Code of Ethics and Conduct for Third Parties

JACK MORTON
together with IMPACTXM

Letter from the CEO

Dear Valued Partner,

At Jack Morton, integrity, trust, and ethical business practices are at the heart of everything we do. As a company committed to upholding the highest standards in all our operations, we believe that our success is built on strong partnerships with those who share our values.

It is with this in mind that I am pleased to introduce our Code of Ethics and Conduct for Third Parties. This policy outlines the ethical standards we require from all who work with us. By adhering to this Code, you help us ensure that we consistently deliver the quality, excellence, and professional conduct that our customers and stakeholders expect from Jack Morton.

We are confident that, through our collective commitment to ethical business practices, we will continue to strengthen our relationships and reach new heights together.

Thank you for your continued partnership and dedication to upholding these values.

Jared Pollacco
CEO
Jack Morton

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01 CODE OBJECTIVE

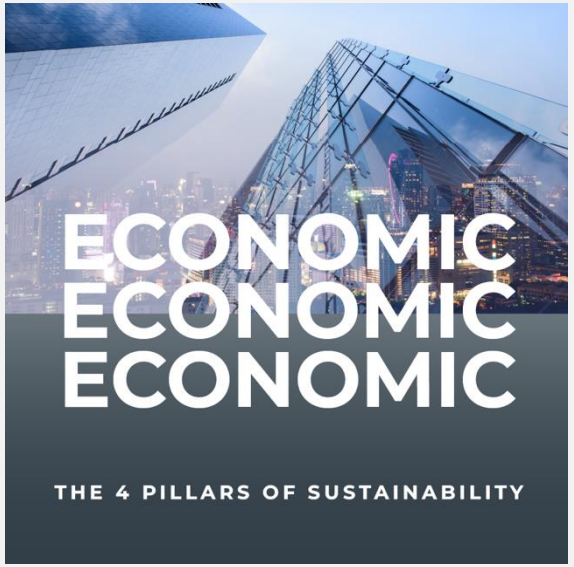
Jack Morton is committed to maintain the highest standards of integrity and sustainability in our supply chain. We expect our suppliers to uphold these standards and conduct business responsibly, ethically, and in compliance with applicable laws and regulations. The Code of Ethics and Conduct for third-parties outlines the principles and practices we require from suppliers and service providers.

HUMAN – Jack Morton aims to maintain and improve human capital in society.

SOCIAL – Jack Morton aims to preserve social capital by investing and creating plans and services that contribute to the framework of our changing society.

ECONOMIC – Jack Morton strives for the efficient use of assets to maintain profitability over time.

ENVIRONMENTAL – Jack Morton aims to improve Earth and human welfare through the preservation and protection of natural capital in the form of land, air, water, and energy.



02 JACK MORTON COMMITMENTS

The Code of Ethics and Conduct for Third-Parties establishes guidelines for Jack Morton's relationship with third parties, defined in this code as its suppliers and service providers; establishes Jack Morton's main commitments to issues related to ethics and compliance with laws; defines how third-parties are accountable to ensure compliance with these commitments; and highlights unacceptable behaviors, which are subject to contractual review, including relationship and/or contract termination.

These commitments are formalized in Jack Morton's Sustainability Policy and Goals – ESG – which guides our activities and includes aspects of integrity, value chain management, and efficiency in the use of natural resources, social responsibility, quality, and safety within processes.

03 CONDUCT EXPECTED FROM THIRD-PARTIES

- Maintain ethical behavior, unblemished reputation, and transparent posture;
- Promote and ensure the safety of all parties;
- Meet all practices described in this Code;
- Comply with all laws and regulations relating to their business;
- Maintain confidentiality of information in case of access to critical Jack Morton data;
- Treat everyone fairly, with dignity and respect;
- Avoid situations that may generate conflicts of interest with Jack Morton;
- Protect the relationship and reputation of all parties;
- Report any violation or suspected violation of ethical rules, either by their own professionals or by Jack Morton representatives.

04 SAFETY AT WORK

Jack Morton is committed to the safety of people. In the work environment, everyone should feel safe to carry out activities. Jack Morton focuses on people's lives and integrity, values that transcend the company's other objectives and priorities.

HEALTH AND SAFETY are everyone's responsibility. Our third-parties are also required to meet these principles, complying with all legal requirements and implementing good health and safety practices for their respective employees and subcontractors, including appropriate equipment, training on safety procedures, using proper PPE, and promoting a safety culture.

Third parties with access to Jack Morton's facilities or on show-site must ensure their teams and subcontractors meet all safety procedures,
adhere to local standards, and provide pertinent certificates and any other legal requirements.

05 RESPECT AND HUMAN RIGHTS

In relationships, Jack Morton expects parties to respect all audiences, discourages with zero-tolerance any practices of moral or sexual harassment, discrimination, intimidations, disrespect for Human Rights, or noncompliance of labor obligations.

Jack Morton reiterates the importance of attitudes and respect for human beings and their rights and will not tolerate situations that may represent an infraction. Any agreement will be immediately terminated for degrading situations, considering the following:

- Prohibit the use of child, forced, or slave-like labor, unsafe working conditions, or cruel/abusive disciplinary practices in the workplace.
- The workplace is free from discrimination of all workers on any ground (including race, religion, disability, gender, sexual orientation, or gender identity), harassment, and abuse.
- Working hours, compensation, and benefits comply with local laws and employment rights in the country within which it operates.
- Respect the right of employees to freedom of association and collective bargaining.

06 PRESERVATION OF THE ENVIRONMENT

Jack Morton recognizes that an ecologically balanced environment is a common asset for society, essential to the quality of life, and must be promoted and preserved for generations to come.

Our third-parties are also required to comply with this commitment by meeting all environmental laws and regulations, maintaining an active and engaged posture in environmental issues, and mitigating risks that may impacting environment. This includes but not limited to:

- Reducing waste, emissions, and energy consumption.
- Properly handling and disposing of hazardous materials.
- Implementing environmentally friendly practices in production, packaging, and transportation.
- Complying with applicable environmental regulations and industry best practices.

07 SOCIAL RESPONSIBLITY

Jack Morton is committed to the social development of the communities in which it operates. In this sense, the company strives for ethical and sustainable relationships, focused on the common good.

In developing a network of solidarity, Jack Morton requires our third-parties to be active agents in understanding and supporting the social, economic, and environmental needs of the communities around us.

08 RELATIONSHIP WITH THIRD-PARTIES

Jack Morton seeks to maintain solid, long-lasting relationships with its customers, suppliers, and alliances. This trust is reflected in transparency, ethics, and professionalism of the parties, always respecting market practices and guaranteeing free initiative and competition.

Jack Morton seeks and values third-parties who share its principles and strives to promote them. Since Jack Morton maintains this commitment, its third-parties are also required to:

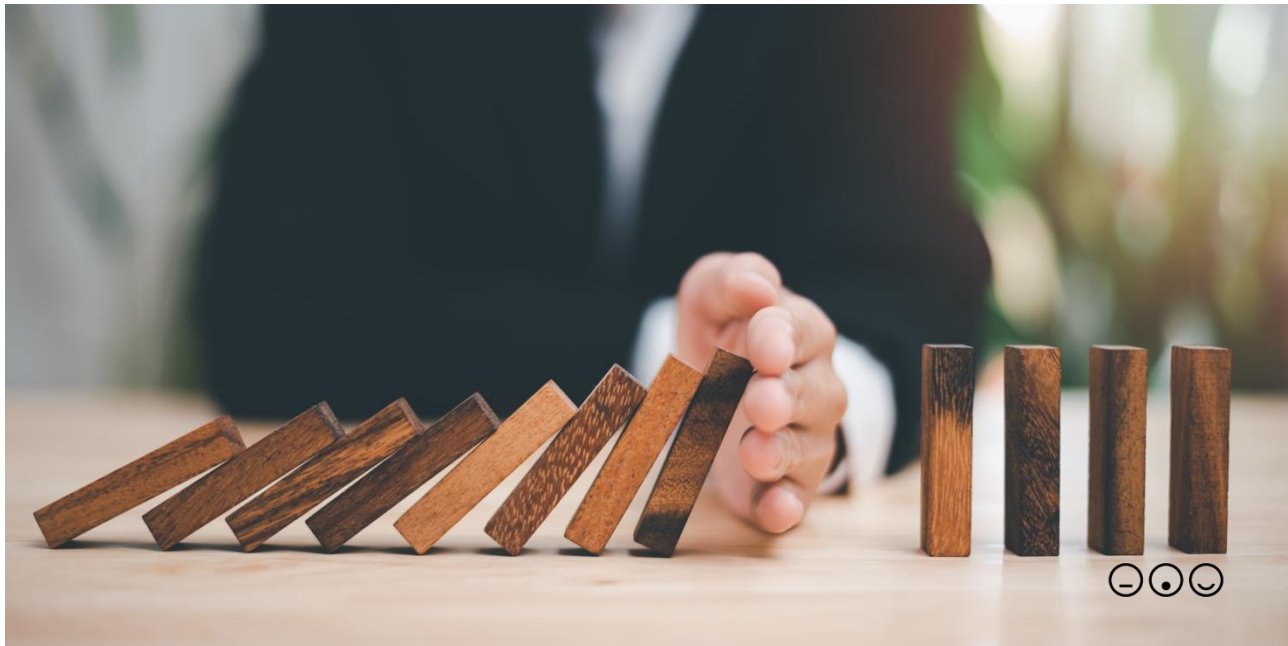
- Base their practices on ethical principles and in compliance with anti-corruption laws, ensuring fair competition and respect for all parties involved;
- Do not tolerate child labor, slave-like labor, and non-compliance with current legislation, anti-corruption laws and environmental laws;
- Ensure safety of people;
- Base their negotiations on business needs, respecting legal, technical, commercial, professional, reputational, and/or ethical criteria;
- Do not allow, accept or contribute, in any way, to practices involving corruption, bribery, money laundering, and/or conduct contrary to the laws and provisions of this Code;
- Ensure the highest quality of products or services provided, operating with clarity in any commercial and production situations;
- Meet agreements in accordance with the best commercial practices, complying with competition laws and without discrimination;
- Respect freedom of choice.

09 CONFLICT OF INTEREST

A conflict of interest is defined as a situation in which a professional or third-party acts or is influenced to act against the objectives of the party involved (Jack Morton), making an inappropriate decision, prioritizing personal or third-parties' interests, rather than the company's interests. This situation may generate financial, reputational, or business impact.

Jack Morton will communicate and monitor these situations and, if confirmed, especially in the event of damage to Jack Morton, the company may terminate the relationship with that third- party. So, therefore, third-parties are required to report any conflict of interest to Jack Morton, or any suspicion that may affect the transparency of the business.

Attention should be paid to relationships with employees with family ties, a supplier that is owned by a former Jack Morton employee, a supplier who has hired former Jack Morton employees in key functions, any provision of private services, promises of employment, undue courtesies or favors, use of inside information obtained in activities with Jack Morton and/or other interests that may generate undue benefits to
the parties.



10 GIFTS AND ENTERTAINMENT

The offering of gifts or entertainment may generate a conflict of interest. These events must be limited to immaterial values, with an institutional objective and must not represent any kind of reciprocity. If the third-party understands some courtesy is necessary, and to prevent any doubt, it is recommended that BEFORE any action or offer, to contact the Jack Morton manager to ask if the courtesy meets the corresponding guidelines.

11 FIGHT AGAINST CORRUPTION, MONEY LAUNDERING, AND CRIMINAL ACTIVITIES

Jack Morton does not tolerate any type of relationship involving illegal or criminal activities. Everyone is required to strictly comply with anti-corruption and anti-money laundering laws, and is prohibited from offering, promising, making, authorizing, or providing (directly or indirectly through third-parties) undue advantages, payments, gifts, or transfer of money for anyone, whether a public agent or not, to illegally influence or reward any action or decision for the benefit or their employer or to Jack Morton.

Signs of irregularities with an impact on the reputation of third-parties may result in contractual review and application of sanctions, including contractual termination. In this sense, it is important to mention:

- Third-parties representing Jack Morton before Agents or Public Bodies must comply with Jack Morton guidelines for relationship with public agents;
- Agreements bind everyone to comply with all anti-corruption laws;
- Third-parties must be committed to fight against corruption and money laundering, being aware of prevention practices of any transaction that may pose a risk of illegal or criminal involvement;
- Jack Morton prohibits and condemns illicit trade activities, and only supports the legal sale of its products/services;
- In its compliance process, Jack Morton, may carry out due diligence activities, reputational analysis, and links with accredited entities (OFAC, UN). Depending on these results, Jack Morton may request additional inquiries, contractual review, or termination.

12 FRAUD

Any kind of illegality or fraud, including but not limited to falsifying records, manipulating prices, undue benefits to Jack Morton employees or representatives, undue favoritism or misappropriation of assets will not be tolerated, and may result in penalties such as interruption of relationship or other appropriate measures.

Our third-parties are required to operate in compliance with Jack Morton's Code of Ethics and Conduct through their culture, promoting a structured, controlled environment and training their respective employees, representatives, and subcontractors to ensure ethical, legal, and professional behavior.

13 COMPETITION PRACTICES

Jack Morton believes in, and practices, free and fair competition and considers its business relationships as essential. Jack Morton operates in an ethical manner, and with respect to competition, adheres to "antitrust legislation", and does not condone or accept its third- parties engaging in practices contrary to free competition, such as cartel formation, market division, price manipulation, or predatory conduct.

14 CONFIDENTIALITY OF INFORMATION

Third-parties are required to maintain confidentiality and secrecy of all Jack Morton information to which they may have access, including documents, databases, financial, or accounting information, project, or any materials filed and registered in any way, whether original or not, protecting them and not disclosing them to other third-parties or using them for other purposes.

In addition, third-parties must comply with all local data protection laws and regulations, according to their responsibility attributed by law or by agreement.

Depending on the nature of the negotiation, the third-party must align the prohibitions, limitations, and guidelines involving data confidentiality with Jack Morton information security requirements.

15 EXTERNAL COMMUNICATION

The third-party should not engage in public discussions that may be understood as an expression of Jack Morton's or its customer's opinions or points of view, unless previously approved by Jack Morton. This includes comments on public social networks, business forums, or other social media channels.

16 JACK MORTON TRADEMARK

The use of Jack Morton's image, name, or brands is not allowed, except if previously and formally authorized, for exclusive use in the development of its professional activity.

17 REPORTING CONCERNS

Jack Morton reserves the right to audit and assess third-parties to ensure compliance with this Code of Ethics and Conduct for Third-Parties. Third-parties are expected to provide all necessary information and cooperate fully with any audits. Non-compliance may result in the termination of the business relationship.

In case you become aware or suspect any violation to this document, illegal practices, fraudulent bids, improper use of information, bribery, fraud of any kind, or other situation contrary to ethics, whether by a Jack Morton employee, representative, or by any third-party, please report that to the corresponding channel:

Jack Morton website: jackmorton.com
By e-mail: Jason.Cenicola@impact.xm.com

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Thank you