

JTEC INDUSTRIES, INC.

Supplier and Business Partner Code of Conduct

Version 1.2 — Effective September 29, 2026

Jtec Industries, Inc. (“Jtec,” “we,” or “our”) designs, manufactures, and supplies material handling solutions, including autonomous mobile robots (“AMRs”), AMR management software, and related integration, installation, commissioning, training, and support services. This Code of Conduct (“Code”) describes the standards Jtec holds itself to, and requires of its own subcontractors and sub-suppliers, in the conduct of its business, including business conducted with or on behalf of Jtec's customers and other business partners.

This Code is intended to reflect internationally recognized ethical business standards — including the principles reflected in the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises — tailored to Jtec's actual scale and operations as a domestic manufacturer. Jtec makes this Code available to customers and other business partners who require evidence of a comparable code of conduct in lieu of signing a customer-specific supplier code, and it may also be submitted as a Supplier Replacement Code or equivalent under a specific customer agreement where that agreement permits substitution of a comparable code.

As used in this Code, “Jtec Personnel” means Jtec's employees and contingent workers, and “Subcontractor” means any subcontractor or sub-supplier that Jtec engages to support its business operations. Jtec commits to the standards in this Code in its own operations, and commits to take reasonable steps to cause its Subcontractors to operate consistently with this Code with respect to the goods, materials, or services they provide in support of that business. Jtec further requires its Subcontractors to take reasonable steps to pass on standards consistent with this Code to their own suppliers, so that the principles in this Code are reasonably carried forward along Jtec’s supply chain.

At a minimum, Jtec and its Subcontractors will comply with the laws, rules, and regulations of the jurisdictions in which they operate. Where this Code sets a higher standard than applicable law, Jtec will adhere to the higher standard. This Code supplements any written agreement between Jtec and a customer or other business partner, and in the event of any conflict between this Code and the terms of that agreement, this Code will govern.

This Code is organized into eight sections: a CSR/Sustainability Statement, Section A (Ethics and Standards of Conduct), Section B (Human Rights and Labor), Section C (Health and Safety), Section D (Environmental), Section E (Data Protection and Privacy), Section F (Compliance Management Process), and Section G (Reporting Concerns; Engagement with Business Partners).

CSR / SUSTAINABILITY STATEMENT

Jtec is committed to conducting its business in a manner that supports responsible environmental, social, and governance (“ESG”) practices appropriate to its size and operations as a domestic manufacturer. This statement summarizes Jtec’s current sustainability commitments and practices; it is not currently

prepared in accordance with the Global Reporting Initiative (GRI) or another globally recognized reporting framework, and Jtec will consider adopting such a framework as the scale of its operations and stakeholder needs warrant. Jtec's current sustainability commitments include: (a) the human rights, labor, health and safety, business ethics, and environmental standards set out in Sections B through D of this Code, including Jtec's identified environmental and human rights risks and the measures Jtec has taken to address them; (b) the identification and management of sustainability-related risks through the compliance process described in Section F; and (c) the waste reduction, recycling, and energy efficiency practices described in Section D, including Jtec's uncertified environmental and energy management practices. Jtec reviews and updates this statement periodically as its sustainability practices evolve.

SECTION A — ETHICS AND STANDARDS OF CONDUCT

Jtec conducts business with integrity and holds itself and its Subcontractors to the following standards:

1. Business Integrity

Jtec does not engage in corruption, misrepresentation, extortion, embezzlement, or bribery in connection with its business. Records Jtec prepares in the course of its business, including invoices, work records, and expense reports, are accurate, truthful, and complete.

2. Anti-Corruption and Anti-Money Laundering

Jtec complies with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, and applicable export control and trade sanctions laws, including the U.S. Export Administration Regulations. Jtec does not source goods or services from any entity or individual identified on an applicable U.S. denied-party or restricted-party list, or from any country subject to comprehensive U.S. trade sanctions. Jtec is committed to complying with applicable international treaties and agreements concerning the non-proliferation of nuclear, chemical, and biological weapons and missile technology, to the extent applicable to its business.

Jtec also complies with applicable anti-money laundering laws and regulations in the jurisdictions in which it operates, and does not knowingly participate in the placement, layering, or integration of funds derived from illegal activity into the legitimate financial system. Jtec takes commercially reasonable steps to know the identity of the customers and business partners with whom it transacts, and does not accept cash or cash-equivalent payment for its products or services outside the ordinary course of business.

3. Business Courtesies

Jtec competes for and performs business on the merits of its products and services. Jtec Personnel do not offer or accept gifts, entertainment, or other business courtesies intended to improperly influence a business decision, and never offer or accept cash or cash-equivalent gifts in connection with a customer or business partner relationship.

4. Fair Competition

Jtec complies with applicable antitrust and fair competition laws. Jtec does not enter into discussions or agreements with competitors concerning pricing, bids, or market allocation, and does not use a

customer's or business partner's name, logo, or reference that relationship in advertising, marketing, or promotional materials without that party's prior written approval.

5. Protection of Property, Information, and Intellectual Property

Jtec exercises reasonable care with any customer or business partner property, equipment, funds, confidential information, or intellectual property in its possession in connection with a business relationship, and promptly reports any suspected or actual misuse, theft, or unauthorized disclosure of such property or information. Jtec likewise expects any customer or business partner in possession of Jtec's own confidential information, know-how, trade secrets, or intellectual property to protect it with comparable care and to use it solely for the purposes for which it was disclosed.

6. Substance-Free Work

Jtec Personnel do not perform work while under the influence of alcohol or any substance that impairs the ability to work safely, and do not possess illegal drugs or controlled substances while on a customer's premises or while conducting business on Jtec's behalf, except for legally obtained medication used as directed.

7. Conflicts of Interest

Jtec Personnel disclose to Jtec any personal, financial, or other interest that could reasonably be expected to compromise their objectivity or Jtec's obligations to a customer or business partner. Jtec will disclose to the affected customer or business partner any conflict of interest involving that relationship that Jtec identifies.

8. Product Compliance

Jtec designs, manufactures, and provides Jtec's products and services in compliance with applicable product safety, quality, and regulatory standards, and does not knowingly engage in illegal or unethical conduct in the sourcing, manufacturing, sale, or distribution of Jtec's products and services.

9. Artificial Intelligence

Where Jtec develops or uses any Jtec AI-enabled products or tools, including artificial intelligence functionality incorporated into Jtec's products or software, Jtec does so with attention to transparency, data quality, and applicable legal and regulatory requirements, and monitors the performance of such tools as appropriate to their intended use.

10. Disclosure of Information

Jtec provides accurate and timely information to customers, business partners, regulators, and other stakeholders in connection with its products, services, and business operations, and does not knowingly withhold, misrepresent, or improperly restrict information that it is legally or contractually obligated to disclose. Jtec maintains internal controls reasonably designed to ensure that financial and operational information it discloses is complete, accurate, and prepared in accordance with applicable accounting standards and regulatory requirements.

11. Counterfeit Parts

Jtec sources components and materials only from reputable, qualified suppliers and does not knowingly purchase, use, or supply counterfeit, unauthorized, or non-conforming parts in its products. Jtec maintains reasonable supplier qualification and incoming-inspection practices designed to detect and prevent the introduction of counterfeit parts into its supply chain, and requires its Subcontractors to apply equivalent safeguards with respect to components supplied in support of Jtec's business.

SECTION B — HUMAN RIGHTS AND LABOR

Jtec supports and respects the protection of internationally recognized human rights and is not complicit in human rights abuses. Jtec upholds the following labor standards in its own workforce (approximately 115–130 direct employees plus contingent workers) and requires its Subcontractors to do the same:

1. Child Labor & Young Workers

Jtec does not use labor by any person younger than the age for completing compulsory education, younger than age 15, or younger than the minimum legal age for employment, whichever is highest. Where local law stipulates a higher age limit, Jtec follows that higher limit. Jtec does not assign anyone younger than 18 to hazardous work, as defined by applicable law. For any Jtec Personnel younger than 18, Jtec limits work to hours and conditions permitted by applicable law, does not schedule such personnel for night work, and ensures their work does not interfere with their education. Jtec requires its Subcontractors to apply equivalent protections to any young workers engaged in work supporting Jtec's business.

2. Modern Slavery

Jtec does not use forced, bonded, indentured, or involuntary prison labor, or any other form of modern slavery or human trafficking, in any part of its operations or its Subcontractors' operations. Jtec does not require Jtec Personnel to lodge deposits of money, or to surrender original identification documents, passports, or educational certificates, as a condition of employment. Jtec Personnel are free to terminate their employment upon reasonable notice, and Jtec does not charge Jtec Personnel or job applicants recruitment fees or other costs of obtaining employment; where a third-party recruiter is used, Jtec requires that any such fees be borne by Jtec, not the worker. Jtec follows ethical recruiting practices, including verifying candidates' identity and eligibility to work, providing accurate information about the terms of employment before hiring, and using only reputable, licensed recruiters or staffing agencies. Jtec requires its Subcontractors to uphold equivalent standards against forced labor, debt bondage, human trafficking, and unethical recruiting practices in their own operations and supply chains.

3. Freedom of Association

Jtec complies with applicable law governing employees' rights to join, or refrain from joining, worker organizations and to bargain collectively, and does not tolerate discrimination against any employee who exercises those rights.

4. Non-Discrimination

Jtec does not discriminate on any basis prohibited by applicable law, including race, color, religion, age, sex, pregnancy, sexual orientation, gender identity, national origin, disability, marital status, citizenship, or veteran or military status. Jtec likewise prohibits harassment of any kind, including sexual harassment and

harassment based on any characteristic protected by applicable law, and maintains a reporting procedure through which Jtec Personnel may raise harassment concerns without fear of retaliation.

5. Wages and Working Hours

Jtec complies with all applicable federal and state wage and hour laws, and any applicable collective bargaining agreements, including as to minimum wage, overtime, breaks, leaves, and legally mandated benefits, for its own workforce. Jtec requires its Subcontractors to comply with equivalent wage and hour standards with respect to work performed in support of Jtec's business.

6. Rights of Minorities, Indigenous Peoples, and Local Communities

Jtec respects the rights of minorities, consistent with the non-discrimination protections set out in Section B.4 above. Jtec's current operations do not involve activities on or affecting lands traditionally owned or used by indigenous peoples or other local communities. If Jtec's operations later involve such activities, Jtec will address the rights of any affected indigenous peoples or local communities, including free, prior, and informed consent where applicable, consistent with applicable law.

7. Land, Forest, and Water Rights

Jtec's current operations do not involve activities that affect land, forest, or water rights, or that result in the forced eviction of any individual or community. If Jtec's operations later involve such activities, Jtec will address any affected land, forest, or water rights consistent with applicable law and the principles reflected in this Code.

8. Use of Private and Public Security Forces

Jtec does not engage private security forces at its facilities. Where Jtec engages public security personnel (for example, local law enforcement) or where a Subcontractor engages private or public security personnel in support of Jtec's business, Jtec expects that such personnel act consistently with applicable law and internationally recognized human rights standards, including proportionate use of force and respect for the rights of Jtec Personnel, visitors, and the surrounding community.

SECTION C — HEALTH AND SAFETY

Jtec complies with all applicable occupational health and safety laws and regulations, including OSHA requirements, and maintains a program reasonably designed to:

- (a) ensure Jtec Personnel are trained and qualified to safely perform their work before beginning any activity at a customer or business partner facility;
- (b) provide appropriate protective equipment and safe working conditions, including mandatory personal protective equipment requirements and designated hearing protection zones within Jtec's shop and production areas;
- (c) maintain emergency response procedures appropriate to the scope of work performed, and ensure Jtec Personnel working at a customer's or business partner's facilities are familiar with that party's site-specific emergency procedures; and
- (d) track, investigate, and report workplace injuries and illnesses, and take corrective action as needed.

(e) take into account psychological well-being, alongside physical safety, in the design of its health and safety program.

Jtec proactively engages state environmental protection and federal occupational safety authorities to conduct periodic assessments of its facility, and uses the results of those assessments to monitor and continuously improve its health, safety, and environmental practices.

In addition, and scaled to the nature of its operations, Jtec maintains reasonable physical and personnel security measures, including access controls limiting entry to Jtec facilities to authorized personnel, background checks for Jtec Personnel in security-sensitive roles to the extent permitted by applicable law, and prompt reporting of security incidents affecting a customer's or business partner's interests to Jtec's Compliance Officer at compliance@jtecindustries.com.

SECTION D — ENVIRONMENTAL

1. Environmental Compliance and Continuous Improvement

Jtec complies with all applicable environmental laws and regulations relevant to its operations, including those governing permits, hazardous material handling and disposal, and discharges to air, soil, or water. Jtec is committed to the continuous improvement of its environmental performance and reduces waste and resource consumption where commercially practicable. Given the nature of Jtec's business as a manufacturer and supplier of AMRs, AMR management software, and related services, this Section D is not intended to impose environmental obligations beyond those arising from Jtec's actual operations and applicable law (for example, obligations specific to mining, chemical processing, or agricultural supply chains do not apply to Jtec's operations).

2. Climate

Jtec recognizes the importance of addressing climate change and supports the development and use of technologies that enable the transition to a low-carbon society, including through the design of energy- and resource-efficient AMR products. Jtec strives for energy efficiency in its own operations where commercially practicable.

3. Restricted Substances and Conflict Minerals

Jtec will comply with a customer's published prohibited and declarable substance lists, where applicable to the products or services Jtec provides to that customer, and will notify the customer if compliance becomes infeasible. Where requested in writing, and where a Jtec product or component is reasonably determined to contain a conflict mineral (tin, tantalum, tungsten, gold, or their derivatives) sourced from a conflict-affected or high-risk area, Jtec will cooperate in good faith with reasonable due diligence requests consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4. Circular Economy

Jtec supports the principles of a circular economy in the manufacture of its material handling products, including by seeking to reduce material input, incorporating recycled or renewable materials where commercially practicable, and supporting the reuse or recycling of components at end of life.

5. Energy Efficiency

When renovating or repairing its facilities or infrastructure, Jtec will consider more energy-efficient materials, equipment, and systems, alongside cost, functionality, and other business considerations, where commercially practicable.

6. Renewable Energies

Jtec's facilities are located in Illinois. Based on the composition of the regional electric grid serving its operations, Jtec estimates that approximately 20–25% of the electricity it consumes comes from renewable sources. Jtec will continue to monitor opportunities to increase its use of renewable energy where commercially practicable.

7. Responsible Sourcing of Raw Materials

Jtec's products may contain aluminum, copper, lithium, steel/iron, and zinc, among other raw materials. Jtec is committed to the responsible sourcing of these materials and expects its suppliers to source them in a manner that avoids contributing to human rights abuses, conflict financing, or significant environmental harm. Where a Jtec product or component is reasonably determined to contain a conflict mineral (tin, tantalum, tungsten, gold, or their derivatives) sourced from a conflict-affected or high-risk area, Jtec will cooperate in good faith with reasonable due diligence requests, including completion of a Conflict Minerals Reporting Template (CMRT) or Extended Minerals Reporting Template (EMRT) where requested in writing, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

8. Water Quality and Consumption

Jtec's manufacturing operations do not generate hazardous process wastewater requiring a discharge permit. Jtec monitors its water use and will consider practicable measures to reduce water consumption as opportunities arise in connection with facility upgrades or process changes.

9. Air Quality

Jtec manages air emissions associated with its manufacturing processes in compliance with applicable environmental laws and regulations, and considers air quality impacts, alongside cost and operational feasibility, when evaluating changes to its manufacturing processes or equipment. Jtec maintains weld fume extraction systems in its production areas to control workplace air quality, and proactively engages its state environmental protection agency to conduct periodic assessments and identify opportunities for improvement.

10. Noise Emissions

Jtec manages workplace and facility noise in accordance with applicable occupational health and safety requirements, and considers noise impacts, alongside cost and operational feasibility, when evaluating changes to its manufacturing processes, equipment, or facility layout. Jtec maintains designated hearing protection zones within its shop and production areas where noise levels warrant such controls.

11. Environmental Management System

Jtec maintains an uncertified, internally developed set of practices to manage the environmental impact of its operations. These practices currently include: recycling of steel scrap generated in production; recycling of cardboard and other packaging materials; engagement of a qualified third-party vendor for the safe collection and disposal of hazardous materials, where generated; and confirmation, on an ongoing basis, that Jtec's operations do not generate hazardous wastewater requiring a discharge permit. These practices are overseen by Jtec's Chief Operating Officer, are reviewed periodically, and are updated as Jtec's operations and applicable requirements evolve. Jtec will consider pursuing a certified environmental management system (for example, consistent with ISO 14001) as the scale of its operations warrants.

12. Energy Management System

Jtec maintains an uncertified, internally developed set of practices to manage energy use at its facility. These practices currently include replacement of fluorescent lighting with LED lighting throughout the facility, and use of motion-sensing controls for lighting in factory spaces to reduce energy consumption when areas are unoccupied. These practices are overseen by Jtec's Chief Operating Officer, are reviewed periodically, and are updated as additional energy efficiency opportunities are identified.

SECTION E — DATA PROTECTION AND PRIVACY

Jtec respects the right to privacy and is committed to protecting personal data. Jtec collects, uses, and processes personal data belonging to its personnel, customers, and business partners proportionally, responsibly, and lawfully, and in accordance with applicable data protection law. Jtec maintains reasonable administrative, technical, and organizational safeguards designed to protect personal data against unauthorized access, use, or disclosure, and to ensure timely reporting of any data security incident to affected customers or business partners as required by applicable law or contract.

Jtec maintains information security practices — including incident response procedures and personnel security awareness training — appropriate to the size and scope of its business. Jtec does not currently maintain a TISAX, ISO 27017, ISO 27018, or comparable third-party information security certification, but will consider pursuing such certification as the size and scope of its business evolves.

SECTION F — COMPLIANCE MANAGEMENT PROCESS

Jtec maintains a compliance process reasonably designed to ensure ongoing conformance with this Code. At a minimum, Jtec will:

- (a) designate a person or function responsible for compliance with this Code;
- (b) maintain reasonable documentation sufficient to demonstrate compliance, retained for no less than three (3) years, unless a longer period is required by applicable law or a specific customer agreement;
- (c) upon a customer's or business partner's reasonable written request, and no more than once every twelve (12) months absent a good-faith basis to believe a violation has occurred, complete a self-assessment questionnaire regarding compliance with this Code and provide the results within a mutually reasonable timeframe; and
- (d) provide reasonable training to relevant Jtec Personnel regarding this Code's requirements, and take reasonable steps to make Subcontractors aware of the standards in this Code.

If a customer or business partner has a good-faith, documented basis to believe Jtec or a Subcontractor has materially violated this Code, that party may request supporting records relevant to that specific concern. Any on-site inspection will be conducted only on at least ten (10) business days' prior written notice, during regular business hours, no more than once in any twelve (12)-month period absent a reasonable good-faith basis to believe a violation has occurred, and will not extend to Jtec's proprietary or confidential technical information, trade secrets, source code, firmware, or product designs except to the extent directly and narrowly necessary to confirm compliance with this Code. Any information obtained in connection with such a review will be treated as confidential and, where a written agreement exists between the parties, in accordance with the confidentiality terms of that agreement.

If a customer or business partner identifies a substantiated violation of this Code, Jtec will investigate and provide a corrective action plan within thirty (30) days of notice (or such longer period as is reasonably required given the nature of the issue), and report on the outcome. Remedies for an uncured, material violation of this Code are as set forth in the applicable written agreement between Jtec and that party, if any; absent such an agreement, the parties will work in good faith toward a mutually acceptable resolution, which may include a corrective action plan or, where warranted, termination of the business relationship.

SECTION G — REPORTING CONCERNS; ENGAGEMENT WITH BUSINESS PARTNERS

Jtec Personnel and Subcontractors should promptly report any known or suspected violation of this Code to Jtec's Compliance Officer at compliance@jtecindustries.com, or to such other reporting channel as Jtec may designate in writing from time to time. Jtec will not tolerate retaliation against any individual who reports a suspected violation in good faith. Customers and other business partners may also raise any concern regarding Jtec's compliance with this Code directly with Jtec's Compliance Officer. As a general matter, and depending on the complexity of the specific concern, Jtec aims to acknowledge receipt of a reported concern, complete an initial assessment, and provide a status update or resolution, at each such step within approximately fifteen (15) business days of the prior step.

A customer or business partner may review Jtec's compliance with this Code in accordance with Section F above and may request reasonably relevant supporting information in connection with a specific, good-faith concern.

ADMINISTRATION

Jtec may revise this Code from time to time. Where this Code has been submitted to a specific customer or business partner as a comparable or replacement code under a written agreement, Jtec will provide that party with at least sixty (60) days' prior written notice of any material revision before it becomes effective, and if that party reasonably objects that a proposed revision no longer meets the applicable equivalency standard under its agreement with Jtec, the parties will discuss the revision in good faith before it takes effect.

This Code is not intended to create new or additional rights in favor of any third party. As set forth above, this Code supplements any existing written agreement between Jtec and a customer or business partner, and governs in the event of any conflict between this Code and the terms of that agreement.

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