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## Third Party Code of Conduct

4<sup>th</sup> Edition

## J.S. HELD THIRD PARTY CODE OF CONDUCT

### I. INTRODUCTION

J.S. Held's commitment to maintaining the highest ethical standards starts with our CEO and Corporate Leadership and resides with every employee. J.S. Held's continued success depends upon the fostering of a culture in which our Third Parties reinforce our values, and we expect them to operate in compliance with the principles outlined in this Third Party Code of Conduct (this "Third Party Code"). This Third Party Code has been developed to convey our expectations regarding ethical conduct we expect from our suppliers, manufacturers, service providers, business partners, affiliates, distributors, resellers, agents, consultants or consulting firms, and all other third parties (our "Third Party Partners") that provides goods or services to, for, or on behalf of, J.S. Held LLC, its subsidiaries and/or affiliates ("J.S. Held").

This Third Party Code outlines our expectations for all Third Party Partners. Each Third Party Partner is expected to be aware of, understand and build processes to comply with applicable laws in jurisdictions where it operates or conducts business. Where the provisions of law and this Third Party Code address the same subject, to the extent legally permitted, Third Party Partner should apply the provision which furthers the intent of this Third Party Code to the greater degree. Every Third Party Partners are expected to meet these standards in connection with the operations of its business. Third Party Partners should establish and enforce policies which comply and align with the expectations of this Third Party Code.

The provisions of this Third Party Code are in addition to those specified in any agreement between the Third Party Partner and J.S. Held. Violations of this Third Party Code are taken seriously and should be reported immediately upon discovery by the Third Party Partner. Failure to comply with the terms of this Third Party Code may jeopardize a Third Party Partner's relationship with J.S. Held, up to and including termination of some or all of the goods or services being provided by a Third Party Partner to J.S. Held.

### II. EMPLOYMENT AND LABOR

**Human Rights.** Third Party Partners shall: (i) treat all of their workers fairly and with dignity; (ii) adopt an approach to human rights consistent with the United Nations Universal Declaration of Human Rights; (iii) support and respect the protection of internationally proclaimed human rights; and (iv) ensure that they are not complicit in human rights abuses.

**Forced Labor.** Third Party Partners shall ensure that all employment is voluntary and free from forced labor, including prison labor, bonded labor, slavery, or human trafficking. Third Party Partners are prohibited from conducting any form of recruitment that involves coercion, deception, or confiscation of identity documents. Third Party Partners shall conduct due diligence to ensure employees are not subjected to any form of exploitation or abuse.

**Harassment, Discrimination and Diversity.** Third Party Partners shall provide equal employment opportunities to all individuals regardless of race, color, gender, religion, age, disability, sexual orientation, nationality, pregnancy, parental status, or any other characteristic protected by law. Discrimination in hiring, promotion, or any other aspect of employment is prohibited. Third Party Partners shall maintain a work environment free from harassment, abuse, or intimidation, including sexual harassment, physical abuse, or verbal abuse. Policies and procedures should be in place or developed to address complaints and grievances promptly and effectively.

**Child Labor.** Third Party Partners shall adhere to legal minimum working age requirements and ensure that no person below the legal age is employed, in accordance with local law and international standards. Third Party Partners shall implement age verification procedures and comply with regulations concerning the employment of young workers, ensuring their work does not interfere with their education, health, or overall well-being.

**Employment Status.** Third Party Partners shall employ only workers who are legally authorized to work in their location. Third Party Partner is responsible for validating employees' work eligibility status.

**Wages and Working Hours.** Third Party Partners shall comply with applicable laws and industry standards regarding working hours, breaks, and overtime. Third Party Partners shall ensure that employees' working hours do not exceed legal limits. Overtime work should be voluntary and compensated in accordance with all applicable labor laws. Third Party Partners shall implement scheduling practices that prioritize employee well-being and work-life balance.

Third Party Partners must also provide employees with wages and benefits that meet or exceed legal requirements, including minimum wage standards and overtime compensation. Compensation should be sufficient to meet basic needs and provide a decent standard of living. Third Party Partners should conduct regular reviews to ensure fair and equitable compensation and cannot deduct wages for disciplinary purposes.

### **III. INTEGRITY, ETHICS AND ANTI-CORRUPTION**

**Business Integrity.** Third Party Partners shall conduct business with integrity and honesty, adhering to high ethical standards, and avoiding bribery, extortion, corruption, fraud, and other unethical practices. Third Party Partners maintain accurate financial records, avoid conflicts of interest, and promote transparency and accountability.

**Intellectual Property and Software.** Third Party Partners shall respect all intellectual property rights and software licensing obligations and use technology only in a manner that protects, and is in compliance with, the owner's intellectual property rights.

**Confidentiality/Privacy.** Third Party Partners shall abide by their obligations relating to protection, collection, storage and proper handling of confidential and personal information of their customers and employees.

**Gifts, Meals and Entertainment.** Third Party Partners shall not offer, accept or solicit any gifts, meals or entertainment to J.S. Held personnel in any situation which might improperly influence, or appear to improperly influence, such personnel's decision in relation to the Third Party Partner.

**Conflict of Interest.** Third Party Partners shall not allow bias, conflict of interest, or inappropriate influence of others to override its professional judgments and responsibilities. Third Party Partners shall voluntarily declare any such conflicts involving J.S. Held's personnel.

**Whistleblower Protection and Anonymous Complaints.** Third Party Partners shall protect the confidentiality of their whistleblower employees, prohibit retaliation, and, where legally permitted, provide an anonymous complaint mechanism for their employees to report grievances.

#### **IV. HEALTH, SAFETY & ENVIRONMENT**

**Health and Safety.** Third Party Partners shall comply with relevant safety standards, regulations and laws and provide a safe and healthy work environment and implement measures to prevent accidents, injuries, and occupational illnesses. Such measures include conducting risk assessments, providing safety training, and ensuring access to necessary protective equipment and medical care. Third Party Partners should regularly monitor workplace conditions and address any hazards or safety concerns promptly to minimize risks to employee health and well-being.

**Environment.** Third Party Partners shall comply with all local environmental laws and regulation and strive to operate in an environmentally responsible manner beyond compliance. Third Party Partners support aiming to minimize their environmental impact through resource conservation, waste reduction, and pollution control measures. Third Party Partners should apply the precautionary principle to environmental challenges and strive for continuous improvement across impact areas including but not limited to climate, water resources, energy resources, pollution, land-use, and extraction and consumption of other natural resources.

**Access to Facilities.** Third Party Partners may only access J.S. Held locations when necessary to perform the work requested. J.S. Held may limit such access, in its sole discretion. Third Party Partners personnel may not possess weapons, firearms, illegal drugs or alcohol of any kind at any J.S. Held location. Third Party Partners' personnel must possess an identification card and/or security card while in J.S. Held locations. Third Party Partners shall use its best efforts to minimize any interference with the use and occupancy by J.S. Held, its tenants and guests at the facility at which work is performed. Third Party Partner must immediately stop work if J.S. Held notifies the Third Party Partner that their activities constitute a nuisance or interfere with use and occupancy of the facility. In such case, Third Party Partner shall promptly contact J.S. Held to reschedule the work for a mutually agreeable time.

#### **V. REPORTING CONCERNS**

To report questionable behavior or a possible violation of this Third Party Code, you are encouraged to work with your primary J.S. Held contact in resolving your concern. If that is not possible or appropriate, you may report the issue to the J.S. Held Ethics Hotline at [jsheld.ethicspoint.com](mailto:jsheld.ethicspoint.com).

Third Party Partner hereby confirms that it will adhere to and apply the requirements specified in this Third Party Code.