

CODE OF CONDUCT & ETHICS

We should treat all those in the marketplace with fairness & integrity.

Anti-Discrimination

Each of us should have the opportunity to reach our full potential and contribute to Jogobu's success. To accomplish this, you should never discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation or any other term or condition of employment.

Your employment decisions regarding employees and applicants must always be based on merit, qualifications and job-related performance, without regard to non-job-related characteristics such as:

- Race, color, ethnicity, or national origin
- Gender or gender identity
- Sexual orientation
- Age
- Religion
- Disability
- Any other legally protected status

Making employment decisions based on any of these personal characteristics is always against our policies and is illegal under the laws of many countries. You must always act fairly and give qualified individuals the chance to develop their abilities and advance within our company.

Anti-Harassment

Jogobu seeks to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. Our company complies with all country and local laws prohibiting harassment, and our Code prohibits harassment in the workplace.

Harassment includes unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility towards others because of individual characteristics

You should never act in a harassing manner or otherwise cause your co-workers to feel uncomfortable in their work environment. It is important to remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

Anti-Violence

Jogobu's safety programs include a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.

Our company also prohibits the possession of weapons in the workplace. To the full extent permitted by local law, this prohibition extends to company parking lots as well as our facilities. Our zero-tolerance policy for workplace violence applies to behavior on company premises, as well as to the behavior of our employees engaged in Jogobu business anywhere in the world outside of our premises.

Don't delay – speak up and report threats or potential violence immediately to local management.

Our Customers

Integrity in the marketplace requires each of us to treat our customers ethically, fairly, and in compliance with all applicable laws. When dealing with our customers, you should always:

- Earn their business based on our superior products, customer service and competitive prices
- Present our services and products in an honest and forthright manner
- Avoid unfair or deceptive trade practices
- Communicate our sales programs clearly
- Deliver on your promises

Our contracts with customers must always reflect the importance and value we place on their business. All customer sales and trade spending agreements should be in writing and conform to our policies.

Our Suppliers

We hold our suppliers to the same standards of integrity to which we hold ourselves. An unethical or illegal act of a supplier may hurt Jogobu's reputation as a good-standing company and cause a loss of goodwill in the communities we serve. Therefore, all suppliers must comply with our Supplier Code of Conduct as a condition of doing business with us. Our suppliers include any third-party vendor, consultant, contractor, service provider or supplier of raw materials, ingredients or packaging components.

If you are responsible for selecting a supplier, you should base your decision on merit, quality of service and reputation.

Product Quality

We are committed to providing high quality products across all sectors. We maintain consumer trust by carefully selecting superior products from our trusted brands. We are also committed to developing new software products in an ethical and responsible manner, and to following applicable ethical standards and guidelines relating to research.

If you are involved in any aspect of procuring, developing, handling, packaging or storing our products, you are expected to:

- Know the product quality standards, policies, and procedures that apply to the products
- Follow good practices and testing protocols
- Comply with all applicable safety laws and regulations

It is important to always be alert for situations that could compromise our products. If you see something that could negatively affect the quality of the product, speak up and report it immediately.

Conflicts of Interest

You should avoid a conflict, or an appearance of a conflict, between your personal interests and our company's interests.

Our company's conflicts of interest policy is straightforward – we all have an obligation to act in the best interest of our company at all times. Conflicts of interest may arise when you, a family member or a friend:

- Engage in activities that compete with, or appear to compete with, our company's interests
- Let your business decisions be influenced, or appear to be influenced, by personal or family interests or friendships
- Use company property, information or resources for personal benefit or the benefit of others
- Hire, supervise or have a direct or indirect line of reporting to a family member or someone with whom you have a romantic relationship
- Have outside employment that negatively affects your job performance or interferes with your Jogobu responsibilities
- Work for, provide services to, have a financial interest in or receive any personal benefit from a supplier, customer, competitor or a company that does or seeks to do business with Jogobu if such relationship or interest could influence, or appear to influence, your business decisions. In general, it will not pose a conflict of interest if you or a family member have a nominal stock ownership interest (generally, less than a 1% equity interest) in a supplier, customer or competitor, unless that equity interest constitutes more than a small portion of your overall investment portfolio and thus creates the potential for the appearance of a conflict of interest.

You must disclose potential conflicts of interest to our company. Remember, having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.

If at any time in your employment you think that you may have a potential or actual conflict of interest, you have an obligation to disclose the conflict promptly to our company so that a determination can be made as to the existence and seriousness of an actual conflict. Many times, conflicts can be resolved by an open and honest discussion.

Certain material conflicts may require the acknowledgement of your confidentiality obligations, reassignment of roles, or recusal from certain business decisions.

You must disclose any actual or potential conflict to Jogobu by doing the following:

- Check with Global Compliance and Ethics or your local controller to submit your disclosure through the proper channels established by your sector or region. If you are unsure about who to contact, you can also disclose your conflict by sending an email to compliance@jogobu.com
- If you are subject to our Code of Conduct training, you must also disclose your potential conflict of interest at the end of the training course when prompted to do so. You should continue to disclose such circumstances each year, if the potential conflict is ongoing.

Anti-Corruption

Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means.

Corruption may involve payments or the exchange of anything of value and includes the following activities:

- Bribery (bribery of a government official or commercial bribery)
- Extortion
- Kickbacks

Corrupt activities are not only a Code violation, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in various countries. Should you become aware of any potential or actual corrupt arrangement or agreement, speak up and report it.

To comply with anti-bribery laws, no employee should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or his or her representatives to:

- Obtain or retain business,
- Influence business decisions, or
- Secure an unfair advantage

These prohibitions apply to our business operations and to anyone acting on our behalf, including agents, consultants, suppliers and contractors.

A “government official” includes a person who works for or is an agent of a government owned or government-controlled entity. For purposes of anti-bribery laws, government officials include elected and appointed officers or employees of national, municipal or local governments (including individuals holding legislative, administrative and judicial positions), officials of political parties and candidates for political offices, and employees of a government or a state-controlled company.

Not all government payments are problematic. For example, payments may be made to a government entity in the normal course of business, such as to pay taxes or when the government entity is a customer or supplier. However, payment of any kind for bribes or facilitating payments to government officials in any country is prohibited.

“Facilitating” payments are discretionary payments to government officials to expedite or ensure routine actions – such as issuing licenses, permits or visas. If you receive a request from a government official for a bribe or facilitating payment, you must decline to make the payment unless you have a reasonable good faith belief that failure to make the payment may subject you or others to physical harm. You must also promptly report the request for a bribe or facilitating payment directly to the Law Department or Global Compliance and Ethics Department or through the Speak Up line.

All payments and gifts to, and entertainment of, government officials must be pre-approved in writing by your local Compliance and Ethics representative or your local Law Department General Counsel. All payments, both direct and indirect, made to government officials must be accurately recorded in our books and records.

If you are unsure whether you might be dealing with a government official, or have any other questions on complying with anti-bribery laws, you should contact your local Compliance and Ethics representative or your local Law Department General Counsel for guidance. Always speak up and report any suspected bribery activity.

Anti-Money Laundering

Jogobu complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. “Money laundering,” is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. Check for “red flags” such as requests from a potential customer or supplier for cash payments or other unusual payment terms. If you suspect money laundering activities, speak up and report it.

International Trade Controls

As a global company, Jogobu transfers goods, services and technologies across national borders. Our business transactions are subject to various trade controls and laws that regulate export and import, including:

- Government-imposed export controls, trade restrictions, trade embargoes, legal economic sanctions and boycotts
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned.

If you are involved in the transfer of goods or services across national borders on behalf of our company or our customers, you must comply with these laws, regardless of where you are located. Always consult with the Legal Department for proper guidance on this subject.

Political Activities

Jogobu encourages its associates to participate in their communities, which may include political activities. However, you may not use company funds or resources, or receive company reimbursement,

for personal political activities, including contributions to political candidates or parties. You should avoid even the appearance of doing so.

On occasion, Jogobu may communicate information and its corporate opinions on issues of public concern that affect our company. These announcements are not intended to pressure you to adopt certain ideas or support certain causes. Your decisions to contribute your own time or money to any political or community activity are entirely personal and voluntary.

Jogobu obeys all laws in promoting our company's position relative to government authorities and in making political contributions. Corporate political contributions are strictly regulated and must always be approved by the Jogobu Legal Department.

Business Gifts

The practice of giving or receiving a customer's or supplier's business gift requires careful consideration by you and your manager. Before any gift is exchanged, you should determine if it is permitted under our Code and policies. Our Gifts Policy and applicable sector or function policies define acceptable business gift practices.

You are prohibited from providing, offering, or receiving any gift that serves to, or appears to, inappropriately influence business decisions or gain an unfair advantage.

However, under certain circumstances you may exchange business gifts that are intended to generate goodwill, provided:

- The gift has a legitimate business purpose, is of nominal value (generally under €75 Euros or its equivalent), is infrequent and meets all other requirements of our policies, including the Sustainability Policy and Anti-Bribery Compliance Policy.
- The gift is not cash or a cash equivalent
- Your division or function does not have a "no gifts" policy in effect
- The gift is permitted under the laws that apply to the recipient and the recipient of the gift is authorized and permitted to accept the gift "Business gifts" do not include company-sponsored sales contests or incentive programs. In addition, business hospitality, including meals and entertainment, is not prohibited so long as the nature and frequency of the occasion is reasonable, the occasion involves the active conduct of company business and the business hospitality otherwise complies with our policies.

Gifts to government officials: You should be aware that giving or offering even a simple gift or meal to a government official can be illegal. You must obtain prior written approval from your local Compliance and Ethics representative or your local Legal Department before giving or offering any gift, meal or entertainment to a government official.

Fraud

You misuse company resources, and commit fraud, when you intentionally conceal, alter, falsify or omit information for your benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Examples of fraud include:

- Altering part numbers to meet productivity goals
- Presenting false medical information to obtain disability benefits
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work
- Misrepresenting sales or donations of products to obtain unauthorized pricing for a customer
- Misstating financial information in our company's books and records

You should also avoid the appearance of fraud. For example, never spend company funds without proper approval. Similarly, never enter into an agreement on behalf of our company unless you are authorized to do so.

Company Resources

Jogobu relies on you to use company resources honestly and efficiently. Resources include physical property, such as facilities, supplies, equipment, machinery, spare parts, raw materials, finished products, vehicles and company funds. They also include intangible assets, such as company time, confidential information, intellectual property and information systems. You should use company resources only for legitimate business purposes and protect them from theft, loss, damage, or misuse.

The obligation to protect company funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts. You must always:

- Ensure the funds are properly used for their established purpose
- Obtain required approval before incurring an expense
- Accurately record all expenditures
- Verify that expenses submitted for reimbursement are business-related, properly documented and comply with our policies.

If you are aware of company resources being misused, speak up and report it.

Confidential Information

During your employment, you may acquire certain information about Jogobu, its customers, suppliers or business partners or another third party that is confidential, competitively sensitive and/or proprietary. You should assume that company information is confidential or competitively sensitive unless you have clear indication that Jogobu has publicly released the information.

Always take reasonable and necessary precautions to protect any confidential information relating to Jogobu or another company to which you have access. You should not disclose any confidential business information to anyone outside Jogobu, even to members of your own family, unless the disclosure is:

- Properly authorized
- A clearly defined, legitimate business need
- Subject to a written confidentiality agreement approved by the Legal Department

Even within our company and among your co-workers, you must only share confidential information on a need-to-know basis.

This obligation of confidentiality does not prohibit you from raising concerns about potential Code or legal violations either within the company or to government authorities. Your ability to report legal violations internally or to a government authority, either during or after your employment, is not prohibited by any other Jogobu policy or agreement.

Privacy

Personal information broadly refers to any information that identifies or relates to an identifiable person. If you access this type of information or the systems that maintain it, you must comply with all applicable policies and laws regarding the processing of such information. You must:

- Only access, collect and use personal information that you need and are authorized to see for legitimate business reasons;
- Disclose personal information only to authorized persons who have a legitimate business reason to know the information and who are obligated to protect it;
- Securely store, transmit and destroy personal information in accordance with applicable policies and laws; and
- Promptly report any actual or suspected violations of our policies or other risks to personal information to your local Legal Department.

Our Privacy Principles establish a globally consistent foundation for our information collection, handling and use practices. Further, Jogobu is committed to complying with applicable privacy laws in the

countries where we conduct business, including such laws regarding the cross-border transfer of certain personal information. Consult with the Legal Department if you have any questions or believe you may be required to transfer personal information outside of the country in which it was collected.

Intellectual Property

Our intellectual property is an invaluable asset that must be protected always. Intellectual property includes our trademarks, brands, package designs, logos, copyrights, inventions, patents and trade secrets. You should never allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement that has been approved by the Legal Department.

Furthermore, our trademarks should never be used in a degrading, defamatory or otherwise offensive manner. Our intellectual property also includes employees' work product. As a company employee, any work you create, in whole or in part, in connection with your duties, and/or using company time, resources or information, belongs to Jogobu. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials you may help to create or author in connection with your work for our company belongs to Jogobu. You should promptly disclose any invention related to our business, so that it may receive the same protection as other intellectual property of our company.

Email, Internet and Information Systems

Our information technology systems are a key component of our business operation and are provided for authorized business purposes. Your use of these systems must comply with our Information Security Policy and Acceptable Use Standards. You may engage in reasonable incidental personal use of phone, email and the internet as long as such usage does not:

- Consume a large amount of time or resources
- Interfere with your work performance or that of others
- Involve illegal, sexually explicit, discriminatory or otherwise inappropriate material
- Relate to outside business interests
- Violate our Code or any company policy

While it is generally not our practice to monitor employees' use of our information systems, Jogobu reserves the right to monitor, record, disclose, audit, and delete without prior notice the nature and content of an employee's activity using our company's email, phone, voicemail, internet and other systems, to the extent permitted by local law.

External Communications

If you are contacted and asked to discuss company business with any members of the press, investors or market analysts, do not provide any information. Instead, you should politely advise the outside party that you are not authorized to discuss the subject, and refer them to the spokespeople designated.

Investigating Misconduct

All reports of suspected violations of our Code or the law will be taken seriously and promptly reviewed. As appropriate, Compliance and Ethics will assign investigator(s) to review all reported instances of alleged Code violations. The investigator(s) will:

- Act objectively in determining facts through interviews or a review of documents
- Contact employees who may have knowledge about the alleged incident(s)
- Recommend corrective actions and/or disciplinary measures where appropriate In accordance with applicable law, Jogobu strives to:
- Protect the confidentiality of the individuals involved, to the extent practical
- Inform an employee of the accusations reported against him/her at a time when such a disclosure will not jeopardize the investigation
- Where permissible, allow employees to review and correct information reported

Disciplinary Actions

You are expected to follow the Code, and comply with our policies and the law while conducting business on behalf of Jogobu as a condition of employment. Violating the Code, our policies or the law may result in:

- Disciplinary action, up to and including termination of employment, depending on the nature and severity of the Code violation
- In the case of a violation of law, civil and/or criminal penalties may be imposed by a governmental agency or a court.

Issuance of and Amendments to Our Code

Our Code is reviewed periodically by Compliance and Ethics & the Legal Department to determine whether revisions may be required due to changes in the law or regulations, or changes in our business or the business environment.