

Your Responsibilities

As an employee of JMC, you play a critical role in maintaining our culture of ethics and integrity. Doing your part means that you have the following responsibilities:

- Know and follow this code, JMC's policies, laws, and regulations. You have a particular responsibility to understanding the requirements that relate directly to your job.
- Handle every action and decision with integrity.
- When in doubt, speak up; ask questions and report concerns. If you see something, say something.
- Work as a team and treat others respectfully.
- Cooperate and be truthful when responding to an investigation, inspection, or audit.
- Complete all training and read all communications regarding the code.

The leaders in our company have further responsibilities:

- Be an example for others to follow.
- Establish clear expectations for your work groups and help employees understand their responsibilities.
- Be approachable and accessible. Maintain an environment where others can comfortably ask questions or raise concerns, either in a group setting or in a confidential manner.
- Be consistent when enforcing our standards and holding people accountable.
- Never ask or pressure anyone to do something you would feel uncomfortable doing or are prohibited from doing yourself.
- If you supervise third parties such as vendors, contractors, etc., make sure they understand our expectations and their obligations.

We value our employees' feedback. If you have suggestions for ways to enhance our Code, our policies, or our resources to address a particular issue you have encountered, bring them forward. Promoting a more ethical organization is a responsibility we all share.

JMC has an open-door policy that provides you with two-way, honest, and respectful communications. The open-door policy is intended to create an atmosphere where you can raise concerns, express doubts, discuss problems, ask questions, make observations, and offer suggestions about workplace issues or improvements. You should feel free to talk with your supervisor, their manager, all Human Resources associates or leadership.

In most cases, your supervisor should be your first point of contact. They are likely in the best position to understand your concern or question and take the appropriate action.

If you're uncomfortable in speaking with your supervisor, your supervisor is unable to answer your question, or you have already shared a concern and believe it's not being addressed, you have the option of contacting the HR Department or your supervisor's manager.

You may respectfully disagree with others – with anyone – without fear of consequence or retaliation. If you have a question or know or suspect that there has been a violation of our code, policies, or the law, you need to speak up. Remember: an issue cannot be addressed unless it is brought to someone's attention.

We will not tolerate retaliation against anyone who reports a concern in good faith. Claims of retaliation are taken seriously. Every claim will be investigated and, if substantiated, a retaliator will be disciplined up to and including termination.

Respect in the Workplace

We work best when we work together as a team, treat each other with respect, and value the unique contributions of others. It is your responsibility to help create a positive work environment where everyone can contribute to the best of their abilities. Doing your part means you:

- Treat others with respect – our colleagues, our customers, our vendors/suppliers/partners, and everyone you interact with at work.
- Consider new ideas and listen to better understand and learn from different points of view.
- Understand that offensive messages, comments, and inappropriate jokes are inconsistent with our company culture and are never acceptable.

At JMC, there is simply no room for discrimination or disrespect.

Harassment

We all have a responsibility to maintain a workplace free from harassment. Do your part by being thoughtful and respectful as you interact with others and avoid behavior that may be viewed as threatening, bullying or abusive.

JMC takes seriously all forms of harassment, including conduct that is sexual in nature. If you experience or witness harassment, speak up and report the problem.

- Everyone has the right to a work environment that is free from harassment and inappropriate conduct.
- We hold ourselves and others accountable to report and address all forms of harassment, inappropriate conduct, and bullying, including but not limited to:
- We do not tolerate degrading or inappropriate jokes, slurs, bigotry, physical or verbal intimidation, unwelcome sexual advances, unwelcome touching, rude gestures, offensive notes, emails or social media posts, or other disrespectful conduct.

Diversity and Inclusion

JMC maintains a culture that is fair for all employees. We build our best teams by seeking out a wide range of unique backgrounds, perspectives, talents, and experiences. This allows us to attract talent that is as diverse as the people who purchase our products. Our culture requires your commitment to:

- Listen to various perspectives that represent our employees and customers.
- Help create an environment where different ideas can thrive and drive innovation.
- Never discriminate based on race, color, religion, gender, gender identification, sexual orientation, marital status, citizenship status, ancestry or national origin, age, disability, military or veteran status or other occupationally irrelevant characteristics.

Fair Competition

We believe in a competitive marketplace. Competition or antitrust laws are intended to ensure that the marketplace is open and fair and operates in the best interest of the public. These laws are complex and compliance requirements can vary depending on the circumstance.

In general, avoid collaborating, or even the appearance of collaboration, with competitors. In your role at JMC involves discussing, negotiating, or finalizing agreements or contracts, you have a greater responsibility to be sure you understand the relevant rules governing fair competition.

Use extreme caution in any communication with competitors. Unless you have express approval, never develop any written, verbal, or indirect agreement or understanding with a competitor, or discuss marketing or other competition practices with a competitor.

Gathering Competitive Information

JMC obtains competitive information only through legal means and never through misrepresentation or any behavior that could be construed as corporate “espionage” or “spying.”

When collecting business intelligence, you must live up to our standards of integrity – never engage in fraud, misrepresentation, or deception to obtain information.

When we hire former employees of competitors, you must respect their legal or contractual obligations not to use or disclose confidential information that is the property of their former employers.

Fair Dealing and Vendor Relations

The work and support of our vendors, representatives and other business partners is key to our success. At JMC we create an environment where our business partners have an incentive to continue to work with us and have the confidence, they must be confident that they will be treated lawfully and in an ethical manner. You make an important contribution to JMC’s success when you:

- Conduct each business relationship with honesty, fairness, mutual respect, and non-discrimination.
- Never take advantage of our business partners through manipulation, concealment, misuse of confidential information, misrepresentation of facts or other unfair dealing or practice.
- If you supervise business partners:
 - o Be certain they understand for high performance in ethics and compliance, in addition to their contractual obligations.
 - o Where possible, select vendors based on objective criteria, not personal relationships, or friendships.
 - o Be alert to any signs that a business partner is violating applicable law or regulations.
 - o Promptly disclose any situation that that may appear to involve a conflict of interest.
 - o Protect the confidential and proprietary information of our business partners.

Accurate Recordkeeping and Financial Reporting

Accurate information is essential within the company so that we can make informed business decisions. Additionally, regulators, investors, and others rely on our accurate and honest books and records.

Employees in finance or accounting have special responsibilities in this area, but everyone contributes to the process of recording business results and maintaining records. Each of us has a responsibility to ensure that the information we record is complete, fair, accurate, timely and understandable.

To meet our responsibility to cooperate with audits, investigations, and legal document requests, you must preserve records according to our policies, respond fully with all information requested and refrain from editing, modifying, or deleting requested information. This means you must:

- Ensure that all company accounting and financial records meet generally accepted accounting principles and all other applicable regulatory or industry standards.
- Check that our records are clear, complete, and supported by documents that explain the nature of the entries.
- Never record false sales or record them early. Never understate or overstate known liabilities and assets. Never defer recording items that should be expensed.
- Do not establish any accounts of unrecorded company funds or assets, or any other types of “off the books” accounts.
- Never pressure, manipulate or mislead outside accountant who are involved in auditing or reviewing our financial statements or internal controls.

Records Management and “Litigation Hold Orders”

JMC retains our business records as long as needed for business purposes, or longer if required by law. Documents may be destroyed only in accordance with our records retention policy. Documents may never be destroyed in reaction to or in anticipation of an investigation, lawsuit, or audit.

If you receive a “Litigation Hold Order,” you must not alter or discard any relevant information. Contact the Director of IT if there is any doubt about whether record destruction is appropriate.

We have a responsibility to be honest and transparent about our operations and performance, to use our property with care and to protect confidential and private information.

Confidential Company Information

Confidential means any information that is “proprietary,” which means it belongs to the company and is not publicly known or is subject to restrictions as to how and with whom it can be shared. Confidential business information includes but is not limited to:

- Passwords and other log-in information.
- Customer and employees’ personal information.
- Pricing and cost information.
- Vendor names, vendor lists and vendor agreement terms.
- Intellectual property, including inventions, patents, designs and copyrights.
- Data developed or purchased by JMC or entrusted to us by third parties.
- Marketing data, business and/or strategic plans.

You have a responsibility to protect all confidential information, including intellectual property. Always keep such information secure and protect it from loss, misuse or inappropriate access and disclosure. To fulfill this responsibility, each employee must:

- Share confidential information only with those who are authorized to have it and require it to do their jobs.
- Never share confidential information, either internally or externally, unless you have verified the following information:
 - o The identity of the person requesting the confidential information;
 - o The person requesting the confidential information is authorized to receive it and you are authorized to send it;
 - o The information will be used for an authorized purpose; and
 - o The information can be transmitted in a secure manner.

- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Follow computer and network security procedures to prevent unauthorized access.
- Never install unauthorized software on company computers or share IDs and passwords.
- Never discuss confidential information if unauthorized persons could overhear your conversation. For example, do not have such conversations in visitor or common areas, around others, or when using mobile phones in non-private spaces.
- Immediately report any theft, loss, or unauthorized disclosure of confidential information or personal identifying information (PII).
- Ensure that you have leadership's approval before engaging in new business or entering into potential agreements with external companies. This may include ensuring that the external company has signed a Non-Disclosure Agreement (NDA) before conversations begin.

Use of Company Assets

Each of us is entrusted with the care of company assets.

Assets include:

- Physical – Facilities, vehicles, furniture, lockers, equipment, and supplies
- Information – Data, databases, reports, files, plans, records, intellectual property including trademarks and logos
- Financial – Company funds including checks, credit cards, invoices and other records that serve a monetary purpose
- Electronic – Computers, electronic storage devices, telephones, information systems, internet/intranet access, personal digital assistants, and other similar devices, systems, and technology.

We must protect them from loss, damage, theft, waste, and improper use.

- Use company assets only for business purposes.
- Physically secure your office, workstation, and equipment by locking items or completely shutting down systems.
- Report any equipment that is damaged, unsafe or in need of repair.
- Only use authorized software, devices, and procedures.
- When using JMC physical and information assets, you should have no expectation of personal privacy.
- Limited personal use of phones, the internet, email, and instant messaging is allowed as long as it does not interfere with your job, have only a negligible cost to the company, and you have your supervisor's approval.

- Seek value whenever purchasing supplies and other company assets.

Speaking on Behalf of Jordan Manufacturing Company

JMC speaks with one clear and consistent voice when providing information to the public and the media. For this reason, it is important that only designated employees speak publicly on behalf of JMC.

- Only authorized employees should speak with the media on behalf of JMC.
- Unless you are authorized to do so, never give the impression that you are speaking for or on behalf of JMC in any communication that may become public, including social media.
- If you are not an “Authorized Spokesperson” and you receive an outside inquiry about the company from news media or other outside person or organization, please:
 - o Politely decline to comment. Do not engage in a discussion or provide information.
 - o Do not ignore a media call.
 - o Immediately refer the inquirer to the Director of HR and notify them of the inquiry, who will work with the Leadership Team on a response
- If you are contacted by a law enforcement agency or government official regarding JMC-related business or activities or receive any type of legal enforcement process documentation pertaining to JMC, immediately notify the Director of HR.
- If you are contacted by a regulatory agency or regulator regarding JMC-related business or activity, immediately notify the Director of HR.

Using Social Media

Social media is a great way to connect with people and potential customers, but always be careful when writing anything that might be published online. Practice common sense by keeping your electronic communications professional and consistent with our values and policies. Always assume the whole world will read your posts.

- Do not post information about our products or services without prior approval.
- Your social media profile and activity may have an impact on JMC, including the company’s reputation. Please keep this in mind when noting Jordan Manufacturing Company as your employer on social media platforms.
- If you mention that you are employed by JMC, in your user profile or by signing your online comments as “John Smith, JMC marketing manager,” you must include a statement to the effect that the views that you express are your own and do not reflect those by JMC.
- You are responsible for your posts. Do not engage in activity online that would be unacceptable in person or that would call into question the reputation and integrity of JMC.

- Remember that JMC policies and procedures, in addition to various laws and regulations, may apply to our social media interactions.

Conflicts of Interest

A conflict of interest may occur when your personal interests or activities affect your ability to make objective decision on behalf of JMC and our customers. In many instances, conflicts can be avoided or managed if certain steps are followed. Be proactive in situations where a conflict could arise. Avoid situations that might lead to even the appearance of conflict. If you find yourself in a potential conflict of interest situation, talk with your supervisor. Depending on the circumstances, some conflicts may be resolved by disclosure and management.

It isn't always possible to imagine every situation that could present a conflict, but there are certain situations where conflicts are more likely to arise.

- Outside employment and professional activities – You should not take on outside work that interferes with your work at JMC. In addition, your supervisor must approve – in advance – any outside activities that may be related in any way to your work at JMC.
- Financial interests – It may be a conflict if you hold a significant financial interest in a company or outside organization that does business with, or otherwise is related to or could affect JMC's business or reputation.
- Corporate opportunities – If you learn about a business opportunity through your work at JMC, you may not take advantage of that opportunity for personal gain unless you have discussed it with leadership.

Gifts and Other Business Courtesies

Business courtesies, such as gifts, entertainment, and meals, can help build successful business relationships, but there are times and circumstances when even well-intentioned gifts or entertainment can cross an ethical line or even be illegal.

- Gifts and entertainment that you provide on behalf of JMC must be consistent with all applicable laws and regulations and with the policies of the recipient's organization.
- Accurately record all expenses for gifts and entertainment.
- Any gift, entertainment, or meal that you provide on behalf of JMC should be modestly priced and be related to a business meeting or discussion.
- Leadership must approve, in advance, any gifts you plan to provide.
- You must notify leadership if you receive any business-related gift.
- You must not provide gifts to government employees or foreign officials.

- You may not offer or accept a gift, whether an item or service, that could embarrass you or JMC or harm our company's reputation.

Fraud

Fraud is an intentional act of deception, misrepresentation, or concealment done in order to gain something of value. At JMC, we manage the risk of fraud through our core value of integrity and through personal responsibility, utilizing business processes, controls, and the standards in this Code.

We have zero tolerance for fraud and similar misconduct and will seek to identify, investigate, resolve, and possibly prosecute any fraud or related misconduct committed by any employee, vendor, or other third party.

- You have a duty to follow established procedures and report suspected fraud, misconduct, or dishonesty.
- Be alert to all types of fraud, including fraud committed by associates, customers, vendors, or other third parties affiliated with JMC.
- If something seems suspicious, do not ignore it – follow up by reporting your concerns to your supervisor so the situation can be investigated.
- If you suspect fraud, contact Human Resources.

Improper Payments, Bribes, and Kickbacks

Always work honestly and with integrity. Never offer or accept a bribe or kickback from anyone. Be mindful that every associate is responsible for not only their own actions, but also to report concerns of improper conduct by any third party that is affiliated with JMC.

A bribe is anything of value that is given to influence the behavior of someone to obtain business, financial, or commercial advantage. A bribe can be something other than cash, such as a gift, favor, job, or offer of a loan.

Facilitation payments typically are small payments to a low-level government official that are intended to encourage the official to perform their responsibilities. A government official is anyone who works for or is an agent of a government-owned or government-controlled entity, including elected and appointed officials of national, municipal, or local governments. Government official also includes officials of political parties and candidates for political offices, as well as employees of a government or a state-controlled company.

- Do not offer, give, solicit, or accept bribes or kickbacks, or provide or accept any other kind of improper payment or item or service of value.
- Do not pay facilitation payments. If a facilitation payment is requested, immediately report the request to the Chief Financial Officer (CFO).

- Keep accurate books and records so that payments can be honestly and complete described and documented.
- Be alert for anyone doing business on our behalf who has a reputation for questionable business practices. Be vigilant in monitoring that person's or organization's behavior and report your concern to a supervisor or member of leadership.

Anti-Money Laundering

It is important to know and comply with all laws and regulations intended to prevent money laundering. Terrorists, narcotics traffickers, counterfeiters, smugglers, and other criminals often attempt to use legitimate companies to hide their proceeds or their sources of funds.

Many forms of other crimes are related to money laundering, including forging financial documents, exploitation of vulnerable persons, hacking, and identity theft.

Aiding in money laundering and making payments to prohibited individuals are serious criminal offenses.

All employees must ensure that they are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.

Health and Safety

We understand the importance of providing a healthy, safe, and secure workplace for our co-workers and others who visit our facilities. Our commitment to health and safety is a team effort: look out for one another, use common sense, and speak up whenever you suspect or witness a health, safety, or security risk.

- Always do your part to keep the place in which you work in good, clean, orderly condition. Good plant housekeeping is a great aid in preventing accidents.
- Be alert and use good judgment. Speak up about any possible hazards and always report work-related accidents or illnesses.
- Always follow safety, fire, and security protocols.
- Help contractors and third parties to act in a manner consistent with our safety requirements.
- Do not work under the influence of alcohol or illegal drugs.
- Immediately report anyone, whether a co-worker or visitor to the premises, who uses threats or intimidation or is violent. These actions endanger everyone and, in addition, undermine our company culture as an ethical organization.
- Do not bring firearms or other weapons on JMC premises, except as authorized.

JMC can be held responsible for your actions if your off-duty conduct interferes with our ability to conduct our business or poses a risk to our company's reputation.

Human Rights

We are committed to respecting the human rights and dignity of everyone.

We comply with all applicable laws pertaining to fair employment practices, freedom of association, privacy, collective bargaining, immigration, working time, wages, and hours, as well as laws prohibiting forced and compulsory child labor, employment discrimination and human trafficking. We will not tolerate abuse of human rights in our operations or in our supply chain.

You can support efforts to end human rights abuses by taking action:

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners to your leadership or Human Resources.
- Remember that respect for human dignity begins with our daily interactions with one another and with our customers and business partners. It also includes promoting diversity and inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.

Sustainability and Environmental Stewardship

We are committed to complying with all relevant environmental laws, and we work to continuously improve our conservation efforts.

- Be proactive and look for ways to reduce waste and use energy and natural resources more efficiently.
- Recycle when you can and conserve paper by limited printing.
- Speak up if you have any suggestions about reducing our environmental impact, please reach out to the Director of HR.