



Integrity and Compliance Programme

1. Policy Statement

Jord International (Jord) created the Integrity and Compliance Programme to reinforce Jord's commitment to conducting its business with integrity. The Programme includes the Jord Code of Business Conduct. When people behave with integrity, they act honestly, sincerely, ethically, morally, and legally.

The Jord Integrity and Compliance Programme covers all policies and procedures related to ethical conduct and compliance. This allows Jord to communicate standards of ethical conduct to its employees, outside businesses and the general public.

2. Purpose

Jord is committed to the highest ethical and professional standards, and fosters a culture of integrity and accountability. This Programme is established for the following reasons:

To provide a formal statement of Jord's standards and rules of ethical business conduct to all Jord employees and business partners

- To provide information about existing laws and Jord policies
- To protect Jord and its staff from legal action should breach of ethical conduct occur

Jord is committed to promoting the prevention, detection and resolution of conduct that does not conform to laws, regulations, Jord policies and business conduct.

Accordingly, Jord's Ethos provides:

We respect all people and all cultures, and recognise that all parties must succeed to sustain long term business partnerships. In this, we strive to be scrupulously fair.

3. Scope

The Integrity and Compliance Programme sets the ethical tone for work conducted at Jord. All Jord employees are expected to follow the standard described below:

- Compliance is everyone's responsibility
- Everyone who works at Jord has a responsibility to, in good faith, report any known or suspected violation of applicable laws or regulations
- Anyone, who honestly and in good faith reports suspected wrongdoing, will be protected from retaliation
- All Jord employees are expected to participate in the Integrity and Compliance Programme Training

4. Jord Code of Business Conduct

Jord's policy is to prevent unethical or unlawful behaviour, to halt such behaviour as soon as possible after its discovery, and to discipline employees who violate the standards in this Code. All Jord employees must



comply with the Code of Business Conduct, seek clarification when questions or issues arise through the Executive Director and the Head of People and Culture (P&C), and assist the assigned manager in investigating any allegations of wrongdoing.

Jord's Code of Business Conduct cannot cover all circumstances or anticipate every situation. Consequently, employee's encountering situations not addressed specifically by this Code should apply the overall philosophy and concepts of this Code and the Integrity and Compliance Programme into the situation.

5. Observing laws and regulations

Jord is subject to laws and regulations in countries in which the company operates. These can relate to, for example, health and safety, the environment, accounting, taxation, trade practices, immigration, and intellectual property. Jord is committed to complying with all applicable laws and regulations. Breaches of the law may have serious consequences, including civil and criminal action against the individual and/or the company.

6. Condemning bribery and corruption

Jord conducts its business with integrity and transparency. Employees are expected to use only legitimate practices in commercial operations and in promoting the company's position on issues before government authorities. Jord strictly prohibits improper payments – such as bribes and kickbacks – intended to introduce or reward favourable commercial and governmental decisions. Employees must:

- Not offer or receive – or engage a third party to offer or receive – anything of value (including cash, loans, gifts, favours or hospitality) for the purpose of inducing or rewarding favourable action or the exercise of influence, regardless of the country, public or private sector or person concerned.

7. Exercising care with corporate gifts and hospitality

To support the integrity of Jord's business operations, employees are required to exercise care when accepting or offering gifts and hospitality (including meals, entertainment, travel and accommodation) in the ordinary course of business. Such exchanges may compromise or appear to compromise the exercise of objective and independent judgment. Employees must:

- Must not offer or accept gifts or hospitality, even if nominal value, if the exchange may compromise or appear to compromise the exercise of objective and independent judgement
- May offer or accept gifts or nominal value, only where these are token, seasonal or due to a special occasion or local customs
- May offer and accept occasional business-related meals and entertainment with business partners, where the value of these is in line with accepted local business practices. Appropriate approval must be obtained for an employee when an exception under a special company programs applies

8. Conflict of Interest

Employees are expected to act in the best interests of Jord and to avoid conflicts that may compromise, or appear to compromise, the objective performance of their duties whilst employed at Jord. This is crucial to maintaining trust in the integrity of Jord business operations. Employees must not:



- Maintain outside employment which conflicts with the business of Jord or compromises the ability of the employee to perform to the best of his/her abilities in the defined role
- Maintain an outside business, commercial interest or employment which conflicts with the interests of Jord

If there is any question as to conflict of interest the employee must advise the People and Culture who will make a determination.

9. Using company assets, inventions, and technologies responsibly

Jord's assets (including funds, equipment and resources) as well as company technologies (including electronic communications such as email, internet access and the provision of mobile devices) must be used for legitimate business purposes. Employees also have duty of care to advance Jord's business interests. All assets are and remain the property of Jord. Employees must never use Jord property, information or their position for personal gain. Employees are:

- Obligated to use Jord computer hardware and software systems in a responsible and ethical manner. There should be no authorised access of computers or data belonging to other staff members, or use of unlicensed software in Jord computer equipment. The company licenses or subscribes to necessary software and reference material such as industry codes and standards for use with Jord
- To promptly and fully disclose to Jord each and every invention, design, or work (or other subject matter of copyright), in part or full, and every improvement conceived, developed or perfected by the employee
- To fully assist Jord, whether during or after employment, in any application for patent, design, copyright or other protection Jord seeks regarding the assets; inventions; and technology and in the execution of any assignment or other document conveying employee interest in such material and things and other intellectual property right to the company

10. Maintaining complete, accurate, and timely business reports

Complete, accurate and timely business reports are vital to the transparent and reliable communication of Jord's operational and financial status. Jord relies on employees to ensure that all business records – including financial, People and Culture, payroll, and other business records – accurately reflect the underlying facts and figures. Employees must:

- Accurately and honestly provide information in business reports and records
- Pay attention to detail to ensure that records are accurate
- Not mislead or misinform others by supplying inaccurate information in business reports and records

11. Protecting confidential information

Whilst working at Jord, employees may access various types of proprietary, confidential, or private information belonging to Jord or its customers, suppliers, employees, or others (confidential information). Inappropriate use of such information may jeopardise Jord's reputation, its competitive position and breach privacy. Employees must use confidential information only for its intended use and as part of their duties at Jord.



By accepting employment with the Jord, employees agree that:

- The property of the Jord includes all information (including trade and business secrets) that relates to the affairs or business of the Jord, other than information already in the public domain or which is required by law to be disclosed, which comes into the possession of the employee in the course of and by reason of employment with Jord
- The confidential information has been and will continue to be acquired by Jord at the company's initiative and expense
- Jord has spent and will continue to spend effort and money in establishing and maintaining the confidential information

12. Building a safe workplace

Establishing and maintenance of a safe work environment is the shared responsibility of all employees. Jord will take all reasonable steps to ensure a safe environment and compliance with government regulations. Employees must obey safety rules and exercise caution in all their work activities.

Employees have the responsibility:

- To avoid risks to themselves and their colleagues by working in a safe manner and adhering to prescribed safe working procedures
- To report all near misses, hazards and accidents, which could lead to injury, loss or damage for the purpose of facilitating investigations by managers

Managers and supervisors have the added responsibility for the safety of employees under their supervision. They are also responsible for maintaining the safe operation of the workplace in accordance with standard operating procedures.

A Safety Committee is established in all locations where Jord operates. The aim of these Safety Committees is to improve safety, monitor incidents, approve safe operating procedures and assist with safety issues. All safety related incidents must be raised with a member of the Committee.

13. Training and Compliance Monitoring

The Integrity and Compliance Programme is provided to all employees. Its contents are reinforced at induction sessions, through regular internal communications, and training sessions. New clients, joint ventures, suppliers, subcontractors and others working on behalf of Jord will receive a copy of the Compliance and Integrity Programme will be required to adhere to the standards of the Programme. Compliance with the Programme is monitored regularly by the CEO and the Head of People and Culture and reported annually to the Board of Directors. The CEO and the Head of People and Culture relies also on the support of various officers responsible for monitoring the compliance.

14. Reporting violation

Jord depends on its employees to report violations of the Integrity and Compliance Programme and the Jord Code of Business Conduct so that the company can take appropriate action and remedy the situation. Several different channels of reporting are available, depending on the issue, including:



- Your immediate supervisor
- Your General Manager
- The Head of People and Culture and/or People and Culture Manager of your office
- The Executive Director

If the employee believes they have been subjected to retaliation, they should immediately contact People and Culture.

15. Review of the Integrity and Compliance Programme and the Jord Code of Business Conduct

Jord International reviews the Integrity and Compliance Programme and the Code of Business Conduct on an annual basis, and may modify or supplement at any time. Comments and suggestions in relation to the content of the Programme and Code are welcome from all employees. Employees will be notified of any major revisions to the Code through internal communications.

If employees have questions or comments in relations to the content of this Code, they can contact:

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