

# Supplier Code of Conduct

**Jotron**





# Table of contents

Amendment record .....	2
1 General .....	4
2 Human Rights .....	4
3 Fair Labour Conditions.....	4
4 Health, Safety, Environmental Management.....	4
5 Material Compliance and Conflict Materials.....	5
6 Counterfeit Parts .....	5
7 Business Ethics .....	5
8 Trade Compliance.....	5
9 Management System .....	5
10 Information Security .....	6
11 Protection of Personal Data .....	6
12 Business Practice .....	6
13 Declaration of Supplier’s Acknowledgement and Acceptance of the Jotron Supplier Code of Conduct	7

# 1 General

Jotron's ability to create economic value is dependent on applying 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. Jotron has a "zero tolerance" policy when it comes to unethical business behaviour, such as bribery, corruption and forced labour.

We expect that all of our 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 our supplier to replicate standards of the Code of Conduct further down the supply chain.

## 2 Human Rights

Suppliers are expected to protect human rights of their employees and to treat them with dignity and respect. As supplier to Jotron, you shall:

- Respect the personal dignity, privacy and rights of each individual.
- Refuse to make any person to work against his or her will.
- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

## 3 Fair Labour Conditions

All Jotron suppliers shall ensure fair labour conditions. As supplier to Jotron, you will:

- Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation.
- Respect the rights of employees to freely associate and bargain collectively.
- Not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations.
- Not use any forced labour, including but not limited to involuntary prison labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice.
- Compensate employees fairly and follow local wage regulations and laws, including those relating with minimum wages, overtime hours and legally mandated benefits.
- Ensure that working hours, including overtime, do not exceed applicable legal requirements.

## 4 Health, Safety, Environmental Management

Jotron suppliers shall provide a safe and healthy workplace for all of the employees and shall conduct the business in an environmentally sustainable way. As supplier to Jotron, you will:

- Formally appoint a competent person to manage health, safety and environmental programs and improvements.
- Make available safety information on identified workplace risks and correspondingly train employees to ensure that they are adequately protected.
- Assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.
- Have the systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges.

- Have the system in place to ensure the safe handling, movement, storage, recycling, reuse and management of chemicals and other materials that pose a hazard if released to the environment.
- Provide Jotron with up-to-date FMD requested by Jotron.
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation

## 5 Material Compliance and Conflict Materials

At Jotron, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to Jotron are in compliance with requirements covered under the scope of all relevant regulations. As supplier to Jotron, you will:

- Implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals.
- Respond in a timely manner to Jotron's requests for evidence of your compliance with these requirements.

## 6 Counterfeit Parts

Suppliers are expected to develop, implement and maintain effective methods and processes to minimise the risk of introducing counterfeit materials or components into the supply chain. In addition, suppliers shall provide notification to recipients of counterfeit parts and materials when required and exclude them from the delivered product.

## 7 Business Ethics

Jotron expects its suppliers to adhere to the highest standards of moral and ethical conduct and to respect local laws. As supplier to Jotron, you will:

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Jotron employees), government officials and any other party are in compliance with applicable anti-bribery laws.
- Adhere to anti-trust and other competition laws.
- Protect all confidential information provided by Jotron and our respective business partners.
- Respect intellectual property of others, including Jotron.
- Adhere to international trade regulations and export control regulations.

## 8 Trade Compliance

Both parties must comply with relevant import and export control laws and regulations applicable to them including embargoes, sanctions, and anti-boycott rules. Suppliers are expected to understand any sanctions, import and export control requirements relating to their work, and ensure decisions and activities comply with those requirements.

## 9 Management System

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. As supplier to Jotron, you will:

- Comply with all applicable laws, regulations, contractual agreements and generally recognized standards.

- Communicate the principles set forth in Supplier Code of Conduct to your employees and to your supply chain.
- Be encouraged to fulfil the expectations set forth in Supplier Code of Conduct by allocating appropriate resources.
- Develop adequate documentation to demonstrate that you share the principles and values expressed in Supplier Code of Conduct.

## 10 Information Security

It's vital to Jotron that its suppliers ensure that all sensitive data and information (including the assets and equipment on which it is processed and stored) is appropriately protected. We expect data and information to be correctly and clearly marked, and systems managing this to have appropriate protection. Access to classified information should be restricted to individuals with relevant formal security clearances and on a 'need to know' basis. Failing to protect sensitive and classified information is against the law and could significantly damage both the supplier's and Jotron's reputation. In cases of national security, if laws are broken, the individuals involved can also face substantial fines and imprisonment.

## 11 Protection of Personal Data

Jotron takes data protection extremely seriously and we intend to work with suppliers who feel the same about data. Jotron operates across many jurisdictions and applies the principles of the 2018 version of the Norwegian Personal Data Act across all our entities, irrespective of location. Our privacy notice is located here. We expect our suppliers to understand how to effectively and compliantly manage our data, including holding our data securely, and only sharing our data where permission has been provided to do so. Specific arrangements will be described in the contract through a data protection clause or more prescriptive agreements, which must be applied.

Due to the nature of our business, there is a requirement to notify us if there are any relevant changes to a supplier's business such as changes in ownership or acquisitions which may involve significant changes in supplier's structure, or if there has been an issue with processing our data by the supplier, or a sub/processor, and if this is on another contract out of courtesy.

## 12 Business Practice

It is essential that our suppliers securely and accurately capture, store and retain business records when needed. In addition, alongside agreed contractual payment terms, we expect our suppliers to pay their suppliers in a timely manner.

We expect that our suppliers', take an active role in protecting the values, principles and behaviors outlined in this Supplier Code. Suppliers must ensure that there is a system for their employees to raise any issues or concerns regarding legal and ethical issues. We expect that suppliers' employees are free to raise concerns without fear of retaliation.

This Supplier Code of Conduct is designed to provide information to clarify the expectation we have and sets out the minimum standards of behavior and practices we expect from our suppliers and partners.

It's an enabler of business and ensures good business practice from end-to-end delivery, benefiting both our suppliers and customers. We also expect that suppliers flow down these principles to their own suppliers in order to ensure alignment across the supply chain.

If a supplier is found not to have the expectations laid out in this code, its relationship with Jotron will be reviewed and corrective action may be taken, subject to the terms of any existing contracts.

## 13 Declaration of Supplier's Acknowledgement and Acceptance of the Jotron Supplier Code of Conduct

We, ..... , hereby declare that we have read and understood Jotron Supplier Code of Conduct and will comply with these principles.

We, ..... , confirm that we effectively communicate the contents of the Code of Conduct to our employees, agents, subcontractors and ensure all measures required are implemented accordingly.

We also confirm that we have noted that compliance to the Code of Conduct is an essential prerequisite for business relations between Jotron and us.

Signature: .....

Title: .....

Date: .....