

JOHNSON CONTROLS ARABIA
CODE OF ETHICS
VALUES FIRST



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VALUES FIRST

*“EVERYONE,
EVERYWHERE,
EVERYDAY”*

At Johnson Controls Arabia, everything we do each day contributes to making the world more productive, secure, and sustainable. Delivering effective solutions for our customers is key to succeeding in the marketplace, However, achieving these values is equally important, as success means nothing without integrity. That’s why Integrity First is our core value.

Our values are the foundation of everything we do, no matter where we do it. They remind us - and those around us - of who we are, what we stand for, and how we approach our work. They serve as both our inspiration and our guide. This is why Johnson Controls Arabia’s Code of Ethics is titled "Values First."



VALUES FIRST

*“OUR VALUES
DRIVE WINNING
BEHAVIORS,
WHICH DRIVE
WINNING
OUTCOMES”*

INTEGRITY FIRST

We are committed to honesty and transparency, upholding the highest standards of integrity and honoring the promises we make.

PURPOSE-LED

We believe in doing good by doing well, holding ourselves accountable to make the world a better place through our solutions, societal engagement, business practices, and dedication to protecting people and the environment from different perspectives including Health and Safety.

CUSTOMER-DRIVEN

Our success is tied to our customers' success. Long-term, strategic relationships give us valuable insights and the ability to deliver exceptional customer experiences and solutions.

FUTURE-FOCUSED

Driven by a culture of innovation and continuous improvement, we tackle today's challenges while always asking, "What's next?"

ONE TEAM

We operate with respect and care as one team, working collaboratively to create purposeful solutions that drive progress and move the world forward.



MESSAGE FROM THE CEO

Dear Valued Team,

I am incredibly proud of the culture we have built together, a culture rooted in innovation, collaboration, and mutual respect. Our Code of Ethics is more than a set of rules; it is a reflection of our shared values and principles, serving as a guiding compass as we navigate the complexities of our business and work toward achieving our goals.

Since our foundation, Johnson Controls Arabia has earned a strong reputation, built on a foundation of values and ethics, inspired by the traditions, customs, and morals of our societies. This clear ethical vision, combined with our commitment to leadership and excellence, has fueled our growth and benefited individuals and communities through progress and development.

We are respected both locally and internationally for our unwavering commitment to ethics, compliance with legislation, and dedication to human rights. By upholding the highest standards of integrity, morality, and humanity, we have shaped a corporate culture that continues to define who we are today.

Our Code of Ethics is not just about compliance—it embodies the spirit of integrity and ethical behavior that drives our success. It empowers each of us to make responsible decisions, foster trust with colleagues, partners, and clients, and contribute to a positive and productive work environment.

I encourage you to read this Code of Ethics carefully and thoughtfully. Internalize its principles, and let it guide your actions and interactions every day. By upholding these standards, we protect not only Johnson Controls Arabia's reputation but also the values that make our organization an exceptional place to work.

Thank you for your dedication and commitment to maintaining the highest ethical standards.

Together, we will continue building a company we are proud to be part of and a legacy we can celebrate for years to come.

Sincerely,

Mohanad AlShaikh

Chief Executive Officer -Johnson Controls Arabia



VALUES FIRST

“WHY OUR VALUES COME FIRST”

Johnson Controls Arabia has built a trusted reputation over 30 years by consistently delivering on our promises and providing value to our customers and stakeholders. This reputation is a responsibility we all share, regardless of our role within the company. Our individual decisions and actions directly impact Johnson Controls Arabia's ability to meet the expectations of our customers, and other stakeholders.

Although we are a diverse team supporting many brands and functions worldwide, we succeed as One Team. Our choices and actions must foster a culture of trust and respect, enabling us to collaborate and do our best work.

This is why we have Values First, our Code of Ethics. It outlines clear expectations for behavior and serves as a guide to achieving the best outcomes for both us and our stakeholders. It is a practical and easy-to-use resource that helps us put our shared values into practice. When our values inspire the right behaviors, everyone prospers.



VALUES FIRST

*“WHEN OUR VALUES DRIVE
THE RIGHT BEHAVIORS,
EVERYONE WINS”*

JOHNSON CONTROLS ARABIA’S ETHICS & COMPLIANCE GUIDELINES

Values First, our Code of Ethics, is the foundation of Johnson Controls Arabia Ethics & Compliance guideline. This guideline represents a comprehensive approach to ensuring that our individual conduct, business operations, and organizational culture uphold the highest standards of integrity. Through leadership commitment, effective communication, training, monitoring, reporting mechanisms, and other tools, the Ethics & Compliance guideline supports us in identifying and safely navigating ethical and compliance risks, ensuring we conduct business in alignment with our values.

VALUES FIRST

“OUR RESPONSIBILITIES”

At Johnson Controls Arabia, it is essential that everyone, regardless of role or seniority, is familiar with and adheres to the Code of Ethics every day. This applies to all employees, officers, and members of the Board of Directors. Violating the Code is a serious matter and may lead to disciplinary action, including dismissal, in accordance with local legal requirements.

Johnson Controls Arabia has policies that further elaborate on many of the topics covered in the Code, which can be accessed on **JCA’s Portal**.

In addition to following the Code and company policies, each of us is obligated to comply with the laws that apply to our work. We also have a responsibility to speak up if we are uncertain about what to do or have concerns, particularly if we witness or suspect misconduct.

THE SCOPE OF THIS CODE OF ETHICS

This Code of Ethics applies to all employees of Johnson Controls Arabia (JCA), as well as its affiliates, branches, and anyone acting on its behalf or representing it in dealings with third parties.

All individuals in these categories must adhere to this Code, regardless of their work location, job role, or level of employment, including, but not limited to:

- 1- Executives, officers, directors, employees, and any individuals representing JCA.
- 2- Employees of all affiliates and branches.
- 3- Agents with agency contracts, consultants, contractors, and any other parties representing or acting on behalf of JCA.

All these parties are required to comply with the principles outlined in this Code to ensure ethical conduct in all professional interactions.

VALUES FIRST

“SPECIAL RESPONSIBILITIES OF LEADERS AND SUPERVISORS”

While all of us must follow the Code and embody Johnson Controls Arabia's values, employees in leadership or supervisory roles have additional responsibilities to:

- Regularly remind team members and direct reports of the importance of adhering to the Code.
- Actively seek opportunities to discuss the Code and our values, such as during team meetings and individual performance reviews.
- Recognize and reward ethical leadership, aligning it with our desired culture and business outcomes.
- Ensure appropriate actions are taken when managing consequences for employees who violate the Code and/or Company's policies.
- Serve as role models by demonstrating a personal commitment to ethics and compliance in both words and actions.
- Ensure that team members are aware of the different ways they can report concerns and emphasize that retaliation will not be tolerated.
- Insist that non-employee staff (such as consultants, temporary workers, and contingent workers) acts in line with the Code and our values.

Ethical Leadership & Decision-Making “Doing what is right is our goal”

HOW WE WIN

Ethical leadership and decision-making are vital in creating a workplace that fosters mutual respect and integrity.

WHAT WINNING LOOKS LIKE

It is the foundation of a culture that positively impacts both individual and organizational performance.

Ethical leadership and decision making can be broken down into the following:

1. Personal Integrity

A leader with personal integrity sets a positive example for their team and is recognized for several core values:

- **Honesty:** An honest leader is transparent in their communications and actions, ensuring that they provide clear, truthful information without manipulation or deceit.
- **Trustworthiness:** By consistently fulfilling promises and demonstrating integrity, a leader builds trust with their team, leading to strong and lasting relationships.
- **Caring and Concern for Others:** Leaders who genuinely care about the well-being of their employees create a supportive work environment that encourages collaboration and mutual respect.
- **Respect:** Ethical leaders show respect for the rights, feelings, and opinions of others, fostering fairness and enhancing teamwork.
- **Fairness:** Leaders who treat all employees equally, providing them with the same opportunities, promote a just and inclusive environment where everyone feels valued.

2. Ethical Role Modeling

An ethical leader does not just follow ethical principles but also embodies them, setting a standard for others in the organization. Key elements of ethical role modeling include:

- **Authentic Behavior:** Ethical leaders lead by example, displaying genuine, honest behaviors that inspire others to follow suit.
- **Open and Honest Communication:** They prioritize clear and direct communication, ensuring that all team members are well-informed and encouraged to engage in open dialogue.
- **Consistent Ethical Messaging:** Ethical leaders align their actions with their words, continuously reinforcing messages of integrity and ethical behavior to create a strong ethical culture.
- **Promotion of a Speak-Up Culture:** They encourage employees to speak up when they observe unethical behavior or have concerns, contributing to a transparent, accountable workplace environment.
- **Walking the Talk:** Ethical leaders align their actions with JCA’s values and principles, ensuring consistency between what they say and do.

3. Ethical Management

Ethical management is key to creating and maintaining a workplace where ethical behavior is expected, rewarded, and reinforced. It involves fostering a culture of integrity, accountability, and responsibility, where everyone feels valued and supported. Ethical management includes the following key practices:

- **Setting Standards and Expectations:** Ethical leadership starts by establishing clear ethical standards and communicating them to the team. Leaders must make sure that employees understand what is expected of them in terms of ethical conduct and the company's values.
- **Holding People Accountable:** Ethical leaders ensure that employees are held accountable for their actions. This accountability reinforces the culture of responsibility and ensures that everyone upholds the ethical standards set for the organization.
- **Disciplining When Necessary:** When unethical behavior occurs, it's important for leaders to take appropriate action to address it. Addressing unethical behavior promptly ensures that ethical guidelines are respected and that all employees understand the consequences of misconduct.
- **Sharing Successes and Failures:** An ethical leader is transparent with their team, sharing both successes and failures. By doing so, they foster a culture of openness and continuous learning, allowing the team to grow and improve together.
- **Promoting Lessons Learned:** Ethical leaders use both positive and negative experiences to promote continuous improvement and reinforce the importance of ethical behavior. By sharing lessons learned, leaders provide valuable insights for employees to apply in future situations.

WHAT WINNING LOOKS LIKE

When you encounter situations where JCA does not have a specific policy or set of standards, or if you are unsure about how to apply a policy, or if the right action is unclear, you should ask the following questions to guide your ethical decision-making:

Ask Yourself:

- Is it legal?
- Is it consistent with JCA's Code of Ethics?
- How would this decision appear to others within JCA and externally?
- Could this decision harm JCA or affect its reputation?
- Will I be satisfied with the announcement of my actions?
- Would I be embarrassed if colleagues, friends, or family knew what I did?

If you answer "no" to all these questions, Go ahead-and lead others by example!

However, if you answer "yes" or "not sure" to any of these questions, you should pause and seek advice or consult with the Legal and Compliance Division .

JCA'S PRINCIPLES

Health and Safety

“Keeping Everyone Safe”

HOW WE WIN

Safety is everyone’s responsibility, we value our safety and well-being, as well as that of others, to ensure we prioritize achieving our fullest potential.

WHY WE PUT VALUES FIRST

We succeed as a team when the well-being of our people and visitors is our highest priority. Health and safety in the workplace are utmost importance, and our Zero Harm Vision and its goals guide our focus. Ensuring everyone's safety is a collective responsibility. We support each other in our daily activities to prevent injuries and accidents, and we take immediate action if we identify any potential hazards. By practicing strong safety culture, we not only protect ourselves but also create a more comfortable work environment, enabling us to concentrate on delivering outstanding customer experiences and solutions.

WHAT WINNING LOOKS LIKE

We foster a Zero Harm culture by:

- Understanding and adhering to all safety guidelines and procedures
- Avoiding unnecessary risks in the workplace and never asking others to do so
- Stopping work immediately if it becomes unsafe, even if it means delaying production or tasks
- Always reporting unsafe or unhealthy conditions, including hazards, broken or missing equipment, threats of violence, or weapons on Company property
- Being prepared and knowing how to respond in case of injury or emergency
- Arriving at work free of any substances that could impair judgment or endanger safety

Background

A production line colleague asked you twice this week to cover for him while he took unscheduled breaks. He mentioned that his new medication sometimes makes him feel dizzy. When you raised concerns about the potential risks to both his safety and the safety of others, he reassured you that there was no need to worry and that he would soon adjust to the medication.

Question: Is any action required on your part?

Recommended Actions

- 1) **Recognize the Health and Safety Obligation:** Everyone has a responsibility to address any potential health or safety risks, regardless of how minor they may seem. Failing to act in such situations violates the Code of Ethics.
- 2) **Encourage the Colleague to Seek Supervisor Guidance:** Advise your colleague to speak with his supervisor about the side effects of his medication. This could lead to a temporary reassignment of duties or other accommodations to ensure his well-being and the safety of others.
- 3) **Be Prepared to Take Further Action if Necessary:** If your colleague is unwilling to raise the issue with his supervisor, inform him that you and other team members will need to take action to address the concern. This ensures that the safety of the team is not compromised.
- 4) **Respect Privacy but Prioritize Safety:** While it's important to respect your colleague's privacy, safety in the workplace is always the top priority. By ensuring that potential risks are addressed, you are acting in the best interest of everyone's well-being.

JCA'S PRINCIPLES

Conflicts of Interest

“Acting in the Company’s Best Interests”

HOW WE WIN

We make smart, objective choices that put the Company and our customers ahead of personal benefit.

WHY WE PUT VALUES FIRST

We do not allow personal interests or relationships to interfere with winning as One Team. A conflict of interest exists whenever social or family relationships, activities outside of work, financial investments, or other personal interests have the potential to interfere with our ability to make unbiased decisions on behalf of the Company.

We make decisions openly, thoughtfully and with integrity; this benefits our business and shows everyone that we can be trusted to do the right thing.

WHAT WINNING LOOKS LIKE

We demonstrate our commitment to the Company’s best interests **by:**

- Making objective business decisions based on relevant facts and sound judgment.
- Avoiding situations where a decision could be, or appear to be, influenced by conflicting interests, such as potential personal gain.
- Disclosing any conflicts of interest that cannot be avoided, so that they can be properly managed.
- Seeking guidance whenever we are uncertain about a potential issue.

How we win by asking ourselves Could our proposed decision or action:

1. Make us feel obligated to someone else?
2. Be inconsistent with JCA’ values?
3. Be influenced (even a little) by personal or family considerations?
4. Give the appearance that we are not putting the Company’s best interests first?

If the answer to any of these questions is “yes” or “maybe,” it’s important to seek advice from Legal and Compliance Division .

Background

Your team is bidding for a significant contract with a prospective customer, and the decision on the contract is expected soon. While attending a conference, you discover that a key decision-maker from the prospective customer will also be there . You wonder if it would be appropriate to invite this individual to dinner to make a final pitch for JCA.

Recommended Actions

- 1) **Avoid Inviting the Decision-Maker to Dinner:** Since the contract decision is imminent, inviting the decision-maker to dinner could be perceived as an attempt to influence their decision inappropriately. This could create a conflict of interest or an appearance of impropriety, which could undermine the integrity of the bidding process.
- 2) **Opt for a Neutral Setting:** Instead of dinner, invite the decision-maker for a more neutral, low-key meeting, such as coffee or tea. This allows for a professional conversation without the perception of offering undue hospitality or personal gain.
- 3) **Focus on Building the Relationship Through Professional Means:** Use the opportunity to answer any questions they might have about your company, products, or services. Provide value through clear, transparent information rather than trying to win the business through personal actions or hospitality.
- 4) **Ensure Transparency:** If there is any uncertainty about the interaction, seek advice from your company’s Legal and Compliance Division . It’s always better to confirm the appropriateness of your actions before proceeding.

JCA'S PRINCIPLES

Recordkeeping and Disclosure

“Creating and Maintaining Accurate Records”

HOW WE WIN

We keep accurate records and accounts to help us operate effectively and to provide timely and truthful information to those who need to rely on it.

WHY WE PUT VALUES FIRST

To provide the proper formality and systematic compliance in relation to storage, retention, backup, and destruction of documents and Records created or received by the company, by assigning the responsibilities for administering these procedures to the relevant stakeholders with the requirements of applicable regulations, internal business needs, and accepted records management practice.

By doing so, we help preserve the trust and confidence we've earned with our customers, and other stakeholders.

WHAT WINNING LOOKS LIKE

- Key practices for maintaining accurate records include the timely and complete documentation of all transactions, strict adherence to established accounting principles, and ensuring full transparency in records management.
- Employees are expected to precisely document all activities as they occur, ensuring that every transaction is properly recorded and categorized in line with industry standards and legal requirements. This includes avoiding any form of secret or undisclosed funds, as well as refraining from concealing or altering documents.
- Additionally, all employees must ensure that records are in full compliance with applicable laws, regulations, and company policies, safeguarding the integrity and accuracy of the company's reporting.

Background

You are aware that JCA's records management policies require certain records to be deleted after a set period. However, due to previous issues with locating documents on a particular matter, you have decided to keep all related records indefinitely, thinking it might be helpful in case they are needed later. Is this a good practice?

Recommended Actions

- 1) **Follow the Records Retention Policy:** Adhere to the company's established records retention policies. Only keep records for the designated period as outlined in the retention policy. Once that period has passed, securely delete or dispose of the records in accordance with company guidelines.
- 2) **Avoid Retaining Records Indefinitely:** While it may seem helpful to keep records longer to avoid issues with document recovery, retaining records beyond their retention period can lead to unnecessary risks, including data overload, security vulnerabilities, and potential legal issues.
- 3) **Ensure Legal and Compliance Obligations Are Met:** Be aware of any specific legal requirements regarding data retention, especially with sensitive or personal data, and ensure that all records are deleted or archived according to these obligations.
- 4) **Consult with the Legal and Compliance Division if Unsure:** If you're ever unsure about whether to retain or delete a record, consult with your company's Legal and Compliance Division to ensure that you are following the correct procedures and staying compliant with all applicable laws.

JCA'S PRINCIPLES

Fair Competition/Antitrust

“Doing Business Fairly”

HOW WE WIN

We are dedicated to fair competition and customer trust by avoiding collusion with competitors.

WHY WE PUT VALUES FIRST

The laws that promote fair competition, often referred to as antitrust laws or competition laws, are complex and vary across different countries. These laws are designed to prevent businesses from engaging in unfair practices that could harm the market or consumers. Violating these laws can lead to serious consequences, including heavy fines and legal penalties.

We recognize at JCA that even the perception of unfair or deceptive behavior in our business practices could damage our reputation and expose us to legal risks. Therefore, we are committed to upholding high standards of fairness and transparency in all our competitive activities to avoid any potential legal or reputational harm.

WHAT WINNING LOOKS LIKE

- Refrain from entering into any formal or informal agreements or engaging in practices with competitors **that involve:**
- **Price Fixing:** Setting or agreeing on a fixed price for goods or services, rather than allowing the market to determine fair pricing.
- **Bid Rigging:** Coordinating with competitors to manipulate the bidding process, ensuring that a particular competitor wins the contract unfairly.
- **Market Allocation:** Dividing or sharing markets with competitors, whether by region, customer group, or other factors, to avoid competing directly in those areas.
- Never improperly interfering with our customers' existing business contracts
- Never abusing our market-share position

Background

While attending Event, a company employee engaged in a conversation with the sales director of a competing company while waiting for a panel discussion to start. During the conversation, the competitor mentioned a common customer—the Facilities Procurement officer for a major city—and suggested that this customer was particularly difficult to deal with. The competitor then speculated about the potential outcome if companies like theirs decided to stop doing business with the city. The employee felt uncomfortable with the direction of the conversation, particularly since it seemed to imply an unethical collaboration between them. To remove themselves from the situation, the employee pretended to take a phone call and moved to another seat.

Recommended Actions

- 1) **Disengage from Similar Conversations:** In the future, if any conversation with a competitor takes a concerning direction, it is critical to immediately disengage. Politely steer the conversation to a neutral topic or remove yourself from the situation entirely.
- 2) **Report Concerns:** Report any uncomfortable or suspicious discussions with competitors to the [Legal and Compliance Division](#) to ensure compliance with competition laws and avoid legal exposure.
- 3) **Seek Guidance on Best Practices:** Familiarize yourself with the company's policies and legal guidelines surrounding interactions with competitors. Attending training sessions on competition laws and ethical conduct can also help reinforce the importance of avoiding such situations.

JCA'S PRINCIPLES

Diversity and Inclusion

“Valuing our Diverse Talents, Backgrounds and Perspectives”

HOW WE WIN

We make the most of our diverse talents, backgrounds, and perspectives to gain exceptional insights and innovation.

WHY WE PUT VALUES FIRST

Our diversity enables us to solve problems more creatively, make decisions more thoughtfully, and identify opportunities more proactively. When everyone feels empowered to contribute to and actively participate in our collective success, it creates an environment where all stakeholders can benefit.

This sense of inclusion and shared purpose fosters a culture of collaboration, where employees are motivated to give their best, customers experience better products and services, and stakeholders see the value of their support reflected in sustainable growth and positive outcomes.

WHAT WINNING LOOKS LIKE

- Listening to others with respect by giving them your full attention and considering their opinions.
- Treating people fairly by being impartial and ensuring that everyone is treated with dignity, regardless of their background or differences.
- Providing equal opportunities by making sure that all individuals have the same chances to succeed and grow, without any form of discrimination or bias.
- Lastly, being open to feedback by welcoming constructive criticism and suggestions from others and using them as a tool for personal and professional growth.

Background

A female employee is one of only three women on her team. She notices that her male supervisor consistently favors the ideas and opinions of male colleagues during team meetings, often undermining her and other women. This behavior leaves the female team members feeling belittled and denied the opportunity to contribute fully. The employee fears that raising the issue might confirm the supervisor's gender biases.

Recommended Actions

- 1) **Direct Communication with Supervisor:** The employee should consider discussing her concerns directly with the supervisor in a respectful and constructive manner. She can ask for clarification about why her ideas are being overlooked and express her desire for more equal consideration in future meetings.
- 2) **Escalating the Issue:** If the issue is not resolved after speaking to the supervisor, the employee should escalate the matter to a senior manager, who can address the concern more objectively.
- 3) **Using Company Resources:** If further action is needed, the employee can use resources like HR Department or The Legal and Compliance Division to report the issue confidentially and without fear of retaliation.

JCA'S PRINCIPLES

Respectful Treatment, Preventing Harassment and Workplace Bullying “Promoting and Maintaining a Respectful Workplace”

HOW WE WIN

We treat others with respect, promoting a positive work environment in which we thrive as One Team.

WHY WE PUT VALUES FIRST

Interacting in ways that promote mutual trust and respect. This kind of positive interaction not only strengthens individual relationships but also plays a crucial role in shaping our overall company culture, reinforcing the principles of excellence and integrity in everything we do. When trust and respect are foundational in our daily interactions, we create a workplace where high standards are upheld, and ethical practices are consistently prioritized.

WHAT WINNING LOOKS LIKE

- Building trust with colleagues and partners, listening to understand, and thinking ahead about how our words and actions might be perceived by others.
- We also commit to reporting and standing up to inappropriate jokes or insults, bullying, harassment, or any other offensive comments regarding race, gender, color, religion, age, national origin, disability, or other characteristics protected by law.
- Report any inappropriate conduct, whether it is directed at you or another individual, to ensure a respectful and safe environment for everyone.

Background

An employee recently started working under a new supervisor who is described as inquisitive and outgoing. While the supervisor may intend to be friendly, his questions about the employee's personal life have made the employee feel uncomfortable. Despite the employee requesting that the supervisor stop asking personal questions, the supervisor dismissed the request, labeling the employee as "too uptight" and questioning whether he is a good fit for the team. The employee is now feeling nervous about the situation and is unsure how to address it without Hazardous their relationship with the supervisor.

Recommended Actions

- 1) **Document the Behavior:** The employee should keep a record of the supervisor's inappropriate comments and any interactions where their boundaries were crossed. This documentation can help support their case if they need to escalate the issue.
- 2) **Set Clear Boundaries:** In any future conversations, the employee should be firm but respectful in setting boundaries, repeating that personal questions are not welcome in the workplace.
- 3) **Reach Out for Support:** If the employee feels uncomfortable addressing the issue directly, they should not hesitate to involve HR or a Senior Manager. Reporting the behavior ensures that the employee's concerns are addressed in a professional manner, without fear of retaliation.
- 4) **Use Confidential Reporting Channels:** If direct confrontation is not an option, the employee can report on the Helpline confidentially.

JCA'S PRINCIPLES

Equal Opportunity and Preventing Discrimination

“Supporting and Advancing our People”

HOW WE WIN

We attract talented individuals, develop their potential, and set them up for success.

WHY WE PUT VALUES FIRST

We are fully committed to hire and promote the best and the brightest. We base employment decisions on qualifications, aspirations and performance, never on prejudice or bias. Giving everyone a fair chance is the right thing to maintain a workplace that is inclusive and free from any form of discrimination. We do not tolerate unfair treatment or bias based on race, color, religion, national origin, gender, pregnancy, age, disability, marital status, military service, or any other characteristic or status that is legally protected under applicable laws. Our policy ensures that all individuals, regardless of their background or personal identity, are treated with dignity, respect, and equality. We are dedicated to creating an environment where everyone has the opportunity to succeed and contribute without fear of discrimination or bias.

WHAT WINNING LOOKS LIKE

- Treating everyone with fairness and focusing on the unique value they bring to JCA, regardless of background or personal characteristics.
- Making recruitment, training, promotion, and disciplinary decisions based solely on merit, ensuring that all employees have equal opportunities to advance based on their skills, performance, and potential.
- Providing reasonable accommodations to employees with disabilities to support their full participation and success in the workplace.
- Maintaining a zero-tolerance policy for any form of discrimination, making it clear that there are no excuses for such behavior, and it will not be accepted under any circumstances.

Background

An employee has overheard their supervisor saying that he doesn't want older workers on his team, quoting that they can't keep up with the production speed requirements. The supervisor claims that this is not discrimination, but rather a matter of performance. The employee is concerned and unsure whether the supervisor's attitude is justified.

Recommended Actions

1) **Address the Issue:** The employee should raise their concern with HR or a Senior Manager to ensure that the supervisor's attitude is addressed, and that the workplace remains free from discrimination. Open dialogue can help correct misunderstandings and reinforce the company's commitment to fairness

2) **Review Company Policies:** Familiarize themselves with the company's anti-discrimination policies and performance standards to understand the expectations.

3) **Evaluate Performance Requirements and Standards:** It's essential to determine whether the supervisor's claim about "production speed" is reasonable and whether it applies equally to all employees, regardless of age. If the supervisor is applying performance standards in a way that disproportionately impacts older employees, this could be a sign of discrimination.

JCA'S PRINCIPLES

Bribery and Other Forms of Corruption

“Doing Business Honestly”

HOW WE WIN

We secure and maintain business by offering a compelling value proposition and fostering relationships built on transparency and trust.

WHY WE PUT VALUES FIRST

We place integrity at the forefront of everything we do, as it is the foundation of our strong reputation as a trustworthy and reliable business partner. We are firmly committed to ethical practices and have no interest in resorting to unethical methods, such as attempting to 'buy' business or engaging with those who encourage or tolerate corrupt practices. Regardless of local customs or the practices of other companies in the industry, we stand firm in our commitment to resist corruption in all of its forms. Our business practices are guided by honesty and transparency, ensuring that we maintain the highest ethical standards in all our dealings.

WHAT WINNING LOOKS LIKE

- Never offering, promising, or giving anything of value (directly or indirectly) to a government official or anyone else to gain a business advantage. This includes encouraging others to act improperly or rewarding them for doing so.
- We refuse to accept bribes or kickbacks (whether material or not) and will notify the Legal and Compliance Division if they are offered, whether internally by employees or externally by business partners.
- We diligently follow our Third-Party Travel, Gifts and Entertainment Policy and Anti-Corruption laws and regulations.
- We do not accept any form of facilitation payment. While such payments may be seen as normal in certain countries, they are considered a form of bribery under international conventions and the laws of most countries. Facilitation payments are used to expedite or facilitate the performance of routine governmental actions by public officials and will not be tolerated.

Bribery can occur in interactions with both public and private parties, encompassing public bribery (with government officials) and commercial bribery (with privately owned companies).

Background

A business development team is preparing a bid for a large urban redevelopment project in a developing market. Although the team is confident that they have the resources and capabilities to succeed on the project without external support, the city government's procurement official strongly recommends that they meet with a local company to discuss the possibility of using them as a subcontractor. However, the team becomes aware that the CEO of the recommended subcontractor company is related to the procurement official, raising concerns about a potential conflict of interest

Recommended Actions

- 1) **Politely Decline the Meeting:** The team should clearly explain to the procurement official that they do not need a subcontractor for the project and decline the meeting without Clash. Transparency and professionalism are the key.
- 2) **Seek Guidance from the Legal and Compliance Dept.:** To ensure that all decisions align with company policies and legal requirements, the team should seek advice from the Legal and Compliance Division before proceeding further.
- 3) **Avoid Any Unethical Influence:** The team should be alert in avoiding any actions that could be interpreted as offering or receiving improper influence, whether directly or indirectly. This includes avoiding deals or business arrangements with parties that may have conflicts of interest.
- 4) **Maintain Integrity and Transparency:** Throughout the process, the team should remain focused on maintaining integrity, transparency, and fairness in all dealings. Upholding these values will not only protect the company from legal and reputational risks but also reinforce its commitment to ethical business practices.

JCA'S PRINCIPLES

Data Privacy and Cybersecurity

“Protecting Personal Data and avoiding Cybersecurity Attacks”

HOW WE WIN

We prioritize the privacy and protection of employees', candidates', suppliers', and customers' personal data and confidential information (i.e. trade secrets), Confidential information is as precious to our customers as it is to us; its unauthorized use or disclosure could cause serious financial and reputational harm.

Personal data refers to any data that could be used to identify someone, either directly or indirectly, including but not limited to, email addresses, financial information, names of family members, employee ID number, name and government identification number, credit card information, and/or salary and other financial benefits or compensation.

WHY WE PUT VALUES FIRST

Ensuring transparency means providing clear, honest, and open communication while only sharing information that is necessary for the task at hand and for those who need it. It involves safeguarding sensitive data by taking appropriate measures to protect it from unauthorized access or misuse. This also includes assuming that all information is confidential unless there is explicit confirmation or permission to disclose it. Additionally, it's essential to comply with all relevant privacy laws and adhere to the company's privacy policy, ensuring that personal and organizational data is handled responsibly and in accordance with legal and ethical standards.

WHAT WINNING LOOKS LIKE

- Act as a responsible steward of personal information by following JCA's policies regarding access, transfer, and use of such data.
- Use personal information solely for the purpose it was originally obtained.
- Access only the minimum amount of personal information necessary to complete the task at hand.
- Share personal information only with authorized personnel on a need-to-know basis for completing their work.
- Never disclose personal information to unauthorized individuals outside of JCA or to anyone within JCA who does not require access for their job.
- Adhere to good cybersecurity practices by following the required processes when using JCA's network, systems, computers, mobile devices, or other technology.
- Safeguard the privacy of your co-workers by protecting their personal information.
- Contacting **IT Department or Legal and Compliance Division** immediately if we know or suspect that customer information was inadvertently mishandled in any way.

Background

A team leader wants to send flowers to an employee who recently had a baby, which the employee's colleague (who is also a friend of the new mother) thinks is a thoughtful Motion. Since the team leader knows that the two employees are friends and live near each other, he asks for the friend's home address to arrange the delivery. The employee feels uncomfortable sharing the home address without first obtaining her friend's permission but is also concerned about spoiling the surprise.

Recommended Actions

- 1) **Communicate Concerns Professionally:** The employee should politely explain to the team leader that, in accordance with company privacy policies, she is unable to share her friend's personal information without prior consent.
- 2) **Suggest an Alternative Solution:** The employee can recommend that the team leader work with HR to arrange the surprise while respecting the privacy of the individual involved.
- 3) **Respect for Privacy:** The employee should remind the team leader that handling personal information carefully is essential to maintaining trust and compliance with privacy policies.
- 4) **Conduct Regular Privacy and Cybersecurity Trainings:** Employees should receive regular training on data privacy and cybersecurity practices, including how to recognize phishing attempts and the proper steps to take when handling sensitive information. This training should be mandatory and updated regularly.
- 5) **Ensure Third-Party Compliance:** All concerned departments must ensure that vendors, contractors and clients who have access to the company's sensitive data comply with the same privacy and cybersecurity standards. Contracts with third parties should include specific clauses regarding data protection, cybersecurity responsibilities, and the steps to take in the event of a data breach.

JCA'S PRINCIPLES

Acceptable Use of Information and Other Associated Assets “Protecting Company’s Data and Preventing Unauthorized Data Transfer”

HOW WE WIN

We protect JCA’s data, systems, and intellectual property by clearly outlining the expected behaviors and responsibilities of all employees and stakeholders. This approach is communicated during onboarding and reinforced through regular training sessions to ensure that everyone understands the importance of safeguarding information and technology assets. Access to sensitive information is restricted, any unauthorized copying, removal, or transfer of such data exposes JCA to legal, financial, and cybersecurity risks.

WHY WE PUT VALUES FIRST

Mitigating risks associated with misuse or unauthorized access helps in protecting sensitive data and maintain compliance with legal and regulatory requirements. By promoting responsible behavior and outlining clear expectations, this approach enables JCA to safeguard its assets while fostering a culture of security awareness among users, ultimately helping to prevent data leakage, misuse, or unauthorized disclosure.

WHAT WINNING LOOKS LIKE

- Ensuring that data is stored and processed only on authorized technology assets and systems owned by JCA.
- Not copying, downloading, extracting, or transferring any JCA data or files to external or personal email accounts.
- Avoiding the storage or transfer of JCA data on USB drives, external hard drives, personal computers, or personal mobile devices.
- Not transferring, uploading or backing up JCA data to personal or unauthorized cloud storage accounts (including, but not limited to, Google Drive, OneDrive, iCloud, Dropbox, or similar platforms).
- Participating in interactive training sessions that incorporate real-world scenarios.
- Securing devices by following all company-approved security measures and protocols.
- Reporting any security incidents immediately to the IT Department and the Legal & Compliance Department to ensure prompt action and risk mitigation.

Background

An employee routinely copies and transfers company files from JCA-issued laptops to personal storage locations, such as personal email accounts, USB drive, or personal cloud storage, for convenience and future reference. The employee does not believe this behavior is harmful and is unaware that retaining company files outside JCA-approved systems may violate JCA policies, confidentiality obligations, and applicable data protection and cybersecurity laws.

Recommended Actions

- 1) **Recognize Legal and Policy Responsibilities:** Employees must understand that copying, transferring, or retaining JCA files outside authorized systems - regardless of intent - may constitute a breach of confidentiality, data protection obligations, and cybersecurity requirements.
- 2) **Cease Unauthorized Data Retention:** The employee must immediately stop copying or storing JCA data on personal devices, accounts, or external storage and ensure that any retained files are securely deleted in accordance with IT instructions.
- 3) **Use Approved Tools and Systems Only:** All company files must be accessed, stored, and processed exclusively through JCA-approved devices, platforms, and secure remote access solutions.
- 4) **Report and Remediate Promptly:** If company files have already been transferred or retained without authorization, the employee must promptly notify the IT Department and the Legal & Compliance Department to assess the risk and take corrective action.
- 5) **Reinforce Awareness and Training:** Managers and employees should participate in regular data handling and cybersecurity awareness training to ensure a clear understanding of the legal responsibilities, acceptable use, and the consequences of non-compliance.

JCA'S PRINCIPLES

Physical Property, Reputation, and Confidential Information “Safeguarding Assets”

HOW WE WIN

We prioritize safeguarding not only JCA's assets, money, information, ideas, and reputation but also safeguarding the same for our customers, suppliers, and other business partners to sustain our operations and ensure future success.

WHY WE PUT VALUES FIRST

We are focused on the future. By making the most of the resources we have today, we position ourselves for success tomorrow. Our assets whether property, money, information, ideas, or our reputation are essential to sustaining our operations and enabling investment in innovation and ongoing improvement.

As responsible of these assets, we leverage them to deliver outstanding customer experiences and create long-term value for our stakeholders.

WHAT WINNING LOOKS LIKE

- Protecting the company's assets is a critical responsibility for all employees. This includes safeguarding against fraud, ensuring that records are managed in accordance with company policies, securing data from unauthorized access or misuse, and using company assets exclusively for business purposes.
- Employees must exercise sound judgment in protecting all types of assets—whether they are financial, physical, informational, or intangible. This involves not only adhering to established security protocols but also actively preventing any misuse or unauthorized access to sensitive resources.
- By consistently applying good judgment and following company guidelines, we help ensure that our assets are preserved, efficiently utilized, and aligned with the company's goals and values.
- Never use confidential information for personal gain.
- Take steps to protect JCA's confidential information when dealing with third parties by ensuring they sign Confidentiality & Non-Disclosure Agreements.
- Remember that your obligation to protect confidential information remains even after you leave JCA.

Background

Last night, you had dinner with an old high school friend who works for a local engineering firm. During the conversation, you both shared pride in your respective companies' focus on innovation to solve real-world problems. During the conversation, you mentioned some of the newest products your company is developing, particularly highlighting how these products will address customer needs. After the dinner, you began to wonder if you may have shared too much information and potentially put your company's intellectual property and competitive advantage at risk.

Recommended Actions

- 1) **Assess What Was Shared:** Review the conversation and identify the specific information that may have been disclosed. Focus on whether any proprietary details or non-public information about your company's products, strategies, or intellectual property were mentioned.
- 2) **Consult with the Legal and Compliance Dept.:** If you believe you may have shared confidential or sensitive information unintentionally, reach out to the Legal and Compliance Division for guidance. They can assess whether the information shared possess a risk and advise you on next steps.
- 3) **Learn from the Situation:** Moving forward, be mindful of the types of information you discuss with anyone outside of the company, even if they are not direct competitors. It is important to be discreet and avoid disclosing proprietary or confidential information that could harm the company's competitive position.
- 3) **Foster Awareness of Company Policies:** Make sure you are familiar with the company's policies regarding the protection of intellectual property and confidential information. If you're unsure whether something is considered confidential, be wary and avoid sharing it.
- 4) **Strengthen Personal Security Practices:** Going forward, practice caution in all conversations regarding the company's operations, products, or future developments. Always consider whether the person you are speaking with could gain access to sensitive information, and refrain from discussing non-public matters.

JCA'S PRINCIPLES

Third-Party Intellectual Property and Commercial Rights “Doing Business Respectfully”

HOW WE WIN

We respect the intellectual property and commercial rights of others, just as we would want them to respect ours.

WHY WE PUT VALUES FIRST

We respect intellectual property and commercial rights of others and do not claim credit for or use ideas that are not our own.

We understand that using others' protected works without permission is illegal and could expose us to legal risks and liabilities.

WHAT WINNING LOOKS LIKE

- avoiding unauthorized use of intellectual property, using third-party assets only with permission, employing approved software, and adhering to relevant laws.
- We do not infringe third parties' rights and use only assets such as software, designs, trademarks, trade secrets, and patent with permission.
- Following the applicable intellectual property laws.

Background

A company engaged with a software development firm to create a specialized tool for its internal use. The contract signed between the two parties included provisions for the use of certain proprietary software components owned by the vendor. However, the agreement did not clearly define the extent to which the company could use, modify, or distribute the software beyond its internal operations.

Upon the software's completion, the company decided to integrate it into a new product offering for external clients. This move violated the terms of the agreement with the software vendor, who had restricted the use of the software to internal purposes only.

Recommended actions

- 1) **Clarify IP and Licensing Terms in All Contracts:** The employees should ensure that all contracts with third-party vendors or partners explicitly define the scope of use for any intellectual property involved. This includes detailing any restrictions on use, modifications, distribution, and geographical limits. The terms should be as specific as possible to avoid ambiguity.
- 2) **Seek the support of the Legal & Compliance Dept.:** Legal or Compliance Dept. must approve any licenses to use intellectual property rights, even owned by JCI, JCA or third parties.

JCA'S PRINCIPLES

Responsible Communications

“Building Trust and Reputation through Responsible Communications”

HOW WE WIN

We foster trust and build our reputation through responsible communication, including social media practices. We strengthen our brand and stakeholder relationships through thoughtful, accurate, and consistent communications, along with responsible engagement on social media.

WHY WE PUT VALUES FIRST

We are committed to communicating truthfully, accurately, and consistently with our customers and stakeholders. This is vital for building a business rooted in trust, long-term relationships, and mutual value, rather than just transactional exchanges. We recognize that each of us serves as an ambassador of JCA. Our actions and words reflect the value we bring to the marketplace and help preserving our reputation. We uphold this responsibility by using social media thoughtfully and by directing external inquiries to colleagues with the appropriate authority and expertise.

WHAT WINNING LOOKS LIKE

- Employees must adhere to the company’s Communications Policy by sharing only authorized and accurate information, maintaining a professional tone in all interactions, and safeguarding confidential or sensitive data.
- When engaging in both internal and external communications, employees should refrain from disclosing information that is not approved or intended for public release.
- all social media interactions related to JCA’s activities—whether personal or professional—should align with the company’s values and standards.
- Employees must avoid posting illegal, harmful, or inappropriate content that could damage the reputation of JCA or undermine its integrity. Social media use should never interfere with work responsibilities, and it’s important to remember that online actions, even outside of work hours, can have an impact on the company.
- What we post and share online can either positively or negatively affect the perception of JCA. Therefore, it is essential to be mindful of our digital footprint and how it reflects on the company.
- When engaging on social media, employees should follow these guidelines:
 - Do not refer to JCA or express opinions on behalf of the company unless you have an official approval from Marketing Team.
 - In professional social media websites, i.e.: LinkedIn, clearly state that any opinions expressed are your own and do not reflect JCA’s views.
 - Avoid engaging in discussions or comments related to JCA, as your participation could be misinterpreted.
 - Do not use your JCA email address for personal social media accounts.
 - Do not participate in discussions defending or clarifying JCA’s position, as it may be misunderstood.
 - Refrain from making positive or negative posts about current or former JCA employees, customers, or suppliers, unless being reviewed and approved by JCA’s Marketing Team.

Background

A technician who shared photos on social media that showed the use of low-quality tools and non-compliance with our safety regulations. This incident not only misrepresents our company's commitment to quality and safety but also poses a risk to our Legal implication.

Recommended Actions

- 1) **Maintain Professionalism:** Ensure that all content related to your work reflects our company's high standards and values.
- 2) **Protect Confidentiality:** Do not share any sensitive or proprietary information about our company, employees, or clients.
- 3) **Comply with Policies:** Adhere to company guidelines, especially regarding safety and quality standards, in any posts involving work-related content.
- 4) **Seek Approval When in Doubt:** If you are uncertain whether a post complies with our policy, consult Marketing department before sharing.
- 5) **Be Mindful of Online Behavior:** Remind your colleague—and yourself—that all employees are ambassadors for the company, and their behavior online reflects on the company’s reputation. Social media posts, even outside of work hours, can influence how others perceive JCA.

JCA'S PRINCIPLES

Procurement

“Selecting Our Suppliers Responsibly”

HOW WE WIN

We select suppliers fairly and objectively to build long-term, mutually beneficial relationships based on trust and integrity.

WHY WE PUT VALUES FIRST

We strive to build meaningful, long-term relationships with our suppliers, grounded in mutual benefit and trust. These partnerships are key to our success in the marketplace, enabling us to deliver exceptional customer experiences and solutions. We seek suppliers who share our commitment to integrity and collaboration. When suppliers are equally invested in the success of our customers, they thrive alongside us—winning when our customers win.

WHAT WINNING LOOKS LIKE

- We are committed to treating all current and potential suppliers with fairness, integrity, and respect, regardless of the size or duration of the transaction.
- Our supplier selection process is guided by a strong commitment to compliance with all applicable legal requirements, ensuring that we conduct thorough due diligence on potential suppliers.
- We base our decisions on clear, objective performance criteria, including quality, price, service, reliability, availability, technical excellence, speed of delivery, and adherence to ethical business practices.
- To maintain transparency and fairness, we avoid situations that could lead to conflicts of interest and ensure that all supplier relationships are free from any undue influence.
- We also uphold strict standards when it comes to gifts and hospitality, refraining from accepting any gifts that could be perceived as inappropriate or that might compromise our impartiality.
- By following these principles and Business Partners Code of Conduct, we strengthen our supplier relationships and foster a culture of trust and accountability.

Background

A procurement manager meets with her team to select a supplier from two options: their current supplier and a new one with only six months of trading history. One team member is wary of the new supplier's lack of references, while another insists it's time for a change, believing in the new company's potential. During lunch, one team member talks to someone from the new supplier, revealing a personal connection to that person, which raises concerns for the other team member about a potential conflict of interest (COI). The concerned team member suggests reporting this to their boss, but the other disagrees, claiming that her personal ties won't affect the bidding process.

Recommended Actions

- 1) **Clarify COI Policy:** Review the company's conflict of interest (COI) from The Business Partners Code of Conduct to ensure clarity on personal connections with suppliers and the potential impact on decision-making.
- 2) **Address COI Concerns:** Hold a meeting to discuss the perceived conflict of interest and the importance of transparency in the procurement process.
- 3) **Involve a Senior Manager:** If necessary, escalate the issue to a senior manager or the procurement manager's boss for an impartial review of the situation and to ensure an unbiased decision.
- 4) **Evaluate Suppliers Objectively:** Implement a structured and objective evaluation process for selecting the supplier, focusing on key factors like price, quality, and references, to avoid any bias.
- 5) **Document Discussions and Decisions:** Ensure all discussions, concerns, and decisions are thoroughly documented to maintain transparency and accountability.
- 6) **Disclose Personal Connections:** In all procurement processes, encourage full disclosure of any personal relationships with suppliers to prevent potential conflicts of interest.

JCA'S PRINCIPLES

Anti-Money Laundering and Countering Terrorism Financing

HOW WE WIN

JCA expects its employees, representatives, and business partners to recognize and act when they encounter activities that may compromise our ethical principles or damage our reputation. The Anti-Money Laundering and Counter-Terrorism Financing laws and regulations (referred to collectively as the “AML and CTF Laws”) establishes the foundational standards governing JCA’s conduct in these areas. Specifically, it aims to:

- **Commitment to Compliance:** JCA ensures compliance with all applicable AML and CTF Laws in the conduct of its business activities, in all regions where we operate.
- **Legitimate Business:** JCA engages only with customers and partners involved in legitimate business activities, ensuring that their funds originate from lawful sources.
- **Know Your Business Partners (KYBP) Procedures:** JCA follows KYBP procedures to verify the legitimacy of prospective customers, agents, vendors, suppliers, subcontractors and business partners. This is essential to confirm that they are involved in legal business and have funds derived from legitimate sources.
- **Screening of Business Partners:** JCA carefully screens BPs and third parties who have significant commercial dealings with the company, ensuring that we mitigate risks related to AML and CTF Laws.

JCA’s dedication to these principles ensures that we maintain the highest ethical standards in our operations.

Examples of Red Flags Associated with Potential Money Laundering or Other Illegal Activities:

1. Offers to pay in cash or overpayments followed by requests for refunds.
2. Orders, purchases, or payments that are unusual or inconsistent with a customer's usual trade or business.
3. Unusually complex deal structures that seem unnecessarily convoluted.
4. Attempts by a customer to provide false or misleading information during registration or transactions.
5. Unusual fund transfers to or from countries or banks unrelated to the transaction or customer.
6. Requests to make payments to third parties who are not related to the business transaction.

WHAT WINNING LOOKS LIKE

For Payments to Vendors, JCA SHALL:

- Only work with vendors with proven long-term business relationships.
- Pay only upon receipt of an invoice.
- Use legitimate channels (e.g., banks) for transferring money to international suppliers.

Reporting of Misconduct

Employees must follow the proper reporting procedures to ensure the seriousness of the report is verified, and the report can be followed up on effectively. Employees can contact the Legal and Compliance Division directly.

Anonymous reporting is allowed; however, it may make it more challenging to investigate the issue thoroughly.

Background

On 2008, one of the largest European engineering and electronics company in the world, settled penalties reaching \$1.6 billion because of violating FCPA rules that are imposing controls upon receiving moneys from unknown sources through their distributors. The company and three subsidiaries that pleaded guilty to criminal charges also agreed to retain an independent compliance monitor for a term of four years.

Recommended actions

- 1) **Immediate Reporting:** Employees shall consult the Legal & Compliance Dept. in case any their customers need to make any cash payment or to send indirect payments from any other third party account.
- 2) **Review and Strengthen Know Your Business Partners (KYBP) Procedures:** We shall follow a more rigorous customer Due Diligence. This includes verifying the identity of new clients or business partners and understanding the nature of their transactions.
- 3) **Awareness for Employees:** Employees shall not enable any cash transactions or any other bank transactions with regard to the collection of JCA’s due payments, unless it is directly transferred from our customers’ banks accounts who are registered through the KYBP Procedures.

JCA'S PRINCIPLES

Political and religious Activities and Lobbying “Restrictions on political and religious participation”

HOW WE WIN

We generally limit the use of company resources for any political and religious activities, including office space, to avoid the appearance of favoritism. We strictly respect all laws and regulations that prohibit political and religious activities and lobbying.

WHY WE PUT VALUES FIRST

At JCA, we prioritize values as the foundation of everything we do. We believe that a strong commitment to ethical principles and respect for diversity helps to create an inclusive and harmonious workplace. Our core values guide our decision-making processes and shape how we interact with each other, our clients, and the community.

We understand that navigating political and religious activities in the workplace can be sensitive, which is why we set clear guidelines to maintain fairness and neutrality. By limiting the use of company resources for such activities, we avoid the risk of appearing biased and ensure that all employees feel respected, regardless of their personal beliefs.

We focus on fostering an environment where respect, collaboration, and integrity thrive. It helps us meet our legal obligations and maintain a positive, productive work culture, free from the influence of external pressures like political or religious agendas.

This approach ensures that we stay true to our commitment to respect, fairness, and professionalism, reinforcing the importance of our values in shaping the success of the company and the well-being of our employees.

WHAT WINNING LOOKS LIKE

- Not using JCA's name to promote a specific political party
- Never attempting to improperly influence any government agency, representative or legislator.
- Complying with all relevant laws in relation to political and religious prohibitions.

Background

An employee has been asked to create a banner for an upcoming campaign for a political event. To complete the banner, the employee plans to use the conference room at the office, after the working hours, and with their own materials. The employee also ensures that the room is not needed for any company business. The question arises: Is it permissible to use company office space for this personal political activity?

Recommended Actions

- 1) **Use Personal Resources:** The employee should seek alternative spaces outside of company premises to complete the banner, ensuring that no company resources (e.g., office space, equipment, or supplies) are used for the political activity.
- 2) **Clarify Company Policy:** Employees should familiarize themselves with company policies regarding political engagement to ensure that they understand the boundaries around the use of company resources and the company's commitment to political neutrality.

JCA'S PRINCIPLES

Research Integrity and Ethically Sourcing Competitive Intelligence “Doing Business Smartly”

HOW WE WIN

We keep ourselves informed about market trends and opportunities through ethical research.

WHY WE PUT VALUES FIRST

Staying informed about trends and changes in our markets allows us to better understand the competitive environment, continuously improve our offerings, and proactively address the needs of our customers. We prioritize integrity in all our efforts, ensuring that we gather information about our competitors in an ethical and responsible manner.

WHAT WINNING LOOKS LIKE

- Being transparent about who we are and the purpose of our inquiries when seeking information
- Not using third parties to engage in actions we would not engage in ourselves, and not soliciting confidential information about former employers from colleagues.

Background

A business development professional was in the process of negotiating and finalizing a bid proposal for a major project. During the process, they received an email from a prospective customer's procurement manager. However, due to an error, the procurement manager mistakenly attached a proposal from one of the company's competitors, rather than the intended marked-up version of the company's own proposal. Upon reviewing the attachment, the business development professional noticed that the competitor's bid was 25% lower than their own.

Faced with this new information, the employee considered lowering their bid price to match or beat the competitor's offer. However, they were unsure whether using this information was appropriate and whether it would violate any ethical or legal guidelines.

Recommended Actions

- 1) **Notify the Customer About the Mistake:** Politely inform the procurement manager of the error and delete the email and attachment to ensure no unfair advantage is taken.
- 2) **Report the Incident to Legal and Compliance Dept.:** Immediately report the incident to the [Legal and Compliance Division](#) to ensure proper documentation and compliance with ethical standards.
- 3) **Avoid Using Competitor Information Unethically:** Never use any information obtained through mistakes or unethical means. Always act in a way that reflects fairness and integrity.
- 4) **Focus on the Proposal's Strengths:** Concentrate on the value proposition of the original bid. Use competitive advantages and differentiators to make the proposal compelling without resorting to price manipulation.

JCA'S PRINCIPLES

Government Contracts Compliance

“Honoring Special Obligations to our Government Customers”

HOW WE WIN

We prioritize serving government customers by focusing on compliance with their unique requirements and regulations.

WHY WE PUT VALUES FIRST

We are committed to being customer-focused and recognize that government customers often have distinct needs compared to those in the private sector. It is essential that we carefully understand and adhere to these specific requirements to ensure we meet their expectations.

by Understanding government contracts, adhering to laws, maintaining truthful communication, and ensuring proper handling of classified information and avoiding penalties that could harm our business or reputation.

WHAT WINNING LOOKS LIKE

- Adhering to all relevant laws governing government contracts, as well as export regulations for products and data.
- Complying with regulations regarding the hiring or collaboration with current or former government employees.
- Understanding the proper procedures and timelines for responding to government solicitations.
- Being alert about handling classified information or any data subject to special restrictions.
- Ensuring that all documents and communications are accurate, honest, and transparent.
- Providing up-to-date, certified cost or pricing data when required for submitting proposals.
- Refraining from receiving or using unauthorized information regarding competitors.

Background

A procurement manager for Government contracts discovers that a supplier made a minor change to the specification of a component used in products sold to government customers. The supplier explained that the change was small and probably improved the component, and therefore, the company was not informed about the modification. However, the procurement manager is concerned that recent shipments to government customers may not comply with the specific requirements of the relevant government contracts due to this change

Recommended Actions

- 1) **Report to Legal and Compliance Division** : Immediately escalate the issue to the **Legal and Compliance Division** to get professional legal advice on how to proceed.
- 2) **Evaluate the Impact**: Work with **Legal and Compliance Division** to determine if the change in the component affects the terms of the government contract and if any corrective action is necessary.
- 3) **Notify the Government (if required)**: If the **Legal and Compliance Division** advises that the change must be disclosed to the government, the procurement manager should ensure the proper channels are followed for this disclosure.
- 4) **Review Internal Processes**: The procurement manager should work with the supplier to improve communication about product changes in the future, ensuring that all changes are properly documented and communicated in accordance with contract requirements.

Duty of Loyalty

Duty to Disclose

When in doubt, disclose it!



VALUES FIRST

“SPEAKING UP AND GETTING HELP”

SPEAK UP – EVERYONE’S VOICE COUNTS

At times, the right course of action is clear. However, situations can sometimes be complex or unfamiliar, leaving us uncertain about how to proceed. If you have any concerns, it’s important to speak up immediately. Not only is it our responsibility, but it also helps us gain clarity quickly and avoid potential issues. If something has gone wrong, speaking up provides the opportunity to investigate and correct the situation.

RESOURCES

There are several ways to raise an ethics or compliance concern:

- Contact Human Resources or Legal and Compliance Divisions.
- You may submit an anonymous complaint without disclosing your identity through Johnson Controls 24-hour Integrity Helpline: www.johnsoncontrolsintegrityhelpline.com

ZERO TOLERANCE FOR RETALIATION

Johnson Controls Arabia has a strict policy against retaliation. Anyone who raises a concern in good faith will not face retaliation in any form, including threats, harassment, reduction of hours, termination, or any other negative consequences. Retaliation is in direct conflict with our values and undermines the trust that is key to our success. Acts of retaliation are considered serious misconduct and will result in disciplinary action, up to and including termination of employment.

Often, the right thing to do is obvious. At other times, a situation may seem complex or unusual and we may be unsure about how to proceed.

If you have a concern, please speak up immediately. Not only do we have a duty to do so, but it also allows us to quickly gain clarity and avoid potential problems.

If something has gone wrong, it gives us an opportunity to investigate and correct it.

VALUES FIRST

“ADHERENCE TO JCA’S CODE OF ETHICS AND COMPLIANCE POLICIES”

- Based on the aforementioned values and principles, each one of us should recognize the importance of respecting and applying the requirements of JCA’s Code of Ethics and Compliance Policies in everything we do at JCA. Moreover, JCA is committed to the highest standards of integrity and has a zero-tolerance policy for any violations of its Compliance Policies and/or Values.
- Whereas any violation by an employee of JCA’s Values and Compliance Policies not only damages JCA’s reputation, exposes JCA to serious sanctions and penalties, but also undermines the trust we have built with each other and with our business partners.
- To ensure JCA’s commitment to the highest levels of respecting and applying its Code of Ethics and Compliance Policies for the purpose of safeguarding our business sustainability, employees violating these policies will be subject to disciplinary actions, which may include termination."

VALUES FIRST IN CLOSING . . .

The Code of Ethics is meant to inspire and guide us as we collaborate to create a more comfortable, safe, and sustainable world. It demonstrates how to apply our values while seizing opportunities and managing risks. While it can't address every possible situation, it's essential to ask questions when we're uncertain about the right course of action and to raise any concerns we may have. The Code provides various resources and channels to assist us in doing so.