

Ethical Guidelines

Jotron



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1 General

Jotron is committed to high ethical standards as the foundation for a trust-based and binding relationship with society and the company's owners, employees, partners, customers and suppliers.

Corporate ethics are more than avoiding contravention with the law. They are about how we behave towards each other and the outside world. All Jotron employees, customers, partners, agents and suppliers are responsible for following the rules and guidelines that build on Jotron's corporate values.

We expect that all Jotron suppliers to adhere to similar standards and to conduct their business ethically. The suppliers are expected to support the UN's Universal Declaration of Human rights and ensure that they are not complicit in human rights abuse. Moreover, we expect Jotron supplier to replicate these standards further down the supply chain by acknowledgement and acceptance of the [Jotron Supplier Code of Conduct](#).

2 Policy Applicability

This Policy applies to:

- i. all employees and contracted personnel of Jotron (each an "Employee", collectively "Employees"); and,
- ii. all natural and legal persons (and their respective employees) that perform services for or on behalf of Jotron, including without limitation, suppliers, consultants, contractors, distributors, and agents (including without limitation, sales agents/representatives) (each an "Associated Person", collectively "Associated Persons").

As a condition of doing business with Jotron, Jotron will require each Associated Person to accept that this Policy be incorporated into the contract.

This policy is governed by the HSE & HR Manager and owned by the Managing director of Jotron AS.

3 Relations to employees

3.1 Human rights and working environment

Jotron respects all individuals and is actively making efforts to ensure a good working environment characterised by equality and diversity. Equality, openness and tolerance must characterise our working environment. Behaviour must be based on the respect for others, and other cultures, religions and customs must also be respected. Fair employment practises following local norms and laws is the basic standard in all Jotron entities. No form of discrimination, harassment or bullying is tolerated.

Jotron shall comply with UN's Universal Declaration on Human Rights, The UN's Convention on Rights of the Child and International Labour Organization Conventions (ILO conventions).

Jotron shall not engage in or support any kind of use of child labour. If a young worker is employed, this needs to be controlled and arranged according to legal requirements in terms of safety, work hours and guidance and is not allowed to interfere with applicable compulsory schooling.

3.2 Occupational Health, Safety and Employee Security

The Jotron Group Management recognises its responsibility and obligations to create and sustain a culture that supports the implementation of high standards in the field of health, safety and employee security.

3.3 Loyalty, impartiality, conflict of interests and related party transactions

Jotron respects the individual employee's right to a private life and private interests but demands openness and loyalty to the company and the company's interests. All Jotron employees are expected to behave with great objectivity at work and with no conflicts of interest of any kind.

Employees who can influence or make decisions on behalf of Jotron must not participate in the consideration or determination of any issues where they or their related parties have personal or financial interests.

Jotron employees cannot hold another position or carry out work for others without permission from immediate superior.

Each employee must assess for themselves whether any conflicts of interest exist. If their case is borderline, or if somebody requires it, they must submit the case to their immediate superior.

3.4 Confidentiality

All Jotron employees have a duty of confidentiality by law and written agreements concerning:

- Product design
- Production secrets
- Commercial, technical, or contractual matters
- Calculations and budgets
- Information not generally known which could have significance for the company
- Personal information acquired about others in the course of the employee's work for the company
- All business matters not made public are to be considered to be confidential.

This duty of confidentiality remains in force after an employee has left the company. No individual can exploit the information specified above in their own business or in the service of working for others.

3.5 Travel

All business-related travel and hotel expenses shall be paid by Jotron. Exceptions shall be approved by the immediate superior.

3.6 Political activity

Jotron maintains a neutral position with respect to party politics and does not give support to political parties, including financial support.

4 Relations to Customers, Suppliers, Competitors & Public Authorities

4.1 Competition

Jotron will compete in a fair and ethically justifiable manner within the framework of the anti-trust and competition rules in the markets. This applies in relation to competitors as well as to customers and suppliers.

4.2 Corruption and bribery

Corruption includes bribery and trading in influence. Corruption undermines legitimate business activities, distorts competition, ruins reputations and exposes companies and individuals to risk. Jotron is against all forms of corruption and will make active efforts to ensure that it does not occur in the Group's business activities.

Employees who believe they have been offered bribes or subjected to inappropriate pressure or attempts to exert such pressure should immediately report this to their immediate superior.

4.3 Gifts and business courtesies

Jotron employees must exercise caution in relation to offering or accepting gifts and business courtesies. Gifts or other remuneration should not be accepted if there is reason to believe that its purpose is to influence business decisions. Transparency must be exercised when receiving and presenting gifts and other benefits.

Hospitality such as social events, meals or entertainment may be accepted if there is a clear business reason. The cost of any hospitality must be kept within reasonable limits.

5 Property and assets

5.1 Real estate and movables

Jotron's property and assets will be managed and safeguarded in an appropriate manner. The use of Jotron's time and assets (including intangible property rights, facilities and financial assets) for purposes not directly related to Jotron's business is prohibited without authorisation from a relevant Jotron representative. The employees must protect Jotron's property and assets against loss, damage and abuse.

5.2 Intellectual property

Intellectual property such as know-how, methodology, concepts and ideas are important to Jotron's success in the market. The employees involved with the group's intellectual property must protect and administer it in the interest of the group, as well respecting the intellectual property rights of others.

6 Environment

Jotron will be at the forefront in protecting the environment and undertake initiatives to promote greater environmental responsibility. Jotron must adhere to relevant local and internationally recognized standards, minimize its environmental impact and continuously improve its environmental performance. Jotron will promote development of environmentally friendly technologies and all employees share a responsibility for achieving these goals.

7 Information, communication and contact with the media and other external parties

All information from Jotron shall be reliable and correct and maintain high professional and ethical standards. Communication with the media should be handled by the Managing Director of Jotron AS.

8 Handling of infringements

All conditions which could involve a breach of prevailing regulations and provisions should be raised with the employee's immediate superior. An employee's own good judgement and integrity will often be crucial. A simple rule of thumb could be to consider the possibility that a decision must be defended to a critical audience.