



JAC PRODUCTS Supplier Code of Conduct and Declaration Statement

Original Date: November 15, 2022
Revision Date: April 1, 2024

JAC Products commits to operate in an economically, socially and environmentally responsible manner. We require that all entities within JAC Products, as well as its directors and employees, observe the highest standards of business and personal ethics, keeping themselves free of influences that might conflict or appear to conflict with representing the best interests of the Company. In the same manner, suppliers to JAC Products shall commit and adhere to, the same principles in their business relationships with JAC Products. These principles are described below for our suppliers and shall be acknowledged per signature in the below Supplier Declaration.

This document is available online at: <https://jacproducts.com/supply-partners>

We require that all JAC Products suppliers familiarize their organization and key stakeholders with this document and that our suppliers sign the Supplier Declaration and return it to the appropriate JAC Products purchasing representative.

Supplier Declaration

As a supplier to JAC Products or any of its subsidiaries and affiliates (“JAC Products”) we hereby declare that we will adhere to and comply with the following principles:

1. Business Partners

We will, as a supplier to JAC Products, only retain employees, suppliers, subcontractors and other business partners that adhere to the ethical standards reflected in this declaration.

2. Compliance with Laws and Regulations

We will, as a supplier to JAC Products, always comply with all applicable laws and regulations of the country where we conduct our business. In addition, we shall have internal verification procedures to assure that the legal requirements explicitly mentioned in this document, among all other legal requirements, will be followed.

3. Fair Market Behavior

We will, as a supplier to JAC Products, support and abide with the laws and regulations that prohibit restraint of trade, unfair competition, and abuse of monopolized power. In dealing with competitors, our team will observe and avoid discussions or agreements that might be perceived as violations with these laws and regulations. In particular, as a supplier to JAC Products, we shall not execute anti-competitive agreements with competitors, suppliers, customers or other third parties and will not abuse a dominant market position.



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4. Import and Export Controls

We will, as a supplier to JAC Products, comply with all valid and applicable laws when importing and exporting goods and services.

5. Improper Payments

We will, as a supplier to JAC Products, not directly or indirectly offer, promise, accept or receive “Kickbacks”, “Bribes”, “Gifts”, “Services” “Entertainment”, or any other forms of payment or other undue advantages in the purpose to obtain advantage in business.

6. Hospitality and Gifts

We will, as a supplier to JAC Products, recognize and follow JAC Products regulations for hospitality, gifts and expenses. Hospitality and gifts shall be modest and infrequent. Gifts may not exceed a value of \$50 USD. Hospitality and gifts may, under no circumstances, be offered or received under or in connection with contract bidding, evaluation or award. Payment of cash gifts (including a gift card) is never allowed. JAC Products employees are to courteously decline or return any kind of gift, favor or offer of excessive entertainment that violates these directions and inform the offer or of our policy.

7. Conflict of Interest

We will, as a supplier to JAC Products, not take part in, will not influence or attempt to influence in any decision which can give rise to any actual or perceived conflict of interest.

8. Discrimination

We will not, as a supplier to JAC Products, participate or condone illegal discrimination of persons due to background like ethnicity, sexual orientation, age, gender, race, color, national origin, ancestry, disability, religion or any other category protected by law. We will treat all persons with dignity and respect and not interfere in the carrying out of their duties and responsibilities.

9. Utilization of Children as Labor

We will not, as a supplier to JAC Products, employ children below the age of 15 except as part of a governmental approved job training, apprenticeship or similar program.

10. Forced Labor

We will, as a supplier to JAC Products, uphold the human rights of workers, treat them with dignity, and respect as agreed by the international community. This applies to all our employees including temporary,

Page 2 of 5

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3937 Campus Drive | Pontiac, MI 48341
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migrant, student, contract, direct employees, and any other type of worker. Consequently, we award the rights to all employees as a bare minimum.

11. Occupational Health and Safety Standards

We will, as a supplier to JAC Products, provide and maintain a safe workplace and take proactive measures to prevent occupational injuries and hazards. We will comply with all applicable laws and regulations and will have programs to assure compliance. Where existing laws and regulations are not adequate or perceived to be inadequate to assure protection to our employees, we will establish and meet higher standards. Further, we will implement effective emergency response procedures and maintain appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. We will provide the employees with appropriate personal protective equipment and ensure machinery and equipment are properly safeguarded to prevent injuries.

12. Environmental Standards

We will, as a supplier to JAC Products, recognize and adhere to JAC Products' environmental requirements based on national laws and regulations together with the ISO 14001 Environmental Management System. We will establish an environmental management system that effectively manage risks, conserves natural resources and protects the environment. Related efforts shall support reductions in energy use, water use, waste production, greenhouse gas emissions and air pollution.

13. Responsible Waste, Hazardous Materials and Chemical Management

We will, as a supplier to JAC Products, adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including disclosure and labeling for the appropriate and safe use, proper handling, recycling and disposal. In addition, we will collect data from material manufacturers and for all components, to identify all substances that are in the final product and initiate appropriate changes to achieve compliance and reduce risks.

14. Conflict Minerals

We will, as a supplier to JAC Products, adopt policies and management systems conforming to the Organization for Economic Cooperation and Development (OECD) standards for responsible sourcing, transparency, traceability and due diligence of the supply chains of so called "Conflict Minerals" (Tin, tantalum, tungsten and gold (3TG) mined in the Democratic Republic of Congo, as well as other named conflict zones around the world).



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15. Uyghur Forced Labor Prevention Act (UFLPA)

We will, as a supplier to JAC Products, fully validate that our supply chain complies with the United States Customs and Border Protection requirements of this Act. *“The Uyghur Forced Labor Prevention Act (Public Law No. 117-78), also known as the UFLPA, directs the Forced Labor Enforcement Task Force to develop a strategy for supporting enforcement of the prohibition on the importation of goods into the United States manufactured wholly or in part with forced labor in the People’s Republic of China, especially from the Xinjiang Uyghur Autonomous Region, or Xinjiang.”* Upon request from JAC Products, we will provide documentation to certify the validation of our supply chain, in order to prevent shipments from being detained. If a shipment is detained, we will fully cooperate with the appropriate authorities to swiftly release any held shipments. We understand that any delays caused by a lack of validation of our supply chain to the UFLPA will not be considered an act of Force Majeure. We will be held fully responsible for any costs associated with a shipment that does not meet the UFLPA requirements. JAC Products will work with a sense of urgency to assist any suppliers who proactively identify any potential issues in their supply chain, where it may require a change in sourcing in the supplier’s supply chain. Further details about the UFLPA can be found at <https://www.cbp.gov/trade/forced-labor/UFLPA>

16. Confidentiality

We will, as a supplier to JAC Products, treat information about your internal operations with absolute confidentiality. Confidential information is that which is not generally known outside the Company. Examples of confidential information include: (1) business information about the Company’s sales, earnings, financial condition, major contracts, and acquisitions or mergers, (2) information about the Company’s customers and suppliers, or (3) the Company’s trade secrets or intellectual property. As a supplier to JAC Products, we will treat confidential information as an important asset and will not reveal this information to competitors, customers, suppliers, or others outside of our organization, unless disclosure is required in the ordinary course of our duties as a supplier on your behalf. In such case, we shall secure a confidentiality agreement with whom the disclosure is required.

17. Information Security

JAC Products places great importance on protecting the confidentiality, integrity, and availability of its data and information systems. Suppliers are expected to have a risk-based information security management system that they continuously improve to decrease the risk of cyber and information security events that may affect JAC Products, the supplier, or the supplier chain.



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Due to the ever-evolving threat landscape, increasing supply chain complexity and regulatory pressure, suppliers must maintain measures to control and manage the security within internal operation and through their supply chain system.

As all companies are potential targets, working together to minimize the risk of cyber incursion is important. Threat actors are indiscriminate in their use of supply chains to access networks and therefore we would request that all our suppliers support us in preventing any malicious activity and immediately contact JAC Products using supplier.cyber@jacproducts.com if you identify anything that causes you concern or suggests that anything untoward has occurred on your network.

Date: _____

(Signature of Qualified Supplier Representative) Signer's printed name:

Signer's title: _____

Company name: _____

Phone no.: _____

Registered address: _____

E-mail address: _____