

Code of Conduct

Jotron



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1 Introduction

The Code of Conduct applies to all organizations that supplies goods or services to Jotron or has established a business relationship with the company – including agents, distributors, and other partners (“Suppliers”). Jotron comprises the parent company Jotron AS and its subsidiaries.

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 behavior and requires suppliers to comply with the same ethical standards.

2 Code of Conduct

This Code of Conduct is designed to clarify Jotron’s expectations and sets out the minimum standards of behavior and practices required from Suppliers. It’s a business enabler and ensures good business practice of end-to-end delivery, benefiting both our suppliers and customers. Jotron also expects that Suppliers flow down these principles to their own suppliers to ensure alignment across the supply chain.

In addition, Suppliers are encouraged to align with leading international and industry best practices. At Jotron, we recognize that upholding these standards is a continuous process. We invite Suppliers to join us in a shared commitment to ongoing improvement and responsible business conduct.

Suppliers must comply with all applicable laws and regulations and with our Code of Conduct. In instances where our Code establishes a higher standard than legal requirements – without creating a conflict – compliance with the Code is expected. Any perceived conflict between the Code and applicable legal obligations should be reported to the appropriate Jotron manager.

If a Supplier is found not to meet 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.

3 Human and labor rights

Suppliers must uphold and promote the principles set forth in the United Nations Universal Declaration of Human Rights and ensure they are not complicit in human rights abuses. Suppliers are expected to take proactive steps to identify, prevent, and mitigate any adverse human rights impact within their operations and supply chains.

3.1 Anti-discrimination and fair treatment

Suppliers must uphold the dignity, privacy, and fundamental rights of every individual. Suppliers are expected to commit to an inclusive and respectful work environment, free from any form of harassment. This includes, but is not limited to, verbal, non-verbal, physical, or visual conduct that is sexual, coercive, threatening, abusive, or exploitative in nature. Discrimination in any form is prohibited, including but not limited to discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation, or sexual orientation.

3.2 Anti-slavery and human trafficking

Suppliers must not use any form of forced, bonded, or involuntary labor, including but not limited to prison labor, slavery, or human trafficking. All work must be voluntary, and workers must be free to leave their employment upon providing reasonable notice. Under no circumstances must any individual be required to work against their will.

3.3 Young workers

Suppliers must not employ child labor at any stage of their activities. A “child” is defined as anyone under 15 years of age, the legal age for completing compulsory education, or the minimum employment age in the country—whichever is highest. If child labor is discovered, suppliers must provide appropriate remediation and support. Workers under 18 (Young Workers) must not engage in hazardous work or tasks that compromise their health or safety.

Suppliers are required to verify and document the birth dates of all employees. For student workers, suppliers must conduct due diligence on educational partners, protect student workers’ rights in line with applicable laws, and support legitimate workplace learning programs. In the absence of local wage laws, student workers, interns, and apprentices must be paid at least the same as entry-level workers doing similar work.

3.4 Wages and benefits

Suppliers must ensure that all workers are compensated fairly and in accordance with all applicable wage laws and regulations. This includes compliance with minimum wage standards, overtime compensation, and legally mandated benefits. Under no circumstances must wages be below a living wage – defined as income sufficient to meet basic needs and support a decent standard of living.

Working hours must comply with the maximum limits set by local laws. A workweek must not exceed 60 hours, including overtime, except in emergency or exceptional situations. All overtime must be voluntary. Workers must be entitled to at least one day off in every seven-day period, except in emergency or exceptional situations.

3.5 Freedom of association and collective bargaining

Suppliers must uphold and respect workers' rights to freely associate, form or join trade unions of their choice, participate in collective bargaining, and engage in peaceful assembly. Equally, workers must be free to opt out of such activities without coercion.

4 Health and safety

Suppliers must ensure a safe and health-promoting work environment in compliance with all applicable laws and regulations. Suppliers must demonstrate a structured approach to health and safety that meets legal standards and reflects good practice.

A qualified person must be appointed to oversee health & safety efforts, including risk assessments, incident follow-up, and continuous improvement. Suppliers must identify potential emergencies and implement clear preparedness plans, including evacuation procedures, alert systems, and regular training.

Employees must be provided with suitable personal protective equipment (PPE) and trained to understand workplace risks and safety procedures. Training must be role-specific and documented to ensure competence and awareness.

Suppliers must maintain documentation such as health and safety policies, risk assessments, emergency plans, training records, and incident handling procedures. Jotron reserves the right to audit and verify compliance with these requirements.

5 Environment

Suppliers are expected to actively assess their environmental impacts and take meaningful steps to minimize any adverse effects.

5.1 Decarbonization and energy use

Jotron will prioritize suppliers who show a clear commitment to reducing CO₂e emissions in alignment with the Paris Agreement's 1.5°C target. Suppliers are encouraged to monitor and report Scope 1 and 2 emissions, significant Scope 3 emissions, and set reduction targets. In addition, suppliers are encouraged to actively reduce energy consumption and transition to renewable energy sources.

5.2 Resource use and waste management

Jotron will prioritize suppliers who are adopting circular practices. Suppliers are expected to use natural resources responsibly, actively minimize waste and resource use, and continuously seek opportunities to increase reuse and recycling.

Suppliers must manage hazardous and non-hazardous waste generated from operations in compliance with applicable laws and regulations. All wastewater must be characterized, monitored, controlled, and treated as required before discharge or disposal.

5.3 Pollution prevention

Suppliers must comply with all applicable laws and regulations that prohibit or restrict the manufacture, marketing, or use of specific substances in products and manufacturing, including labelling for recycling and disposal.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations must be characterized, routinely monitored, effectively controlled, and properly treated before being released into the environment.

All required environmental permits (e.g. for discharge monitoring), approvals, and registrations must be obtained, maintained, and kept current, including all related operational and reporting obligations.

5.4 Protection of biodiversity

Biodiversity refers to all types of life on Earth, including the variety within species, between species, and of ecosystems, such as plants, animals, fungi, and microorganisms. Suppliers must ensure that their activities do not cause significant biodiversity loss. This includes ensuring that forest-risk commodities are deforestation free and in compliance with applicable laws and regulations.

6 Ethics

The highest standards of ethics and integrity must be upheld in all business interactions.

6.1 Anti-corruption and bribery

Suppliers must refrain from 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 follow applicable anti-bribery laws.

6.2 Trade compliance

Suppliers must fully comply with all applicable import and export control laws, regulations, and trade restrictions, including embargoes, sanctions, and anti-boycott laws. Suppliers are expected to have a thorough understanding of relevant trade compliance requirements and ensure that all decisions, transactions, and business activities align with these regulations. This includes obtaining necessary licenses and permits, accurately classifying goods and services, maintaining proper documentation, and screening transactions against restricted or sanctioned party lists. Suppliers must also stay informed of any regulatory updates that may impact their operations and take proactive measures to remain compliant. Any potential violations, risks, or concerns related to trade compliance must be promptly addressed and reported to the appropriate authorities.

6.3 Fair competition

Suppliers must adhere to anti-trust and other competition laws to ensure fair market practices and prevent anti-competitive behavior.

6.4 Counterfeit prevention

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

6.5 Responsible mineral sourcing

Suppliers must adopt a policy and conduct due diligence to ensure that tantalum, tin, tungsten, gold, mica, cobalt, copper and lithium used in their manufactured products are responsibly sourced, in accordance with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas, or an equivalent and recognized due diligence framework.

6.6 Whistleblower protection

Suppliers must ensure that there is a system for their employees to raise any issues or concerns regarding legal and ethical issues without fear of retaliation.

6.7 Business practices

Suppliers must uphold responsible business practices. Alongside adhering to agreed contractual payment terms, suppliers must ensure timely payments to their own suppliers. They must securely and accurately capture, store, and retain business records as required for legal, regulatory, or operational purposes. Additionally, suppliers must maintain transparency and accountability in all business transactions.

7 Information security

Suppliers must ensure that all sensitive data and information, including the assets and equipment on which it is processed and stored, is appropriately protected. Data and information must be correctly and clearly marked, and the systems managing this must 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.

7.1 Protection of personal data

Jotron applies the principles of the EU General Data Protection Regulation (GDPR) across all operations and expects suppliers to handle personal data securely and in compliance with applicable laws. Suppliers are expected to understand how to effectively and compliantly manage our data, including ensuring secure storage and only sharing data where permission has been provided. 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, suppliers are required to inform us of any significant business changes, including ownership transitions, acquisitions, or issues related to the processing of our data – whether directly or through subcontractors – and if these occur under another contract out of courtesy.

8 Management systems

We expect that our Suppliers' take an active role in protecting the values, principles and behaviors outlined in this Supplier Code. 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 Code of Conduct.

Suppliers must comply with all applicable laws, regulations, contractual agreements, and generally recognized standards. Suppliers are expected to communicate the principles set forth in the Code of Conduct to its employees and to supply chain. Suppliers are encouraged to fulfil the expectations set forth in the Code of Conduct by allocating appropriate resources. Additionally, suppliers should develop adequate documentation to demonstrate that they share the principles and values expressed in the Code of Conduct.

9 References

The following references were used in preparing this Code and may be useful sources of additional information:

[ILO Fundamental Conventions](#)

[OECD Guidelines for Multinational Enterprises](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

[Responsible Business Alliance Code of Conduct](#)

[United Nations Global Compact](#)

[United Nations Guiding Principles on Business and Human Rights](#)

[United Nations Universal Declaration of Human Rights](#)

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