

# SUPPLIER CODE OF CONDUCT



**YEAR ENDED 31 DECEMBER 2024**

## Introduction

This Code of Conduct defines the minimum standards of behaviour Jonas Software UK & Europe ('Jonas') expects of our suppliers and partners. The purpose of this Code of Conduct is to formally communicate Jonas' requirements and expectations to our supply chain and partners. Jonas seeks suppliers that are committed to conducting business in an ethical, social and environmental responsible manner.

## Ethical dealings

Suppliers are required to:

- Comply with all applicable laws and regulations of the countries and locations in which they operate.
- Conduct a zero tolerance policy regarding corruption, misrepresentation, extortion, embezzlement, kickbacks, bribery and any other type of corrupt actions.

## Environmental & sustainability

Suppliers are required to:

- Comply with all applicable current and future environmental laws, regulations e.g. Streamlined Energy and Carbon Reporting requirements and standards including compliance with industry best practice standards for the responsible sourcing of products and materials such as The Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification, Fairtrade, labelling and other relevant standards.
- Seek to reduce negative environmental impacts including the prevention of pollution and providing visibility to progress towards this commitment. We expect our suppliers to encourage the use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.
- Seek to measure and understand the Greenhouse Gas emissions associated with its supply of products or services and support the Jonas in understanding its Scope 3 emissions within the supply chain.

## Health and Safety

Suppliers are required to:

- Provide a safe and healthy work environment for its employees, visitors and contractors.

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## Employment standards

Suppliers are required to:

- Be focused on transparency within their supply chain, understanding their suppliers and partners, and following best practice processes to ensure they are committed to tackling Modern Slavery, including employee training and clear processes and policies.
- Comply with all child labour laws and not employing anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.
- Provide equality of opportunity and treatment regardless of race, colour, gender, gender identity or expression, religion, nationality, sexual orientation, maternity, age, disability or political affiliations. Suppliers are expected to promote a work environment free from harassment, victimisation or any other form of inappropriate behaviour or abuse on any grounds.
- Comply with all national regulations on pay and benefits. These should be sufficient to meet basic needs of workers and families.
- Comply with national regulations on working hours.
- Allow workers to associate with others, form, and join (or refrain from joining) organisations of their choice, and bargain collectively, without interference, discrimination, retaliation or harassment. In the absence of formal representation, suppliers shall ensure that workers have a mechanism to report grievances and that open communication between management and workers is facilitated.
- Maintain proof of each employee's ability to work, such as visas and licenses.

## Proprietary information

Suppliers are required to:

- Use personal data you receive through business dealings with Jonas only for the agreed purpose. Security of such personal data is paramount and as such, personal data should be kept securely, protected from unauthorised access or disclosure and retained only for as long as is necessary to provide the services.
- You are required to comply with relevant Data Protection legislation and best practice guidance (as amended and updated from time to time).

## Facilitation of tax evasion

Suppliers are required to:

- Pay their taxes in accordance with the law and put in place reasonable prevention measures to ensure that they, and any persons associated with them, do not engage in tax evasion or the facilitation of tax evasion.

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## Violation of our supplier code of conduct

Jonas' goal is to drive excellence in these areas throughout our own organisation, and to support and influence positively the development of these areas in our supply chain. We strive only to do business with suppliers who share our commitment. We welcome open, honest discussions with suppliers where they feel they might not be able to fully adhere to the Code and the opportunity to explore solutions to these challenges. Where there is a failure to comply with these standards, Jonas will endeavour to resolve the potential issue by working closely with the supplier. If a supplier continually breaches this Code or refuses to comply, we will re-evaluate our business relationship.

## Report suspected violations of the code

Suppliers, employees or contractors may report suspected violations of this Code. All such reports are treated as confidential and may remain anonymous where permitted by law.

## Review

Jonas will review this policy annually and may at any time withdraw this policy or publish replacement or revised versions of this policy to reflect developments in the business, or changes to legislation or procedures.

DocuSigned by:

*Darrell Boxall*

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Darrell Boxall

Group CEO, Jonas Europe