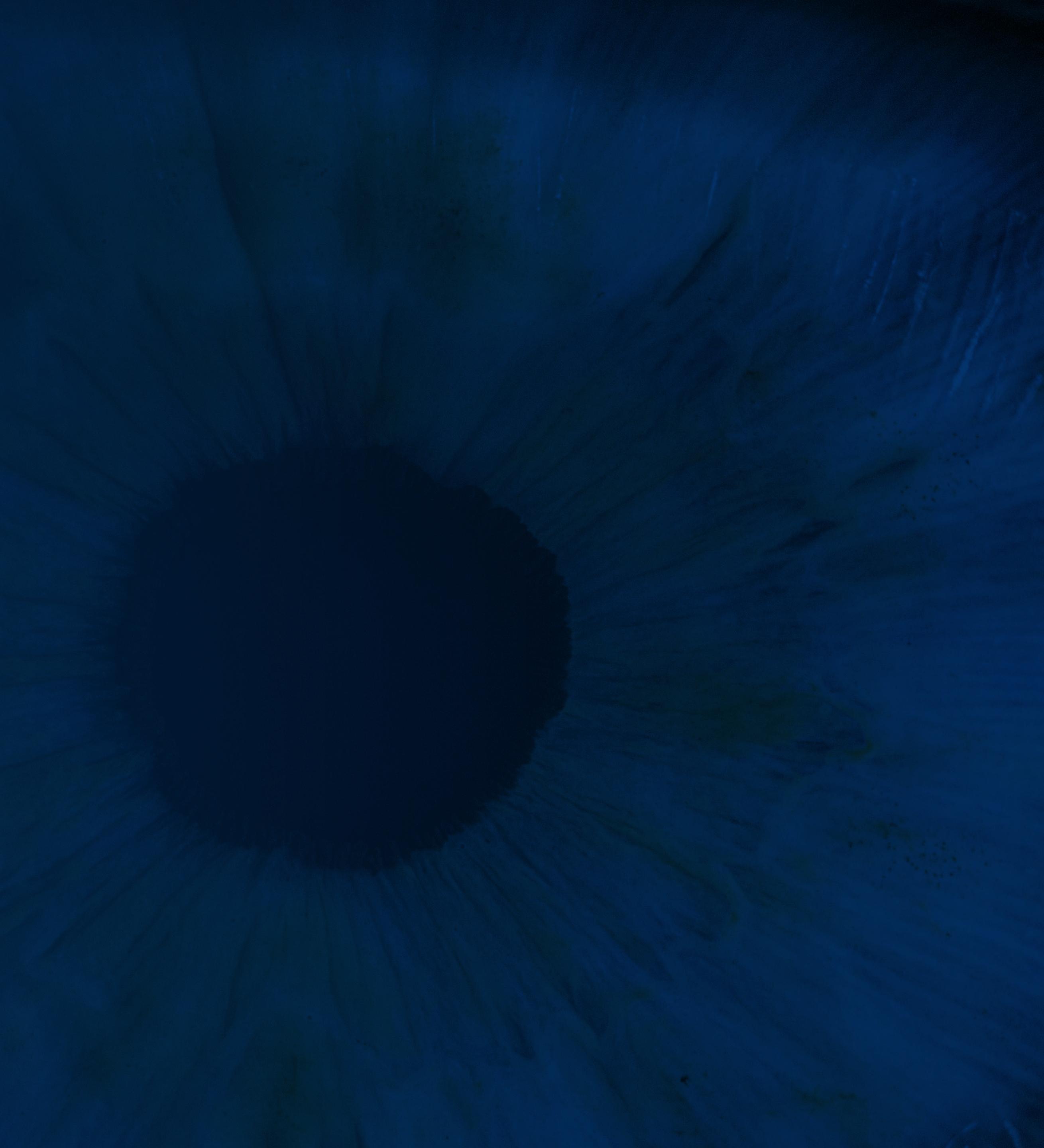
# JLI Code of Conduct



# Version 2, Nov 2024



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# **1. INTRODUCTION BY THE CEO**

# "JLI vision has always had a strong culture where common sense and accountability have been natural cornerstones"

We want this behavior to continue to be the hallmark of JLI, which is why this Code of Conduct sets out the guidelines for how you, as an employee, can help do the right thing for JLI, your colleagues and our customers.

Our values and culture are critical to our ability to continue to attract and retain the talent we need to help our clients create innovative vision solutions at the highest level.

It's the small actions and decisions we make every day that combine to create our company culture, and it's a shared responsibility to contribute to its positive development.

Our Code of Conduct outlines how we do things right, but does not cover every possible scenario, so there will always be a need for us to think for ourselves and use common sense to make decisions that are in line with our company values.



Jørgen Dan Læssøe, CEO





# 2.THE JLI SPIRIT

In JLI, there has always been a flat corporate structure with a high degree of autonomy. We want to keep it that way, and part of your job as an employee is to help make sure that happens, while effectively making good, beneficial decisions - no matter how big we get. There are two things in particular you can do to contribute to this:

- Don't be afraid to ask for advice, help and guidance - and offer the same where you can. A helpful culture with open communication is a good breeding ground for making good and informed decisions, as well as being able to work without managers.
- When making a decision follow the consultation principle (described in section 2.1)

JLI is also characterized by a high degree of commitment, autonomy and accountability on the part of each employee. A commitment and responsibility that extends beyond the physical workplace. As part of JLI's strategy to demonstrate social responsibility, it was decided

in 2021 that JLI will make an active effort to work with UN's Sustainable Development Goals (SDGs). Among other things, this will be done through an official commitment to the UNGC (United Nations Global Compact), with annual monitoring of our progress, and by becoming part of the EcoVadis universe, which measures the company against the SDGs.

With these two efforts, JLI vision and our employees commit to work and act in accordance with the UN Global Compact's 10 principles, as well as to set goals and develop in EcoVadis' four sustainability pillars: environment, labor and human rights, business ethics and information security, and sustainable procurement.

# 2.1 Principle of consultation

The purpose of the consultation principle is to empower every employee to make the decisions that need to be made, when they need to be made, confident that they can make the right decision without consulting with a "boss" - since there aren't really any of them at JLI anyway and the few that are, can't make decisions for everyone.

Basically, it's about asking yourself some questions (see text box: Basic considerations) and doing some groundwork that is appropriate to the scale of the decision to be made. The more employees the decision affects and/or the greater its financial impact, the bigger the decision can be said to be, and the more preparatory work should also be done.

In addition to taking responsibility for our decisions, a number of areas where JLI employees are expected or encouraged to take shared responsibility are discussed in the following sections, it is therefore important that all employees read and familiarize themselves with the information in this Code of Conduct.

# **BASIC CONSIDERATIONS** IN THE CONSULTATION PRINCIPLE

- Does it create value for JLI (directly or indirectly) in relation to the expense?
- doing it?
- Would I think it was a good idea, if one of my colleagues, did it?

• Would I do it, if all my colleagues knew I was

# <sup>1</sup> The UN Global compact's 10 principles applied

Learn more: https://globalcompact.org/what-is-gc/mission/principles

### Human rights

1. Principle: JLI supports and respects the protection of internationally declared human rights, and 2. Principle: ensures that JLI or JLI's employees are not involved in human rights violations.

### **Working conditions**

3. Principle: JLI will maintain freedom of association and recognize the right to collective bargaining,

4. Principle: JLI works to eliminate of all forms of forced labour, 5. Principle: for effective abolition of child labour, as well as 6. Principle: elimination of discrimination in connection with employ-

ment and occupation.

### Environment

7. Principle: JLI supports a precautionary approach to environmental challenges;

8. Principle: JLI undertakes initiatives to promote greater environmental responsibility; and

9. Principle: encourages the development and diffusion of environmentally friendly technologies. **Anti-corruption** 

10. Principle: JLI works against corruption of any kind, including extortion and bribery.





# **3.0UR RESPONSIBILITY TO JLI**

# 3.1 We safeguard JLI's reputation

JLI receives many orders from existing customers because we are recommended internally based on the quality of our products and our employees. As part of safeguarding JLI's reputation, we treat customers, suppliers and others with respect, and we strive to deliver the best quality possible - being honest and open about limitations, unforeseen events or other challenges.

We also strive not to do anything that might otherwise damage JLI Vision's reputation or in any way put the com-pany in legal difficulties.

## 3.2 We treat inside information with confidentiality

We have a lot of know-how that has been built up over many years. We want to protect this as best we can. Know-how is not only the programs, but also knowledge of which components we use and how we approach the tasks, our methods and, not least, how we develop sharp and relevant images for the systems.

That's why there is confidentiality.

It is also not for anyone else to know who our customers or agents are. Of course, we use clients as references if they agree to this, but this information is also shared on a need-to-know basis.

# **3.3 We safeguard JLI's financial stability**

We know that running a development business like JLI involves some risk of loss, but we are conscious of our shared responsibility to ensure that JLI is protected financially by making good decisions in line with the consultation principle, and by ensuring that offers are based on the knowledge and experience JLI has built up over time, so that they are as realistic as possible.

# **4 OUR RESPONSIBILITY TO (OURSELVES AND) EACH OTHER**

JLI is an international and technologically advanced company operating in a competitive market. We therefore place high demands on all employees in terms of good human qualities, professional competence, business understanding and the ability to adapt and develop.

At JLI, we therefore want to create a working environment that is attractive, motivating and developing, and which at the same time stimulates the creative abilities and initiative of the individual employee - the management can create the framework for this, but only the employees themselves can realize this wish.

What makes a workplace attractive to you? What motivates you and stimulates your creative abilities? Find out and make it part of your working day, it is important that there is room for this at JLI.

"JLI is an international and technologically advanced company operating in a competitive market. We therefore place high demands on all employees in terms of good human qualities, professional competence, business understanding and the ability to adapt and develop."

## 4.1 Your contribution to a healthy and safe workplace

JLI makes it a priority to create an environment that helps ensure a healthy and safe workplace. JLI management is supported in this work by the Work Environment Commitee (AMU in Danish), but it involves all JLI employees. This is demonstrated, for example, by the fact that we have an annual discussion on current working conditions during the company seminar. There are several areas where you as an employee can take specific actions to improve the health (both physical and mental) and safety (both physical and digital) of yourself and your colleagues at JLI. Some of the most significant are presented in the following sub-sections.

### 4.1.1 Good physical working conditions

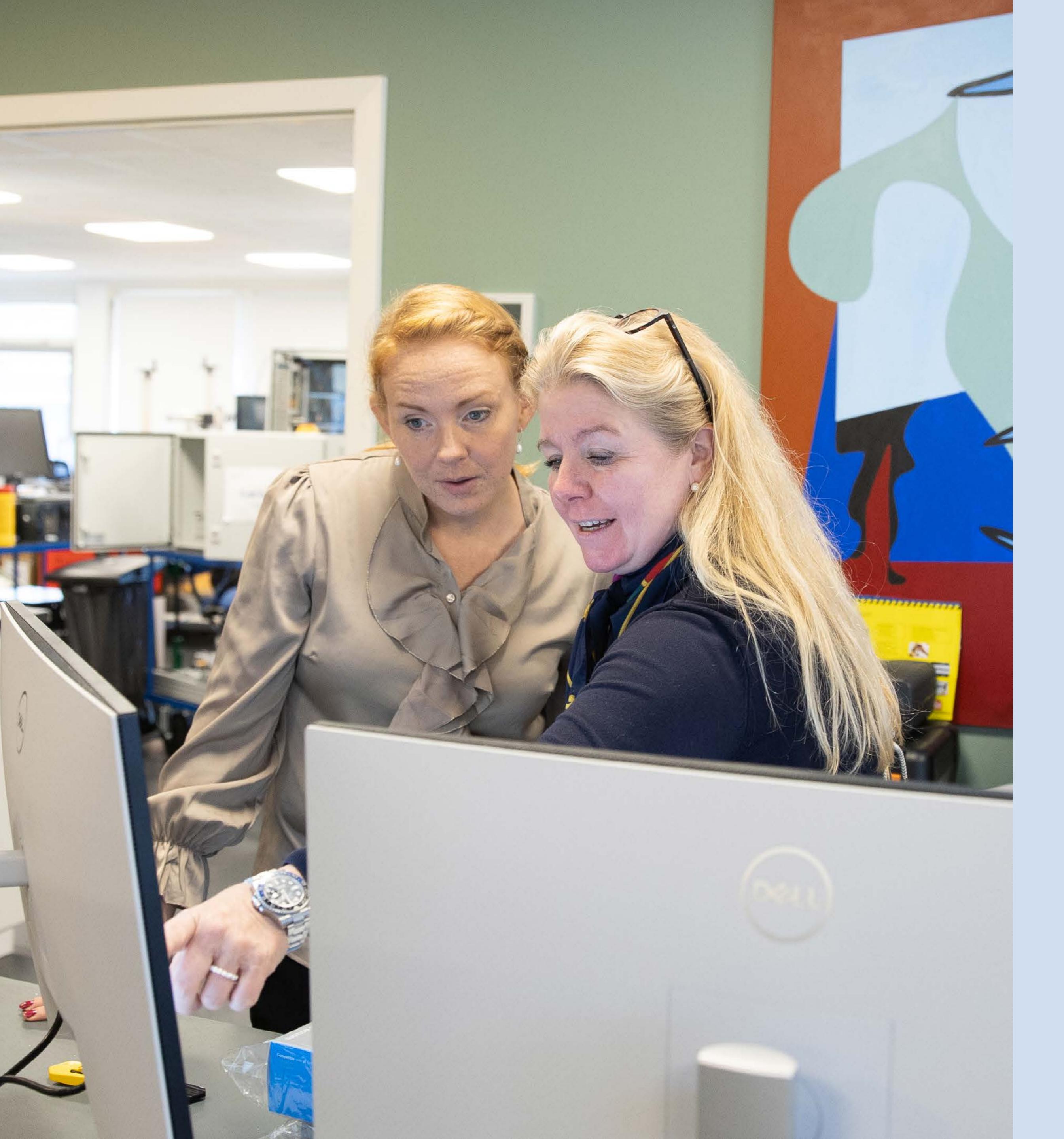
It is important that you can work in conditions that best support the work you do, so use the consultation principle to ensure that you have the things in place to enable you to work in good postures and do your job to the best of your ability. This applies to technological equipment, safety equipment, ergonomic equipment or whatever else might be helpful/necessary. See the JLI Safety brochure for more details.

An important tip is to move around during your working day. Whether it's changing positions ("the best position is the next position"), a game of table tennis, walking around during phone calls or similar, get up out of your chair and do something active.

### 4.1.2 Mental health

Good physical working conditions also have a positive impact on your mental health, and it is also important for your sense of work satisfaction. Good results and good relationships are some of the cornerstones in contributing to job satisfaction. The lack of the same can be a cause of stress.





If you suspect that you or a colleague are developing unhealthy stress, don't be afraid to react. For example, be aware of signs such as insomnia, memory problems, behavioral changes such as increased aggressiveness, reduced concentration and performance, etc.

JLI has a stress preparedness plan, and has organized training on stress management and prevention in the past. The JLI Work Environment Committee conducts an annual job satisfaction survey, and we refer to the committee for further information.

### 4.1.3 Physical safety

JLI Vision must be a safe place to work. If a situation or work task is deemed to pose a safety risk, stop and ensure safety before the task is carried out.

As a new employee, you should attend JLI's safety training as soon as possible. This will include material describing how best to avoid or deal with certain common situations that may pose a safety risk. If necessary, JLI will also organize first aid training.

### 4.1.4 IT-security

As an employee of an IT company, it is also of the utmost importance to be vigilant about IT security. JLI has an IT Security Policy which can be found on JLI's internal wiki. This contains practical guidelines that you as an employee are required to know and follow. General training on IT security issues is also made available.

In general, it is important that you as an employee are aware of situations that may pose an IT security risk and that you are familiar with both the afore-mentioned IT Security Policy, as well as JLI's internal requirements for back-up procedure, which are described in detail in the company's Quality Manual.

# 4.2 We do not accept discrimination or violence of any kind

At JLI it is important that all employees thrive in their daily work and that the workplace is a good place to be. There is no age discrimination, everyone can stay at JLI as long as they contribute work, knowledge, humor or music.

We treat each other with respect and therefore consider any expression of racism, sexual harassment, bullying or any other form of discrimination, insult or exercise of violence as unacceptable.

We have a shared responsibility to ensure that the above violations do not take place. If you yourself experience or become aware that a violation of any of the above exists, you are expected to go to management, the employee representative or your mentor immediately.

### **Contingency plan**

We take reports of abuse seriously. Every report will be thoroughly investigated and followed up with the necessary measures. Management has a duty to take your concerns seriously and to keep information confidential from unconcerned parties. Depending on the specific behavior, you will be given help on how to deal with the situation going forward.

### Sanction

Depending on the situation, the offender may receive a verbal or written warning or risk dismissal or expulsion. The sanction will be assessed on a case-by-case basis according to the seriousness of the violation and the circumstances. Where appropriate, management will try to mediate between the parties involved.

# 4.3 Your professional contribution

Independence, cooperation and responsibility are essential skills for JLI employees.

The knowledge each employee contributes with - and builds up during their time at JLI is the most valuable resource in the company. Every week, knowledge sharing is invited at the board meeting, and it is also encouraged that people pass on specific skills they have acquired or are acquiring during their employment in the form of written guides, internal courses or video material for training colleagues. Open, effective knowledge sharing is at the heart of JLI's success and continued growth.

## 4.4 Your social contribution

All employees are generally encouraged to participate in JLI's social initiatives, as getting along with colleagues has a significant impact on our job satisfaction.

We have a team in charge of organizing activities, but everyone is welcome to make suggestions as we need to accommodate different interests. Equally, of course, it's important to be able to say no - the important thing is that we embrace each other and get on well with each other.

# 5.OUR RESPONSIBILITY TO OUR CUS-TOMERS

## 5.1 Your contribution to ensuring product quality

It is the responsibility of each employee to contribute to ensuring product quality, and it is therefore important that you refer to the quality manual in case of doubt and familiarize yourself with the main elements of the process, as well as actively participate in the project status process with the quality manager for the projects you are responsible for.



# 5.2 We are reliable, flexible partners Our reliability and flexibility are some of the qualities our clients value most.

# 5.3 We treat our customers' data responsibly

### 5.3.1 Non-disclosure agreements

When we handle customer and potential customer issues and data, it is confidential. It is the responsibility of the administrative project manager to assess as early as possible whether an NDA is required, to have one prepared, signed and communicated to relevant staff.

See also section 3.2 on internal confidentiality.

### 5.3.2 GDPR

JLI places a high priority on the protection of personal data. Therefore, in our activities we follow the applicable legal rules for the protection of personal data and data security.

JLI processes personal data in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and national data protection legislation. A security assessment of our data processes has been carried out by a third party.



# 6. OUR RESPONSIBILITY TO SOCIETY

## 6.1 We comply with the law

We comply with all laws to which we are subject as a Danish company and expect our employees to comply with all relevant national laws and regulations as well. This, of course, includes any form of fraud and deception as described in the Danish Criminal Law.

### 6.1.1 We do not tolerate bribery, extortion, money laundering or any other form of circumvention of § 144 of the Danish Criminal Law

JLI does not tolerate any form of bribery. It is unacceptable, unethical and strictly forbidden to offer or accept bribes either directly or indirectly. Bribery is the offering, giving or receiving of anything of value (money or gifts) with the intention of the giver exercising undue influence on the decision or conduct of the recipient. Bribery typically involves "something for something" from which both parties benefit, e.g. a supplier offering money to a company's employee in order to obtain orders from that company.

### 6.1.2 Conflict of interest

A conflict of interest arises when an employee's private interest in any way conflicts or seems to conflict with JLI's interests.

A real or potential conflict of interest is not necessarily a violation of JLI's Code of Conduct, but continuing to work in a context or participate in a decision that knowingly involves a conflict of interest is.

Please contact management with regards to questions concerning conflicts of interest.

## **Bribery can be:**

- a direct or indirect promise of or access to something of value
- offering or receiving money under the table (giving or improper benefits
- support and donations or votes for the purpose of exercising undue influence or obtaining dependency

### Whistleblowing system:

JLI has a third party hosted whistleblower system that is available to all stakeholders (customers, suppliers, employees or other). Entries can be made and the policy can be read at:

https://jlivision.whistleportal.net

receiving money, gifts or anything else of value in re-turn for favourable treatment), loans, remuneration, re-wards or other



### **Employees must:**

- be cautious when receiving anything from business partners. This also applies when employees give anything of value to business partners
- if in doubt about the risk of receiving or giving a bribe, consult a colleague - or follow the English comma rule: "If in doubt, leave it out"

### **Employees must not:**

- use third parties, such as business partners, to indirectly offer or accept bribes
- accept or give bribes, money under the table or other improper payments for any reason
- accept or offer personal favors, such as free travel, unusually large gifts or dinners, which could be perceived as an inducement to enter into or renew a business relationship
- enter into any agreement with any third party that could damage JLI's reputation

# 6.2 We support the UN Guidelines on Human Rights

JLI are a part of the UN Global Compact Network and all employees are encouraged to read and familiarize themselves with the UN Guidelines on Human Rights so that they can help support our compliance with them as a company and as individuals. Read them here on the UN's own website or **here** in danish translation.

## 6.3 We support good causes

### 6.3.1 Donations

JLI makes donations on special occasions to good causes. Only the management or the board can decide on donations, but you are welcome to make well-prepared suggestions.

### 6.3.2 Anything else?

If you have suggestions for good causes it would make sense for us as a company to support, please bring them up.



# **7 OUR RESPONSIBILITY TO THE ENVI-**RONMENT

## 7.1 Your contribution to reducing JLI's carbon footprint

JLI is taking several steps to reduce the company's CO<sub>2</sub> footprint. It is our goal to be neutral in Scope 1&2 CO<sub>2</sub>e emissions by 2030. Our environmental goals and efforts are continually progressing and improving as we, along with the rest of the world, learn more about what we can do to reduce our carbon footprint, while simultaneously being mindful of other important environmental areas that need attention, such as biodiversity, forestation, and air and water pollution as main examples.

There are several ways you as an employee can personally help reduce JLI's carbon footprint. Among other things, we focus on the following:

- Waste management (see the following section)
- Turn off the power (use remote switches)
- Choose sustainable transport options both for shipment and travelling
- Offer customers climate offsets
- Offer customers a Product Carbon Footprint report
- JLI quality process templates
- Follow the JLI purchasing policies for a more sustainable procurement process

Be continually mindful of the environmental impact of your choices in the procurement, production and sales processes of JLI products. Share anticipated and discovered concerns as well as inspiration for improvements with the sustainability team. These and any other possibilities for you as a JLI employee to help reduce JLIs overall carbon footprint are discussed at our yearly seminar.

Complete the sustainability promoting tasks as set out in the



# 7.2 We recycle responsibly and according to legislation

All recyclable commercial waste must be sorted for recycling.

In accordance with municipality regulation the following fractions are available for recycle: bio/food, glass, metal, plastics, food and drink packaging, paper, cardboard, textile. Non-recyclable waste and hazardous waste (if any) are sorted separately.

Every employee has a responsibility to find out whether the materials they work with can be recycled and to dispose of them properly. Sorting stations are available on site for all fractions. There are overviews available on site for the placement of the various recycle bins as well as sorting guidelines. More sorting often means longer walks to put waste in the right bins, but that is good for your health and movement in the workplace as well as the environment. Two birds with one stone.

Our goal is to not produce any hazardous waste and to have our weight of recycled and recovered waste come as close to our total weight of waste as possible. The result of our efforts will be presented in the yearly ESG report.

# 7.3 We pay attention to sustainable procurement

# "Think about what you buy where"

Climate neutrality cannot possibly be obtained without the combined efforts of JLI, our suppliers and our customers. We therefore make efforts to include our entire supply chain in our own efforts to make environmental improvements.

JLI's administration will regularly send out questionnaires to new suppliers of a certain importance to get feedback on their sustainability efforts. Based on these, there will be a rating of suppliers which will be continuously updated on JLI's internal wiki.

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Suppliers with a higher level of responsibility will be selected unless there are technological or customer requirements that prevent this. When new products are investigated, the most sustainable product will also be selected, unless there are technological or customer requirements that prevent this.

# 7.4 Green power and biodiversity

JLIs first big leap for improvement of our impact on the environment was to purchase 100% green power in the fall of 2021. In the fall of 2023, it was furthermore made possible in cooperation with our landlord, Wihlborg, to install solar panels on the roof to further secure the use of green power.

Since 2023 JLI has also been searching for partners and discussing solutions where we can contribute to biodiversity improvement projects.

# 7.5 We also educate ourselves on sustainability

We aim to become more knowledgeable about our products, production, transport, installation and work processes in relation to the climate footprint they have. We include third parties in this process and use this knowledge as a basis for optimizing our products and workflows, whereby we will continuously minimize our carbon footprint as much as possible.

Every year, an internal ESG report is prepared, which shows our progress and suggest actions we as a company should make in order to stay on track for our goal of climate neutrality in 2030. The report will be shared at the company seminar, to make sure everyone is up to date. New employees also receive the latest copy of this report as part of their on-boarding.



