



**DOING THE RIGHT THING.**

Code of Conduct for the ZEISS Group

[zeiss.com/compliance](https://zeiss.com/compliance)



Seeing beyond

”

Not only what we do, but also the “how” is of great importance – for each of us and the reputation of our company. We do the right thing! [#teamZEISS](#)



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Internalize and live our  
Code of Conduct.  
We set a good example!

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**Management Board  
of the ZEISS Group**



Andreas Pecher

Dr. Markus Weber

Stefan Müller

Dr. Karl Lamprecht

Susan-Stefanie Breitkopf

Sven Hermann

Dr. Jochen Peter

# Dear employees, Dear business partners,

## **We thank you for deciding to do the right thing every day**

ZEISS is a company dedicated to delivering optimum performance and meeting the highest demands, not only with our technology, but also in our Compliance with the “rules” of good and fair behavior in competition and when dealing with one another. As a Management Board team, we attach great importance to a corporate culture in which we treat our employees, customers, and business partners with honesty in our dealings and courtesy and respect in our cooperation.

It is our firm conviction that sustainable economic success is inextricably linked to Compliance with laws and internal rules. The ZEISS Code of Conduct creates a common understanding of what “doing the right thing” means to us. It is our guideline for responsible business conduct.

In most cases, we at ZEISS already make the right decisions intuitively. Every now and then, however, we may find ourselves in situations where the “right decision” cannot be completely clearly distinguished from a “wrong decision”. Inadvertently or even deliberately taking the wrong path can have far-reaching negative consequences for our company and for you personally, result in high fines and cause lasting damage to the reputation of ZEISS.

Therefore, an important appeal to you: Use the ZEISS Code of Conduct and, if in doubt, better ask once too often than not often enough! If you have any questions about Compliance-related topics, you can contact your supervisor or our Compliance organization in confidence.

We all at ZEISS must always act responsibly, with no exceptions, and must adhere to mandatory legal and operational requirements.

As a Management Board team, we thank you for deciding to do the right thing every day.

## **Management Board of the ZEISS Group**

Dr. Karl Lamprecht | Susan-Stefanie Breitkopf | Sven Hermann  
Stefan Müller | Andreas Pecher | Dr. Jochen Peter | Dr. Markus Weber

# About the ZEISS Code of Conduct

**Everyone at ZEISS must know the rules and act accordingly**



Employees can find **practical examples** of topics from the ZEISS Code of Conduct [here](#).

Our Code of Conduct applies to all employees and supervisors at ZEISS. Supervisors have an important role model function in this: they set a good example and promote our Compliance culture.

Everyone at ZEISS must comply with laws and internal rules. We also encourage our business partners to make sustained efforts to comply with applicable laws and regulations, including, for example, data protection, human and environmental rights, and our approach to energy-efficient behavior.

The Code of Conduct does not intend to explicitly reference all legal regulations which apply to our business conduct. Instead, it explicitly addresses those subject areas which are essential for the sustained success of ZEISS. Accordingly, all employees are expected to comply with laws and internal rules even in those cases that are not explicitly listed in this Code of Conduct.

This Code of Conduct fully complies with the requirements of the “Responsible Business Alliance Code of Conduct” (RBA). In addition, ZEISS supports the “UN Guiding Principles on Business and Human Rights” (UNGP) in Business and the rights set out in the “International Bill of Human Rights”. The “core labour standards of the International Labour Organization” (ILO) are also of particular importance to ZEISS.

## **When in doubt, ask for advice and point out possible Compliance violations**

Laws and internal policies can be complex, are subject to change and often vary from country to country. For this reason, the Compliance organization at ZEISS offers a global network of contact persons who provide comprehensive advice and information.

All employees are requested to report violations of laws and internal rules. This also applies if violations have

been committed by business partners in connection with their activities for ZEISS.

## **Consequences of non-compliance with the Code of Conduct**

Our Code of Conduct forms the basis of our actions and is non-negotiable. Violations of the law and internal policies can lead to significant damage for the company (e.g., in the form of fines or through loss of reputation) and may result in criminal or labor law consequences for affected employees.





We are not alone and can seek advice at any time.

We behave fairly, respectfully, and communicate transparently.

We are law-abiding and adhere to the Code of Conduct without exceptions.

# **DOING THE RIGHT THING.**

We support each other in doing the right thing.

We address misconduct openly and report violations immediately.

For us, doing the right thing means that all employees at ZEISS are responsible for aligning their actions with applicable laws and internal rules.

# The right behavior: Our principles

## In this chapter:

- » Fair behavior
- » Environmental and climate protection, energy efficiency, sustainability
- » Product safety and quality



I am proud to be part of #teamZEISS. There are many reasons for this – it is particularly important to me that we treat each other with respect and fairness.

Treating colleagues as well as customers, suppliers and other business partners in an unbiased, polite and appreciative manner must be the linchpin of our corporate culture.

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**Lazgin Sis**

Representative for persons with disabilities,  
Carl Zeiss AG (Oberkochen, Germany)



# Fair behavior

## **We promote fair working conditions and expect reliable and respectful behavior from our employees and business partners**

Our employees and business partners (customers, sales partners, and suppliers) are the focus of our activities. Respective relationships shall be marked by mutual appreciation and reliability.

We expect honesty in our actions as well as courtesy, respect, and fairness in our dealings with each other.

We offer fair working conditions and comply with the statutory provisions for the protection of employees as well as collective or company agreements and contractually stipulated regulations (e.g., on remuneration, working hours, free choice of employment and freedom of association).

We respect human rights

We reject any form of child or forced labor, slavery or human trafficking and we support an appropriate living minimum wage. Humane treatment in the workplace is a foundational principle of ZEISS.

We create an appreciative corporate culture

We prohibit any kind of discrimination in our organization based on ethnic or social origin, nationality, skin color, gender or gender identity, sexual orientation, marital status, age, religion, world view, political, social or trade union affiliation or other characteristics protected by law. In addition, we do not tolerate any behavior that qualifies as harassment or bullying.

### **This is what we expect from you:**

- » Conduct yourself in a courteous, respectful, and fair manner when interacting with each other.
- » Do not discriminate against anyone for any reason.
- » When possible, speak directly with people who may not be aware of the impact of their actions.
- » Respect cultural differences.
- » Make and communicate decisions transparently and comprehensibly.

### **The aspiration of ZEISS:**

- » We stand up for fair working conditions and human rights, in our company and among our business partners.
- » We respect human rights by, among other things, neither committing nor contributing to slavery or other forms of oppression, forced labor or human trafficking.

More information:

- » [ZEISS group policy statement on respecting and promoting human rights](#)





# Environmental and climate protection, energy efficiency, sustainability

## We are committed to environmental and climate protection and the economical use of resources

Compliance with high environmental standards was already a corporate objective in the statutes of the Carl Zeiss Foundation. The careful use of resources (including energy and water), continuous improvement of environmental performance and ongoing improvement of energy efficiency are central factors in our business activities.

**What is important to us and how do we implement it:** In our business activities, we strive for CO<sub>2</sub> neutrality (Scope 1 and 2 emissions\*). Our approach: avoid, reduce, and offset.

Careful handling of the environment, economical use of resources, regulated recycling and disposal are important components of our corporate philosophy – this claim also applies to our business activities and our products.

These principles play an important role throughout the entire product life cycle – e.g., in development,

production, packaging, shipping, use by customers, recycling and disposal.

In addition, we also take environmental issues, energy efficiency and water consumption into account when planning building facilities and products.

Maximum efficiency in the use of resources, taking into account economic feasibility, and Compliance with applicable relevant laws and regulations are important to us.

We want to avoid or minimize negative impacts on the environment as well as on the reputation of ZEISS.

More information:

- » [Company policies about environmental protection](#)
- » [Company policies about energy management](#)

\* Scope 1 emissions: CO<sub>2</sub> emissions from direct combustion of fossil fuels (e.g., gas, heating oil). Scope 2 emissions: CO<sub>2</sub> emissions from indirect energy purchases (e.g., electricity, district heating) which in turn are generated from the direct combustion of fossil fuels (e.g., gas, heating oil, coal).

### This is what we expect from you:

- » Use resources (water, materials, electricity, etc.) economically and carefully.
- » Recycle and dispose of waste in accordance with regulations and in an environmentally sound manner.
- » Implement environmental protection and energy efficiency measures relevant to your work area while maintaining cost effectiveness.
- » Report potential environmental risks to internal contact persons to prevent environmental damage.
- » Immediately notify internal contact persons if environmental damage has occurred.
- » Inform our suppliers that environmental protection and energy efficiency are part of our selection and evaluation criteria.

### The aspiration of ZEISS:

- » We create sustainable products and value chains.
- » We introduce closed water cycles as far as technically possible.
- » We minimize environmental impacts on water bodies.
- » We support the procurement of energy from renewable sources and the use of energy-efficient equipment, products, and services.
- » We operate an environmental and energy management system and continue to develop it.
- » We ensure the availability of the necessary resources and data to achieve the defined environmental and energy targets.
- » We comply with the relevant laws and regulations on the environment, climate, energy, and sustainability.

# Product safety and quality

## **We are fully committed to the safety, quality, and optimal performance of our products**

Our products, solutions and services must be safe and meet the required quality and performance to deliver effective, reliable, accurate, and optimal results according to their intended use.

We support the success of our customers and business partners through innovation, reliability and user-friendliness and promote sustainable business relationships and solutions.

Product safety begins in the initial development phase, accompanies the procurement and production process, and is an essential aspect of the installation of our products at customer sites and during service.

A large number of legal requirements for the development, production, approval and sale of our products serve to ensure product safety. ZEISS products must not endanger the safety and health of consumers or users under any circumstances and must comply with the applicable regulatory requirements and quality specifications.

We are committed to complying with the requirements and maintaining the effectiveness of our quality management system. This is how we avoid defective products that can harm not only the company (e.g., reputation), but more importantly users, patients, consumers, or others.

### **This is what we expect from you:**

- » Be guided by the rules relevant to your job.
- » Help ensure that our products, solutions, and services deliver optimal performance and meet the highest standards.

### **The aspiration of ZEISS:**

- » We comply with the applicable standards, regulations, and customer requirements and ensure these are incorporated in internal specifications.
- » We implement business-specific quality management systems, maintain them, and continuously improve them where possible.
- » We define relevant quality targets and review them regularly.
- » We inform our customers and stakeholders and take corrective action when we become aware of hazards posed by our products (e.g., through market observation or consideration of regulatory reporting on product safety).

More information:

- » [Corporate Management Manual](#)

**In this chapter:**

- » Competition and antitrust law
- » Avoiding conflicts of interest, secondary activities
- » Fighting corruption
- » Adherence to export controls and customs regulations
- » Correct bookkeeping and accounting, anti-money laundering

# The right behavior in business activities



My team and I ensure transparency – we always inform our customers and business partners openly and honestly about the price, performance, and quality of our products, among other things.

By advertising correctly, ZEISS will remain a trustworthy business partner in the future.



**Adela Chen**

Marketing Communication Supervisor,  
Carl Zeiss (Shanghai) Co., Ltd; China



# Competition and antitrust law

## **We respect the principles and rules of fair competition and do not tolerate anti-competitive behavior**

Regulations protecting fair competition are an essential component to the free market economy. To this end, there are laws worldwide that prohibit actions such as:

- » Collusion and exchange of information between competitors on prices, territory allocation, product quantities or other parameters relevant to competition
- » Price fixing by sales partners
- » Abuse of a dominant position

We avoid giving any appearance of concerted behavior

The examples of prohibited activities listed here include informal discussions, informal understandings or coordinated conduct, as all of these are measures restricting competition.

We conduct legally compliant marketing

It is prohibited to gain competitive advantages through unfair marketing activities. Advertising statements about products and services must be truthful, accurate and not misleading.

### **This is what we expect from you:**

- » Refrain from any collusion or exchange of information with competitors on competition-determining factors (e.g., price, conditions, production quantities, sales territory, customer allocation).
- » Do not attempt to influence the pricing or other terms and conditions of sale of our distributors – either by threatening disadvantages or by promising benefits.
- » Do not interfere with bidding processes, e.g., do not match bids with competitors and do not ask bidding entities to provide you with non-public information.
- » Do not exploit dominant positions (e.g., by boycotting deliveries).
- » Do not make untrue or misleading advertising claims.

More information:

- » [Company policies on conduct in competition](#)





# Avoiding conflicts of interest, secondary activities

**We make our decisions exclusively based on objective criteria and do not allow ourselves to be influenced by personal interests**

In everyday business, situations may arise in which personal interests or private relationships conflict with the interests of ZEISS. Conflicts may arise, for example, from the employee's own entrepreneurial (sideline) activities or, under certain circumstances, from those of family members or friends.

Make such conflicts of interest transparent and leave the relevant decisions to your supervisor or colleagues.

We communicate possible conflicts and secondary activities openly and transparently

ZEISS generally supports the socio-political or social commitment of its employees. However, activities in associations, parties or other social, political or societal institutions, whether as a mandate holder or in an honorary office, must be compatible with the fulfillment of the duties under the employment contract.

The supervisor or Human Resources department must be informed about any additional (entrepreneurial) sideline activities, honorary offices or similar activities. Approval may need to be obtained for them.

## This is what we expect from you:

- » Disclose any potential or actual conflicts of interest to your manager or Human Resources.
- » Hand over decisions where you may have a conflict of interest to your supervisor or colleagues.
- » Do not cause related parties (e.g., family members, partners, friends) to perform activities for you that you may not perform yourself due to a conflict of interest.
- » Inform your supervisor and obtain approval from the Human Resources Department before you begin any outside employment (e.g., work for another company, own entrepreneurial activity).
- » Inform your supervisor before accepting an honorary position (e.g., as a juror, on the local council or as an exercise instructor).

More information:

- » [Company policies for dealing with conflicts of interest](#)

# Fighting corruption

## We do not tolerate corrupt behavior by our employees or business partners

We strive to be successful within the framework of fair competition. In doing so, we convince through price, performance, and the quality of our products and services and not because business partners are influenced by corrupt actions. That would harm competition and is therefore prohibited.

Corrupt behavior means abusing one's decision-making authority in a professional environment for one's own private benefit or for the benefit of a third party, e.g., by demanding, accepting, offering, or granting personal benefits or benefits to third parties in return for the award of a contract.

We do not bribe and we do not take bribes

Both the person who grants or holds out the prospect of such an advantage and the person who demands or receives it may be liable to prosecution. Such an advantage is any kind of benefit such as monetary payments (e.g., donations), non-cash benefits (e.g., vouchers, invitations, inadmissible discounts) or gifts in kind but can also be services or favors (e.g., internship for daughter).

We always act with the utmost restraint when it comes to invitations and gifts

Not every granting or acceptance of invitations or gifts is corruption. Socially customary benefits that are not made with the purpose of unlawful favoritism (e.g., in connection with the awarding of contracts) may be permissible. But the appearance of improper influence can quickly arise. Therefore, general restraint is required when accepting or granting invitations and gifts, especially in the case of public officials (e.g., representatives of authorities and employees of state organizations) or employees from the medical sector (e.g., doctors and pharmacists).

More information: [Company policies on gifts and invitations](#)

In many countries, invitations and gifts to these groups of people are completely prohibited. Therefore, in these cases, no benefits of any kind are permitted. Exceptions to this may be reasonable hospitality in connection with product presentations or training events, insofar as these have been approved internally in advance.

## This is what we expect from you:

- » Don't make business decisions based on whether you receive a personal benefit.
- » Do not attempt to influence business decisions in favor of ZEISS by granting or promising personal benefits to decision-makers of business partners.
- » Reject bribery attempts and report them immediately to your supervisor or Compliance Officer.
- » Be extremely cautious about invitations and gifts. Keep the benchmark of **€50** (or the equivalent value in local currency) as a guideline value in individual cases.
- » Only accept invitations or gifts of a higher value in exceptional cases that cannot be refused for cultural reasons. Make this internally transparent and make them available e.g., for social purposes or an internal raffle.
- » Only grant invitations or gifts of a higher value in justified exceptional cases and after first checking their permissibility under local law.
- » Do not grant invitations or gifts to public officials or employees of any government agency or the medical sector.

# Adherence to export controls and customs regulations

## **We comply with all applicable export control and customs regulations**

ZEISS is a globally active company that must comply with any regulations restricting the free movement of goods in its worldwide business activities.

Various national and international laws and embargoes restrict or prohibit the import, export or domestic trade of certain goods, technologies, or services, as well as capital and payment transactions.

The restrictions and prohibitions may result from the nature of the goods, the country of origin or use or due to the business partners themselves.

Every ZEISS company and its employees must comply with the relevant customs regulations for import and export transactions.

### **This is what we expect from you:**

Have the staff responsible for export control verify that

- » restrictions or prohibitions exist (e.g., on the purchase, sale, brokering, and marketing of goods and services, and on the transfer of technology).
- » official approvals must be obtained before the respective action is performed.
- » customs regulations must be complied with for import and export transactions.

### **The aspiration of ZEISS:**

- » We have policies and regulations for control and monitoring processes to ensure Compliance with export control and customs regulations.
- » We appoint trained experts who perform the necessary checks and have the right to stop any activity in case of doubts about legal Compliance.
- » We conduct IT-based screening processes (sanctioned parties, restricted goods, embargo restrictions and end-use).

More information:

- » [Company policies about export control and customs](#)

# Correct bookkeeping and accounting, anti-money laundering

**We record our financial transactions completely and accurately and only work with reputable business partners**

All business transactions must be properly reflected in accounting records, balance sheets and tax returns. This requires that all relevant facts are recorded correctly and completely and documented and archived in a traceable manner.

Any infringement may expose the company to investigations for accounting manipulation, document offenses, allegations of fraud, tax offenses, or money laundering charges.

We do not tolerate practices that serve the purpose of money laundering or financing terrorism

Money laundering means that the origin of illegally obtained money (e.g., from terrorism, drug trafficking, bribery, and other criminal acts) is concealed by smuggling it into the legal economic cycle, thereby creating the appearance of legality.

It is the declared objective of ZEISS not to be misused for money laundering or other illegal purposes or to contribute to this.

**This is what we expect from you:**

- » Comply with tax and accounting regulations.
- » Do not transact business outside of standard processes.
- » Ensure careful and orderly archiving of all documents related to business transactions.
- » Comply with legal retention requirements.
- » Do not alter or destroy documents related to government investigations or private litigation.
- » Stop transactions immediately if there are any indications of money laundering or terrorist financing and report any suspicious cases to the relevant colleagues.

More information:

» [Company policies about finance and controlling](#)



# The right way to handle information

## In this chapter:

- » Data privacy
- » Protection of trade secrets,  
and information security
- » Ban on insider trading

In my work, confidential handling of personal data and Compliance with IT security standards are essential.

Close collaboration with the Data Protection Coordinators and regular training sessions help my colleagues and me to implement the requirements that must be met.

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**Monica Jernigan**

Service Delivery Specialist,  
Carl Zeiss, Inc. (Dublin, USA)



# Data privacy

**We process personal data only within the framework of applicable laws and protect this data from unauthorized access**

The more extensive electronic data processing becomes, the more important is the protection of personal data of our customers, business partners and employees. Such personal data may only be disclosed and processed within the framework of the applicable laws. The framework for data privacy is provided by international and national regulations.

The Group-wide data privacy management system, which is operated by the Corporate Data Protection Officer and the global data privacy team, provides support in meeting these data privacy requirements and avoiding potential negative effects due to inadequate protection of this data.

The locally applicable laws specify which types of data are considered sensitive and must be given special protection accordingly.

## What is personal data?

Personal data are all data that make an individual person directly or indirectly identifiable (e.g., name, address, age, gender, but also indirect data on IP addresses or bank details).

## This is what we expect from you:

- » Get an overview of the extent to which you are dealing with personal data.
- » Protect personal data from unauthorized access (e.g., by maintaining the required security standards in electronic communications with third parties).
- » Collect personal data only when necessary to perform the task and as permitted by law.
- » Dispose of records containing personal data in a controlled and secure manner.
- » Require our business partners to maintain the same high privacy standards.

## The aspiration of ZEISS:

- » We implement and continuously develop the data protection management system.

More information:

- » [Company policies about data privacy](#)





### Computers & smartphones are in safe hands with you.

A single day — much like in real life — full of IT challenges that you have navigated perfectly. Here is a short summary of the most important points we covered.

- 1 Using your workstation computer in a secure fashion.
- 2 Sending and receiving emails securely.
- 3 Storing and exchanging data securely.
- 4 Using smartphones and tablets in a secure fashion.



# Protection of trade secrets, and information security

## **We protect confidential data from unauthorized access**

Our inventions and know-how are critically important for the long-term success of our company. Therefore, our intellectual property and all confidential information must be protected from third party knowledge or unauthorized access. This also includes protection against data theft, cyber-attacks, or malware.

Intellectual property includes, for example, inventions and prototypes. But trade secrets, customer or supplier data and software also deserve appropriate protection.

A variety of measures such as multifactor authentication, anti-virus programs, and recurring training reduce potential risks. These also include procedures to maintain and continuously improve our security level, the adequacy of which is regularly assessed and certified by independent bodies.

We do not disclose  
confidential information

The protection of this information is ensured through the implementation of the Group-wide information security management system.

As such, employees may not participate in public discussions (e.g., lecture events, Internet forums) or disclose company-relevant information in public (e.g., on the Internet) without prior consent.

## **This is what we expect from you:**

- » Keep confidential information pertaining to the company private and do not share it with unauthorized individuals – this includes family and friends.
- » Protect files and records from unauthorized access (e.g., through encryption).
- » Always comply with the security rules set forth by information security.
- » Apply the same security rules to information disclosed to us by third parties as confidential.
- » Do not share confidential information when using social media.
- » Do not store company data on private electronic devices (e.g., computers, tablets, smartphones).
- » Do not connect private electronic devices to the corporate network.

## **The aspiration of ZEISS:**

- » We implement and continuously develop the information security management system.
- » We maintain appropriate control processes to ensure correct implementation.

More information:

- » [Company policies about security](#)

# Ban on insider trading

**We do not use any non-publicly available information from listed companies that we obtain in the course of our work for ZEISS to obtain financial or business advantages for ourselves or third parties**

Insider trading law serves to protect investors. On one hand, it prohibits the exploitation of insider information to gain direct or indirect personal advantages when buying or selling securities. On the other hand, the unauthorized disclosure of such information is prohibited.

Insider information is information that is not yet known to the market and the disclosure of which is likely to have a significant effect on the price of the securities concerned (e.g., information on planned corporate acquisitions, strategic agreement on cooperation between two companies, financial results, new products, problems with products or important contracts).

## This is what we expect from you:

- » Do not use information that you obtain about listed companies (e.g., Carl Zeiss Meditec AG) in the course of your business activities to buy or sell securities until this information is publicly known.
- » Never disclose insider information to third parties. Third parties also include family members, partners, friends, or other ZEISS employees who do not have this information.
- » Do not make recommendations to third parties about buying or selling securities if you have inside information about those securities.

More information:

» [Investor relations on TEAM ZEISS](#)

# The right behavior in the workplace

## In this chapter:

- » Occupational health and safety
- » Handling company property

At our workplaces in assembly, it is necessary for me and my colleagues to wear protective equipment.

The meaning of this equipment is already in the name: The protection, not only of our own health, but also of the products that are processed at our plant.



**Sabine Wanner**

Individual equipment assembler,  
Carl Zeiss Jena GmbH (Oberkochen, Germany)





# Occupational health and safety

**We ensure a healthy working environment and safe workplaces through comprehensive occupational safety measures and medical care, as well as the provision of health-promoting measures**

Safety in the workplace and protecting the health of all employees is a fundamental principle for ZEISS and has been described in the Carl Zeiss Foundation statutes.

We see the health of our employees as a key factor for the success of ZEISS

The success of a company does not only depend on modern technology and highly efficient products, but rather - first and foremost – on the people behind them. The physical and also mental health of employees are key factors for their performance and motivation and ultimately the company's success. Safe workplaces that promote good health and wellbeing are equally important to employers and employees.

We take necessary measures to promote good working conditions

Each ZEISS entity must take and continuously develop the measures in line with its business operations to prevent accidents and to minimize occupational health and safety risks as well as to promote healthy working conditions.

The workplace health management at ZEISS promotes and improves the health of employees through preventive and wholesome measures.

Every supervisor is responsible for the protection of their employees and must provide them with qualifications, guidance, and instructions.

## This is what we expect from you:

- » Familiarize yourself with the hazards and occupational health and safety aspects of the workplace.
- » Adhere to health and safety regulations and use the required personal protective equipment.
- » Take advantage of the prevention and health promotion measures offered.
- » Conduct yourself in such a prudent manner that potentially dangerous situations do not arise in the first place.
- » Act as a role model in occupational health and safety.
- » Report critical situations, near misses and accidents immediately to the responsible supervisor and, if necessary, other internal contact persons, to avoid them in the future.
- » Seek advice on health and safety issues in the destination country well in advance of business travel.
- » Inform our relevant suppliers that occupational health and safety is part of our selection and evaluation criteria.

## The aspiration of ZEISS:

- » We implement and continuously develop the occupational health and safety management system.
- » We ensure the availability of the necessary resources to achieve the defined goals.
- » We comply with the relevant laws and regulations on occupational health and safety.

More information:

- » [Company policies about occupational health and safety](#)



# Handling company property

**We handle company property with care and protect it from loss, damage, theft, and unauthorized use**

All employees are obligated to treat company property with care and for the intended purpose. The workplace and all equipment serving employees or the company must always be kept in order and any damage must be reported immediately to the supervisor.

Company property includes, for example, machinery, tools, office equipment, vehicles, and all information and communication systems.

We use company property privately only with appropriate permission

As a general rule, company property may not be used privately, passed on to third parties or removed from the company unless express permission has been granted by the supervisor or the responsible department in the company.

We use company funds sparingly

Financial resources must be used sparingly and appropriately, for example by always booking and settling business trips in accordance with the relevant travel policy.

**This is what we expect from you:**

- » Protect all company assets and information and communication systems from loss, damage, or misuse.
- » Use the resources provided by the company sparingly and carefully.
- » Use company property for personal purposes only with supervisor permission and in accordance with internal policies.
- » Never use company property for unauthorized purposes (e.g., visiting illegal websites).
- » Use company funds sparingly and follow applicable travel policies when booking and accounting for business travel.
- » Be wary of third parties who attempt to damage our company property (e.g., through theft, fraud, hacking).
- » Report damage to or loss of company property immediately.

More information:

- » [Company policies about security](#)

**In this chapter:**

- » Reporting Compliance violations
- » Internal contact points
- » Special responsibilities of supervisors

# The right behavior in case of doubt





In some situations, it is not easy to know which behavior is the right one. In these cases of doubt, you are not alone!

Contact your supervisor and talk about the situation. In addition, the members of the ZEISS Compliance Organization will be happy to assist you as contact persons for advice!



**Klaus Birkle**

Chief Compliance Officer,  
Carl Zeiss AG (Oberkochen, Germany)

# Reporting Compliance violations

**We seek advice from the relevant contact points if we have any questions and report possible violations without delay**

All employees are expected to contact their supervisor, the responsible HR or relevant functional department, the employee representative, or the Compliance organization if they have any doubts about their own conduct or if they receive information about legally dubious processes in the work environment.

If employees cannot or do not wish to openly address a possible violation of laws or internal rules to the aforementioned contact points, the whistleblower system [ZEISS Integrity Line](#) can be used. It also allows anonymous reports and can be accessed both via the intranet and via the ZEISS public website.

We protect good faith whistleblowers

All concerns raised in good faith regarding non-compliance with laws and internal policies will be taken seriously and will be treated confidentially. The whistleblower does not have to fear any disciplinary measures or sanctions, even if the alleged misconduct of the accused person is not confirmed. However, deliberately false accusations (e.g., made solely to harm others) will not be tolerated.

More information:  
[Compliance page on TEAM ZEISS](#)

We respond consistently to proven Compliance violations with consistent measures, in accordance with the principle of proportionality. For each individual case, we examine which consequences are suitable, necessary, and appropriate.

# Internal contact points

Do you have a question related to a Compliance topic?  
Please feel free to contact one of the following contact points:



Talk to your  
supervisor.



Talk to the HR or  
responsible functional  
department.



Talk to the ZEISS  
Compliance Organization:

[Compliance Officer](#) or  
Corporate Compliance  
([compliance@zeiss.com](mailto:compliance@zeiss.com))

**If you believe a Compliance violation  
has occurred, you may also report it  
as follows:**



### **ZEISS Integrity Line**

The electronic whistleblower system [ZEISS Integrity Line](#) is available 24 hours a day. Reports can be made in a protected area and can also be submitted anonymously. [FAQ about the whistleblower system](#)



### **Compliance@zeiss.com**

Send an [email](#) to the ZEISS Corporate Compliance team.

### **Compliance Officer**

ZEISS employees can find an overview of the responsible [Compliance Officers](#) on the [Compliance page](#) on TEAM ZEISS.





# Special responsibility of supervisors

## **We expect our supervisors to embed the importance of Compliance in the company and to act as role models for employees**

Each individual employee has a responsibility to do the right thing and to abide by the rules. Executives and supervisors have a special responsibility. By virtue of their leadership role and their associated function as role models, they shape the corporate and Compliance culture.

We see the role model function of supervisors as the key to our Compliance culture

Our supervisors must ensure that the principles set out in this Code of Conduct, as well as the laws and internal policies to be complied with, are known to employees, understood, and followed. A culture of trust must be created, characterized by transparent communication and where honest and constructive criticism is welcomed. Individual misconduct must be stopped and, if necessary, punished.

### **This is what we expect from our supervisors:**

- » Act as a role model for employees and regularly communicate the importance of Compliance to them.
- » Ensure that you and your employees know, understand, and comply with the requirements of the Code of Conduct.
- » Ensure that your employees receive the necessary instructions and complete the Compliance trainings.
- » Set goals for yourself and your employees that are consistent with this Code of Conduct.
- » Initiate corrective or disciplinary action for violations of laws and internal policies.
- » Be the point of contact for employees and support them, e.g., by following up on indications of misconduct.
- » Encourage your employees to address potential Compliance violations.

#### More information:

- » [Leadership Principles](#)
- » [ZEISS Core Competency Model](#)
- » [Framework and Concepts for ZEISS](#)



Use the ZEISS Code of Conduct as a guideline for responsible and compliant business conduct.

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