

Jungheinrich Group Code of Conduct

1. Scope

This Code of Conduct covers all German and international companies within the Jungheinrich Group. It applies equally to the Board of Management, managers and employees of all Group companies.

As the Group has interests in all regions of the world, either directly or via third parties, its business activities are subject to different legislation. The respective national laws and conventions may deviate to a greater or lesser extent from the German law applicable for the registered office of the Group. In the event of local deviations which lead to less strict regulations in comparison with German law, this Code of Conduct is to be understood, at least, as internal corporate rules of behaviour for all employees in the Group. To clarify issues of interpretation, the Compliance Officer (hereinafter abbreviated as CO) is to be contacted in advance. The CO always consults closely with the Chairman of the Board as the most senior compliance officer in the Group. The objective is to ensure uniform, correct behaviour by all employees throughout the Group.

2. Organisation

The Board of Management and the managers of the Group shall be obliged to fulfil their role model function for the employees at any time and in full in accordance with the adopted management mission statement. The management mission statement of the Jungheinrich Group is based on the criteria of

- ☐ building confidence,
- ☐ exemplary character,
- ☐ taking responsibility and
- ☐ adding value.

The implementation of the above criteria, which among other things should be achieved with continual compliance with this Code of Conduct, requires a high degree of willingness on the part of all managers and employees to actively participate. In the event of any violations of this Code of Conduct or serious irregularities in its application by employees which cannot be definitively clarified in dialogue between manager and employee, the CO is to be called in without delay in order to ensure application of the Code conforms to corporate and statutory requirements. This notification may be made in person or anonymously. Customers and suppliers also have the opportunity to notify the CO of any possible misconduct within the Group using various media (e.g. Internet, telephone, in writing). In consultation with the Chairman of the Board, the CO shall ensure a rapid assessment of the facts.

The CO and the employees authorised by him or her are bound by a duty of confidentiality. They report to the Board of Management only, primarily to the Chairman of the Board in his or her capacity of most senior compliance officer. At the same time, the regulations concerning data protection are met and the person who made the notification may not suffer any personal disadvantage as a result of their action, unless this took place with defamatory intent.

3. Requirements

According to the adopted management mission statement and the values declared within in to be binding, the Board of Management requires compliance with statutory requirements and shall not tolerate any form of discrimination, sexual harassment or other personal attacks by employees of the Group.

All managers and employees of the Group worldwide shall strive for and promote compliance with all applicable laws, regulations, codes and human rights conventions of any type and institution. In this way, responsible, honest and ethical conduct shall be permanently guaranteed. This includes all internal requirements and guidelines of the Group companies. The CO shall support those affected with their interpretation as well as answering additional issues with respect to possible cultural differences.

In principle, relationships of a private and business nature are not permitted, but where they do exist the expenses incurred must be kept strictly separate from each other. The direct or indirect awarding of contracts to associated companies or persons (relatives, friends etc.) is fundamentally prohibited; where there is doubt in any case, clarification should be sought from the direct supervisor or the CO. In this context, however, the principle of transparency and clarity shall always apply as well as, if in doubt, the priority of restraint.

4. Customer and supplier relationships

Employees are fundamentally prohibited from offering, promising or granting potential or existing customers any form of improper advantage, such as higher quality gifts or cash. This especially applies to relationships with officials. It is immaterial whether the advantage is granted directly or via a third party.

Jungheinrich also requires full compliance with this requirement by its suppliers. The acceptance of products, advantages or services by employees of the Group is expressly prohibited unless and insofar as the customs of the respective country do not require it or low-value items or services are not involved.

Exceptions are to be clarified in advance with the CO who will consult with the Board. In this context, the Board will also refer to the applicable requirements of Central Purchasing, which provide a selection of suppliers according to criteria which can be objectively verified at any time.

5. Antitrust requirements

There must be strict adherence to the applicable antitrust and competition statutes in the respective version of the country. Any agreements and behaviour which could restrict the principle of free competition are prohibited. The respective managing directors and department heads are responsible for enforcing this.

The prohibited conduct relates, for instance, to agreements with competitors regarding prices or other terms, quantity restrictions, market or customer allocations or the exchange of information not in the public domain.

6. Insider information

All employees are prohibited from benefiting from or disclosing to third parties insider information – any information relating to circumstances within the Jungheinrich Group which is known to the employee but not the general public. In particular, insider information may not be used to purchase or sell Jungheinrich shares, either in person or via a third party, or to recommend to a third party that they purchase or sell Jungheinrich shares.

7. Environment and safety

All employees of the Group companies shall comply with the environmental statutes and standards applicable within their respective units and shall demonstrate a corresponding awareness of the careful handling of natural resources when fulfilling their duties. Jungheinrich operates an efficient system for identifying and eliminating potential environmental hazards in order to make a lasting contribution to compliance with environmental protection. The development of new trucks particularly focuses on these issues.

The Group ensures that all employees operate in a safe and healthy work environment, taking cultural influences into account.

8. Confidentiality and data protection

Confidential information of any kind may not be passed to unauthorised third parties nor made accessible to them. This also includes the storage of data, in particular of a personal nature, relating to business partners and employees. Personal data may only be collected, processed and passed on if this is a necessary part of the business activity. This shall however be done exclusively with the knowledge of the person concerned.

All managers shall be obliged to ensure compliance with the data protection laws of the country in which they or their employees are based.

9. Conclusion

This Code of Conduct requires that all managers and employees of the Jungheinrich Group faithfully conduct themselves in accordance with statutory and company requirements in their respective task area and country. This simultaneously includes all internal Group requirements and guidelines for the respective departments.

The ethical and legally proper behaviour of all employees in the Group is to be promoted, in particular towards business partners around the world, because Jungheinrich wishes to act as a credible partner in all issues relating to intralogistics.

Any breaches of the provisions of this Code of Conduct – insofar as they are not clarified by the supervisor – may be reported to the CO as follows:

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Jungheinrich AG

The Board of Management