

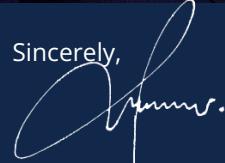


Code of Conduct





Sincerely,

A handwritten signature in black ink, appearing to read "Marco Rebuffi".

Marco Rebuffi
President & CEO
JAS

CEO Message – Commitment to Integrity and Mission of JAS



From its inception in 1978, JAS has been committed to integrity, excellence, and respect in all of our endeavors. Our vision is that every interaction enables positive change by connecting people across the globe. This vision is brought to life through our mission of delivering customer value with passion and our purpose of creating opportunities to thrive, together.

Our values are the foundation of our culture and guide our actions every day:

- **Family:** We embrace inclusiveness and belonging, fostering a supportive and collaborative environment.
- **Integrity:** We lead by example, building trust and respect in all our interactions.
- **Excellence:** We enable quality, service, and performance, striving for the highest standards in everything we do.
- **Innovation:** We embrace agile decision-making and new ideas, driving continuous improvement and growth.
- **Community:** We aim to make a sustainable impact in our ecosystem, contributing positively to the world around us.

Our Code of Conduct is designed to help us navigate the complexities of our industry with clarity and confidence, ensuring that we uphold our values and fulfill our vision, mission, and purpose.

It outlines the principles and expectations that guide our interactions with colleagues, customers, suppliers, business partners, and the communities we serve in the logistics industry.

Read the Code of Conduct carefully and integrate its principles into your daily work and activities. By doing so, we not only protect our reputation and legal standing but also foster a culture of integrity, trust, and respect that will drive our continued success.

At JAS, we are one family that leads with integrity and remains accountable for our performance in the workplace, our business dealings, and our communities. Thank you for your commitment to upholding JAS's values and standards.

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Purpose of the Code

This Code of Conduct ("Code") was developed with JAS's Purpose, Vision, Mission, Values ("PVMV"), and the company's other foundational documents in mind and is intended to provide practical guidance for handling many of the ethical issues you may face in your day-to-day activities. By understanding and living the principles in this Code, we will continue to earn the trust of our colleagues, customers, communities, and each other, so we all can take pride in our company and its impact across the world.

The policies and procedures set forth in this Code, govern the conduct of every aspect and facet of our business. While this Code provides a brief summary of the standards of conduct that are the foundation of our business operations, there is not a rule for everything. It is simply not possible for this Code to describe or cover all situations confronting us in our day-to-day conduct and activities. We each must rely on our individual professional judgment and personal ethical standards to maintain a high standard of honesty and integrity in conducting our business, keeping in mind JAS's PVMV.

The topics covered in this Code are extremely important. Violations of this Code can cause great harm to the company and its reputation, and the company takes all potential violations seriously. Employees who violate the Code will be subject to appropriate disciplinary action, up to and including termination of employment. Additionally, JAS reserves the right, to the extent permissible by applicable law, to deny or recoup bonuses or other incentive-based compensation from JAS employees who engage in legal misconduct or breaches of this Code, or fail in their managerial oversight to report or prevent such misconduct.

JAS will review and update this Code and related policies regularly to reflect changes in laws and business practices. This commitment helps to ensure that JAS's policies remain current and effective in addressing new risks and regulatory requirements and reflects JAS's dedication to maintaining high standards of ethical conduct and compliance.

JAS also has other policies and processes governing performance, conduct, and behavior. Policy violations that are not Code violations will be handled under the appropriate policy or procedure.

To Whom, When, and Where the Code Applies

The Code is designed to provide a unified guide and applies to all directors, officers, and employees of JAS Worldwide, Inc., including all wholly owned subsidiaries, joint ventures, or acquired entities everywhere in the world (collectively, "JAS"), as well as to all JAS business locations worldwide. This includes all persons or entities acting as representatives or agents for JAS. We also expect our suppliers to embrace and conduct their business in full compliance with the principles outlined in this Code, thereby maintaining the high standards of ethical behavior and responsibility expected of all parties associated with JAS.

In some cases, JAS entities may have local policies with content that overlaps with this Code. If the applicable local policy's requirements are less restrictive than the Code's requirements, the Code will apply. If the applicable local policy's requirements are more restrictive than the Code, then you must comply with the local policy.

We are committed to complying with the laws and regulations in every jurisdiction in which JAS operates, and laws and regulations can vary widely from country to country.

Because our company is headquartered in the United States, our employees around the world often are subject to U.S. law in addition to the laws of the country where they work.

Since we operate in over 50 countries, knowing which laws to follow can be complicated, so be sure you understand and are familiar with the laws and regulations related to your job in the country (or countries) where you do business.

When local laws or common practices are not as strict as the requirement in this Code, then the Code applies. If applicable local laws are stricter than the requirements in this Code, then you must comply with the local law.

If you believe our Code conflicts with local law (for example, you believe a country's local laws prohibit compliance with certain provisions of this Code), contact the Legal Department for guidance.

Employees, Managers, Directors, and Officers: Responsibilities

EMPLOYEES MUST:

- ➊ Demonstrate integrity in all we do.
- ➋ Read and be familiar with the Code and other company policies that apply in the business locations in which we operate.
- ➌ Comply with all applicable laws and regulations.
- ➍ Take all required training related to the Code and any matters referenced in the Code.
- ➎ Report possible Code or policy violations or other ethical concerns through our external hotline provider, speaking to any person listed in the Where to Go for Help section or, for certain employees in the EU, through the additional local reporting channels.
- ➏ Ensure that the subcontractors, suppliers, consultants, and agents we engage comply with JAS's Supplier Code of Conduct and the principles of this Code.

EMPLOYEES, MANAGERS, DIRECTORS, AND OFFICERS MUST ALSO:

- ➊ Set the tone at the top. Communicate openly about what matters, and make sure our teams understand how the Code, and other company policies are applicable to their role.
- ➋ Ensure their teams feel comfortable with their duty to speak up – as much about ideas and improvements as about ethics and compliance and the Code.
- ➌ Know where to go, and go there, when they need answers to questions about the Code.
- ➍ When facing ethical dilemmas, have the courage to pause, reflect on the impact of their actions, and ask for help.
- ➎ Earn trust by being role models. We listen, we commit, we act and lead with integrity at all times. Never encourage or direct any employee to achieve a business result at the expense of violating the Code or the law.

EMPLOYEES' RIGHTS

While we expect all employees to follow the Code, we also recognize your rights as a JAS employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code or in any company policy is intended to limit or interfere with your rights under applicable law.



Reporting Concerns

Where to Go for Help

- ➊ **This Code and Other Applicable Company Policies**
- ➋ **Your Supervisor or Managing Director**
- ➌ **Human Resources**
- ➍ **Legal Department**
- ➎ **Ethics Whistleblower Hotline (or, for certain employees in the EU, the additional local reporting channels)**

JAS maintains a company-wide Ethics Whistleblower Hotline, which is intended to cover serious concerns that could have a large impact on JAS, such as actions that violate this Code or company policy or otherwise amount to serious improper conduct, and available 24-7.

Where permitted by applicable law, reporters to the hotline may choose to remain anonymous. The information provided may be the basis of an internal and/or external investigation into the issue reported and anonymity will be protected to the extent possible by applicable law. JAS will attempt to maintain your anonymity; however, your identity may become known during the course of the investigation.

Please note that for jurisdictions in the EU, local reporting channels in addition to the company-wide Ethics Whistleblower Hotline may be required. In these circumstances, reporting of concerns through a designated local reporting channel is also available.

Investigating Concerns

At JAS, we are committed to maintaining the highest standards of integrity and ethical behavior. We take any concerns regarding violations of our Code very seriously. Each report is investigated to ensure compliance and uphold our values. When violations are confirmed, we take appropriate remedial actions to address the issue and prevent future occurrences. We encourage individuals to come forward with any Code concerns or violations, knowing that they will be addressed promptly and confidentially. Our dedication to ethical practices is fundamental to our success and reputation.



No Retaliation

Retaliation is any action that would likely deter someone from reporting a Code concern or participating in a Code investigation.

You are the eyes and ears of our company, and we require your help in avoiding and discovering possible misconduct. JAS prohibits retaliation when potential Code violations, business conduct or ethical issues are reported in good faith or when an employee participates in a Code investigation. Sharing a good faith concern about the Code, even if it turns out to be unfounded, is never an excuse for any type of retaliation and we have a zero-tolerance policy for retaliation.

Although we are committed to upholding the anti-retaliation provisions of the Code, these protections do not shield you from disciplinary action for your own misconduct. Therefore, you should not report a Code concern solely to evade discipline for your own violations of the Code or other company policies.

Honest Reporting

As much as we encourage honest reporting, we do not tolerate knowingly reporting false information. Such reporting, among other things, may lead to criminal or civil liability, depending on the applicable law and the nature of the falsehood, can be damaging to our company culture and undermines our company values, and is a violation of this Code and JAS policy. Never knowingly make a false accusation, lie to investigators, or refuse to cooperate in an investigation, as these actions also violate our Code and may lead to disciplinary action, up to and including termination of employment.

Examples of retaliation include, but are not limited to, firing or demoting an employee, reducing an employee's salary, changing an employee's project, role or working conditions, and verbally or physically threatening or harassing an employee who has reported, threatened to report, or otherwise taken action to address conduct that they believe in good faith is illegal or inconsistent with this Code or any policy in your business location.



Making Sound Decisions

At JAS, integrity is the cornerstone of our policies and actions. When faced with an ethical dilemma and the right answer isn't immediately clear, consider the following questions to guide your decision:

- ➊ Is it aligned with the Code?
- ➋ Is it legal?
- ➌ Does it comply with company policies?
- ➍ Does it benefit the company as a whole rather than favoring a specific individual or group?
- ➎ Would I feel comfortable if my decision or actions were made public?
- ➏ Does it foster trust and pride in JAS?
- ➐ Would I confidently stand behind this decision as a reflection of my integrity?

Where to Go for Help

If the answer to any of these questions is NO, the action may have serious consequences. Do not do it. Seek guidance and look to the Where to Go for Help section.

If the answer to **ALL** of these questions is **YES**, proceed with confidence.

If you are not sure, or still have questions, seek guidance in the Where to Go for Help section.



Promoting Respect and Dignity, Diversity, and Health and Safety

Our Commitment

At JAS, we are committed to fostering a professional, inclusive, and safe work environment where every employee feels valued, respected, and able to contribute. We believe that diversity strengthens our team culture and spirit and drives our success. Harassment, discrimination, and unsafe working conditions have no place in our workplace.

Respect and Care

We respect and care for each other by being open-minded, kind, and fair. Offensive, demeaning, or abusive conduct, including violence, threats, verbal abuse, bullying, unwanted sexual advances, intimidation, and other disrespectful behavior, is unacceptable. This applies to all interactions with colleagues, supervisors, co-workers, and non-employees with whom we interact (e.g., subcontractors, suppliers, consultants, customers, or agents).

Prohibited Conduct

We do not tolerate any conduct that denigrates or shows hostility toward another based on race, color, religion, gender, national origin, citizenship, age, disability, veteran status, genetic information, or any category covered by applicable law.

Prohibited behavior includes, but is not limited to, epithets, slurs, jokes, abusive language, negative stereotyping, intimidating or hostile acts, and the display or circulation of written or graphic material (including through email) that relates to protected characteristics.

Teamwork and Cooperation

We succeed as a team by listening to each other, believing in cooperation, and giving everyone a fair chance to contribute. We value diversity, as our differences make our team stronger.

Health and Safety

Safety is our priority. We ensure a safe work environment by understanding and following all applicable health, security, and safety standards and trainings. We watch out for our colleagues and step in when they need help, reporting all health and safety issues immediately.

Reporting and Accountability

Any employee who discriminates against or harasses another or intentionally violates health, security, or safety standards will be subject to disciplinary action, up to and including termination. Employees are required to report any behavior that they believe constitutes discrimination, harassment, or a violation of applicable health and safety laws and regulations.



Privacy and Personal Data

Our Commitment

At JAS, we are committed to protecting the privacy of our employees, subcontractors, suppliers, consultants, customers, and agents. We recognize the importance of safeguarding personal information and are dedicated to complying with all applicable data privacy laws and regulations.

WHAT IS PERSONAL INFORMATION?

Personal information includes any information that can be used to identify an individual, such as name, address, phone number, email address, social security number, financial and health information, or other similar personal information.

All personal information collected, used, or disclosed by JAS, regardless of the format in which it is collected or stored, is subject to JAS's commitment to maintaining data privacy and complying with all applicable laws.

Collection and Use of Personal Information

We will only collect personal information that is necessary for the purposes identified at the time of collection. We will obtain consent from individuals before collecting, using, or disclosing their personal information, except where permitted or required by law. Personal information should be handled, used, or shared only when there is a legitimate reason to do so, and then only in accordance with applicable law and company policy.

Safeguards

We will use appropriate safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, or modification. Employees are responsible for understanding and complying with legal requirements and the company data security and privacy policies for their business location.



JAS Integrity - Workplace

Retention and Disposal

We will only retain personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by law. When personal information is no longer required, we will endeavor to securely destroy or de-identify it.

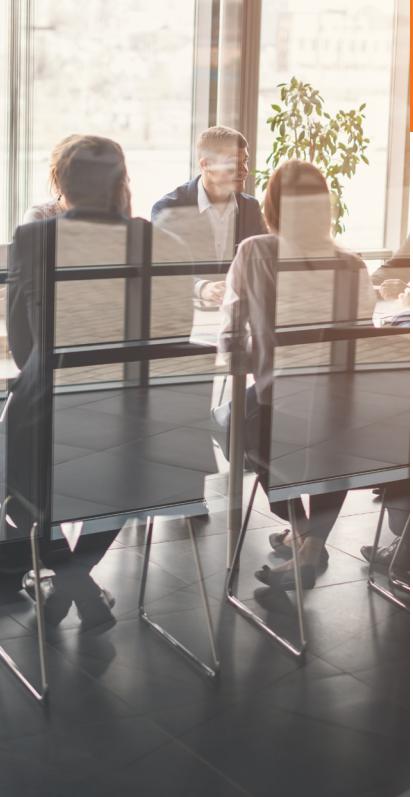
Confidentiality and Compliance

We respect the confidentiality of our customers' and employees' personal, financial, and health information. Penalties for violating data protection laws can be severe. Use caution when handling personal, health, and financial information to ensure that confidentiality is maintained.



Global Considerations

Privacy laws vary greatly from country to country. Acceptable handling procedures in one country may not be acceptable in another. When in doubt, contact Human Resources or the Legal Department.



Anti-Bribery and Anti-Corruption

We are proud to act with integrity and abstain from corrupt, illegal, and unethical practices. All JAS employees, subcontractors, suppliers, consultants, customers, agents, and other business partners are absolutely required to follow all applicable anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act of 2010, and other similar applicable laws. Together we strive for a world that is prosperous, secure, and free of corruption. Each and every one of us must go above and beyond to defend our principle of zero tolerance toward bribery.

Our Responsibilities

We influence with our excellence in service and performance:

- ➊ Merit-Based Success: Our success is built on merit and quality, and our employees, subcontractors, suppliers, consultants, customers, agents, and other business partners know it.
- ➋ Refusal of Improper Payments: If you are faced with a request for or offered an improper payment, you must refuse and contact the Legal Department for help.



Bribes and facilitation payments have no place at JAS or in the conduct of our business. No business goal is worth compromising our integrity.

GOOD JUDGMENT IS TEAMWORK

Perception Matters: It is not only the value of a gift or gratuity – intent, context, and location can change how something looks. What may be acceptable in one place can be influence-peddling in another. If you are unsure or have questions about what is acceptable, asking for advice and guidance is the right thing to do – contact the Legal Department for help.



JAS Integrity – Business Dealings

Prohibited Payments and Compliance with Laws

You may not directly or indirectly offer or provide any money, gift, gratuity, entertainment, or anything else of value to influence any act or decision of any government official or any person in an effort to obtain or retain business or secure any special concession or favorable treatment. We deal with customers, suppliers, agents, consultants, subcontractors, other business partners, and governments in a straightforward and above-board manner.

No Bribes or Kickbacks

- You must not offer to give bribes — such as, for example, commissions or finder's fees — to government officials, political parties, political party officials, or candidates for political office, or employees and agents of other companies and organizations, in an effort to obtain or retain business for JAS.
- You also must not ask for or accept bribes in exchange for giving any individual or company an advantage or favorable treatment in securing or retaining business with JAS.



Q: What should I do if a customs official asks for a non-listed "Expedited Service Fee" to expedite the clearance of a shipment?

Unload It!

A: Facilitation payments, such as those described above, are strictly prohibited at JAS. If a customs official requests such a payment, you should politely refuse and explain that our company does not engage in this practice. Immediately report the incident to the Legal Department. They will provide guidance on how to proceed and ensure that the situation is handled in accordance with company policy and applicable laws. Remember, maintaining our integrity compliance with anti-bribery laws is paramount, even if it means potential delays in shipment clearance.

ADDITIONAL CONSIDERATION Bribes

A bribe can be anything of value or benefit and does not have to be a cash payment or item of direct value. Bribes can be many things including, but not limited to, a job offer for a family member, a personal favor, paying for a business trip, or introduction to an influential person or political figure. A meal or other business courtesy could be considered a bribe if offered to obtain an improper business advantage. If you are unsure about whether an item of value or benefit could be perceived as a bribe, contact the Legal Department before taking any action.



Prohibition of Excessive Gifts and Hospitality

The giving and receipt of excessive gifts and entertainment, to or from any person or company made or that could be perceived as being made for the purpose of obtaining, retaining, or directing business to JAS or another company are strictly prohibited.

No Money Laundering

You must not engage in or facilitate any activities that involve the concealment of the origins of money obtained through illegal activities.

Accurate Books and Records

Complete and accurate books, records, and accounts must be kept and must fairly reflect transactions and dispositions of assets.

Internal Controls

A system of internal accounting controls must be maintained to provide reasonable assurances that transactions are executed in accordance with management authorizations and recorded as necessary to permit the preparation of financial statements in conformity with generally accepted accounting principles. Such controls also must ensure that access to assets is permitted only in accordance with management's authorization and the recorded accountability for assets is compared with existing assets at reasonable intervals.

ADDITIONAL CONSIDERATION **Government Officials**

A government official can be a government employee, a political party candidate or employee, an employee of a state-owned enterprise (e.g., state-owned airlines), an employee of a public international organization (e.g., a non-governmental organization), or anyone acting in an official capacity. If you have any dealings with government officials or manage those who do, contact the Legal Department for special guidance and training.

International Trade Compliance

Commitment to Compliance

As a global company supporting the supply chains of our customers worldwide, we are committed to complying with applicable international trade control laws and regulations governing the import and export of goods, software, technical data, and services across national borders. This includes export controls and sanctions laws and regulations.



Unload It!

Q: A customer tells you that a shipment of solar panels came from Vietnam and provides a customs declaration/certificate of origin that reflects Vietnam. There's Chinese writing all over the packaging and you believe that the shipper makes the solar panels exclusively in China. Should you sign the customs declaration/certificate of origin?

A: No, not without additional diligence and having consulted with the Legal Department. An incorrect statement may result in false declarations to the customs authorities and potentially subject JAS to significant fines and penalties.



Due to the frequent changes in international trade controls, if an employee is uncertain about an applicable legal requirement, he/she should contact the Legal Department.



Unload It!

Q: A customer asks you to move a shipment to Doha, Qatar, but on receipt of the commercial invoice for the shipment, you spot that the invoice is addressed to a company in Iran. Should you continue with the shipment to Doha, Qatar?

A: No, if you suspect that a shipment to a non-sanctioned country (in this case, Doha, Qatar) is ultimately intended for a sanctioned country (like Iran), you should reject the shipment. JAS must not be involved with the shipment in any way even if we are only moving the goods to a non-sanctioned country.



JAS Integrity – Business Dealings

Our Responsibilities

- ➊ **Customer Compliance:** We expect our customers to comply with international trade control laws and regulations in their transportation movements through our services. However, we may be responsible for the accuracy of information submitted to government authorities in connection with customer imports and exports, and in such circumstances, we must be extra vigilant to ensure the customer is providing accurate information. It is possible that JAS may be investigated or held liable for a customer's violation of international trade controls.
- ➋ **Alertness to Restrictions:** All JAS employees must remain vigilant about trade restrictions and customer activities. We must not provide services if there are questions about a customer's compliance with applicable international trade controls.
- ➌ **Consultation and Guidance:** All JAS employees involved in the import and export of goods, software, technical data, or services should be familiar with applicable laws and regulations regarding economic sanctions, and export and import controls.
- ➍ **Internal Controls Compliance:** All JAS employees must comply with all applicable company procedures and safeguards designed to prevent operation in or providing services to embargoed and sanctioned territories or sanctioned persons.

Compliance with Laws

- ➊ **Sanctions and Export Controls:** You and anyone acting on behalf of the company must comply with applicable sanctions and export control laws and regulations of the countries in which we operate. Additionally, you are required to comply with U.S. sanctions laws and regulations, even if you live outside the U.S. and are not a U.S. citizen, and wherever the business is being conducted; we are all considered U.S. persons per company policy.
- ➋ **Anti-Boycott Compliance:** We do not comply with or support foreign boycotts of countries that maintain friendly relations with the United States. If we are asked to comply with or support such a boycott, we promptly report the matter to the U.S. government.

Dealing with Subcontractors, Suppliers, Agents, and Consultants

Commitment to Ethical Partnerships

We are committed to fostering ethical and transparent relationships with our subcontractors, suppliers, agents, and consultants. Our subcontractors, suppliers, agents, and consultants' reputations can directly affect JAS, so it is imperative that our procurement decisions and dealings with subcontractors, suppliers, agents, and consultants reflect our core values of integrity and excellence, and are in compliance with all applicable laws and regulations.

Supplier Selection and Evaluation

- ➊ **Fair Selection Process:** We select subcontractors, suppliers, agents, and consultants based on objective criteria and their compliance with our ethical and performance standards and policies. Personal relationships or gifts or any other favoritism should not influence subcontractor, supplier, agent, or consultant selection.
- ➋ **Due Diligence:** We gather information on potential subcontractors, suppliers, agents, and consultants to ensure they meet our standards for ethical conduct, legal compliance, and quality. We strive to know who they are, what they do, where they operate, and why they want to do business with JAS.
- ➌ **Supply Chain:** We aim to prevent and mitigate negative impacts on individuals and continuously strive to safeguard human rights.

- ➊ **Contractual Relationships:** All subcontractors, suppliers, agents, and consultants must be engaged with a written agreement which has been approved in advance by the President or Managing Director of the relevant operating company and/or the Legal Department, when required.

Compliance and Integrity

- ➊ **Adherence to Laws:** Subcontractors, suppliers, agents, and consultants must comply with all applicable laws and regulations, including those related to labor, health and safety, environmental protection, and anti-corruption.
- ➊ **Adherence to our Codes and Policies:** Subcontractors, suppliers, agents, and consultants must comply with the principles in this Code (as applicable), JAS's Supplier Code of Conduct, and other applicable JAS policies.
- ➊ **Anti-Bribery and Corruption:** We do not tolerate any form of bribery or corruption. The same as JAS, our subcontractors, suppliers, agents, and consultants must not offer, give, or receive bribes or other improper payments to gain an unfair advantage. Any such offers must be reported immediately to the Legal Department.
- ➊ **Accurate Records:** We must maintain accurate and complete records of all transactions with subcontractors, suppliers, agents, and consultants. This ensures transparency and accountability in our dealings.



JAS Integrity – Business Dealings

Fair Competition and Dealing

JAS is a leader in the freight forwarding industry. A free and competitive environment drives us to exceed our customers' expectations. Integrity leads our decisions. We seek to outperform our competition fairly and honestly, gaining competitive advantages through superior performance, and never through illegal, unethical, or questionable business practices.



Our Responsibilities

COMPETE BY THE RULES

Knowing the industry makes us better at what we do – we only collect and use legitimate business intelligence and we neither solicit nor accept offers of competitively sensitive information. In all situations, whether attending trade association meetings, participating in tenders, working in lead logistics (4PL), freight forwarding, customs house brokerage, contract logistics, mergers and acquisitions, or even in informal conversations with friends or family employed by competitors, we adhere to and respect the established rules:

- We do not use confidential or competitively sensitive information from prior employers.
- We do not share competitively sensitive information.
- We do not ask for confidential intelligence from our competitors, customers, suppliers, or other parties.
- We do not steal proprietary or confidential information or possess trade secret information obtained without the owner's consent or in violation of an obligation of confidentiality, and we do not induce such disclosures by past or present employees of other companies.
- We do not enter into any contracts or agreements, formal or informal, written or unwritten, or follow any non-binding arrangements/understandings that have the purpose of or are likely to have the effect of substantially limiting competition.
- We do not misrepresent who we are and our role within JAS. We do provide accurate information about ourselves and our roles when attempting to gain any information about a competitor.

We seek help and obtain guidance from the JAS Legal Department before meeting with competitors.



JAS Integrity – Business Dealings

Fair Dealing

- >We must respect the rights of and deal fairly with our customers, suppliers, and competitors.
- We must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other intentional unfair-dealing practice.



Q: What should I do if a customer provides me with the rate sheet of a direct competitor in an RFQ process?

Unload It!

A: Receiving competitively sensitive information – even if it is not marked as confidential or proprietary – such as a competitor's rate sheet, can put JAS at risk of violating fair competition and antitrust laws and potentially lead to criminal and/or civil penalties. Here's how to handle a situation like this:

DO NOT REVIEW THE INFORMATION:

- Politely but firmly inform the customer that you cannot accept or review the document as it contains competitively sensitive information.

RETURN OR DESTROY THE DOCUMENT:

- If the document was provided in physical form, return it to the customer immediately. If it was sent electronically, delete the file and inform the customer in writing that you have done so.

REPORT THE INCIDENT:

- Immediately notify the Legal Department about the incident. Provide details of how and when the information was received and the actions you took.





JAS Integrity – Business Dealings



Q: If, during a trade association meeting, one of the participants brings up the topic of customer pricing, what should I do?

Unload It!

A: You should firmly and openly object to the discussion on pricing, and if the conversation continues, excuse yourself from the meeting and ensure your objection and excusal are notable and recognized by the meeting participants. You also should report the incident to the Legal Department.



Q: Is it acceptable to ask a new hire from a competitor to share information about their previous employer's strategies and pricing?

Unload It!

A: No, asking for or using a competitor's confidential information can lead to serious legal and ethical issues. It is crucial to maintain integrity and adhere to fair competition practices to protect our reputation and ensure compliance with the law. As JAS employees, we must:

Respect Confidentiality/Focus on Their Experience:

- Do not ask the new hire to disclose any proprietary or confidential information from their previous employer. This includes strategies, pricing, customer lists, or any other sensitive data. Instead, focus on the new hire's skills, experience, and insights that are relevant to their new role.
- Encourage them to apply their knowledge in a way that respects their previous employer's confidentiality.

Reinforce Company Policies:

- Remind the new hire of our commitment to fair competition and ethical behavior. Ensure they understand the importance of not sharing confidential information from their previous employment.

Government as a Customer/Supplier

Working with government entities requires special consideration and adherence to the highest standards of integrity, transparency, and compliance. We are committed to conducting all business with government customers and suppliers in a lawful and ethical manner, ensuring that we meet all legal, regulatory, and contractual obligations.

Our Responsibilities

- ➊ **No Improper Influence:** We do not offer, give, or promise anything of value to government officials.
- ➋ **Adherence to and Knowledge of Regulations:** We comply with all applicable laws, regulations (which may vary from country to country and even within some countries from one location to another), and contractual requirements when conducting business with government entities.

If you deal with the government or a government-owned business, you are responsible for knowing and complying with all applicable laws, regulations, and contractual requirements, including procurement regulations and anti-bribery laws. If you have questions about what is acceptable, contact the Legal Department for guidance.

- ➌ **Accurate Reporting:** We ensure that all reports, certifications, and statements provided to government entities are accurate, complete, and truthful.
- ➍ **Fair Competition:** We compete fairly and do not engage in practices that could be perceived as anti-competitive or unethical. This includes avoiding any form of collusion or bid-rigging.
- ➎ **Cooperation with Audits:** We cooperate fully with any audits or investigations conducted by government entities, providing all necessary information and support.

Special Rules and Safeguards

- ➏ **Bidding Processes:** We adhere to all rules and regulations governing the bidding process for government contracts.
- ➐ **Use of Subcontractors:** We ensure that all subcontractors comply with the same standards and regulations that apply to our direct dealings with government customers.
- ➑ **Gifts and Entertainment:** We do not offer or accept gifts or entertainment that could be perceived as influencing government officials or employees.
- ➒ **Conflicts of Interest:** We avoid any situations that could create a conflict of interest in our dealings with government customers.
- ➓ **Hiring Practices:** Our hiring practices comply with all applicable laws and regulations, ensuring fairness and transparency.



JAS Integrity – Business Dealings



Q: Can I buy lunch for government officials after a meeting to discuss our services?

Unload It!

A: No, buying lunch or any other form of entertainment for (or providing gifts or other hospitality to) government officials is prohibited. Offering meals or entertainment or providing gifts or other hospitality to government officials can be perceived as an attempt to influence their decisions, which can lead to serious legal and ethical issues. It is crucial to maintain integrity and adhere to fair competition practices to protect our reputation and ensure compliance with the law.

Example Response to Government Officials Who Ask for a Follow-Up Lunch:

"Thank you for the productive meeting. While we would love to continue our discussion over lunch, our company policy and government regulations restrict us from offering to pay for meals. We can schedule a follow-up meeting at our office if that works for you."



ADDITIONAL CONSIDERATION Government-Owned Enterprises

Many government-owned enterprises look and feel no different from privately-owned enterprises operating within the same industry. For example, there are several airlines with which JAS does business that are owned – in whole or in part – by the government.

Imagine JAS is negotiating a contract with one of these airlines. To show goodwill, you decide to give a high-value gift to a senior employee of the airline. Because it is a state-owned enterprise, meaning its employees are considered government officials, offering gifts to these employees is prohibited by this Code and would potentially violate international anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act of 2010, and similar local laws.



Conflicts of Interest

We must make all our decisions independently and objectively, prioritizing the best interests of our company, our teams, and our subcontractors, suppliers, consultants, customers, agents, and other business partners.

Conflicts of interest can arise when personal interests compete with our obligation of loyalty as employees. It is our duty to avoid financial, business, or other relationships that might conflict with the performance of job duties or the interests of our customers.

At all times, we must conduct ourselves in a manner that avoids even the appearance of a conflict of interest between our personal interests and those of the company or its customers.

Our Responsibilities

- ➊ Recognize potential conflicts of interest
- ➋ Immediately disclose potential conflicts of interest to the Legal Department
- ➌ Adhere to any guidance or requirements provided to you regarding conflicts of interest



Q: What should I do if I own a significant number of individual shares in a company that is a supplier to JAS?

Unload It!

A: Owning a significant number of individual shares in a company that does business with us can create a conflict of interest. You should disclose this situation to the Legal Department. They will have a confidential discussion with you to understand the extent of your financial interest and its potential impact on your decision-making. Together, you will determine the appropriate measures that may be taken to mitigate any conflict, such as recusing yourself from related decision-making processes.



Recognizing Potential Conflicts of Interest

A conflict of interest exists when your private interest could interfere in any way with the interests of the company or its customers. This can occur in various ways, such as:

- ➊ Owning or holding a financial interest in a company with material business dealings with JAS.
- ➋ Acting as a director, officer, consultant, or employee for a business institution with which we have a competitive or significant business relationship.
- ➌ Acting as a director, advisory member, or officer for a non-profit organization for which you have discretionary authority over whether money or other support will be provided on behalf of the company to the non-profit organization.
- ➍ Accepting gifts, payments, or services of significant value from those seeking to do business with JAS.
- ➎ Knowingly competing with JAS in the purchase or sale of personal or real property.
- ➏ Owning or controlling a firm with which JAS conducts business without prior specific written approval.
- ➐ You or an immediate family member working for or owning a significant interest in another company, which 1) competes with JAS; 2) may interfere or be perceived to interfere with your interests to JAS; or 3) provides services to a customer, supplier, or agent of JAS.

- ➊ Being involved in the hiring, firing, or promotion of, or other significant employment decisions regarding an immediate family member's employment at JAS or having an immediate family member indirectly or directly report to you.
- ➋ Using the company's property, information, or your position in the company or information discovered by virtue of your position with the company to find and/or exploit opportunities for your own personal benefit.



Unload It!

Q: Through my relationship with a customer with whom we recently started doing business, I became aware that this customer is expanding and buying a smaller company. Based on the information gathered and the potential growth and opportunity, I would like to purchase stock in the customer. Can I do this without approval given my current role with the company?

A: No. Because you have discretionary authority in dealing with the company as part of your job, you may not use the information you obtained about the customer through your role at JAS to take any action for your own personal gain. Additionally, this investment would be considered insider trading, which is a violation of the Code and the law.



Disclosing Conflicts of Interest

When we feel our judgment could be biased or there is a conflict of interest, we must stop and disclose the situation to the Legal Department. Disclosing a conflict of interest is about improving decision-making on behalf of JAS and our customers. If your personal interest influences your decision, it is your duty to seek help by involving an independent expert to ensure transparency and objectivity.



Q: How do I disclose a conflict of interest if a family member is employed by a competitor?

Unload It!

A: If a family member works for a competitor, it could influence your objectivity. Disclose this relationship to the Legal Department. They will discuss the situation with you to assess any risks and decide on steps to ensure your decisions remain unbiased. This might include avoiding involvement in competitive analysis or strategic planning related to that competitor.



Q: Can I work as a consultant for another logistics company while employed at JAS?

Unload It!

A: No. Working as a consultant for another logistics company creates a conflict of interest. This type of conflict is not permissible as it creates too great of a risk that information would be unintentionally or intentionally shared with the competitor, may compromise your ability to remain unbiased and fully committed to JAS, affect your decision-making and performance, and may have anti-competitive impact.

Following Guidance from Human Resources and the Legal Department

After disclosing a conflict of interest, it is crucial to follow the guidance provided by Human Resources and the Legal Department. They will:

- Engage in confidential communication with you to understand the situation.
- Assess the risk and determine appropriate measures to mitigate the conflict.
- If the conflict can be cleared, provide you with clearance and specific instructions to ensure your decisions remain unbiased and in the best interest of the company.



Q: I am dating a coworker who is being considered for a leadership position for the group I am in. What should I do?

Unload It!

A: This situation could create a conflict of interest. Even if you and your coworker are currently equals in the same group, advise your supervisor of the relationship so that your supervisor can prevent an inappropriate reporting relationship.



JAS Integrity – Accountability

JAS Conflicts of Interest – How to Make Sound Decisions

At JAS we avoid conflicts of interest. When confronted with a situation that may appear to be a conflict of interest, ask yourself the following questions:

Could my personal interests or relationships influence the decisions I make?



Would I feel uncomfortable if others knew about this relationship?



Could this decision be perceived as not being made solely based on what is best for the company?



Could my ability to remain objective and impartial in my professional duties be compromised due to my personal interests?



If the answer to any of the above questions, is YES, it probably is a conflict of interest. Seek guidance from your supervisor, Human Resources, or the Legal Department.



Q: What should I do if my spouse is an employee at a supplier of the company?

Unload It!

A: If your spouse (or other relative) is an employee at a supplier of your company, you should immediately disclose this relationship to the Legal Department. Transparency is crucial to manage any potential conflicts of interest. The company may then take steps such as reassigning your duties to avoid any influence over supplier-related decisions or ensuring you recuse yourself from discussions and decisions involving that supplier. This helps maintain integrity and trust within the organization. If the answer to any of the above questions is YES, it probably is a conflict of interest. Seek guidance from your supervisor, Human Resources, or the Legal Department.

DID YOU KNOW?

An immediate family member is a spouse, sibling, parent, grandparent, child, in-law or same sex domestic partner. For purposes of this Code, an immediate family member also can be someone who lives with you, someone with whom you have a romantic relationship, someone who is financially dependent on you, or who you are financially dependent on regardless of the family relationship. Occasionally, friendships you develop with individuals associated with our subcontractors, suppliers, consultants, customers, agents, or other businesses. Business partners may have at least the appearance of influencing your actions on behalf of the company.



Gifts and Hospitality

Our company values transparency and integrity in all business dealings. Our policy is simple. We do not exchange gifts or hospitality that look like an attempt to improperly influence a business decision. No matter if you are the giver or recipient you need to recognize when an offer of a gift or hospitality is excessive under our policy.

Our Responsibilities

Acceptable gifts and hospitality are those that are:

- ⌚ Modest in value (USD \$75 or less, or its equivalent) and infrequent.
- ⌚ Given openly and transparently.
- ⌚ Not intended to influence business decisions or create a sense of obligation.
- ⌚ Approved for a large group of employees.
- ⌚ Examples of acceptable gifts include promotional items of modest value, such as pens or calendars; reasonable logoed or branded items; and occasional meals or entertainment that are reasonable and customary in the business context.

REMINDER:

We do not give gifts, meals, entertainment, or hospitality of any kind or promise anything of value to government officials!

Prohibited Gifts and Hospitality

We must not accept or offer gifts or hospitality that:

- ⌚ Are extravagant or excessive.
- ⌚ Could be seen as a bribe or an attempt to influence business decisions.
- ⌚ Are given in secret or with the expectation of a favor in return.
- ⌚ Are cash or a cash equivalent, like a gift card, gift certificate, stock or securities.
- ⌚ Not available to others, like a special discount.

Never request gifts, hospitality or favors from any current or potential business partners – doing so also is a violation of this Code.



Q: Is it acceptable to give a client a gift card as a thank you?

A: No. Giving a gift card is considered a cash equivalent, which is prohibited under this Code. Instead, consider giving a modest, non-monetary gift that is appropriate for the occasion. If you are unsure about what is appropriate, consult with the Legal Department.

Unload It!



Reporting and Approval

If you are unsure whether a gift or hospitality is appropriate, or if it exceeds the \$75 USD threshold you must disclose it to Human Resources or the Legal Department. They will review the situation and provide guidance on the appropriate course of action.

But I might offend the giver!

It can be challenging to refuse a gift, especially if you're concerned about insulting the giver or if the gift is presented in front of others. In most situations, you should politely decline or return the gift stating that while you appreciate being thought of, unfortunately, you cannot accept it because it is a violation of this Code. If you find it extraordinarily difficult to decline or return, it may be okay to accept the gift provided that you promptly inform Human Resources or the Legal Department. They will assist you in donating, distributing, or raffling it among a larger group of employees. Additionally, share our company's rules regarding gifts with the giver to help avoid similar situations in the future.

Travel and Premium Events:

If you receive an offer for paid travel to an out-of-town location or a premium event such as, but not limited to, the Olympics, Masters, Super Bowl, World Cup, and concerts, consult with your manager first. Together, you can determine if there is a valid business reason for you to attend. If there is, JAS should at least cover your travel expenses (airfare and lodging) and any other costs deemed appropriate by the Legal Department. Always ensure that the receipt of travel or premium event tickets is approved in advance by the Legal Department.

Valid Business Reason:

When it comes to hospitality, whether the hospitality sponsor/giver also is attending along with the gift recipient(s) plays a role in determining if it is acceptable. Accompanying attendance by the sponsor/giver helps mitigate the perception of favoritism or undue influence, as the interaction is part of a broader professional engagement rather than a one-sided gift. Further, attending together allows both parties to share the experience, which can lead to more meaningful discussions, insights, and networking opportunities that benefit the business relationship or are directly related to your work.



Sometimes, you may not be sure if a gift is excessive or not, for example:

| WHEN IT IS OKAY | WHEN IT IS NOT OKAY |
|--|--|
| <ul style="list-style-type: none">• AN OFFER TO GO TO LUNCH WITH A NEW SUPPLIER• A GIFT BAG AT A SUPPLIER'S CONFERENCE FILLED WITH SNACKS AND SUPPLIER-LOGOED ITEMS• A GOLF OUTING WITH AND LUNCH WITH A SUPPLIER• AN OFFER TO HAVE A DRINK WITH A SUPPLIER• A TUMBLER WITH A CORPORATE LOGO | <ul style="list-style-type: none">• A MEAL FOR YOUR ENTIRE FAMILY PAID FOR BY A SUPPLIER• A CONCERT OR SPORTING EVENT PAID FOR BY A SUPPLIER NOT IN ATTENDANCE• A GIFT BASKET FILLED WITH AN EXPENSIVE WATCH, AMONG OTHER ITEMS, SENT TO YOU BY A SUPPLIER• AIRFARE AND ACCOMMODATIONS AT A GOLF RESORT• A CASE OF FINE WINE OR BOTTLE OF VERY EXPENSIVE WINE• AN EXPENSIVE PAIR OF NOISE-CANCELLING HEADPHONES |

Giving Gifts and Hospitality

When it comes to giving gifts, meals, and entertainment, there may be occasions where you need or want to provide these to a business contact. In such cases, ensure that the gift, meal, or entertainment serves a legitimate business purpose and is appropriate and reasonable under the circumstances. Always be aware that our subcontractors, suppliers, consultants, customers, agents, and other business partners have their own policies regarding gifts, meals, and entertainment. Never offer anything that could violate these policies or place the business partner in an uncomfortable position.



Q: Can I accept a holiday gift basket from a supplier?

A: If the gift basket is modest in value and given as a customary holiday gesture, it is generally acceptable. However, if the value is significant or if you feel it could be perceived as influencing your business decisions, you should disclose it to the Legal Department for further guidance.



Q: How should I handle a situation where a supplier insists on paying for an expensive dinner?

A: If a supplier insists on paying for an expensive dinner, it could be seen as an attempt to influence your decisions. Politely decline the offer and suggest a more modest meal or offer to split the bill. If the situation persists, report it to the Legal Department.



Accurate Recordkeeping and Financial Integrity

Each of us – at every level of our company – has a responsibility for ensuring the accuracy of all Company business and financial records. Be honest, accurate, and complete in what you record. Accurate recordkeeping and reporting help us meet our legal and regulatory requirements and maintain our reputation and credibility.

Our Responsibilities

- ➊ **Transparency and Accuracy:** No undisclosed or unrecorded fund or asset shall be established for any purpose. No fraudulent or artificial entries shall be made in our books and records (including financial, customs or other records) for any reason. You must never, directly or indirectly, falsify any transactions or company books or records. Estimates and accruals must also be supported by appropriate documentation and based on your best judgment.
- ➋ **Authorization and Recording:** All transactions shall be executed in accordance with management's general or specific authorization. Transactions must be properly recorded in reasonable detail to permit preparation of financial statements in accordance with generally accepted accounting principles and to maintain accountability for assets.

➌ **Proper Use of Funds:** No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment.

➍ **Proper Classification and Timing:** Properly classify transactions to ensure they reflect the true nature of any transaction. Always record and classify transactions in the proper accounting period and in the appropriate account and department. Never speed up or slow down the recording of a revenue or expense to meet a budgetary goal.

➎ **Submitting Expenses and Making Payments:** If you submit expenses for reimbursement or make payments on behalf of the company, include any supporting documentation and approvals that are required.

➏ **Cooperation with Auditors:** All records and transactions are subject to review by internal and external auditors. Full cooperation with the auditors is expected, and under no circumstances will any relevant information be intentionally withheld from them.



Business Records and Communications

Our Responsibilities

- ➊ Avoid exaggeration, derogatory remarks, guesswork, boasting, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to emails, direct messages or chats, internal memos, and formal reports.
- ➋ Records must always be retained or destroyed according to applicable retention laws and our record retention policies. Documents relevant to any pending, threatened, or anticipated litigation, investigation, or audit which are subject to legal hold must not be destroyed unless and until any legal hold is released by the Legal Department and then only in accordance with their normal handling procedures and retention schedule.

With respect to JAS-owned social media accounts, only authorized employees are allowed to use them and speak on behalf of JAS.

Social Media

Social media helps us connect with stakeholders and the public. Remember that statements on social media are permanent and can impact our company's reputation and relationships. Always consider the effect of your words. We must communicate clearly and responsibly to maintain high standards and comply with laws and regulations.

- ➌ Be transparent about the fact that you are a JAS employee by using in-line disclosures (e.g., "proud to work for a Company that...", "as a JAS employee...") or by adding the approved hashtag "#JASEmployee", at the beginning of any post or re-post about JAS or its services.
- ➍ When you post content regarding professional, industry-oriented, or JAS-oriented subject matter, always use a disclaimer (e.g., "The postings on this site are my own views and do not represent the views of JAS").
- ➎ Provide worthwhile, relevant and truthful information in line with your expertise and the work you do every day. Don't spread false information, rumors, or misleading claims about JAS or our employees, competitors, subcontractors, suppliers, consultants, customers, agents, or other business partners.
- ➏ Don't publish, post or release confidential or proprietary information or trade secrets (e.g., non-public financial or operational information, current work projects, internal reports, customers' personal information, or legal information) or information subject to privacy provisions or laws.
- ➐ Online postings referencing JAS must not violate any applicable law, regulation, or JAS policy. This includes not infringing on others' intellectual property rights, including copyrights, trademarks, and rights to publicity and privacy.



JAS Integrity – Accountability

Business records and communications often become public, and, in the case of your personal social media, it is public. Maintaining accurate and transparent business records and communications is essential to uphold the integrity and trustworthiness of our operations, ensuring compliance with legal requirements and fostering a culture of accountability and transparency.



Q: Can I post a video on my personal YouTube channel that includes the JAS logo at the bottom and provides instructions on how to use JAS's transport management system?

Unload It!

A: Posting a video on your personal YouTube channel that includes the JAS logo and instructions on using JAS's transport management system is not permitted.

First, using the JAS logo in personal videos can create confusion about whether the content is an official communication from the company or a personal project and this would be an unauthorized use of the company's intellectual property. Additionally, sharing detailed instructions on using our software could inadvertently disclose sensitive information and potentially harm our brand's reputation.



Government, Media, and Other Inquiries

JAS is dedicated to ensuring clear, accurate, and consistent communication with government entities, media, and other external parties. All inquiries must be managed with integrity and consistent with company policies to safeguard our reputation and comply with legal and regulatory standards. Only designated spokespersons are authorized to communicate on behalf of JAS with government officials, media representatives, and similar third parties. These individuals are trained to handle inquiries in a manner that aligns with our company's policies and values.



**JAS Integrity –
Accountability**

Our Responsibilities

- ➊ Direct any inquiries from a government agency or official that is non-routine or relates to an investigation to the Legal Department. The Legal Department will ensure that all responses are accurate, timely, and complete, fully meeting any legal obligations while preserving the company's rights under the law.
- ➋ Direct any inquiries from the media to the Marketing Department. The Marketing Department will ensure that all media inquiries follow any media relations policies, including policies related to social media, are followed and appropriate internal stakeholders, including the Legal Department, are engaged.
- ➌ Direct all inquiries or documents received from any attorney or legal representative for any third party immediately to the Legal Department for review and response.



Use and Protection of Company Assets

Use and Protection of Company Assets

The buildings we work in, the technology that connects us, the ideas we develop, the emails we exchange, the computers and mobile devices we use for our jobs — all these and more are company assets that we are entrusted to protect. We use them to conduct company business and must safeguard them from damage, loss, misuse, and theft.



JAS Integrity – Accountability

Our Responsibilities

- ➊ Do not use company assets for an outside business or personal gain, or for any illegal or unethical activities (such as accessing or disseminating pornographic or offensive content).
- ➋ The use of corporate funds or assets for any unlawful or improper purpose is strictly forbidden. This includes illegal political contributions to candidates, parties, or government officials in any country, and payments to any government officials or private individuals to influence the purchase of our goods and services.
- ➌ Charitable contributions by the company must comply with all internal policies, including anti-bribery/anti-corruption policies. Such contributions must be made legally, ethically, and transparently.
- ➍ Physical property and resources are provided to help us perform our jobs. Protecting the company's assets helps ensure our ability to grow and succeed. Never lend, sell, or give them away unless authorized.
- ➎ Use electronic assets (including computers, hardware, software, mobile devices, and other media) appropriately. Follow our policies and use good judgment. Any information you create, share, or download onto company systems belongs to the company, and we reserve the right to monitor system use at any time, as permitted by law. Using passwords does not in any way diminish the company's rights to access materials on its electronic systems or create any privacy rights of employees in the messages and files on such systems.

Intellectual Property (IP) Rights

- ➏ Patents, copyrights, trademarks, and trade secrets are valuable company assets. Protect IP diligently, and remember that the company owns any work product (such as ideas, processes, and inventions) you develop or design in the course of your employment with JAS, to the extent permitted by law. This ownership continues even if you leave the company.
- ➐ Third parties hold intellectual property rights too, and it is crucial to respect them. You must not download, copy, reproduce, distribute, display, or modify copyrighted materials or trademarks without the owner's permission. Remember, a work can be protected by copyright even if it does not have a copyright notice.



Q: Can I use a picture in our company newsletter that features a customer wearing shirts with their company's logo on them?

Unload It!

A: Using a picture that features a customer wearing shirts with their company's logo can be sensitive and requires careful consideration. Before including such a picture, you should obtain explicit permission from the customer and the individual(s) wearing the shirts to use their logo/images in our newsletter. This ensures that we respect their privacy and intellectual property rights. Additionally, it's important to consider whether the inclusion of their logo could be seen as an endorsement or imply a partnership that may not exist.

Confidentiality and Protection of Information

Maintaining the confidentiality of information entrusted to us by our company, subcontractors, suppliers, consultants, customers, and agents is crucial for preserving our competitive advantage and reputation. During your relationship with JAS and after your relationship with JAS ends, you must maintain the confidentiality of confidential information entrusted to you by us or our customers, or others with whom we have a confidential relationship.

WHAT IS CONFIDENTIAL INFORMATION?

Confidential information includes all non-public information that might be of use to competitors or harmful to us or our customers if disclosed. It also includes information that contractors, subcontractors, suppliers, consultants, customers, and agents have entrusted to us.

Our Responsibilities

- ➊ Understand Confidential Information: Know the types of information considered confidential and the ways to protect it. Confidential information can be written, spoken, or electronic.
- ➋ Proper Use and Disclosure: Use confidential information only for the purpose for which it was entrusted to us. Do not misuse it in any way. Share non-public information only with those who have both the authorization to access it and need to know the information to do their jobs. Disclosure is only permitted when authorized by the Legal Department or required by laws or regulation.
- ➌ Protect Confidential Information: Take appropriate steps to protect confidential information, such as asking external parties to sign a confidentiality agreement before gaining access to our information. We also use a classification system to identify and protect non-public information. This system should be used per applicable local policies and laws and regulations.
- ➍ Communication and Vigilance: Be cautious about sharing confidential information. Avoid discussing or sharing it in public places, as this can put the information at risk of being disclosed and possibly misused. If you are unsure whether information can be shared or how to share it, consult your manager or the Legal Department.
- ➎ Never share non-public information from your former employer(s) or ask others to do so. Similarly, if you leave the company, do not share our non-public information with others.



Human Rights

Our Company is deeply committed to respecting and promoting human rights in all our operations and interactions. We adhere to the UN Guiding Principles and standards set out in the conventions of the ILO (International Labor Organization), ensuring that our employees, subcontractors, suppliers, consultants, customers, agents, and other business partners avoid contributing to human rights violations. Our goal is to enhance the enjoyment of human rights within the communities where we operate, fostering a culture of respect and dignity for all individuals affected by our business activities.

Our Responsibilities

- >We expect everyone within our organization to uphold these human rights standards consistently in all business activities and decisions. This includes prohibiting child labor, modern slavery, and any form of discrimination or harassment.
- We ensure fair wages, reasonable working hours, and ethical recruitment practices and recognize freedom of association and collective bargaining rights.
- We respect the rights of women, minorities, indigenous peoples, and local communities, including their land, forest, and water rights.

We strive to create a workplace that embraces inclusiveness and belonging and respects all individuals. For more detailed information, please refer to our Human Rights Policy at <https://www.jas.com> and other related guidelines.



Modern Slavery/Human Trafficking

We are dedicated to upholding human rights and preventing modern slavery and human trafficking in all our operations and supply chains. Our employees, subcontractors, suppliers, consultants, customers and agents are integral to our success and culture. We expect each and every one of them to conduct business with a strong commitment to these principles, ensuring compliance with all applicable laws pertaining to modern slavery.

Our Responsibilities

- ⌚ JAS and its subcontractors, suppliers, consultants, customers and agents will not use forced or compulsory labor and will ensure that all terms of employment are voluntary.
- ⌚ We will not hold passports of migrant workers and will only pay fees to reputable temporary worker agencies.
- ⌚ We comply with minimum age requirements, ensure fair compensation that meets or exceeds legal minimums, including overtime pay, and abide by laws concerning maximum working hours.
- ⌚ We maintain transparency in compliance records and are committed to identifying and mitigating modern slavery risks through due diligence, risk assessments, audits, and engagement with suppliers.
- ⌚ We provide training to employees on identifying and reporting modern slavery.

For more detailed information, please refer to our Global Modern Slavery Policy at <https://www.jas.com> and other related guidelines.



Sustainability

We are committed to promoting sustainability and protecting the environment in all aspects of our operations. We recognize the significant impact that our industry can have on the planet, and we strive to minimize our environmental footprint through responsible practices and continuous improvement. Our sustainability mission reflects our commitment to addressing the diverse needs of our stakeholders and ensuring the well-being of future generations across all aspects of Environmental, Social, and Governance (ESG) dimensions.

Our Environmental Responsibilities

- >We comply with all applicable environmental laws and regulations, measure and report greenhouse gas (GHG) emissions, and prioritize renewable energy. Our strategy includes reducing GHG emissions, promoting circular economy solutions, and enhancing energy efficiency.
- We focus on minimizing waste, using natural resources responsibly, and encouraging sustainable practices.
- We support climate protection projects that focus on ecosystem restoration and protection, benefiting biodiversity and local communities.

Transparency and Engagement

We publish an annual sustainability report and encourage employees to report environmental concerns. We engage with stakeholders, including subcontractors, suppliers, consultants, customers, agents, and the community, to promote sustainable practices and collaborate on initiatives that support environmental protection, social responsibility, and good governance practices. By integrating sustainability principles into our daily operations, we foster a culture of not only environmental stewardship, but contribution to a more sustainable future and living our value to make a sustainable impact in our ecosystem.



Corporate and Personal Political Activities and Donations

Many countries have strict laws that limit or prohibit corporate contributions to political parties and candidates.

Political Contributions

To avoid any confusion, JAS has a straightforward rule: No company funds, resources, or facilities may be used to support, directly or indirectly, any political party or candidate anywhere in the world, unless the contribution has been determined to be legal by the Legal Department, is approved by the Board of Directors, and complies with any applicable regional and local policies.

Examples of indirect support include:

- Purchasing tickets for a political fundraising event.
- Providing meals, goods, services, or transportation to a candidate or political party.
- Loaning employees as "volunteers" for political parties or campaigns.

Employee Participation in Political Activities

We value and encourage our employees' personal involvement in the political process. However, such participation must be on an individual basis, on your own time, and at your own expense. When

engaging in political activities, ensure that your views are understood to be personal and not representative of the company. If you plan to seek or accept a public office, inform your manager and disclose your plans to the Legal Department in advance. You will need to discuss with your manager and Human Resources how your official duties might impact your work for the company and receive final approval and guidance from the Legal Department.

Lobbying and Government Relations

Company officials and representatives may meet with government members to discuss policies and legislation of interest to the company. These lobbying activities are subject to special rules and must be coordinated for effectiveness and compliance. Before engaging in any non-routine contact with government officials or employees, consult with the Legal Department.

Participation in Foreign Political Activities

Participating in political activities in a country where you are not a citizen may jeopardize your right to live and work there. Therefore, such participation is prohibited.