

A black and white photograph of a modern building with a curved glass facade and a curved glass dome. The building is surrounded by landscaping, including bushes and a paved area. The image is partially obscured by a large, stylized 'X' graphic that spans the entire page.

SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS



I am writing to you as the President & CEO of JAS Worldwide, Inc. to discuss an important matter that aligns with our shared values of ethics, integrity, and social responsibility. We highly value our partnerships and believe that together, we can create a positive impact in our industry and beyond.

At JAS, we are committed to conducting our business operations with the highest level of ethical standards. As part of this commitment, we have developed a comprehensive Supplier Code of Conduct that outlines the expectations we have of our suppliers regarding social, environmental, and ethical practices. By adhering to these principles, we believe we can foster a sustainable and responsible supply chain that benefits all stakeholders involved.

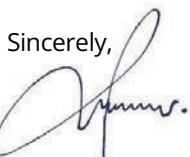
I kindly request you to thoroughly review this Supplier Code of Conduct, which provides detailed guidelines on the following key areas:

1. **Legal Compliance:** Suppliers must comply with all applicable laws, regulations, and standards in the jurisdictions where they operate, ensuring ethical business practices at all times.
2. **Labor Standards:** We expect suppliers to uphold fundamental labor rights, including fair wages, safe working conditions, prohibition of child labor and forced labor, and respect for the rights of workers to associate freely.
3. **Environmental Sustainability:** Suppliers should strive to minimize their environmental impact by implementing sustainable practices, promoting resource efficiency, reducing waste, and using natural resources responsibly.
4. **Ethics and Integrity:** Suppliers must uphold the highest standards of business ethics, honesty, and transparency in their operations, including the prevention of bribery, corruption, and conflicts of interest.
5. **Human Rights:** Suppliers should respect and support the protection of human rights within their sphere of influence, ensuring that their activities do not contribute to human rights abuses.
6. **Diversity and Inclusion:** We encourage suppliers to embrace diversity and inclusion within their workforce, fostering an environment that respects and values individuals from all backgrounds.

By adhering to the Supplier Code of Conduct, you will not only contribute to our shared values but also strengthen the long-term sustainability and success of both our organizations.

Please do not hesitate to reach out to us if you have any questions or require further assistance.

Thank you for your attention to this matter. We genuinely value our partnership and look forward to working together in building a more sustainable and ethical business environment.

Sincerely,


Marco Rebuffi

President and CEO
JAS Worldwide, Inc.

The logo for JAS, featuring the letters 'JAS' in a bold, white, italicized sans-serif font. The 'J' and 'A' are connected, and the 'S' is slightly separated. The logo is set against a dark blue background.



INTRODUCTION

JAS Worldwide is responsible for ensuring that our services are provided within a supply chain process that complies with international standards. Therefore, we have summarized our expectations to our suppliers and service providers (“JAS Partners”) with respect to working conditions, human rights, health and safety, security, the environment and business ethics in this JAS Supplier Code of Business Conduct and Ethics for JAS Partners (the “JAS Supplier Code”). This JAS Supplier Code is based in particular upon the principles of the “UN Global Compact” and the standards set out in the conventions of the ILO (International Labor Organization).

In this JAS Supplier Code, the terms “JAS Worldwide”, “us”, and “JAS” mean JAS Worldwide, Inc., and all of its subsidiaries and affiliated companies.

The JAS Supplier Code defines JAS’s principles and is applicable to all JAS Partners with whom JAS Worldwide conducts business. It is the responsibility of the JAS Partner to disseminate this information to and to educate all relevant parties, and to exercise diligence in verifying compliance with this JAS Supplier Code by the JAS Partner’s affiliate entities, employees, suppliers, agents, sub-tier suppliers, and all other third-parties with whom it does business. JAS will use this JAS Supplier Code as part of its supplier selection and evaluation procedures. JAS reserves the right to potentially end its business relations with a JAS Partner if they do not adhere to the principles set forth below.

You should not hesitate to ask questions about whether any conduct may violate the JAS Supplier Code, voice concerns, or clarify gray areas. To contact JAS, please send an email to ethics@jas.com.



OVERALL COMMITMENT

JAS Partners must respect and comply with the laws and regulations in all countries in which they operate, procure and/or sell goods and services. In case the local legislation requirements are lower than the international standards, which are stated herein, JAS Partners are required to follow the latest international standards.

JAS Partners must respect human rights and mitigate environmental impacts of their companies and activities. JAS Partners must implement the requirements of this JAS Supplier Code into their entire supply chain.

CONFLICTS OF INTEREST

A “Conflict of Interest” exists when a person’s private interest interferes in any way with the interests of JAS Worldwide. JAS Partners have a duty to avoid financial, business or other relationships which might be opposed to JAS’s interests or may cause a conflict with the performance of the JAS Partner’s duties. JAS Partners should conduct themselves in a manner that avoids even the appearance of conflict between its personal interests and those of JAS.

HUMAN RIGHTS

JAS recognizes the importance of maintaining and promoting human rights and respecting workers’ rights throughout the supply chain.

JAS Partners must not use child labor. The minimum age for employment shall be the country’s legal minimum age, or the age for completing compulsory education in that country, whichever is higher.

JAS Partners should actively support women’s rights and strive to create equal opportunities for women within their company.

NO FORCED LABOR

JAS Partners must not, under any circumstances, use, promote or otherwise give rise to the use of forced or involuntary labor. Such labor can include, without limitation, practices such as restricting people's movement; withholding wages or identity documents to force them to stay on the job; trapping them in false debt or wage deductions from which they cannot escape; loss of social status.

JAS Partners shall ensure that workers understand their rights regarding payment of fair wages, overtime, and retention of identity documents. JAS Partners will ensure that workers are treated fairly, and their rights are respected.

In the case of workers being recruited by third parties, JAS Partners will pay particular attention to ensuring that these principles are properly applied.



WORKING HOURS

Working hours (including overtime) must comply with applicable laws and regulations, collective-bargaining agreements, and international conventions. JAS Partners will reject overtime as a substitute for an insufficient regular wage. If overtime is paid, payment shall be based on the respective legal and/or collectively agreed regulations. Work or service outside normal daily working hours shall not be forced by exploiting a worker's vulnerability under threat of a penalty.

FAIR WAGES

JAS Partners shall comply with all applicable laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. JAS Partners shall pay rates of wages which are not lower than those established for the trade or industry where the work is carried out. In places where no legal requirement exists for defining a minimum wage, ILO Convention n° 131 shall be the basis for the definition. Workers must be paid in a fair and timely manner.

NON-DISCRIMINATION AND EQUAL REMUNERATION

JAS Worldwide respects cultural differences. JAS Partners must not discriminate or marginalize any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, national origin, social origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination or retirement (see ILO Convention n° 100, 111).

THE RIGHT TO ORGANIZE AND FREEDOM OF ASSOCIATION

JAS Partners must respect the right of workers to associate freely, form and join workers' organization of their own choice, seek representation and to bargain collectively, as permitted by and in accordance with the applicable laws and regulations. JAS Partners must ensure that representatives of such personnel are not the subject of discrimination (see ILO Convention n° 87, 98). JAS Partners must strive for a fair relationship between their economic interests and the interests of their employees.



HEALTH, SAFETY AND SECURITY

JAS Partners must ensure that the health, safety and security risks of their employees, contractors, and members of the public, which arise from its operations, are minimized.

JAS Worldwide requires that its suppliers carry out their operations in a safe and secure manner, in line with all applicable laws, regulations, and by approved codes of practice and industry best practice standards.

Accordingly, JAS Partners are expected to demonstrate a clear commitment to health and safety management as well as effective and proactive policies and procedures. JAS Partners are expected to promote the guarantee, expansion and further development of safe working conditions. JAS Worldwide will seriously consider the occurrence of accidents together with reactive monitoring and requires full disclosure of statistics. JAS Partners must provide JAS Worldwide with their health, safety and security indicators, risk assessment, and associated improvement plan, if requested.

ENVIRONMENTAL POLICY

JAS Partners shall implement measures contributing to the protection of the environment during the performance of their services. JAS Worldwide expects its suppliers to strive to save valuable resources, consume less energy, and generate less waste and emissions through sustainable use, efficiency optimization, and new technologies. To comply with international industry standards, JAS Partners shall work closely with local authorities and the relevant state institutions. JAS Worldwide encourages and expects JAS Partners to be ISO 14001 and Ecovadis certified or equivalent.



CO₂, GHG EMISSIONS, AND RESOURCE CONSUMPTION REDUCTIONS

JAS Partners should promote the development of technologies limiting CO₂ and other GHG emissions and water consumption as well as encourage energy savings, should promote the use of renewable energies and recycling solutions, and should implement logistic strategies that minimize overall environmental impacts.

NATURAL RESOURCES PRESERVATION

JAS Partners must be focused on reducing the use of raw materials and resources as well as recycling the waste produced by all activities, whenever possible. Appropriate processes towards a circular use of resources must be implemented.

INNOVATION AND PRODUCT LIFE CYCLE

JAS Partners are expected not only to consider the environmental impacts of greenhouse gas (“GHG”) emissions in the performance of their services and in their products during their design phase, but also in their production and procurement processes.

CONFLICT MATERIALS

JAS Partners must comply with applicable laws and regulations regarding conflict minerals including tin, tungsten, tantalum, and gold. JAS Partners’ processes must assure that any tin, tungsten, tantalum, and gold contained in products do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. JAS Partners are expected to exercise due diligence on the source and chain of custody of such minerals in accordance with international standards and make such due diligence measures available on request.





FAIR COMPETITION

JAS Partners must commit themselves to fair and undisturbed competition and comply with all applicable anti-trust regulations. JAS Partners must refrain from engaging in anticompetitive agreements with competitors, suppliers, distributors, dealers, and customers as well as other anticompetitive practices.

ANTI-CORRUPTION, BRIBERY, AND MONEY LAUNDERING

JAS Partners must comply with all applicable anti-corruption laws and regulations. JAS Partners must never, directly or through intermediaries, offer or promise any personal or improper advantage to obtain or retain a business or other advantage from a third party, whether public or private. JAS Partners will not pay or accept bribes, arrange, or accept kickbacks and shall not take any actions to violate, or cause their business partners to violate, any applicable anti-bribery laws and regulations including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act of 2010.

GIFTS AND HOSPITALITY

JAS is prohibited from giving or receiving gifts, payments or other benefits or items of value that could improperly influence, or appear to influence, any business decision. We ask our JAS Partners to respect this policy, and refrain from offering any JAS employee (or close family member of a JAS employee) a gift or other benefit that is more than nominal in value. JAS employees may accept a gift from a JAS Partner with a value of less than \$200.00 USD (or its equivalent in any other currency) in the aggregate, in any single calendar year. However, gifts of cash or cash equivalents, such as gift cards, are never allowed.

DATA PROTECTION

JAS Partners must comply with all applicable data protection regulations. JAS Partners must act appropriately to ensure data protection regarding personal data of JAS Worldwide, JAS Worldwide customers or other personal data handled based on the business relationship with JAS.

RESPECT AND PROTECTION OF INTELLECTUAL PROPERTY

JAS Partners must respect and protect JAS's intellectual property, trade secrets and other confidential, proprietary or sensitive information and may not use or disclose any such information except in accordance with their contract with JAS or with JAS's prior written consent. Any confidential information or data regarding JAS must be always treated as confidential unless that information becomes publicly available through no fault of the JAS Partner. JAS Partners may not disclose JAS's confidential or proprietary information without JAS's permission to persons outside of their organizations, nor may they disclose such information within their own organizations except on a strict "need to know" or "need to use" basis for the purpose intended by JAS. JAS Partners are also prohibited from using this information for their own benefit or the benefit of any other person or entity besides JAS.



ADHERENCE TO FOREIGN TRADE LAW REGULATIONS

By use of appropriate measures, suppliers must take care that transactions with third parties do not violate applicable law on economic embargoes or trade regulations, import and export controls, or provisions concerning the international fight against terrorist financing.

AUDIT

Upon request, the JAS Partner shall provide JAS with all necessary and/or requested documents or information that prove compliance and actions according to this Code.

JAS Partners must inform JAS without undue delay as soon as a breach of any of the principles of this JAS Supplier Code becomes known or is anticipated by it, along with providing a corrective action plan to cure such breach acceptable to JAS. Moreover, JAS Partners grant to JAS the right, to the extent permitted under applicable law, to perform individual unannounced due diligence audits in a reasonable scope and when appropriate for the purpose of ascertaining the supplier's compliance with this JAS Supplier Code.

REPORTING VIOLATIONS

You have an obligation to report any conduct that appears to be unethical or illegal or that appears to violate this Code or any JAS policies.

Online reporting can be made anonymously via the website www.lighthouse-services.com/jas. The website is available in various languages. This website is maintained by Lighthouse Services, Inc., a third-party service provider, and not by JAS.





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