and of the market. By taking customer orientation to the next level of team orientation, we develop solutions and implement them together with our customers and partners.



We place great value on entrepreneurial freedom, and we trust our employees to use this freedom responsibly.

Janoschka. your teampreneur

Perfectly combining the good ideas of individuals with the strength of a team. We place great value on entrepreneurial freedom, and we trust our employees to use this freedom responsibly.

# 1. BASICS

## 1.1 Fair Conduct

Every individual shall be treated fairly, respectfully and with dignity. We are committed to diversity, inclusion, and equal opportunities and encourage a respectful and tolerant workplace in which everyone's unique value is recognized. Sexual harassment, discrimination, racism, abuse of power, intimidation, threats, or any other form of harassment are not tolerated.

OHCHR - guiding principles on business and human rights

## 1.2 Speak-Up

We encourage critical and imaginative thinking and value an open work environment where employees can approach their supervisors or senior management to raise issues or voice criticism without any concerns.

We encourage our employees to speak up freely and without fear.

We do not allow discrimination on the basis of race, national or ethnic origin, gender, sexual orientation, pregnancy, marital or parental status, age, disability, religion or belief, or any other characteristic specified under applicable anti-discrimination law.

## Zero Tolerance

If you've been subject to any kind of racial or sexual abuse, we encourage you to contact the HR department or the management immediately.

Managers encourage open dialogue, support their employees and address their concerns in a fair manner. Our management acts responsibly and appreciative.

All employees are role models for behaviour of integrity.

# 1. BASICS

## 1.3 Compliance with the law

Compliance with all applicable laws and regulations is critically important to the success of our companies worldwide. Any violation of laws or regulations can have severe consequences for both the company and its employees, such as criminal convictions, disciplinary actions, fines, and reputational damage.

We comply with all applicable local, national and international laws and regulations wherever we do business.

## 1.4 Conflict of Interest

A conflict of interest can make it difficult to make impartial decisions that are in the best interest of the company.

Managers (employees with budget or personnel responsibilities) in particular must be familiar with the fundamental laws, regulations, and corporate policies that are relevant to their areas of responsibility. In specific countries, industries, or markets, as well as with specific business partners, stricter rules than those described in this Code of Conduct may exist. In such cases, employees shall apply the stricter standard.

Employees with a potential or actual conflict of interest must quickly disclose it to their supervisor or their company's senior management for prompt resolution.

We disclose potential or actual conflicts of interest and resolve them immediately.

# 1. BASICS

## 1.5 Protection of company assets

We treat company assets of all kinds, such as products, work materials, IT equipment, or intellectual property, carefully and responsibly.

Company assets are used for their intended business purposes and not for unreasonable or improper personal purposes.

Every form of fraud, theft or misappropriation is prohibited, regardless of whether company assets or third-party assets are affected.

We treat company property and other company assets responsibly.

## 1.6 Financial Integrity

All transactions and records relating to our business must be maintained accurately and properly. All transactions, assets and liabilities must be properly documented.

Financial accounts, documents, contracts, and other company information may not knowingly include incorrect or misleading entries.

We conduct our business and financial reporting properly and with transparency.

We comply with tax regulations and fulfill our tax obligations.



# 2. CORPORATE RESPONSIBILITY

## 2.1 Human Rights

We respect the human rights, individual rights, and the dignity of employees and all third parties.

We uphold both the right to freedom of association and the right to engage in collective bargaining in accordance with applicable laws and regulations.

Forced or child labor, all forms of modern slavery and human trafficking, and any form of exploitation are prohibited at Janoschka, and we strictly comply with applicable laws.

OHCHR - guiding principles on business and human rights

## 2.2 Working Conditions

We comply with regulations that ensure fair working conditions, including those regulating compensation, working hours, and privacy.

Ensuring fair working conditions and a safe and healthy workplace is an integral part of our corporate culture.

We comply with all applicable health and safety laws and standards and provide a healthy and safe workplace for our employees.

## 2.3 Education

We consider the education of our people as a social duty. By offering all staff access to education and training we enable them to grow and to develop within their working environment.

We continuously support local institutions as well as market associations and universities in various manners with our prepress know-how.

# 2. CORPORATE RESPONSIBILITY

## 2.4 Environment

We comply with all applicable environmental regulations and with our internal environmental guidelines, for example regarding climate protection.

We strive to increase our resource and energy efficiency in the production and distribution of our products and services, to minimize negative impacts on the environment.

Protecting the environment is an essential part of our corporate responsibility.



For further details see our Sustainability Report.

# 3. BUSINESS PARTNER

## 3.1 Dealing with Business Partners

We carefully check the identity and integrity of potential business partners (due diligence). If in this process, or later in the course of collaboration, we find that the business partner engages in inappropriate or illegal business practices, we reserve the right to immediately end the partnership.

## 3.2 Money Laundering

We comply with our obligations regarding the prevention of money laundering and minimize general money laundering risk by conducting adequate due diligence of third parties.

## 3.4 Anti-Corruption & Anti-Bribery

It is our obligation to maintain the highest standards of integrity in all business interactions worldwide. Any form of corruption or bribery are strictly prohibited.

Our internal Compliance Manual is binding for the entire workforce.

We make fair and independent procurement decisions based on objective criteria such as quality, price, service, reliability, availability, technical performance, contract fulfillment, resource and energy efficiency, and environmental impact.

## 3.3 Fair Competition

We are committed to the principle of fair competition. We comply with applicable antitrust and competition laws.

We condemn all forms of corruption and bribery.

Unless informed and approved by the management beforehand, Janoschka employees may not accept any offer, promise or provision of a favor, gift, invitation or any other form of favorable treatment.

# 4. CONTENT & INFORMATION

## 4.1 Intellectual Property

Protected intellectual property includes any products of the human mind irrespective of their commercial value. This includes, but is not limited to, literary and journalistic works, music, films, TV programs, visual works, and software and its components. Intellectual property is protected under relevant laws (copyright, trademark, or patent rights) or as a trade secret.

Intellectual property infringement includes, but is not limited to, the display, distribution, or performance of copyrighted material without permission and the unauthorized creation and distribution of copies of protected intellectual property.

We respect and protect all forms of intellectual property.

## 4.2 Data Privacy

When we collect, retain, process, or transmit personal data (such as names, addresses, phone numbers, or any person related information) relating to employees, customers, or other third parties, we do so with great care and strict confidentiality and in compliance with applicable law and policy.

We process personal data and information in compliance with applicable law and policy.

## 4.3 Confidentiality

Confidential information is non-public information that is intended for specific recipients only, not for internal spread or external release. In particular, employees with access to especially sensitive information must observe strict confidentiality, even with colleagues.

We protect confidential information from unauthorized disclosure and use.

# OUR COMMITMENT

Every Janoschka employee must understand and comply with this Code of Conduct. Non-compliance damages the reputation of our organisation and the trust of our business partners.

For questions or to report violences of the Code of Conduct you can contact your supervisor, local management, Country Compliance Officer, HR department.

On corporate level feel free to address:



**Sabine Joachims**

Global Compliance Officer  
+49 7825 849 243



**Lutz Braune**

Global Compliance Officer Sales  
+49 173 9989305

Or choose to use the anonymous Compliance Reporting Channel.

# THE COMMITMENT OF OUR PARTNERS

By providing services to Janoschka, each supplier or business partner agrees with the values and provisions set in this Code of Conduct.



**"WE EXPECT OUR SUPPLIERS  
AND BUSINESS PARTNERS TO  
SHARE AND COMMIT TO THE  
VALUES AND PROVISIONS SET  
IN THIS CODE OF CONDUCT  
AND TO OBEY THE LAW."**

The Executive Management



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