



JERA Americas Inc.

SUPPLIER CODE OF CONDUCT

Effective Date, May 2025

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SCOPE

The term *suppliers* as used throughout this document includes vendors, contractors, consultants, and any of their employees or subcontractors. All suppliers are expected to be familiar with the Code of Conduct and must conduct themselves in accordance with the Code.

ETHICS & COMPLIANCE EXPECTATIONS

JERA Americas expects its suppliers to act ethically and follow all applicable laws, rules, and regulations and to conduct business in a manner that reflects the highest ethical standards. This Supplier Code of Conduct sets forth JERA's specific Ethics & Compliance expectations for its suppliers. JERA Americas has zero tolerance for the disregard or circumvention of its policies or engaging in unethical dealings in connection with JERA Americas' business.

If a supplier providing services and products to JERA Americas observes a JERA Americas employee, other suppliers, or subcontractor personnel involved in any known, suspected, or potential unethical behavior or violations of the law, JERA Americas' policies, or this Supplier Code of Conduct, they must report these concerns through EthicsPoint. This is a confidential third-party reporting tool that can also be accessed by phone.

Confidential Reporting Helpline — 1-844-995-4883

Confidential Reporting Website [EthicsPoint - JERA Americas Inc.](#)

HEALTH & SAFETY

JERA Americas is committed to the health and safety of its suppliers and the public. Suppliers are expected to support this commitment and comply with all applicable health and safety regulations. Suppliers must ensure that if training is required for personnel, including subcontractors, it has been completed prior to starting any work for JERA Americas. Suppliers must protect workers and the public from exposure to health and safety hazards. Work must be stopped any time unsafe conditions or behaviors are observed and must not resume until the job can be completed safely.

ENVIRONMENT & SUSTAINABILITY

JERA Americas aspires to be an industry leader in sustainability, including environmental protection, social and community issues, governance, and economic performance. JERA Americas expects its suppliers to provide goods and services sustainably, meaning in an environmentally conscientious manner, supportive of social and community issues, and with proper governance principles.



Regarding environmental performance, certain laws, regulations, and orders affect many areas of JERA Americas' business, including restrictions on hazardous and toxic materials, air and water emissions, and waste disposal. Suppliers must identify and manage any chemicals or materials that may pose a threat to the environment (as defined by the [EPA](#)), including ozone-depleting substances. JERA Americas is committed to meeting or surpassing compliance with environmental laws and all applicable regulatory requirements and enhancing the communities we serve.

JERA Americas expects agents and suppliers to comply with all applicable environmental laws, regulations, and international treaties, to obtain necessary environmental permits, and to conduct their operations in an environmentally and socially responsible manner.

JERA Americas encourages its agents and suppliers to minimize any negative environmental and social impacts of the goods and services they provide. We actively seek suppliers that share our commitment to protecting the environment and the communities we serve and that help JERA Americas meet its sustainability goals.

DISCRIMINATION AND HARASSMENT PREVENTION

JERA Americas seeks to maintain a work environment that recognizes the dignity and worth of each individual and is free from harassment and discrimination based on any protected characteristic or protected activities. Protected characteristics include (at least) race, color, sex, religion, pregnancy condition, national origin, age, sexual orientation, gender identity and/or expression, veteran's status, marital status, qualified disability, genetic information (which includes family medical history) and any other characteristic protected by law.

Protected activities include, for example, the good faith filing of a claim with the EEOC or other government entity.

Examples of prohibited conduct when based on a protected characteristic or protected activity include, but are not limited to, the following:

- Denying equal employment opportunities.
- Making, transmitting, intentionally accessing, displaying, or circulating offensive or derogatory statements, comments, gestures, slurs, emails, or links.
- Creating an offensive, hostile, or intimidating working environment; and
- Engaging in unwelcome flirtation, sexual advances, requests for sexual favors, propositions, touching, and other verbal or physical conduct of a sexual nature.

JERA Americas' policy prohibits behavior that, if left unchecked, could become unlawful or undermine a sufficiently productive work environment. Examples of such behavior include intimidation, coercion, and bullying, regardless of whether such conduct is unlawful or based on a protected characteristic or activity.



EMPLOYMENT PRACTICES

JERA Americas expects its suppliers to follow legally compliant employment practices, including, but not limited to:

- No employment of underage individuals in violation of any applicable child labor laws.
- No use of forced or involuntary labor; and
- Compliance with wage and hour laws and regulations, including those relating to minimum wages.

DRUGS, ALCOHOL & TOBACCO

Suppliers' workers are prohibited from using, possessing, promoting, selling and/or being under the influence of illegal drugs or alcohol while on JERA Americas premises (including in a personal vehicle), while performing work for or on behalf of JERA Americas, while operating an JERA Americas vehicle or other JERA Americas machinery, while using JERA Americas property, and in all other situations where supplier is, or could be construed as, representing JERA Americas, including at mealtimes or during breaks.

Noncompliance with this requirement will result in the applicable worker's removal from a project and may result in termination of a supplier's assignment with JERA Americas. Suppliers shall address the use, or being under the influence, of prescription drugs and/or over-the-counter medications that could reasonably affect the ability to work safely or efficiently. To provide a healthy work environment for all, smoking or vaping is not permitted within any of JERA Americas' enclosed facilities.

WEAPONS

The existence of unauthorized weapons on JERA Americas' property is against JERA Americas' policy. Therefore, unless necessary for JERA Americas' business and authorized in accordance with JERA Americas' policy, the possession of weapons (including, but not limited to, firearms, knives, and explosives) by suppliers on JERA Americas' property, including in JERA Americas vehicles, is expressly forbidden.

WORKPLACE VIOLENCE PREVENTION

JERA Americas is committed to providing a safe working environment, free from workplace violence. Violent or threatening behavior in the workplace is not permissible and will be addressed appropriately. Workplace violence is defined as any direct or implied threat, intentional act, or other unreasonable conduct that would create fear, hostility, intimidation, or other concern of harm in another person.



Threatening behavior or acts of violence on JERA Americas' premises, or off JERA Americas' premises while conducting official JERA Americas business or related in any way to one's work with JERA Americas, is prohibited.

Suppliers who have been assaulted or subjected to threats of any kind in the workplace or who have knowledge of violence or threats against workers are required to immediately report the situation to the JERA Americas Ethics Line by reporting such concerns through EthicsPoint, a confidential third-party reporting tool, or by phone.

[Confidential Reporting Helpline — 1-844-995-4883](#)

[Confidential Reporting Website EthicsPoint - JERA Americas Inc.](#)

If such violence is occurring or a supplier believes imminent danger exists, immediately call law enforcement at 911 and, as soon as possible thereafter, report the matter to the JERA Americas Ethics Line.

CONFLICTS OF INTEREST

Suppliers have a duty to timely disclose to JERA Americas all actual or potential conflicts of interest related to the business relationship with JERA Americas, as well as situations that could be perceived as conflicts of interest.

GIFTS & ENTERTAINMENT (BUSINESS COURTESIES)

It is improper for JERA Americas employees or members of an employee's family to request a business courtesy under any circumstances. Further, they may not accept anything from an existing or potential JERA Americas supplier that could be construed as an attempt to induce the employee to grant an unfair competitive advantage or to motivate the employee to do anything unethical, illegal, or prohibited by JERA Americas policies.

JERA Americas employees are also asked to use common sense and good judgment when offering gifts or entertainment to suppliers, so as not to create circumstances that are inappropriate or give the appearance of impropriety. JERA Americas suppliers may not provide such business courtesies if they are illegal, violate the rules of the recipient's organization, or are offered for something in return.

ACCOUNTING & BUSINESS RECORDS

JERA Americas requires compliance with generally accepted accounting principles and its internal system of accounting and auditing controls.

Accurate, reliable information and records are critical to meeting JERA Americas' financial, legal, and management obligations, and they are necessary to accurately reflect JERA Americas'



transactions. Suppliers are expected to prepare applicable reports, vouchers, reimbursement requests, and bills promptly, completely, and accurately.

Suppliers shall keep complete records, as required by law, of all data (including data from subcontractors) concerning suppliers' charges, policies, procedures, and transactions with JERA Americas at all times.

PROTECTION OF JERA AMERICAS' PROPERTY

Suppliers are responsible for protecting any JERA Americas property under their control from theft, fraud, unauthorized personal use, and negligent misuse. JERA Americas property includes, but is not limited to, tools, materials, supplies, equipment, software, and JERA Americas credit cards.

The misuse or theft of JERA Americas' property or the disclosure of confidential and proprietary JERA Americas information may affect the corporation's profitability and will not be tolerated. Suppliers may not offer JERA Americas property to persons outside JERA Americas without prior approval from JERA Americas.

Personal use of JERA Americas vehicles or moving equipment, such as backhoes, excavators, loaders, and forklifts, is strictly prohibited. All JERA Americas property must be returned to JERA Americas at the termination of the project or contract.

INFORMATION SECURITY

To the extent suppliers are entrusted with or obtain knowledge of JERA Americas' information, suppliers share a responsibility to prevent its misuse, theft, and improper disclosure.

Suppliers must take every care in handling, discussing, or transmitting sensitive or confidential information that could affect JERA Americas, its employees, its customers, the business community, or the general public. Supplier's responsibility to hold JERA Americas' confidential information as confidential is a continuing obligation even after an assignment or contract with JERA Americas ends.

Disclosure of financial information could influence the actions of shareholders and potential investors and possibly violate securities laws. Only designated JERA Americas spokespersons are authorized to release information of this nature. Additionally, other information may be protected from disclosure by JERA Americas' regulated subsidiaries to JERA Americas' competitive affiliates. The affiliate rules for each appropriate jurisdiction should be consulted prior to the release of information to a non-regulated affiliate or to any other person.



Personal information belonging to customers, employees, other vendors or suppliers, and other individuals must not be collected, transmitted, transported, stored, accessed, or removed without a legitimate need to do so. Personal information must be protected from unauthorized disclosure and disposed of in a secure and protected manner. Social Security numbers may not be used in a manner that is prohibited by JERA Americas' policies.

Report any unauthorized disclosure of personal information to the JERA Americas Ethics Line immediately by reporting such concerns through EthicsPoint, a confidential third-party reporting tool, or by phone.

[Confidential Reporting Helpline — 1-844-995-4883](#)

[Confidential Reporting Website EthicsPoint - JERA Americas Inc.](#)

If suppliers are granted login identification to the JERA Americas electronic information systems, the password is considered confidential information due to the significant risk of harm JERA Americas faces if an unauthorized party gains access to the JERA Americas systems. Do not disclose supplier authentication identities (e.g., login ID and password combination) to anyone else unless requested by JERA Americas IT technical support.

Do not disclose authentication identities for JERA Americas systems in response to emails from unfamiliar parties or unsolicited emails (such as “phishing” or social engineering attacks).

Further, while using the JERA Americas electronic information systems, do not open email attachments that are sent by unknown parties or click on links or attachments contained in unsolicited emails or in emails sent by unfamiliar parties (which may include “phishing” or social engineering attacks).

If suppliers have disclosed such information, opened email attachments, or clicked on links as noted above, they must immediately report such security concerns to JERA Americas Information Communications & Technology (ICT) by email at JERAam_it_support@JERAamericas.com can take steps to investigate and, if applicable, mitigate any harmful outcome.

INSIDER TRADING

"Insider trading" means using confidential information about JERA Americas or any other company gained in the course of doing work for JERA Americas to achieve an unfair advantage in the buying or selling of shares or other securities. It includes "tipping," in which the insider provides information to someone else who trades on it.

This includes any information that may influence the decision of an investor to buy, sell, or hold the securities of a company, or that alters the overall mix of information available about a company. Insider trading is both illegal and unethical and is prohibited.

COPYRIGHT, TRADEMARK & PATENT INFRINGEMENT

Copyright laws prohibit the unauthorized use, duplication, or distribution of copyrighted works, regardless of format (e.g., print, video, or electronic form). Suppliers may not use, download, distribute, copy, or otherwise duplicate, reproduce, or otherwise infringe any copyright-protected works or trademarks of others, including licensed computer software and related documentation, training materials, music, cartoons, books, articles, or videos, in violation of law.

Suppliers may not engage in any activity designed to circumvent any technological measure intended to limit access to a copyright-protected work, including attaching links to websites that are accessed through the use of a password. Further, suppliers may not allow others to use JERA Americas' resources to do so.

ANTITRUST & FAIR-TRADE PRACTICES

Suppliers must support and fully comply with antitrust and fair-trade practices laws. Violations of these laws may occur if a JERA Americas supplier engages in unfair pricing practices, unfair marketing practices, or misrepresentation of the products and services of JERA Americas or its competitors. Federal and state antitrust authorities (and private plaintiffs) will be particularly sensitive to business activities that appear to fix prices between competitors, fix costs between competitors, restrict output, or divide markets.

BRIBES & KICKBACKS

Suppliers may never give or offer anything of value to, or ask for anything of value from, a JERA Americas customer or a government employee or official (whether at the local, state, or federal level) that is illegal. Similarly, suppliers may never ask for bribes and kickbacks from a JERA Americas customer, agent, or supplier.

EMERGENCY PREPAREDNESS & BUSINESS CONTINUITY

JERA Americas works with suppliers who have adequate emergency preparedness and crisis response plans for safeguarding their employees, operations, and security of supply in times of business interruptions. All suppliers that provide critical products and services for JERA Americas' business and operations are expected to have assessed the impact of business disruptions. Suppliers should also include JERA Americas in their business continuity plans, and, upon request, participate in JERA Americas disaster-recovery exercises and drills in accordance with contractual agreements.



HUMAN RIGHTS STATEMENT

JERA Americas expects its suppliers to uphold universally recognized human rights and adhere to relevant laws. Just as we expect our employees to act in accordance with the highest ethical and legal standards in their business activities. Suppliers must not use forced labor or child labor in their operations and should be vigilant regarding signs of human trafficking.

We require our suppliers to implement strong policies and procedures aimed at preventing human rights violations. Additionally, suppliers are expected to treat their workers with dignity and respect while complying with all applicable employment and workplace safety laws.

SPEAK UP WITH NO RETALIATION

JERA Americas suppliers are expected to report suspected or actual violations of law, this Supplier Code of Conduct, JERA Americas policy, or any other ethical concerns related to JERA Americas employees, contractors, or other suppliers. Suppliers should contact their JERA Americas business representative with questions or to obtain more information about JERA.

Americas' expectations concerning ethical behavior. Any concerns or misconduct noted by suppliers should be reported directly to [EthicsPoint - JERA Americas Inc.](#)

Reports can be made anonymously. JERA Americas prohibits retaliation against anyone raising concerns or reporting misconduct in good faith. JERA Americas expects its suppliers also to prohibit retaliation.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this Supplier Code of Conduct requirement can lead to the termination of the business relationship, including potential loss of future business opportunities with JERA Americas.

VERSION DATE	RESPONSIBLE FUNCTION	APPROVED BY	CHANGE DESCRIPTION	PREVIOUS VERSION DATE
April 18, 2024	Supply Chain	CEO: COO: LEGAL/COMPLIANCE:	New Supplier Code of Conduct	None