

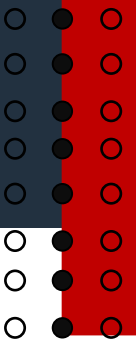


J3ST SOLUTIONS



# Employee Code of Conduct

2019/25



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# WELCOME



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## Why this Code matters

J3st Solutions succeeds when we do the right thing, the right way.

This Code of Conduct is your everyday guide to ethical decisions and lawful behaviour. It applies to all of us and to anyone who works on our behalf.

Use it to understand expectations on anti-bribery, gifts and entertainment, fair dealing, confidentiality, safeguarding information and assets, accurate books and records, and treating people with dignity and respect.

This Code sits beside our Anti-Corruption Policy and other standards.

If something feels unclear or uncomfortable, pause and ask.

We will support anyone who raises a concern in good faith, and we **do not tolerate retaliation**.

Living this Code protects our people, our customers, and our reputation.



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1.

# Integrity and Compliance

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

## Standard

Conduct business honestly, fairly, and in full compliance with applicable laws and company policies

## You must:

**Follow** all J3st policies (Anti-Corruption & Business Ethics, Gifts & Entertainment, Third-Party Due Diligence, Information Security, Data Protection, and Expense Policy).

**Comply** with anti-bribery, competition/antitrust, export controls/sanctions, and anti-money-laundering laws where we operate.

**Make** decisions based on objective business criteria—never personal benefit.

**Complete** all required training and attestations on time.

## You must not:

**Circumvent** policy or controls to **"get the deal done."**

**Ignore** or delay reporting of suspected non-compliance.

## Manager duties:

**Lead** by example, reinforce training, monitor compliance risks, and escalate concerns promptly.

2.

# Anti-Bribery and Anti-Corruption

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

## Standard

Zero tolerance for bribery or corrupt conduct—direct or indirect.

## Prohibited conduct:

**Offering**, promising, giving, requesting, or accepting anything of value to improperly influence a decision or secure an advantage (cash, gifts, travel, entertainment, donations, internships, job offers, discounts, in-kind favors).

**Using** third parties (agents, resellers, consultants) to do what you are prohibited from doing.

**Political** or charitable contributions intended to influence a business decision.

## Notes:

**Facilitation** payments are prohibited (*see S4*).

If a payment is demanded under threat of immediate harm to personal safety, prioritize safety, then report to [compliance@j3st.eu](mailto:compliance@j3st.eu) as soon as possible.

## Government Officials (definition):

**Any** officer/employee of a government or government-controlled entity (including state-owned enterprises, public universities, hospitals), political party/official, candidate for office, or employees of public international organizations.

3.

# Gifts and Entertainment

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

## Standard

Courtesies must be modest, infrequent, lawful, transparent, and never intended to influence.

## General rules:

**Permitted** (if reasonable and infrequent): modest meals, simple refreshments, small branded items, customary tokens from local culture.

**Prohibited:** cash or cash equivalents (e.g., gift cards, vouchers), lavish/habitual hospitality, adult entertainment, or any courtesy during active tenders/negotiations.

**Transparency:** Record all gifts/hospitality accurately in expense reports and, where required, in the Gifts & Hospitality Register.

## Notes:

**Facilitation** payments are prohibited ([see S4](#)).

If a payment is demanded under threat of immediate harm to personal safety, prioritize safety, then report to [compliance@j3st.eu](mailto:compliance@j3st.eu) as soon as possible.

## Government Officials (*strict*):

Prior written approval is required for any gift, meal, hospitality, travel, or expense—regardless of value.

No per-diem or expenses for family/friends of officials.

No travel upgrades or side leisure activities unless expressly approved and legitimate.

## Event & travel guidance:

Vendor-sponsored travel requires pre-approval, a clear business purpose, economy class by default, and documented agenda.

**J3st** pays the vendor directly where feasible.

**Suggested limits (configure internally):** Define “modest” with a per-person/occasion ceiling and annual frequency cap (e.g., €50 per person per event; €150 annual with any single counterparty). Follow stricter local law where applicable.



4.

# Commissions and Third Parties

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

**Standard:** Use vetted partners only; pay fair compensation for legitimate services; maintain full transparency.

## Before engagement (*Due Diligence*):

**Screen** the third party (ownership, qualifications, reputation, sanctions/PEP checks, government ties).

**Document** business rationale; confirm the specific services to be performed.

**Use** a written contract with scope, fee basis, audit/termination rights, and anti-bribery clauses.

## Payments:

**Commensurate** with services; aligned to market norms; paid against detailed invoices.

**Paid** to a bank account in the name and country where services are performed (no cash; no offshore shell accounts).

**Avoid** success fees that could incentivize improper conduct unless tightly controlled and approved.

## Red flags (*escalate*):

**Unusual** payment methods, excessive commissions, vague 'consulting' deliverables, ties to officials, or instructions to avoid documentation.

**Facilitation payments:** Strictly forbidden—small unofficial payments to speed routine actions are not allowed.

5.

# Conflicts of Interest

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

**Standard:** Avoid situations where personal interests conflict or appear to conflict with company duties.

## Common conflicts:

**Financial** interest in a customer, supplier, or competitor.

**Close** personal relationships influencing hiring, supervision, purchasing, or approvals.

**Outside** employment or consulting that competes with or impairs your J3st responsibilities.

**Receiving** personal benefits, discounts, or favors from business partners.

## Your actions:

**Disclose** immediately to your manager and [compliance@j3st.eu](mailto:compliance@j3st.eu).

**Recuse** yourself from related decisions/approvals until guidance is given.

**Obtain** written clearance before accepting outside roles that could overlap with J3st business.



6.

## Records and Transparency

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

**Standard:** Keep complete, accurate, timely records.  
No false or off the books entries, ever.

### *Requirements:*

**Record** all transactions, expenses, and approvals truthfully and promptly.

**Submit** itemized receipts with business purpose, identify participants for meals/entertainment.

**Maintain** the Gifts & Hospitality Register and third-party due-diligence files as required.

**Follow** document retention rules, do not destroy records subject to legal hold or audit.

### *Prohibited:*

**Side** letters, unrecorded discounts, backdating, or mischaracterizing expenses (e.g., booking entertainment as 'training').

7.

# Respect and Responsibility

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

**Standard:** Treat everyone with dignity, professionalism, and fairness. Safeguard people, data, and assets.

## *Expectations:*

**Zero** tolerance for harassment, discrimination, bullying, or retaliation.

**Comply** with health & safety guidance, report hazards and incidents.

**Protect** confidential information, personal data (GDPR), and company/third-party IP.

**Use** systems, tools, and social media responsibly, do not disclose non-public information without authorization.

8.

# Reporting Concerns

**Applicability:** This Code applies to all employees, contractors, directors, temporary staff, and any third parties acting on J3st Solutions' behalf.

**Ask before you act:** If unsure, seek guidance from your manager or [info@j3st.eu](mailto:info@j3st.eu).

**Standard:** Speak up early.  
We investigate fairly and protect good-faith reporters.

## How to report:

Your manager, HR, or [compliance@j3st.eu](mailto:compliance@j3st.eu) (email).  
Anonymous options may be available depending on jurisdiction.  
In emergencies or immediate safety risk, contact local authorities first.

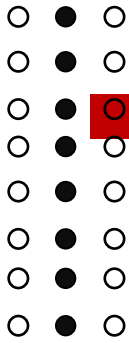
## What happens next:

**Reports** are reviewed promptly and, where appropriate, investigated confidentially.  
**Information** is shared strictly on a need to know basis.  
**Cooperate** honestly with investigations and audits.

**Non-retaliation:** **J3st** prohibits retaliation against anyone who raises a concern or participates in an investigation in good faith.

## Quick Definitions

**Anything** of value: Not just cash—includes gifts, hospitality, travel, jobs/internships, donations, favors, or advantages.  
**Government Official:** Any government employee/representative, candidate, party official, employee of state-owned or state-controlled entities, officials of public international organizations.  
**Facilitation** payment: A small, unofficial payment to expedite routine government actions—prohibited.



Need guidance or an approval? Contact [compliance@j3st.eu](mailto:compliance@j3st.eu)



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