



JAI-O Policy: Anti-Bribery, -Corruption, -Fraud, and Ethical Conduct

Purpose

This policy aims to ensure that the company complies with applicable laws, regulations, and ethical standards, including NADCAP requirements, concerning bribery, corruption, fraud, and ethical conduct. The policy applies to all employees, managers, suppliers, consultants, and other third parties representing the company.

JAI-Overfladebehandling A/S (JAI-O) has zero tolerance for bribery or corruption in any form.

Bribery and Corruption

JAI-O prohibits offering, receiving, soliciting, or accepting bribes or engaging in corrupt practices, whether monetary or otherwise. This applies to all individuals and entities, regardless of their location, including public and private people or organizations. It also applies to any employee, director, agent, consultant, contractor, or other person acting on behalf of JAI-O to gain undue commercial or personal advantages.

Exceptions

Certain actions are permissible if they are appropriate, proportionate, and properly documented, including:

- Normal hospitality in accordance with the policy for "risk areas."
- Expedited processing of procedures is available to all upon payment of a fee.
- Resources provided to streamline decision-making processes.

Risk Areas

Bribery may occur through excessive gifts, entertainment, or hospitality. Such actions are only acceptable within the bounds of JAI-O's corporate entertainment policy (e.g., hosting clients or partners, maximum amount: DKK 1,000 per person).

If there is doubt about the appropriateness of an action, it should be discussed with the Managing Director or Legal Advisor.

Investigations and Consequences

JAI-O will thoroughly investigate any actual or suspected violations of this policy. Employees who violate this policy may face disciplinary actions, including dismissal.

Prevention of Counterfeit Components

JAI-O ensures appropriate control by:

- Maintaining a list of approved suppliers.
- Verifying supplier certificates.
- Procuring materials from trusted sources, such as Original Equipment Manufacturers (OEMs).

Facilitation Payments

JAI-O does not tolerate facilitation payments, even if aimed at expediting legitimate processes.



Third Parties

JAI-O ensures proper due diligence is conducted before engaging with third parties, and all agreements are justified and appropriately documented.

Fraud and Falsification of Records

Fraudulent activities are defined as deliberate, deceptive actions intended to secure an advantage, such as falsifying information or test results. All documentation must be completed accurately and promptly to ensure proper recording of all activities conducted by JAI-O employees.

Ethical Principles of JAI-O

1. We support and respect the protection of internationally proclaimed human rights.
2. We ensure that we are not complicit in human rights abuse.
3. We uphold the freedom of association and recognize the right to collective bargaining.
4. We support the elimination of all forms of forced labor.
5. We support the effective abolition of child labor.
6. We have eliminated discrimination in employment and occupation.
7. We support a precautionary approach to environmental challenges.
8. We undertake initiatives to promote greater environmental responsibility.
9. We encourage the development and diffusion of environmentally friendly technologies.
10. We oppose all forms of corruption, including extortion and bribery.

Accept Authority Media (AAM)

Accept Authority Media (AAM), which may include stamps, electronic signatures, and/or software-specific access codes, must be used properly. Any form of fraud or falsification of records will not be tolerated and will be considered gross misconduct. This may result in suspension, investigation, and dismissal. In severe cases, authorities may be involved, and criminal charges may be filed against those involved.

Records

Proper recordkeeping is essential to prevent concealed bribery or corruption. JAI-O ensures robust controls are in place to maintain accurate and transparent records.

Employee Responsibility and Reporting Concerns

All employees are responsible for preventing, detecting, and reporting bribery or corruption. If an employee becomes aware of or suspects activities or behaviors that may involve bribery or corruption, this must be reported to management.

Concerns can be reported confidentially to the management team. JAI-O will strive to protect the anonymity of individuals reporting such incidents.

The Quality Department at JAI-O conducts regular internal audits to ensure that all documents and Accept Authority Media (AAM) are used correctly and in accordance with the policy. JAI-O will report confirmed violations to customers and accreditation bodies after thorough investigation.

Dated: 02-12-2024, JAI-Overfladebehandling, Sverigesvej 3, DK-7480 Vildbjerg