

JANSONS **BALERS**  
SINCE 1969

**CODE OF  
CONDUCT  
BUSINESS ETHICS**

# Jansons Balers

## Code of Conduct and Business Ethics

### 1. INTRODUCTION

The foundation of Jansons Balers culture lies in our values. We believe that we should always conduct ourselves and our business openly, honestly and in compliance with all applicable laws.

This Code of Conduct and Business Ethics (the “Code”) provides the general principles on the way we should conduct ourselves and our business, how we should serve our customers and how we should work with our suppliers. They are not meant to be exhaustive and cover every possible issue that may arise but instead, you should treat them as guiding principles to help you make the right decision in any situation you may face.

### 2. CONFIDENTIALITY AND ETHICS

We are committed to maintaining the highest degree of integrity in all our dealings with potential, current and past clients, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of providing the business services concerned. We extend the same standards to all our customers, suppliers and associates.

We always conduct our own services honestly and honorably, and expect our clients and suppliers to do the same. Our advice, strategic assistance and the methods imparted through our training, take proper account of ethical considerations, together with the protection and enhancement of the moral position of our clients and suppliers.

### 3. DUTY OF CARE

Our actions and advice will always conform to relevant law, and we believe that all businesses and organizations, including this consultancy, should avoid causing any adverse effect on the human rights of people in the organizations we deal with, the local and wider environments, and the well-being of society at large.

### 4. CONFLICTS OF INTEREST

A “conflict of interest” is where our personal interests conflict with the interests of the company, a situation which could affect your ability to act objectively. This is why we have a Declaration of Interest

process to help you assess whether you have a situation of conflict. If one does exist, we will work with you to determine what, if anything, needs to be done to manage the conflict.

## **5. ANTI-BRIBERY AND ANTI – CORRUPTION**

We take a zero-tolerance approach to bribery and are committed to complying with all applicable anti-bribery laws.

Bribery is when a person offers, promises or gives another person a benefit directly or indirectly (e.g. through a third party) intending that benefit to influence that person to perform their job improperly, or as a reward for doing so. Asking for, agreeing to receive or accepting such a benefit is also bribery. It doesn't matter if the bribe is offered or accepted by a third party. It is still a bribe.

We must not offer nor accept a bribe in any form on any portion of a contract payment, or use other routes or methods to provide improper benefits to customers, agents, vendors, contractors or colleagues of any party to a transaction or otherwise. We must not make a facilitation payment to any government, public official, or other persons in positions of authority able to exert improper influence on business transactions or individuals responsible for making decisions in the course of business.

We must not arrange for nor accept a bribe or kickback from customers, agents, vendors, contractors or colleagues of any party to a transaction or otherwise, or to any government or public official, or other persons in positions of authority able to exert improper influence on business transactions. The same applies to any person responsible for making decisions in the course of business for the purpose of benefiting the colleague or the colleague's family, friends, acquaintances, associates or other connected persons.

We care about the well-being of the communities in which we operate and support giving back to those communities in the form of charitable contributions and sponsorships. However, we must all be careful to ensure that any charitable contribution or sponsorship (whether in cash, the donation of services, products or anything else) is free from any potential perception of being a bribe.

## **6. ACCURATE FINANCIAL INFORMATION AND RECORDS**

We must ensure all transactions are properly included in the books and records of the Jansons Balers Exports and are available for audit. All accounting records must be reliable so they can be used to prepare financial information used within the business, for publication and maintaining accountability for assets and liabilities, and for presenting in compliance with all applicable accounting standards.

We must not attempt to create false or misleading records or conceal information from the company's auditors or regulatory agencies.

## 7. SUPPLIER CODE OF CONDUCT

We must work with suppliers to cultivate safe working conditions, to foster dignity and respect for workers, and to promote responsible environmental practices.

Our **Supplier Code of Conduct** and accompanying Standards detail the principles and practices that we expect our suppliers to uphold and cover:

- Human and labor rights in the workplace, including the eliminating forced, compulsory or child labor
- Eliminating discrimination in employment and occupation
- Respect for freedom of association and collective bargaining
- Ethical conduct
- Responsible management of occupational health and safety and environmental issues
- Demonstrating responsibility, transparency and accountability in compliance with the **Supplier Code of Conduct**.

## 8. PROFESSIONAL CONDUCT, INTELLECTUAL PROPERTY AND MORAL RIGHTS

We conduct all of our activities professionally and with integrity. We take great care to be completely objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our clients.

We retain the moral rights in, and ownership of, all intellectual property that we create unless agreed otherwise in advance with our clients. In return we respect the moral and intellectual copyright vested in our clients' intellectual property.

## 9. QUALITY ASSURANCE AND PRODUCT SAFETY

We must always use our best effort to promptly fulfill customer needs with good quality goods and services that meet high standards of safety and reliability and at prices which represent excellent value for money.

## 10. HUMAN AND LABOR RIGHTS, AND FAIR AND EQUAL TREATMENT

We are committed to upholding the ten principles of the UN Global Compact covering human rights, labor, environment and anti-corruption throughout our operations.

We are also committed to supporting the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, including its core labor conventions to eliminate forced, compulsory or child labor; to eliminate discrimination in employment and occupation; and, respect for freedom of association and collective bargaining.

We are committed to fair and equal treatment in human resource matters, including recruiting, training and development, promotion, transfer, compensation and benefits, discipline, redundancy and dismissal, etc. We do not discriminate on the basis of gender, age, religion, marital status, race, sexual orientation, disability, disease, pregnancy, trade union and/or political affiliation.

### **11. HARASSMENT**

We must uphold values of mutual respect by maintaining a workplace that is free of all forms of harassment, including verbal, physical, visual or sexual.

### **12. ENVIRONMENTAL PROTECTION**

We strive to be environmentally responsible by adopting good environmental practices for offices, equipment and consumption of resources and by supporting practical measures and policies to protect and preserve the environment of the countries in which we operate.

### **13. WORKPLACE SAFETY**

We must all maintain a working environment that is clean, healthy, safe and free of physical violence.

No alcohol or illegal drugs and/or substances are permitted at the workplace.

### **14. REPORTING CONCERNS AND MISCONDUCT**

We encourage everyone to report actual or potential illegal or unethical behavior to appropriate senior management. We will investigate and report to senior management any material violation of this Code. Violations may result in disciplinary action, including termination of employment. In case of suspected fraud or corruption, we reserve the right to report violations to appropriate authorities.

If for whatever reason, you:

- Feel that you cannot speak with your direct line senior management about your concern or complaint, or
- Consider that your concern or complaint has not been handled by the direct line senior management properly, or
- Prefer to report anonymously.

You may raise your concern or complaint to Jansons Balers compliance department by e-mail ([Compliance@jansonsbalers.com](mailto:Compliance@jansonsbalers.com)). Please include all relevant information and supporting documents.