



ETICAL GUIDELINES

JCP is an agency that specialize in media and communication who supplies events, merchandising, advertising, event trips, PR and digital solutions. JCP use their cross expertise to create brave and creative solutions to engage – we call it Captivate People.

This guideline is for the following companies:

- Just Cruzin' Production AS
- JCP Prad AS
- JCP Travel AS
- JCP Arena AS
- Retail Factory AS

JCP work across a sector that is highly influenced by experiences and social interaction. The nature of our work occasionally requires close relations with existing and potential suppliers and clients. This interaction will usually be classified as what you would normally call “customer care”, but we also have to be aware that certain “advantages” can be offered by subcontractors for choosing them. These “advantages” could be received in the form of gifts, prizes, free overnight stays/ trips, discounts etc.

As to make sure that there is no doubt as to what is expected of all our employees, JCP have made some ethical guidelines based on our values;

PROUD, AMBITIOUS, PLAYFUL & PROFESSIONAL

1.Purpose

The purpose with JCP’s ethical guidelines is to create a set of frames for what we experience as ethical and correct behaviour. These guidelines is meant to make clear the divide between legal customer care and unethical and illegal behaviour.

2.Who will be affected by the ethical guidelines?

Any person who takes on work on behalf of JCP commits to follow the guidelines as they stand in this document when acting on behalf of the company. In addition to full and part time employees, these guidelines also affects members of the boards, substitutes, agents, freelancers and others working on behalf of JCP.

All affected staff should sign that they have received and understood JCP’s ethical guidelines.

3. General guidelines

Employees are to perform tasks to the best of their professional and ethical ability, and act in the best interest of JCP reputation and interests in all contexts.

Employees are not to take “the easy way out”, but to go the extra mile to ensure jobs are completed in the most professional manner.

All types of financial crime, hereunder corruption, influenced trade, and whitewashing is all illegal and is not accepted within JCP.

Employees of JCP shall comply to all relevant rules and regulations regarding business and trade. It is illegal to exchange illegal pricing and market information, or to make illegal agreements that are limiting competition with competitors and other business relations.

Employees are to follow instructions from their superiors, as long as these instructions are not forcing the employee to act illegal or unethical.

The requirements included in these ethical guidelines are what we consider to be of a minimum, and JCP is to follow existing rules and regulations. This includes both Norwegian and foreign rules and regulations if a job is underdone abroad. It is the employees responsibility to make sure the rules and regulations are adhered to.

If you as an employee is unsure what to do, ask yourself the following questions:

1. Is it legal?
2. Is it necessary?
3. Should I do it?
4. Is this something I can tell other people about?
5. Is it ok if this ends up on the frontpage of the newspapers?

If your answer is “no” to any of the questions above, a discussion with the nearest leader should take place before a decision is made on the matter.

If there is any doubt on how these guidelines should be understood, practiced or how an employee should relate to any certain situation, this should be discussed with the nearest leader.

4. Guidelines for ethical trade

JCP will contribute and promote safe work- and environmental conditions in our supply chain. JCP`s ethical trade guidelines are based on key UN and ILO conventions and documents. The content of JCP`s guidelines sets minimum and not maximum standards. National legislation must be compliant. Where the guidelines and national laws or regulations deal with the same theme, the highest standard shall apply. All suppliers to JCP are expected to follow these guidelines:

4.1 Forced labor / slave labor (ILO Conventions No. 29 and 105)

4.1.1 There shall be no form of forced labor, slave labor or involuntary work.

4.1.2 Workers may not provide a deposit or identity document to the employer and shall be free to terminate their employment with reasonable notice.

4.2. Professional organization and collective negotiations (ILO Conventions 87, 98 and 135 and 154)

4.2.1 Employees shall, without exception, be entitled to join or establish unions of their choice and to negotiate collectively.

4.2.2 The employer shall not discriminate against union representatives or prevent them from performing their union work.

4.2.3 If these rights are limited by law, the employer shall facilitate and, in any event, prevent parallel mechanisms for free and independent organization and negotiation.

4.3. Child labor (UN Convention on the Rights of the Child, ILO Conventions 138, 182 and 79, ILO Recommendation No. 146)

4.3.1 Children under the age of 18 years shall not perform work that endangers health or safety, including night work.

4.3.2 Children under 15 years (14 or 16 years in certain countries) shall not perform any work that may cause harm to their education.

4.3.3 New recruitment of child labor in violation of the above conventions is unacceptable. If such child labor is already taking place, there will have to be phased out and terminated. At the same time, it is to be ensured that the children are given the opportunity for life and education until the child is no longer in school age.

4.4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Gender Equality)

4.4.1 There shall be no discrimination in working life based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.4.2 Protection against sexually intrusive, threatening, abusive or exploitative behavior must be established and against discrimination or termination on unfair grounds, eg. marriage, pregnancy, parental status or health situation.

4.5. Brutal treatment

4.5.1 Physical abuse or punishment, or threat of physical abuse, is prohibited. The same applies sexual- and other forms of abuse, and various forms of humiliation.

4.6. Health, Safety and Environment (ILO Convention No. 155 and Recommendation No. 164)

4.6.1 It shall be ensured that the workers are provided with a safe and healthy working environment. Necessary measures must be taken to prevent and minimize accidents and health damage as a result of, or related to, workplace conditions.

4.6.2 Workers must have regularly and documented health and safety training. Health and safety training must be repeated for new employees.

4.6.3 Workers shall have access to clean sanitary facilities and clean drinking water. If relevant, the employer should also provide access to facilities for safe food storage.

4.6.4 If the employer makes a lodging, this must be clean, safe and sufficiently ventilated and with access to clean sanitary facilities and clean drinking water.

4.7. Salary (ILO Convention No 131)

4.7.1 Wages to workers must be at least in line with national minimum wage regulations or industry standards, and always sufficient to meet basic needs.

4.7.2 Salary and payroll pay shall be agreed in writing before work commences. The agreement shall be understandable to the employee.

4.7.3 Deduction in salary as a disciplinary reaction shall not be allowed.

4.8. Working hours (ILO Conventions 1 and 14)

4.8.1 Working hours shall be in accordance with national laws or industry standards, and shall not exceed working hours in accordance with applicable international conventions.

4.9. Regular appointments

4.9.1 Commitments to workers, in accordance with international conventions and / or national laws and regulations on regular employment, shall not be circumvented through the use of short-term commitments (such as the use of contract workers, loose workers and day workers), subcontractors or other employment relationships.

4.9.2 All workers are entitled to a contract of employment in a language they understand.

4.9.3 The learning program must be clearly defined in terms of duration and content.

4.10. Marginalized populations

4.10.1 The production and the withdrawal of raw materials for production shall not contribute to destroy resource and income grounds for marginalized populations, for example by seizing large land areas or other natural resources that these population groups depend on.

4.11. Environment

4.11.1 Environmental measures are assessed throughout the production and distribution chain, from production of raw material to sales. Both local, regional and global environmental aspects

should be taken care of. The local environment at the place of production should not be exposed to excessive use or harmed by polluted.

4.11.2 National and international environmental legislation and regulations must be followed.

4.11.3 Relevant emission permits have been obtained where necessary.

4.11.4 Harmful chemicals and other substances must be managed in a proper manner.

5.Conflicts of interest

Employees of JCP should not be employed, work for or be on the board of any competing business, client or supplier. All other involvements and directorships is to be cleared in a written format from the employees nearest leader.

No Employees is to be involved or take part in negotiations with business relations if he, or any of his near relations (spouse, children, parents, close friends etc.) have any relation or other financial interest in the company in which negotiations are taking place.

If a conflict of interest should occur, the employee is bound to warn its nearest leader by its own initiative.

6.Relationships with business partners

JCP is committed to always behave in a professional manner in relations to clients, suppliers and competitors.

Clients are to be greeted in a positive and enthusiastic manner. What is best for the client, is what is best for JCP. We are committed to respect our clients budgets, and are willing to go the extra mile to ensure we get our clients best value for money.

Our suppliers are to be treated in a fair and open manner. JCP's employees are not to take advantage of their position to attain personal deals and advantages with suppliers. Deals with suppliers and third parties who undertake work for JCP amounting 50.000NOK or more is to be signed off by the employees nearest leader.

Deals amounting over 100.000NOK or more is to be sent out to tender, if possible, to at least three parties. All agreements are to contain a clause where the respectful parts commits to familiarise themselves with, and comply to JCP's ethical guidelines.

Competitors of JCP shall be treated and discussed in a respectful manner.

Written agreements shall be made with substantial clients, suppliers and other business relations. These agreements are to be signed off and signed by the management of JCP.

All payments and transfers are to be made payable via bank transfers and to be documented with a receipt.

7. Gifts and Representation

7.1. Gifts and representation of JCP:

Offers of gifts or offers by any means to existing and potential clients, suppliers and/ other business relations and third parties, are to be signed off by the management of JCP.

The management is to decide whether the gift/ representation can be understood as unreasonable based on the value and the relevance of the gift/ representation in the given situation.

The representation is to have a relevance to the situation and is not to exceed industry norms.

JCP is never to offer gifts or representations pre- or during a negotiation process where the intention would be to influence the decision maker, or to achieve other personal favours.

Gifts and representations should preferably be offered to the business as such and not to individuals.

If such gifts or representations are offered, a consideration towards the business relations own ethical guidelines is to be made. Such gifts and representations is to be reported to the management, which in turn is responsible to send a report to JCP's gifts register.

7.2 Gifts and representations from business relations:

JCP's regulations on gifts and representations from business relations also includes gifts and representations offered the relevant employee if the offer is based on a relation to JCP.

Gifts- also including offers of heavily reduced goods and services, from existing or potential clients, suppliers and other business relations and third parties is not to be accepted if these, in the duration of a calendar year, is exceeding an estimated value of NOK 500,- or exceeds industry norms.

Received samples and tests products is to be handed over to the nearest leader who is to decide how JCP will use these.

Where certain cultural expectations dictates a rejection of a gift to be rude or insulting, and an acceptance of such gifts is the local norm, the gift is to be accepted and handed over to JCP upon return. Gifts in the form of money is never to be accepted.

Offers of representation, including travels, hotel stays, restaurant visits, invitations to events (eg. Concerts or sports events) and seminars are all to be signed off by the management.

The management determines whether the representation can seem unreasonable based on a solid evaluation of the value of the representation, the purpose of the invitations, whether a reciprocity action is expected, whether the invitation is aimed at JCP or a specific person, whether professional content of a certain quality and relevance, whether the representation is relevant to JCP's business, hereunder if a representation has a necessary link to quality control of events or facilities used by JCP in business terms.

All relating costs occurred to above representation is to be covered by JCP. Private expenses is to be covered personally. Bringing a companion to such events is not accepted, unless the costs are covered by the employee or the companion.

All gifts/ benefits is to be reported to the nearest leader, who then is responsible to register the gift/ benefit to the gift register

8.Reporting on financial and non financial information

Public information about JCP is to be reported from the management only, or in agreement with the management. JCP is to always report the correct and accountable information, hereunder both financial and non financial information both internally and externally.

9.Loyalty

9.1 Confidentiality

All people undertaking work for JCP have a confidentiality agreement based on sensitive information in business- or personal terms, which the person have been presented with during their work for JCP, through JCP's business partners or JCP's clients. This information is to be held confidential in relation to existing rules and regulations.

The confidentiality agreement applies upon a working relationship has ended. The party commits to refrain from using any business related information (trade secrets) eg sales strategies etc , acquired during work undertaken at JCP, and commits to keeping it confidential.

9.2 Reporting and cautioning

Employees commits to report on conditions, errors or omissions causing danger to life and health, harassment and discrimination occurred to any employees in the company.

The employee has the right to report on critical conditions in the business relating to the Norwegian working environment act (arbeidsmiljøloven) §2- 4. Its encouraged to report on other conditions and events where JCP's ethical guidelines have not been followed.

It is "ok" to make mistakes, whereas it is not ok to hide mistakes.

Retaliation aimed at an employee who reported in compliance to §2-4 is forbidden. If information is presented which is makes it reasonable to believe a retaliation towards the employee have taken place in relation to this first section, it will be assumed that such a retaliation have taken place unless the employer substantiates otherwise.

Reports and cautions can me made to the management.

10. Personal conduct

10.1 Use of the company's equipment and assets:

Equipment made available for work purposes by JCP (E.g mobile phone and PC/ Mac) can also be used for private purposes as long as this use is not in hindrance to work.

Personal use of this equipment, facilities or other equipment is to be signed off by the management.

JCP's equipment is not to be used for illegal downloads or streaming of copyright material or any other illegal or inappropriate material, including pornography.

10.2 Social media:

JCP encourage the use of social media when this is appropriate and in relation to the given employees work. Use of social media for personal purposes during work hours is not accepted.

People's rights for privacy must be taken in to consideration when using social media for work purposes. Publishing images of people or other personal information online should be done with caution.

10.3 Media:

Statements to the media should not be made until this has been cleared and signed off by the management. When approaching media, the employee is to revert to the management.

10.4 Intoxication:

JCP is operating with a zero tolerance to abusing narcotic substances at work. JCP also encourage employees to withstand from the abuse of such substances privately, but we will offer help and support if such abuse becomes a problem privately.

Employees are under no circumstance appear intoxicated whilst at work or in any other contexts with clients or other business relations.

11. The work place:

JCP commits to comply with relevant labour laws and regulations. JCP commits to always use registered and legal labour, and JCP shall actively counteract the use of social dumping.

JCP commits to be a workplace where everyone feels included. All forms of harassment and discrimination based on race, sex, age, religion, sexuality etc shall be prevented.

JCP is actively working to be environmentally friendly, and comply to all relevant demands and duties related to environmental legislations.

12.Sanctions

Any behaviour contradicting to these ethical guidelines will be followed up by JCP, and can for the employee result in consequences such as vocal or written warnings, resignation or dismissal.

All types of financial crimes undertaken by an employee, hereunder corruption and influenced trade, and other illegal actions will be reported to the police, and can lead to criminal charges and/ or other consequences.

This version of Code of Conduct has been review and revised January 6th 2023