

JOHNSON SERVICE GROUP PLC

GUIDING PRINCIPLES OF CUSTOMER CONDUCT

Introduction

Sustainability is a key element of Johnson Service Group's strategy. We aspire to achieve our goals, which are based on the principles of legality, transparency, fairness, trust and cooperation, with the participation of all our stakeholders.

These Guiding Principles of Customer Conduct ("Code") are aimed at building increasingly closer cooperation in order to strengthen these principles whilst building together a supply chain focussed not only on the quality of products or services, but also on the environment and social and working conditions where the products or services are designed, manufactured and marketed.

Johnson Service Group invites all its customers to share and implement the principles expressed in this Code. Customers are encouraged to implement the necessary mechanisms to identify, determine and manage risks in all the areas covered by this Code and to comply with all applicable legal requirements.

In this Code:

Customer means a company, partnership or individual to whom one or more members of the Johnson Service Group supply goods and / or services.

Johnson Service Group means the group of companies, from time to time, of which Johnson Service Group PLC is the ultimate parent undertaking.

Johnson Service Group reserves the right to modify this Code from time to time.

Ethics & Business Integrity

Johnson Service Group has a firm commitment to conducting business with the highest level of integrity. Customers shall endeavour to strictly comply with all legal requirements related to their activities and business environment.

We do not practice nor tolerate any form of corruption, bribery, extortion or embezzlement and, in light of this, customers should not offer bribes or other illegal incentives to the employees of Johnson Service Group. For its part, Johnson Service Group shall never request, directly or indirectly, or accept such illegal incentives or gifts. We reject corruption in all of our business transactions and are fully committed to complying with all applicable anti-corruption laws.

We undertake to formulate contracts and trade agreements with customers that are set out in a clear and straightforward manner, comply with applicable regulations and do not include elusive or improper practices.

Customers undertake to protect and properly use sensitive and confidential information submitted to them in accordance with contractual terms.

Labour Standards

Customers shall not use forced, bonded or compulsory labour and shall not resort to any kind of child labour in their supply chain or business activities, in accordance with applicable anti-slavery and human trafficking laws, statutes, regulations and codes in force from time to time (including, but not limited to, the Modern Slavery Act 2015, the fundamental International Labour Organisation rules and the principles of the United Nations Global Impact).

Customers should seek to handle employee employment contracts in a legal and proper manner in observance of the pertinent labour laws. This includes, but is not limited to, compliance with applicable laws and regulations related to maximum working hours, minimum days or rest and minimum levels of wage.

Customers should apply appropriate policies and procedures to ensure that there is no inhumane treatment in the employee





workplace whatsoever and that employees are not subjected to such issues as harassment, bullying or abuse. This includes taking steps to eliminate unlawful discrimination of any kind in respect of employment and occupation.

Customers are expected to have an appropriate approach regarding diversity and inclusion, reflecting statutory provisions relating to diversity and equality Law in relation to sex, race, gender reassignment, age, disability, sexual orientation, religion or belief, pregnancy, maternity or otherwise. This should include details of approach to monitoring, recruitment, bullying and harassment and training and treating every employee fairly and with dignity.

Johnson Service Group prohibits all practices that constitute discrimination or harassment. Equality of opportunity, respect for diversity and recognition of the talents of every individual in an environment where harassment, abuse or any other form of treatment contrary to respect for human dignity is prohibited should be considered the norm.

Health, Safety and the Environment

Customers shall endeavour to comply with national regulations relating to health and safety and the environment, as well as to obtain, keep and update all necessary permits, licences and registrations relating to their products, services and processes.

Customers should also protect their employees from work-related hazards, limit workplace health and safety risks and operate in accordance with applicable health and safety laws.

Customers are encouraged to adopt systems and/or pursue initiatives that contribute to the preservation of the environment and mitigation of their impact on natural resources. This would include utilising the products and services provided by Johnson Service Group for the purpose they have been provided.

Data Protection and Information Security

Johnson Service Group expects its customers to treat our information assets in the secure manner in which they would treat their own physical and information assets. We expect customers to implement proper information security and data protection controls to protect the confidentiality, integrity and availability of information.

Corruption and Conflicts of Interest

Customers should base decisions on business needs, rather than on the personal interests of employees, the interests of family or friends, or any other reason that creates a conflict which could impact either party's objectivity. In this regard, the customer should be aware of any personal business relationships that may exist with employees, suppliers or competitors and ensure they never influence their decision making.

Unfair Business Practices

Competition laws ensure that companies compete fairly in the market. Any agreement with competitors that has the purpose or effect of fixing prices, distorting a bidding process, sharing markets or customer information should be prohibited.

General Conditions

Johnson Service Group undertakes to comply with the law in any location where it operates. Similarly, customers should endeavour to comply with all laws, regulations, existing contractual agreements, standards and generally accepted technical rules.

Customers are encouraged to implement the necessary mechanisms to identify, determine and manage risks in all the areas covered by this Code and to comply with all applicable legal requirements.

Furthermore, customers are encouraged to continuously improve the suitability, adequacy and effectiveness of their sustainability policies through implementing appropriate measures.

Moreover, customers are also encouraged to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this Code.

As part of our ongoing collaboration with key stakeholders, customers are able to report violations of this Code, or any other form of unethical behaviour, either by email (sustainability@jsg.com) or via the communication channels found on our websites. In the event Johnson Service Group considers that a customer does not comply with the letter and spirit of this Code, we reserve the right to undertake an appropriate improvement process together with the customer.

