

JAS Worldwide, Inc.'s and its affiliates / subsidiaries ("JAS Worldwide" or the "Company") aim to create opportunities to thrive, Together (*Our Purpose*). Every interaction enables positive change by connecting people (*People make the difference*) across the globe (*Our Vision*) and ensure delivering customer value with passion (*Our Mission*).

Our core values of **Family**, **Integrity**, **Excellence**, **Innovation** and **Community**, are designed to enhance customer satisfaction, to unify our people, to interact with our vendors and to serve the community.

As a global company, we believe that "Corporate Responsibility" relates to the way in which an organization meet its wider economic, social, and environmental obligations towards all stakeholders (including employees, customers, suppliers, solution partners, and local communities). It includes, but is not limited to, [Code of Conduct](#), [Supplier Code of Conduct](#), Environmental Responsibilities, Health and Safety, Social Responsibilities, and Security.

It is our responsibility to conduct our business in accordance with applicable laws, rules and regulations, with honesty and integrity, in a manner which demonstrates respect for local cultural and ethnic customs, and with a strong commitment to the highest standards. We demand high standards of integrity and sound ethical judgment from our personnel at all times.

JAS Worldwide defines company objectives that encompass our 4 focus areas as per our QHSE & Sustainability triangle. As a company and a reliable partner in the logistics, we support continuous improvement of our processes and procedures to uplift our management systems and embrace change.



Our QHSE & Sustainability policy commitment prioritizes the well-being of our employees, customers, and communities by fostering a culture of safety, quality, operational excellence, and environmental responsibility. We recognize that our practices not only enhance our internal operations but also contribute positively to our external stakeholders, including our partners, customers, and the broader community. Our commitments include:

- **Human Rights Policy & Global Modern Slavery Policy** – We are committed to upholding human rights and preventing modern slavery and human trafficking in all our operations and supply chains.
- **Health, Safety and Security** – We recognize that safety and security are essential to the success of our business operations and are dedicated to maintaining an environment that promotes people's well-being and the protection of our physical and digital assets.
- **Workforce Empowerment & Equal Opportunity** – Our organization believes that a thriving workplace is essential to our success and are reflected in our core value: "People make the difference."
- **Environmental Policy** – Protecting the environment and minimizing our impact on it is a priority. We recognize that our business activities have an impact and are dedicated to conducting our operations in an environmentally responsible manner.
- **Sustainable Procurement Policy** – We are committed to conducting business with the highest levels of ethics, integrity, and social responsibility in our supply chain.

We believe that sustainable success is built on partnerships and close collaborations within the logistics ecosystem.

By effectively communicating with employees, customers, suppliers, and industry partners, we strive to ensure the understanding of our requirements, enhancing our collective ability to drive positive change. Our commitment to QHSE and Sustainability is continuously reinforced through regular training and awareness programs, transparent reporting, performance monitoring, adopting to industry best practices.

By adhering to this policy, we aim to create a safer, healthier, and more sustainable future for our organization and all those we serve.



Marco Rebuffi
CEO
JAS Worldwide Management, Inc.

JAS Worldwide, together with its affiliates (collectively, “JAS”), is committed to upholding and promoting human rights throughout our operations and supply chain. We recognize that our business activities have an impact on the communities in which we operate, and we are dedicated to ensuring that our policies and practices respect the dignity and rights of all individuals.

Along with our overarching Code of Business Conduct and Ethics, we have established the following human rights policies:

1. **Child Labor and Young Workers:** JAS prohibits child labor in any of our operations or supply chain. We comply with applicable laws and take measures to ensure that young workers are not subjected to hazardous or exploitative working conditions.
2. **Wages and Benefits:** We believe in fair compensation for all employees and contractors. We strive to ensure that wages are competitive relative to the industry. The wages we pay meet or exceed the local legal requirements and comply with all applicable wage, overtime and benefits laws and regulations. We provide benefits such as healthcare, retirement, and vacation time to eligible employees.
3. **Working Hours:** We recognize the importance of a work-life balance and strive to ensure that working hours are reasonable and in compliance with local laws and regulations. We do not require employees to work on holidays without their consent or work excessive overtime.
4. **Modern Slavery:** JAS strictly prohibits any form of slavery, servitude, forced or compulsory labor, or human trafficking. We take steps to ensure that our supply chain is free from such practices.
5. **Ethical Recruiting:** We are committed to ethical recruitment practices and prohibit the use of debt bondage. We ensure that all recruitment practices are transparent and in compliance with all applicable laws and regulations. To the extent that JAS sources staff through recruitment or employment agencies, we only use reputable agencies who maintain our same high standards.
6. **Freedom of Association and Collective Bargaining:** Where allowed by law, JAS prefers a model of direct engagement with its employees and seeks to treat its employees in such a way that each individual feels heard, respected, and treated fairly in all aspects of the employment relationship. We recognize the rights of employees to form and join unions or other worker organizations of their choice without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. JAS is committed to bargaining in good faith with such representatives.
7. **Non-discrimination and Harassment:** JAS does not tolerate discrimination or harassment of any kind, including race, sex, ethnicity, age, sexual orientation, gender identification or expression, religion, disability, national or social origin, or other status protected by applicable law. We strive to create a workplace culture that promotes respect.

8. **Women's Rights:** We are committed to promoting and protecting the rights of women in the workplace. We do not discriminate against women in any aspect of employment and provide equal opportunities for career advancement.
9. **Workforce Empowerment & Equal Opportunity:** Operating in over 50 countries, JAS is inherently multicultural and benefits from a diverse workforce. We value the perspectives our people bring and are dedicated to fostering a workplace culture that is welcoming, respectful, and supportive of all individuals. We promote equal opportunity across roles and strive to ensure every employee feels empowered to contribute, develop, and succeed.
10. **Rights of Minorities and Indigenous Peoples:** We respect the rights of all individuals and communities and are committed to ensuring that our operations do not infringe upon these rights. In line with this commitment, we recognize the importance of safeguarding the rights of minorities and Indigenous peoples, and we engage in meaningful consultation with them when our activities may affect their rights or interests. While we refer to specific groups where relevant, our policy is grounded in a universal respect for human rights, without prioritizing one group over another.
11. **Land, Forest and Water Rights and Forced Eviction:** JAS respects the land, forest, and water rights of local communities and indigenous peoples. We do not engage in forced evictions and take steps to ensure that our operations do not infringe upon the rights of local communities or indigenous peoples.
12. **Use of Private or Public Security Forces:** We recognize that the use of private or public security forces can have an impact on the human rights of individuals. We strive to ensure that any security forces engaged by our company or suppliers are trained and monitored to respect human rights and are in compliance with all applicable laws and regulations.

Implementation

To ensure the effective implementation of this policy, JAS will:

1. Provide training and raise awareness on human rights and this policy
2. Monitor and assess the impact of our activities on human rights and take remediate action to address adverse impacts.
3. Engage with stakeholders, including employees, customers, suppliers, and local communities, to promote respect for human rights.
4. Conduct due diligence to identify and address any actual or potential adverse human rights impacts associated with our business activities.
5. Review and update this policy periodically to ensure its continued effectiveness and relevance.

JAS is committed to promoting and respecting human rights in all of its activities and operations. We recognize that the protection and promotion of human rights is essential for sustainable development and long-term business success. We recognize that this is an ongoing process and will continuously work towards ensuring that our business practices reflect our commitment to upholding human rights and contributing to the well-being of our employees, customers, suppliers, and the communities in which we operate. This policy applies to all JAS employees, contractors, and suppliers worldwide.

JAS Worldwide, Inc., together with its affiliates (collectively, “JAS”), is committed to upholding human rights and preventing modern slavery and human trafficking in all our operations and supply chains. This policy is aligned with the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the requirements of FAR 52.222-50.

Definition of Modern Slavery:

Modern slavery is a broad term that encompasses various forms of exploitation, including forced labor, debt bondage, human trafficking, and child labor. JAS recognizes that modern slavery is a severe violation of human rights and is committed to eliminating it in all its forms.

Policy Objectives:

JAS’s Modern Slavery Policy aims to:

- Ensure compliance with the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the requirements of FAR 52.222-50.
- Identify and mitigate modern slavery and human trafficking risks in our operations and supply chains.
- Promote transparency and accountability regarding modern slavery and human trafficking risks.
- Provide training to employees on identifying and reporting modern slavery and human trafficking.
- Take appropriate action if modern slavery or human trafficking is identified in our operations or supply chains.

Due Diligence:

JAS will conduct due diligence to identify and mitigate modern slavery and human trafficking risks in our operations and supply chains. This will include:

- Conducting risk assessments of our operations and supply chains.
- Conducting audits and assessments of suppliers and contractors.
- Implementing controls to mitigate identified risks.
- Engaging with suppliers and contractors to promote responsible practices.
- Monitoring and evaluating the effectiveness of our due diligence measures.

Transparency and Reporting:

JAS is committed to transparency and reporting on modern slavery risks. We will:

- Publish an annual modern slavery statement and plan that complies with the requirements of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and FAR 52.222-50.
- Ensure our statement is publicly available and easily accessible.
- Include details of our due diligence measures, modern slavery risks identified, and actions taken to address them.

- Engage with stakeholders, including customers, investors, and civil society organizations, to share information and seek feedback on our approach to modern slavery.

Training and Awareness:

JAS will provide training and awareness-raising activities to employees to enable them to identify and report modern slavery risks. This will include:

- Providing training on the definition of modern slavery, its various forms, and the risks associated with it.
- Providing guidance on how to identify modern slavery risks and how to report them.
- Promoting a culture of reporting and whistleblowing.
- Providing support and protection to employees who report modern slavery risks.

Response and Remediation:

If JAS identifies modern slavery in our operations or supply chains, we will take appropriate action to address it. This may include:

- Taking immediate steps to prevent further harm and protect victims.
- Engaging with stakeholders, including suppliers, authorities, and civil society organizations, to address the issue.
- Implementing remedial actions to prevent similar incidents from occurring in the future.
- Providing support and remedy to victims of modern slavery.

Governance:

The responsibility for our modern slavery policy lies with the JAS Board of Directors, who are tasked with ensuring compliance with the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and the requirements of FAR 52.222-50, as well as the effective implementation of the policy.

Conclusion:

JAS is committed to upholding human rights and preventing modern slavery in all our operations and supply chains. We recognize that this is an ongoing process that requires continuous effort and improvement. We will regularly review and update our modern slavery policy to ensure that it remains effective and aligned with best practices. committed to upholding and promoting human rights throughout our operations and supply chain. We recognize that our business activities have an impact on the communities in which we operate, and we are dedicated to ensuring that our policies and practices respect the dignity and rights of all individuals.

JAS Worldwide, Inc., together with its affiliates and subsidiaries (“JAS Worldwide” or the “Company”), is committed to providing a safe and healthy workplace for all employees, customers, contractors, and visitors. We recognize that safety and security are essential to the success of our business operations, and we are dedicated to maintaining an environment that promotes the well-being of our workforce and the protection of our physical and digital assets. Our policy is to comply with all applicable health and safety laws and regulations, and this policy outlines our commitment to health, safety, and security and provides guidelines for fostering and maintaining a culture of safety within our organization.

1. Responsibility

It is the responsibility of managers and supervisors to ensure their employees are trained on appropriate safety procedures, and to provide necessary resources to maintain a safe work environment. JAS Worldwide will also provide training and resources to employees to support their understanding of health, safety, and security policies.

In addition, all employees, contractors, and visitors are responsible for following safety and security policies and procedures.

2. Management System

We are ISO 45001 certified – meaning that JAS Worldwide has implemented and maintains an occupational health and safety management system that meets the requirements of this standard as determined by an independent third-party accrediting certification body.

The ISO 45001 standard provides a framework for managing occupational health and safety risks and opportunities in the workplace. It is designed to help organizations improve the health and safety of their employees and reduce the risk of accidents and work-related illnesses.

ISO 45001 certification demonstrates JAS Worldwide’s commitment to maintaining a safe and healthy work environment and can enhance its reputation with customers, employees, and other stakeholders. It also can help organizations comply with relevant health and safety legislation and regulations.

3. Health

JAS Worldwide will strive to maintain a healthy work environment by:

- Providing workplace ergonomics, personal protection equipment and resources to minimize workplace injuries and illnesses.
- Training, consulting with and soliciting feedback from our employees on matters affecting their health and safety.
- Encouraging employees to report any illness or injury immediately to their supervisor or Human Resources representative as part of incident and accident management procedures.

- Implementing a wellness program that promotes healthy lifestyles and behaviors.

4. Safety

JAS Worldwide will strive to maintain a safe work environment by:

- Providing training to employees on safety policies and procedures, such as emergency preparedness, fire protection, and workplace safety.
- Identifying hazards and performing risk assessments to identify, assess, and minimize health and safety hazards associated with our activities and services.
- Conducting regular safety audits to identify potential hazards and addressing them promptly.
- Maintaining equipment and tools in good condition and ensuring they are used properly.
- Encouraging employees to report any safety concerns or near-miss incidents.

5. Security

JAS Worldwide will strive to maintain a secure work environment by:

- Implementing security measures to protect the physical and digital assets of the company.
- Providing regular training to employees on security policies and procedures.
- Conducting regular security audits to identify potential threats and addressing them promptly.
- Encouraging employees to report any security concerns or incidents.

6. Emergency Preparedness

JAS Worldwide will maintain an emergency response plan that includes procedures for responding to emergencies such as natural disasters, accidents, or security breaches. As part of its emergency preparedness, JAS Worldwide will:

- Consult with local health agencies and public safety authorities where required on any plans and ensure applicable regulations are adhered to.
- Provide training on emergency preparedness to ensure employees are knowledgeable about any plans in place.
- Periodically engage in emergency response drills and exercises to ensure employee engagement in this area.
- Identify and communicate to employees emergency escape routes, evacuation procedures, and provide safety personnel contacts and emergency contact information.

7. Compliance

JAS Worldwide will comply with all applicable health, safety, and security regulations and laws. We will monitor compliance with policies and procedures and take appropriate action if violations occur. Employees and suppliers are encouraged to report any health, safety, or security concerns to our 24/7 Ethics hotline where they will be addressed appropriately.

8. Communication

JAS Worldwide will communicate our health, safety, and security policies and procedures to all employees, contractors, and visitors. We will provide training and resources to support understanding and compliance with these policies.

9. Continuous Improvement

JAS Worldwide will continuously review and improve our health, safety, and security policies and procedures to ensure they remain relevant and effective.

JAS Worldwide is committed to promoting health, safety, and security for all employees, customers, and visitors. This policy outlines our commitment to maintaining a safe and healthy work environment and provides guidelines for implementing and maintaining a culture of safety within our organization.

At JAS Worldwide, Inc., together with its affiliates and subsidiaries (collectively, “JAS Worldwide”), we are committed to creating opportunities to thrive. Together.

This policy reflects our company’s purpose and our core value: *People make the difference*. We believe that a thriving workplace begins with our people. A wide range of experiences, perspectives, and backgrounds strengthens our ability to grow as a global organization. That’s why we are committed to building a workplace where every individual feels supported, respected, and empowered to succeed.

We strive to maintain an environment that promotes fairness, equal opportunity, and mutual respect, regardless of personal background, identity, or any characteristic protected by applicable laws. Our goal is to foster a culture where every team member can contribute meaningfully and grow professionally.

This commitment is embedded in our daily practices, leadership approach, and continuous improvement efforts. The **Workforce Empowerment & Equal Opportunity** is built on the following principles to support a strong, inclusive, and forward-looking work environment for all:

1. **Recruitment and Hiring:** We recruit and hire candidates based on their qualifications, skills, and experience, without regard to personal background, identity, or any characteristic protected by applicable laws. We are committed to creating a workplace that is fair and equitable, where all employees have equal access to opportunities for growth, employment decisions, including but not limited to recruitment, hiring, promotion, compensation, and training. We believe that the diversity of our employees enriches our workplace, promotes creativity and innovation, and enhances our ability to understand and meet the needs of our diverse customer base and the communities we serve.
2. **Training and Development:** We strive to provide training and development opportunities that support respectful collaboration, effective communication, and we encourage all employees to participate in these programs. We also offer training to help managers and supervisors understand and address unconscious bias and promote inclusivity in the workplace.
3. **Workplace Culture:** We strive to cultivate a workplace where all individuals feel respected, supported, and empowered to succeed. Our culture is built on open communication, mutual respect, and shared accountability across all levels of the organization. We have zero tolerance for discrimination, harassment, or any other behavior that undermines these values. We foster a culture of inclusion that encourages open communication, collaboration, and mutual respect among employees at all levels of the organization.
4. **Accommodations and Accessibility:** We provide reasonable accommodations to employees with disabilities to enable them to perform their job duties. We also strive to make our workplaces accessible to all employees and visitors, regardless of their physical abilities. We strive to identify and eliminate any barriers or biases that may prevent employees from reaching their full potential.

5. **Community Engagement:** We support meaningful engagement with the communities where we operate, guided by our values of shared responsibility. Through the Bruni Foundation, employees are encouraged to lead local volunteer initiatives and contribute to broader efforts that advance community resilience, climate adaptation, and progress on global development goals.
6. **Accountability and Continuous Improvement:** Led by our Human Resources team, we hold ourselves and all employees accountable for contributing to a respectful, fair, and supportive workplace. We expect every team member to treat others with dignity and uphold the values reflected in this policy. We provide clear channels for reporting concerns and regularly review our practices to ensure they align with our commitment to a thriving and equitable work environment.
7. **Leadership commitment:** Our company's leadership is committed to promoting these principles at all levels of the organization. We lead by example, demonstrating leadership behaviors, fostering a culture of fairness, access and employee well-being into our strategic planning, policies, and practices.

Policy Scope, Target & Review

This policy applies to all employees, contractors, and temporary workers across JAS Worldwide and serves as a foundation for our ongoing efforts to build a workplace where everyone has the opportunity to thrive. We believe that a workforce enriched by varied perspectives, experiences, and backgrounds is essential to our success as a global company.

As a qualitative target, we aim to foster employee well-being and belonging by integrating respect, fairness, and access into all people processes and policies.

This policy is reviewed annually by the Human Resources team to ensure its continued relevance and effectiveness. Feedback from employee engagement initiatives, internal observations, and best practices informs regular updates and ongoing improvement efforts.

We also expect our suppliers and industry partners to uphold similar principles of fairness, respect, equal opportunity, and workforce empowerment in their own operations.

JAS Worldwide, Inc., together with its affiliates and subsidiaries (collectively “JAS Worldwide”), is committed to protecting the environment and minimizing our impact on it. We recognize that our business activities have an impact on the environment and therefore, we are dedicated to conducting our operations in an environmentally responsible and sustainable manner. We will continue to be guided by our ambition to become a restorative enterprise, leave a positive impact everywhere we do business, and strive to minimize our negative impact on the environment.

Compliance with all Environmental Laws and Regulations: We will comply with all applicable environmental laws and regulations in the countries where we operate. This includes laws and regulations relating to air and water pollution, hazardous waste, and other environmental concerns.

GHG Emissions Reporting: We will measure and report our greenhouse gas (“GHG”) Scope 1-3 emissions regularly to identify opportunities for reduction and track our progress towards our emissions reduction targets. We measure and calculate our Scope 3 transport emissions via EcoTransIT World accredited by the Smart Freight Centre and Global Logistics Emissions Council (“GLEC”) frameworks.

Energy Efficiency: We will strive to improve energy efficiency in our own facilities, operations, and transportation by using energy-efficient technologies, equipment, and practices. We will endeavor to raise the awareness of our employees to environmental issues and promote sustainable practices in their daily activities.

Renewable Energy: We will seek to increase our use of renewable energy sources where we are able to identify opportunities to reduce our dependence on fossil fuels and mitigate our greenhouse gas emissions.

Decarbonization: We will strive to reduce our carbon footprint through a variety of measures, including identifying and engaging business partners who prioritize cleaner fuels and increasing the use of more energy-efficient assets of our core partners.

Water Quality and Consumption & Management: We will manage our water consumption responsibly, conserve water where possible, and ensure that any water we use is of the highest quality. We will also work to reduce our impact on local water resources. In 2023, JAS Worldwide and its philanthropic and charitable partner, The Bruni Foundation, have partnered with charity: water to provide clean and safe water to those in need in Mozambique and India.

Air Quality: We are striving to minimize our impact on air quality through measures such as reducing emissions from our services and facilities and identifying and promoting alternative more energy-efficient transportation options with our service providers.

Sustainable Resources Management: We will seek to use natural renewable resources, such as wood and paper, responsibly and in a sustainable manner, and work to reduce our reliance on non-renewable resources.

Waste Reduction: We will strive to reduce our waste generation and promote the use of sustainable packaging materials in our supply chain. We will also focus on waste reduction initiatives, such as circularity and recycling programs, to minimize the amount of waste sent to landfills.

Reuse and Recycling: We will promote the reuse and recycling of materials to conserve natural resources and reduce our waste generation.

Biodiversity, Land Use, and Deforestation: We will work to find opportunities to protect biodiversity and reduce the impact of our operations on ecosystems and habitats. We will also promote responsible land use practices and avoid deforestation.

Soil Quality: We will promote responsible soil management practices to conserve soil health and prevent soil degradation.

Noise Emissions: We will seek to minimize our impact on local noise levels through measures such as maintaining equipment and facilities properly and reducing the use of noisy equipment where possible.

Stakeholder Engagement: We will engage with our stakeholders, including customers, suppliers, and employees, to encourage their participation and support in achieving our environmental objectives and targets. Our supplier selection will be based not only on quality and competitive pricing of their products and/or services, but also in their adherence to principles of good environmental stewardship.

Responsibility for Implementation: The JAS Worldwide QHSE & Sustainability team is responsible for driving the implementation of this Environmental Policy across the organization. This includes coordinating environmental initiatives, monitoring progress, ensuring compliance with applicable environmental standards, and overseeing our climate commitments.

As part of our Net Zero strategy, JAS Worldwide is committed to reducing absolute greenhouse gas emissions across Scope 1, 2, and 3 by 90% by 2050, in alignment with the Science Based Targets initiative (SBTi). The QHSE & Sustainability team is accountable for tracking these targets and ensure the policy remains aligned with evolving environmental regulations, stakeholder expectations, and our long-term sustainability goals.

This Environmental Policy applies to all JAS Worldwide operations and employees and will be reviewed periodically to ensure its continued relevance and effectiveness.

At JAS Worldwide, our purpose is to **Create Opportunities to Thrive. Together.** As a global logistics leader, we are committed to sourcing goods and services in ways that support a fair, carbon-net-zero, future. This policy outlines our approach to embedding sustainability into procurement practices, aligned with our corporate vision and responsibility to future generations.

This policy is anchored in the principles of the **JAS Supplier Code of Business Conduct and Ethics** and supports its implementation across our global supplier network.

Scope: Applies globally to all suppliers, subcontractors, and partners providing goods or services to JAS Worldwide.

Our Commitments:

JAS strives to:

- Conducting sustainability risk analysis across our supplier base
- Performing supplier assessments on environmental, social, and ethical practices
- Implementing on-site audits focused on environmental or social issues
- Providing training for buyers on social and environmental risks in the supply chain
- Driving supplier capacity building, including training, guidance, and corrective action plans
- Engaging with businesses owned by minorities or vulnerable groups in our supply chain
- Maintain an external whistleblowing hotline for anonymous reporting
- Engage suppliers in climate action, including target-setting and decarbonization initiatives

Voluntary Engagement Target: *By 2030, suppliers representing 80% of our upstream transportation and distribution emissions will have set science-based targets (SBTs) aligned with climate science.*

Supplier Engagement and Expectations:

We expect our suppliers to:

- Comply with the JAS Supplier Code of Conduct, covering: Legal compliance, Labor Rights and Human Rights, Environmental Sustainability, Ethics and Integrity, Diversity and Inclusion.
- Complete ESG (Environmental, Social, Governance) assessments to promote transparency
- Participate in audits, feedback loops, and improvement activities
- Take steps to identify and mitigate ESG risks within their operations and supply chains

Governance & Accountability

The QHSE & Sustainability oversees this policy and promotes the integration of ESG performance into sourcing decisions. While participation in sustainability initiatives is encouraged, JAS reserves the right to reassess or potentially end its business relationship with any supplier that fails to align with the principles outlined in the JAS Supplier Code of Business Conduct and Ethics.

Together, we are creating opportunities and building sustainable supply chains for people and planet to thrive.