

Code of Conduct

JEL Products B.V. Version 2.0, 22 September 2026. This version replaces version 1.0 of 11 July 2025 (manual section A8) in its entirety. Next review: September 2027.

1. Purpose and scope

This Code of Conduct sets out the ethical, social and environmental standards that guide all operations of JEL Products B.V. It applies to all employees, directors, suppliers, subcontractors and business partners. We conduct business with integrity, fairness and responsibility, so that our products contribute positively to people, the environment and our customers' success. Where a customer's supplier code sets a stricter standard, we apply that standard.

2. Compliance with laws and regulations

JEL Products complies with all applicable national, European and international laws, regulations and standards, including but not limited to:

- Dutch and EU legislation on health, safety, labour and the environment;
- EU sanctions regulations and export control rules, including Regulation (EU) 2021/821 on dual-use items;
- The UK Modern Slavery Act 2015, the EU Forced Labour Regulation (EU) 2024/3015 and comparable international human rights frameworks;
- REACH, RoHS, WEEE, CE marking and product safety regulations;
- The General Data Protection Regulation (GDPR).

We expect all suppliers and partners to do the same.

3. Ethical business practices

We conduct our business honestly, transparently and professionally.

- No bribery or corruption: we do not offer, request or accept bribes, gifts, hospitality or facilitation payments intended to obtain or retain business or any improper advantage, directly or through intermediaries.
- Fair competition: we compete on product quality, performance and service. We make no price or market agreements with competitors and reject unfair or misleading practices.
- Conflicts of interest: employees and representatives avoid personal interests that conflict with those of JEL Products or its customers, and disclose them when they arise.
- Accurate records: financial and operational records are complete, accurate and truthful, so that every payment can be traced.
- Confidentiality: information received in confidence from customers, suppliers or partners is protected and used only for the purpose for which it was provided.

4. Sanctions and export control

We do not supply goods or services to persons, organisations, vessels or countries on the sanctions lists of the European Union, nor to parties acting on their behalf. Deliveries outside the European Union are screened in advance against the applicable EU, UK and US sanctions rules. We do not source from sanctioned suppliers or from suppliers owned or controlled by sanctioned parties. Our products are not dual-use items; we verify this whenever the product range or the regulations change.

5. Product integrity and quality

As a specialist in engineered lighting solutions, JEL Products ensures that:

- All products meet the agreed specifications and safety requirements;
- Production and service activities are managed through a certified ISO 9001 quality management system;
- Materials and components comply with the applicable European standards and directives;
- Product documentation, user instructions and certifications are complete and accurate;
- We claim no certificate, approval or performance we do not hold. If a specification requires something we cannot supply, we say so before the order is placed, even if it costs us the order;
- Every luminaire is registered by serial number, so that warranty and spare parts remain traceable throughout its life.

6. Health, safety and working conditions

The safety and well-being of our employees, customers and subcontractors come first. JEL Products maintains a certified VCA** safety management system and works towards continuous improvement.

- We provide a safe and healthy workplace and take proactive measures to prevent accidents and occupational illness.
- All employees receive appropriate safety training and personal protective equipment.
- On customer sites we work within the site rules and the permit-to-work system of the customer. Unsafe work is stopped, even if it costs time or money.
- Subcontractors must meet equivalent safety standards when working on JEL sites or customer premises.
- The use of drugs or alcohol during work is strictly prohibited.
- Incidents and near misses are reported and discussed so that we learn from them.

7. Human rights and labour standards

JEL Products respects and supports internationally recognised human rights and fair labour principles. We:

- Prohibit child labour, forced labour and human trafficking in our own operations and in our supply chain;
- Uphold freedom of association and the right to collective bargaining;
- Provide equal opportunities regardless of gender, ethnicity, religion, age, disability, sexual orientation or background;
- Pay fair wages and maintain reasonable working hours;
- Treat all employees and partners with dignity and respect.

Suppliers and subcontractors are expected to uphold the same standards, to confirm this in writing on request and to cooperate with reasonable verification.

8. Environmental responsibility

JEL Products recognises its responsibility to minimise environmental impact throughout its operations.

- We comply with all applicable environmental laws and regulations, including RoHS, REACH and WEEE.
- We design luminaires for long life, energy efficiency and repairability: a driver or lens is replaced, not the whole luminaire.
- We take back end-of-life luminaires of our own supply for responsible processing.
- In every lighting design we limit obtrusive light to the surroundings and the energy use per light point.
- We align our practices with the principles of ISO 14001, although we are not certified against that standard.
- Suppliers are encouraged to demonstrate environmental responsibility in their own operations.

9. Sustainable procurement

Our procurement decisions are based on quality, reliability, service, price and sustainability performance. We expect suppliers and subcontractors to:

- Adhere to the principles of this Code of Conduct;
- Comply with laws on health, safety, labour, the environment and sanctions;
- Be transparent about their own supply chains and sourcing practices, including the country of origin of the goods they supply;
- Cooperate with audits and information requests where necessary.

10. Data protection and information security

We protect the privacy and integrity of all personal and business data entrusted to us.

- Personal data is collected and used only for legitimate business purposes and no longer than necessary.
- Access to information is restricted to authorised personnel.
- Our processes comply with the General Data Protection Regulation.
- Confidential information is never shared with third parties without permission.

11. Reporting misconduct

Employees, partners, suppliers and customers who suspect a violation of this Code or of the law are encouraged to report it to the management of JEL Products via administratie@jelproducts.nl or +31 33 785 9809. Reports are handled confidentially and without retaliation against anyone who reports in good faith. Every report is investigated and the reporter is informed of the outcome.

12. Implementation and review

This Code of Conduct is maintained and reviewed annually by the management of JEL Products B.V. All employees and key suppliers are informed of its contents and are expected to act accordingly. Suppliers may be requested to sign the acknowledgement on the last page or to demonstrate compliance in another way.

13. Approval

Approved by the management of JEL Products B.V. Version 2.0, dated 22 September 2026, replaces version 1.0 of 11 July 2025.

Approved on behalf of the shareholders of JEL Products B.V.

L. de Graaf, Technical Director

J. de Graaf, General Director

Nijkerk, 22 September 2026

This document is issued as a typed statement and is valid without a handwritten signature. A hand-signed copy can be provided on request to your organisation via administratie@jelproducts.nl.

Supplier Acknowledgement

We hereby acknowledge receipt of the JEL Products B.V. Code of Conduct, version 2.0, and confirm our commitment to operate in accordance with its principles, including the requirements on sanctions, human rights in the supply chain and transparency about the country of origin of the goods we supply.

Item	To be completed by the supplier
Supplier	
Registered address	
Registration number	
Name and title of signatory	
Date	

Signature of the supplier

Signed for the supplier, name and date as stated above

Please return the signed acknowledgement to administratie@jelproducts.nl.