

# Together



we are

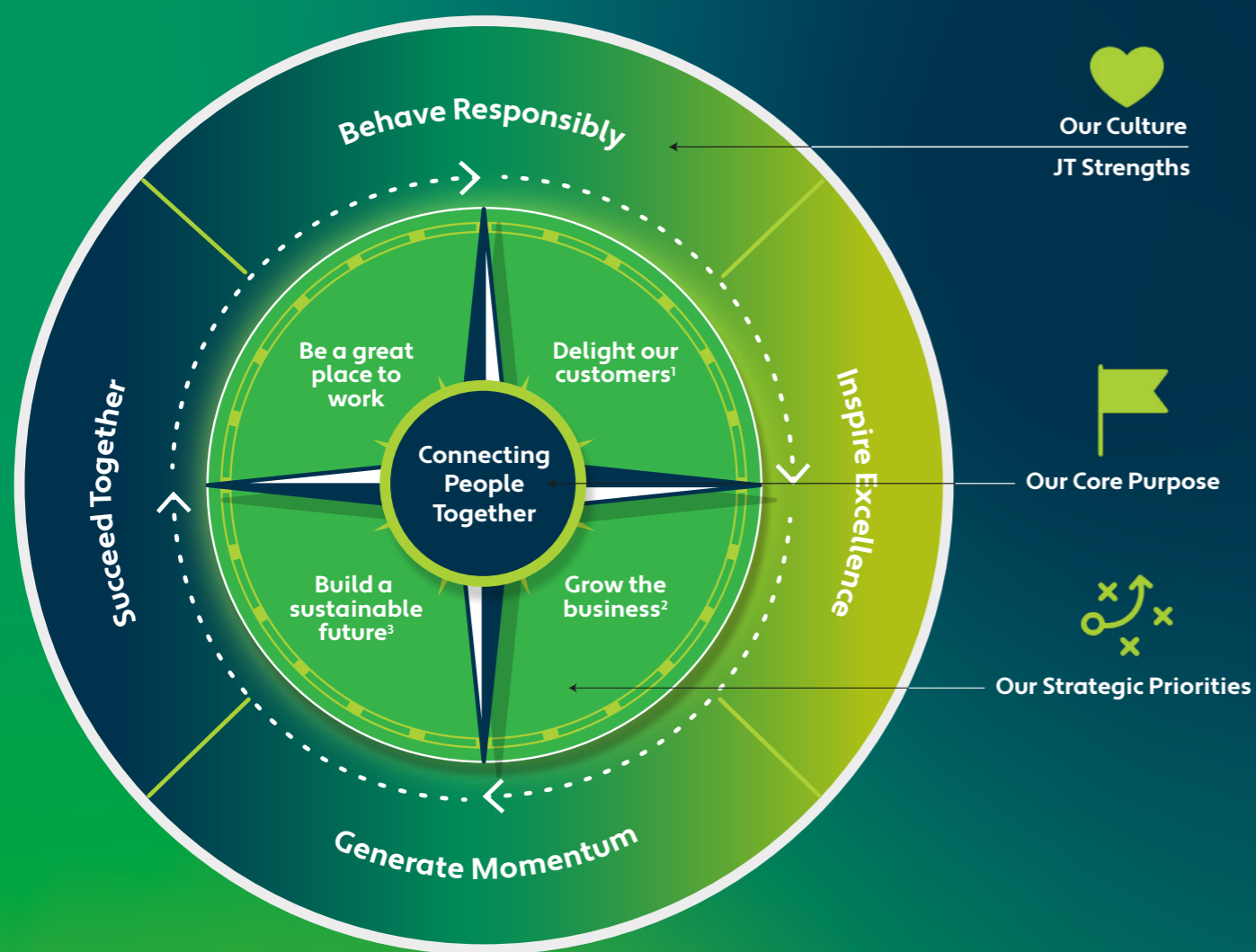


## JT Code of Business Ethics

[www.jtglobal.com](http://www.jtglobal.com)

Facts and figures correct at time of publication. October 2021.

# The JT Strategy Compass



1. With our network and service.
2. On the Channel Islands and Internationally.
3. The triple bottom line of People, Planet and Profit.

## Welcome to the most important document we have at JT – our Code of Business Ethics.

When I think of my time at JT, and consider why I'm proud to be Chair, I put it down to these reasons: innovation, diversity and the values of the business. These values give us the instinct to do the right thing and to treat each other with respect.

Having a strong set of values that respect our people, our islands, the global customers we serve, and the planet has always been at the heart of what we do and will continue to be critical to building our purpose-led, future-fit business. Our ability to successfully deliver our purpose of 'connecting our Islands and our customers to their sustainable future' is dependent on each and every one of us living these values, day in and day out.

The digital world increasingly presents us with new considerations for managing cyber and data security, and how we act in a connected world has become more complicated than ever. What's more, the accelerating pace of change in our industry, and the greater speed with which we must operate, often intensifies these challenges.

The Code of Business Ethics is our guidebook for putting our values into practice. It sets out a clear standard of conduct to ensure that we always make the right choice, providing a framework of simple dos and "don'ts". It's a document which not only protects JT, and each and every one of our people, but will help us to have a meaningful impact on the lives of the people we do business with.

Much of our strength lies in the shared values of our people. Behaving with integrity is part of who we are. Thank you for your diligence as we work towards delivering our vision of 'being the best connected telco in the world'.

Thanks for taking the time to read this document.



Phil Male  
Chair

# What is the Code of Business Ethics?



Our Code of Business Ethics is a central policy document that confirms the expectations of every single person working for and with JT, as members of a government-owned company that must be complied with, regardless of location. These standards should be read in conjunction with any professional code that also applies to a professional group of Directors, employees and/or contractors.

# Why do we have a Code of Business Ethics?

## Trust is fundamental to everything we do.

Doing the right thing means we must always act with integrity to ensure we are trusted by our customers, colleagues, business partners and the communities within which we work.

Our Code of Business Ethics sets out what we expect from every single person working for, and with, the company. It also underlines our responsibilities to our people, partners and, our shareholder, the Government of Jersey.



## Our way of working

We want to be known as a trusted company that operates in a way that supports our customers, the Government of Jersey, the communities of the Channel Islands and the other stakeholders we work with.

To deliver this we are guided by our **JT Strengths**. These are designed to enable every manager to lead and develop our people in a way that encourages behaviour that is consistent with our Code of Business Ethics.

We relentlessly prioritise and pursue the outcomes that matter to our business by **generating momentum** and we do this by working with agility when it comes to

delivering our products and services to market.

This requires us to **inspire excellence** by making things simple and easy for our customers, partners and colleagues.

We can only achieve this when we **succeed together** by being reliable, trusted and transparent to deal with.

This behaviour leads to a brand that our external stakeholders see as being **knowledgeable, innovative and responsible**.



# Who is the Code of Business Ethics for?

Our Code of Business Ethics is for everyone working for and with us: the Board, the Executive Committee (Exco), employees, contractors, business partners and suppliers. We expect our suppliers and business partners to uphold the same standards and to abide by our Code of Ethical Purchasing.

These standards are aimed to help you:

- make informed decisions;
- promote standards and ethical behaviour in a Government-owned company; and
- be clear about the absolute standards to which you are held.

## Compliance

Compliance with our Business Ethics is an essential element in our business success and we are committed to providing transparent governance and reporting on this as part of our Annual Report.

The JT Group Board is responsible for ensuring these ethics are applied throughout JT. The Chief Executive Officer is responsible for implementing these ethics and is supported in this by the JT Group Corporate Affairs Director and the JT Group HR Director. Day-to-day responsibility for implementing these ethics is delegated to all senior management across the company.

Assurance of compliance is given and monitored each year. Compliance is subject to review by the JT Group Board and is further supported by the Audit Committee. Any breaches of the Code of Business Ethics must be reported to both.

The JT Group Board will not criticise management for any loss of business resulting from adherence to these ethics and other mandatory policies. Provision via the JT Whistle-blowing Policy has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.

## What are the consequences of not complying?

We take compliance with our Code of Business Ethics seriously and there are very serious consequences for not complying with it. We may take disciplinary action and even dismiss people or terminate their contracts where necessary.

## What does this mean for every person who represents or works with us?

We expect you to:

- behave in an ethical manner, taking pride in your actions and decisions;
- comply with the ethics and rules in our Code of Business Ethics and fulfil your legal and regulatory obligations
- understand how our Business Ethics (detailed below) apply to your work;
- speak up if you feel a working practice is not ethical or safe or if it breaches our Code of Business Ethics.



## The manager's role

Every manager has an important role in ensuring our Code of Business Ethics is understood and applied by their team. In particular, we expect them to:

- be a role model for doing the right thing
- regularly ensure their team members are familiar with our Code of Business Ethics and that they understand it;
- hold their team members accountable for complying with our Code of Business Ethics.



# Our Business Ethics

At JT we believe in growing our business responsibly and sustainably. Our Business Ethics are the foundation for how we do business everywhere we operate and are at the heart of our Code of Business Ethics. It defines the non-negotiable behaviours for all our employees and codifies our culture, making clear what is expected from our people. Through living our Code of Business Ethics, we will deliver our core purpose as a business by bringing our JT Strengths and brand to life, every day, in everything we do.

## 1. Personal integrity and conduct



We act with honesty, integrity and fairness in all our dealings, both internally and externally. We do not permit promising, offering or giving any benefit or advantage of any nature to any persons to influence any kind of decisions (including but not exclusively to Government, regulatory, administrative or judicial personnel) or obtain improper advantages for the company. We do not offer or accept any gifts, hospitality or other types of incentives which may reward or influence a business decision, however appropriate and proportionate gifts may both be given or received in accordance with JT's [Anti-Bribery and Corruption Policy](#). We avoid any contracts that may lead to a conflict of interest between personal activities and the business. Employees must not seek gain for themselves or others through misuse of their positions.

## 2. Obeying the Law



JT and its employees are required to comply with all applicable international and domestic laws and regulations and appropriate standards and ethics. It's vital that every employee should be familiar with the relevant laws and regulations that apply where they work. If there is a difference between a local legal requirement and our Code of Business Ethics, the rule of thumb is to apply the most stringent standard. If in any doubt, contact your line manager, Legal Team or HR Team.

## 3. Respecting our employees



JT is committed to an inclusive working environment where everyone feels valued and respected. A place where every employee can be themselves so that they can reach their potential. We will promote diversity, inclusion, life-long learning and equal opportunity, including for those with disabilities. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions.

We will recruit, employ and promote employees on the sole basis of the qualifications and abilities needed for the work to be performed.

We are committed to being a Living Wage employer, ensuring that all our employees around the world are paid a fair wage, to allow them to meet their everyday needs.

We will not use any form of forced, compulsory, trafficked or child labour and commit to regular monitoring and auditing of our supply chain to ensure that we can identify any modern slavery or unethical pay practices.

We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We will maintain good communications with employees through company-based information and consultation procedures.

We will provide transparent, fair and confidential procedures for employees and third parties to raise concerns. We will not retaliate against whistle-blowers or employees that raise issues with us.

## 4. Operating with financial integrity



As a Government owned company, we will conduct our operations in accordance with the UK Corporate Governance Code. We will provide timely, regular and reliable information on our activities, structure, financial situation and performance to our shareholder. We will base our investment decisions, acquisitions and business relationships on economic criteria as well as social and environmental considerations.



## 5. Supporting local communities and society



We engage with local communities to help us understand and respond to concerns they may have; for example in relation to network development. We invest in society in a way that makes effective use of our resources and provide support to the most vulnerable groups within our communities to ensure they are able to digitally connect with each other. We will also actively support charitable organisations in the Channel Islands and the other jurisdictions in which we operate.

## 6. Becoming a sustainable business



We are committed to making continuous improvements in the management of our environmental impact and to the longer-term goal of developing a sustainable business. We will work in partnership with others to promote environmental care, increase understanding of environmental issues and disseminate good practice.

## 7. Being an ethical company



We will co-operate with governments, regulatory bodies and other public organisations, both directly and indirectly through bodies such as trade associations, in the development of proposed legislation and other regulations which may affect legitimate business interests. As a Government owned company, we are politically neutral and we will not take a position, directly or indirectly, for or against any political representative or organisation. We will actively work with other Government of Jersey publicly owned companies to serve the best interests of the people of Jersey.

We believe in vigorous yet fair competition and support the development of appropriate competition laws. JT companies and employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations. We will not tolerate activity by employees that seeks to directly or indirectly undermine the credibility of any regulatory body that oversees the markets that we operate in.



## 8. Safeguarding our customers



We value the trust that our customers place on us. We are committed to safeguarding the information they provide to us. We will collect and use data in line with our values, applicable laws and with respect for privacy as a human right.

# Speaking up

If you see behaviour at work which you feel may be a breach of our Code of Business Ethics or seems illegal or unethical, please report it. You must report any behaviour which you suspect to be unlawful or criminal. This could be bribery, fraud, price fixing or a breach of data privacy.

You must also report abuse of our systems, processes or policies. This could be bullying or harassment, a conflict of interest, danger to the health and safety of employees or the public, potential abuses of human rights or serious environmental issues.

The Board of JT Group has a non-retaliation policy for when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if there is no proven unlawful conduct of compliance breach.

## What does this mean for me?

There are three ways to speak up:

### 1. Report it to your line manager:

We know it is not always easy to raise your concerns. To make it easier, we have an open communications policy so we encourage you to discuss any issues or potential issues that concern you with your line manager.

### 2. Report it to the HR team:

If it's not appropriate to discuss the issue with your line manager, you should discuss the matter with the HR Team.

### 3. Report it confidentially:

You may want to report your concern to someone who is further removed from the situation. There may be occasions when reporting a concern internally is not appropriate or doesn't feel like the right approach. Everyone working for or with JT Group has the right to raise any issue with 'Protect', a non-profit whistleblowing charity who support individuals, organisations and society.

## What happens next?

The steps below outline what we do when someone raises a concern:

1. When you raise a concern, a decision will be made as to which area will progress the matter: Human Resources, Corporate Affairs or Legal teams.
2. In confidence, we will then contact the person raising the concern to ensure we have all the information we need and talk through our next steps.
3. If we decide to proceed with an investigation, a qualified expert will investigate, keeping the person who raised the concern informed throughout the process.
4. We will keep transparent and accurate records of all disclosures and subsequent actions.



# Q&A

Q1

**Q: I am a contractor working on a JT contract and I have a concern to report. Can I do so and how do I do this?**

A: Yes you can. As a contractor you will have access to the JT Xchange. On there you will find JT's Whistle-blowing policy, which outlines the process for raising a concern confidentially and the contact and number for doing so.

Q2

**Q: I am concerned that my colleagues will find out if I raise a concern. Will it be kept confidential?**

A: Protecting the identity of innocent people is our priority. JT Group will not tolerate retaliation against an employee who raises a genuine concern. We will keep what you tell us private and confidential throughout the investigation process, subject to our legal obligations. Anonymous reporting is available through Protect, the non-profit charity that provides whistleblowing services for individuals and organisations.

Q3

**Q: What if I report something suspicious that turns out not to be a compliance breach?**

A: This is fine as long as your report was made because of a genuine concern.

Q4

**Q: I have a concern about the actions of a colleague. How should I report this?**

A: The most important thing is that you report your concern. Ultimately, it doesn't matter which route you choose. If you feel comfortable talking to your line manager, please do that. Your line manager is there to support you and can help you choose the correct course of action.

## 1. Personal integrity and conduct

### Conflicts of interest

If you find yourself in a position where your personal and business interests potentially come into conflict, you are required to declare, obtain approval and register these potential conflicts of interests. To help you decide whether you are facing a conflict of interest, imagine you are explaining your actions to friends, a colleague or the media and consider whether you would feel comfortable.

**Here are some examples of actual conflicts of interest, which must be avoided or immediately resolved:**

- Any outside business activity that detracts from your ability to devote appropriate time and attention to your responsibilities within JT Group.
- Recruiting or managing a relative or partner.
- Recruiting an individual due to their significant political connections which you intend to leverage for JT's benefit.
- A personal interest in a supplier, customer or competitor which influences your decisions at work.
- Using JT Group's resources for political activities.

**Here are some examples of potential conflicts of interest, which are situations that require you to agree a way of ensuring the conflict does not materialise, obtain approval and register the interest:**

- Board membership (by yourself or a close relative) of an enterprise customer or supplier.
- Other employment.
- A close relationship with a senior manager of a competitor or supplier.
- Working in the same department as your partner or close relative.
- A material financial interest (by yourself or a close relative) in a supplier or enterprise customer.

If you're unsure if your interest is material then please consult someone in the HR team.



## What does this mean for me?

### We expect you to:

- Act in JT's best interests, recognising potential conflicts of interest.
- Discuss concerns with your line manager and register any potential conflict of interest.
- Remove yourself from business areas where you have a personal interest.
- Not make political donations in JT's name.
- Check with local laws and JT Group requirements before making investments.

### Tell your line manager and HR representative about:

- Any other employment you undertake or board memberships.
- Close relationships with people in your reporting chain.
- Close relationships with people going through the recruitment or tender process, if you have any influence over the decisions to recruit or award a contract.
- Close relationships with people who work for competitors, major customers, suppliers or other business partners. This is particularly important if you have access to sensitive information.

### What to do if you see yourself in a situation of potential conflicts of interest:

#### Step 1:

Declare your potential conflict of interest by informing your line manager and HR representative.

#### Step 2:

Agree how it will be managed and get the approval from your line manager and local HR team.

#### Step 3:

Formally register the situation with the Head of Legal so you and the company are protected.

### Q: A close friend is applying for a job in JT, is this OK?

A: We encourage you to recommend JT as a great place to work. However, you must ensure that you are not involved in the recruitment process and the job role in question is not reporting to you.

## Gifts and hospitality

We support the reasonable and proportionate giving and receiving of hospitality as part of a normal business relationship. However, we prohibit the giving or receiving of any gifts or hospitality that are excessive or improper.

We need to ensure that we are never influenced by, or seek to influence through, the provision of gifts or hospitality. For example, we do not give or receive gifts or hospitality during a tender process or when signing a new deal.

The JT Group Gifts and Hospitality Policy Standard outlines the principles we all need to follow, including the requirements for gaining approval and registering items given or received.

We also have additional approval processes for giving or receiving gifts or hospitality to Public Officials.

## What does this mean for me?

### You should never:

- Give or accept any gifts or hospitality of inappropriate value.
- Give or accept any gifts or hospitality during a tender process.
- Give or accept any cash or cash equivalent.
- Ask for gifts or hospitality.

### The giving or receiving of gifts should be rare. You should:

- Think about the context of the gift or hospitality: imagine how it might look to someone outside JT or on the front page of the newspaper.
- If the gift or hospitality involves a Public Official, please consult with The Corporate Affairs & Legal Team as you may need additional approval from JT Group.
- Know and understand the JT Group Gifts and Hospitality Policy Standard.
- Seek approval and record gifts or hospitality where required by JT Group Gifts and Hospitality Policy Standard.

**Q: I've been invited out to dinner by a potential supplier currently bidding for a new contract. What should I do?**

A: You should decline. It is inappropriate to go for lunch/ dinner or any other hospitality event with a supplier during a tender process or request for proposal process.

**Q: I've been sent a high value gift by a supplier and don't want to cause offence by returning it. What should I do?**

A: It is important that you notify your line manager and seek guidance from the HR or Legal team. Ideally you should politely refuse and return the gift. If this is not possible then the item should be donated to charity.

**Q: My travel costs into the office are expensive. Can I claim some of it back?**

A: Normal travel into your place of work can't be reclaimed. There may be exceptions for out of hours working; check our policy for details.

## What does this mean for me?

We expect you to:

- Be cautious when giving or receiving gifts or entertainment, especially when a Public Official is involved.
- Ensure that all gifts and entertainment are permitted by local law.
- Be aware that JT Group may be liable for the actions of third parties.
- Be aware that even charitable donations can be seen as bribes if payments are made to facilitate a process or secure a commercial advantage.
- Refuse to pay facilitation payments.

If in doubt, consult with the Legal Team.

## Bribery and improper payments

The law prohibits bribery in every kind of commercial setting. We are committed to countering all forms of bribery.

A bribe can come in many forms. Facilitation payments and kickbacks are examples of bribery. Giving or accepting gifts and hospitality might also be bribery in certain situations.

Facilitation payments are illegal. JT Group will not tolerate them unless an employee's personal safety is at risk, in which case the matter should be reported to the Legal Team as soon as possible. Many countries prohibit the offering or giving anything of value to Public Officials in order to influence their actions. One of the ways we make sure this does not happen is by not making political donations.

Local ways of working are not an exception to these rules. These rules apply not only to JT Group employees but also to anyone authorised to act on behalf of the company or represent it, such as agents, advisors, representatives or intermediaries.

## 2. Obeying the law

Employees must at all times comply with laws and regulations that apply to the countries in which JT Group operates. Ignorance of the law is no excuse. Timely legal consultation is essential to ensure that JT's legitimate business interests and opportunities are protected.

All employees must immediately notify their Line Manager (or someone from the HR or Legal teams) and take legal advice if they suspect or discover any illegal activity in relation to JT's operations or associated activities involving third parties.

### Fair competition

Investigations by competition authorities may result in significant fines and costs, compensation claims by our customers and competitors, and damage to our reputation and commercial relationships. Criminal sanctions for individuals may also apply.

### Competition laws prohibit:

- Anticompetitive agreements.
- Sharing of commercially sensitive information between competitors, unless approved by the Legal team.
- Certain restrictions imposed on or agreed with distributors and other customers; and
- Abuses of dominant market positions.

### Co-operating with competition authorities

JT Group co-operates fully with the competition authorities, while consistently and robustly defending its legitimate interests. All contacts with competition authorities (including, where relevant, national courts) are co-ordinated by the Corporate Affairs and Legal teams.



## What does this mean for me?

### We expect you to not:

- Participate in cartels.
- Discuss, agree or exchange information about, any of the following, directly or indirectly, with competitors (unless approved by the Legal team):
  - The price or terms of sale for products and / or services.
  - The price or terms to be demanded from suppliers.
  - The co-ordination or allocation of bids or quotes.
- Boycott or refuse to deal with certain competitors, customers or suppliers without first seeking advice from the Legal team.
- Impose restrictions on the commercial activity of a customer or a third party without first seeking advice from the Legal team, including control of the resale price, the territory or channels in which they may resell JT group products and services and the extent to which they may sell competing products.
- Where JT has a strong market position, conduct itself in order to take unfair advantage of customers or unfairly prevent competitors from entering, remaining or expanding in a market.

You should understand and comply with the requirements of competition law that operates in your categories, markets and functions. Managers are expected to provide the appropriate documentation, communication and training for their teams.

### 3. Respecting our employees

#### Diversity & Inclusion

We pursue equality of opportunity and inclusion for all employees through our employment policies and practices.

We aim to create an inclusive environment where everyone feels respected and valued.

We recognise and celebrate the importance of diversity in our work spaces so we are as diverse as the customers we serve. We will not tolerate any form of discrimination especially related to but not exclusive to age, gender, disability, sexual orientation, cultural background or belief. We base relationships with and between employees on respect for individuals and their human rights, and will not tolerate any form of child labour.

We must all challenge discriminatory behaviour when we see it. We want everyone to feel able to raise any concerns. In the first instance, please speak to the individuals concerned before consulting your local HR team or going through the Speak Up process, on page 7 of this document.

#### What does this mean for me?

##### We expect you to:

- Comply with JT's Business Ethics.
- Act fairly and show respect towards others in all your dealings.
- Understand your responsibilities under local law.
- Challenge discriminatory behaviour.
- Raise any concerns with the HR team.
- Base any employment decision you make purely on merit.

### Preventing harassment and bullying

JT Group will not tolerate harassment or bullying. Harassment and bullying can take many forms and have serious repercussions. We are all responsible for ensuring that they don't happen at JT. We may instigate disciplinary or legal action against people who harass or bully others. We will treat each other respectfully and challenge any unfair behaviour. Guidance is available with the HR team.

#### What does this mean for me?

##### We expect you to:

- Build trust in your teams by treating everyone with respect.
- Make sure all your communication abides by this Code, no matter how informal you are being.
- Never be derogatory or abusive to or about your colleagues.
- Speak up if you think a colleague is being harassed or bullied.

**Q: I can see that one of my colleagues is being picked on constantly by other team members. I want to raise this but I am concerned that it might be my turn next. What should I do?**

**A: You should always challenge inappropriate or unacceptable behaviour. Speak to your line manager or someone in the HR team. If you do not feel comfortable doing this, then you should raise the issues with your ExCo Director.**

**Q: A colleague is recruiting a new team member. I am concerned that they may be discriminating against certain candidates. Should I challenge them?**

**A: You are right to raise your concern as we will not tolerate any form of discrimination. Urge your colleague to discuss the selection criteria with the HR team and if there is no change then you should raise the issues with your line manager or ExCo Director.**

## Occupational Health & Safety

JT Group is committed to providing healthy and safe working conditions. JT complies with all applicable legislation and regulations and aims to continuously improve health and safety performance. Everyone at JT has a role to play. Managers are responsible for cascading and implementation of any health and safety guidance for their direct reports and third parties under their control.

As a condition of our employment, we all have a duty to work safely. In addition, any use, sale or distribution of illegal substances will be treated extremely seriously.

Please support your colleagues by reporting any breaches of this Code to your local HR team. We will provide support to those affected by problems with alcohol or drugs.

### What does this mean for me?

#### We expect you to:

- Never work under the influence of illegal drugs or alcohol.
- Not carry on with any work that becomes unsafe or unhealthy.
- Report any concerns you have about a colleague's use of alcohol or drugs to the HR team.
- Familiarise yourself with local laws, cultures and customs when travelling.

#### Our non-negotiable rules:

- We always drive safely and legally: we always wear a seatbelt, obey the speed limit and never use a handheld mobile device when driving.
- We never work under the influence of alcohol or drugs.
- We never carry out work on any electrical equipment unless qualified.
- We always wear protective gear, attach a safety harness and use fall protection equipment when working from height.

**Q:** I often think when I walk through the office that I see things that are potentially dangerous, I don't mean things that are likely to kill someone but could easily cause injury. I am not sure if I have the authority to stop people and tell them what they are doing is dangerous?

**A:** Everyone in JT has the authority to intervene and stop something that is dangerous. The person may not realise that it is dangerous until you point it out. In general, if it looks dangerous it probably is.

## Human Rights

JT Group recognises that it has a responsibility to respect human rights and the ability to contribute to positive human rights. JT respects employees' rights to form and join a legally recognised union of their choice or any other body representing their collective interests, and establish constructive dialogue and bargain in good faith with trade unions or representative bodies.

### What does this mean for me?

#### We expect you to:

- Respect the dignity and human rights of colleagues and all others they come into contact with as part of their jobs.
- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit.
- Have a fair wage including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards.



## Professional development

We communicate our goals and strategies to our people so they're committed to and enthusiastic about our purpose and vision. We believe that as a leading employer, JT Group should play an active role in supporting our people's personal and professional development.

Our selection, recruitment, training and internal promotion policies are based on clear criteria relating to skills, competencies and merit.

We regularly communicate with our employees to keep them informed on events that affect the company.

### What does this mean for me?

We expect you to:

- Participate in a regular conversation with your manager to keep improving your performance.
- Take personal responsibility for improving your own skills and knowledge.

## 4. Operating with financial integrity

### Financial Integrity

We base our investment decisions, acquisitions and business relationships on economic criteria but will also take into account social and environmental considerations.

You should only ever spend company money where there is a legitimate business need and where the cost is worth the benefit. You should know the local expenditure limits and financial policies which directly apply to your role.

As a public entity, every manager at JT has an extra duty to ensure that their teams manage budgets well and spend company money carefully.

When assessing value for money, it is important to consider: quality, service, reliability, sustainability, compliance with our Code of Ethical Purchasing and any terms and conditions.

### What does this mean for me?

We expect you to:

- Understand and apply the finance and expense policies that are relevant to your role.
- Strive to find the best value when spending company money.
- Understand when you can and when you can't commit JT's funds.
- Purchase goods and services only through our registered suppliers.

**Q: I think my colleague is regularly claiming taxi fares for working after hours but actually takes public transport home. What should I do?**

**A: You should speak to your line manager in the first instance. Alternatively, talk to the HR team if you feel it is more appropriate.**





## Accurate reporting

The financial reports and other information that JT Group maintains internally and the financial information it provides to its shareholder, regulators and other stakeholders must be accurate and complete.

Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Any failure to record transactions accurately, or falsifying or creating misleading information or influencing others to do so, could constitute fraud and result in fines or penalties for employees or for JT Group.

## What does this mean for me?

To ensure the accuracy of our business records and financial information, you should not:

- Do anything to artificially inflate or shift sales or profit between reporting periods.
- Create, maintain or procure others to produce or maintain undisclosed or unrecorded accounts, funds or assets.
- Conceal, alter or falsify company records, accounts and documents.

## Operating a responsible supply chain

We base all of our procurement on our Code of Ethical Purchasing. We do this to responsibly manage the wider impact our business has on communities, society and the environment. We also expect our suppliers and contractors to act responsibly. We work closely with each of them to make sure they follow our requirements in their operations and supply chains.

## 5. Supporting local communities and society

### Communities and society

We aim to deliver products and services that can transform people's lives and contribute to more sustainable living by empowering individuals, contributing to wider development goals and reducing environmental impacts. To do this, we must operate responsibly wherever we do business to maintain the trust of society.

### Local communities

Through being open and honest, we aim to gain the trust and support of our local communities. We always listen to the concerns local communities have, for example in relation to network deployment, and seek to answer the questions they raise. We will be inclusive and will always do our best to make sure that everyone is heard.

### Charitable support

JT is committed to providing support and sponsorship to many communities in which we work.

## What does this mean for me?

### We expect you to:

- Be sensitive to your local community's needs – listen and respond to the concerns people have about JT's operations.
- As appropriate, get involved in JT's work to support the local community.

**Q: My team wants to raise money for a local charity, are there any restrictions on who to donate to?**

**A: There are no restrictions on giving personal donations. Any donations made on behalf of JT should always be made through the Corporate Affairs team.**

## 6. Becoming a sustainable business

JT is committed to becoming a fully sustainable business that will be carbon neutral on Scope 1 and 2 by 2030 whilst also halving our supply chain emissions.

Wherever possible, we reduce our use of resources and cut any harmful emissions for which we are responsible. We reuse and recycle telecommunication equipment and waste. We comply with relevant environmental legislation and international standards. In countries where environmental legislation is not evident or enforced, we will ensure that responsible practices for managing environmental impacts are in place.

We work with customers, suppliers and contractors to develop products and services and working practices to minimise the impact on the environment. We will maintain stakeholder confidence by being open and responsive to the concerns of customers, regulators and the local communities in which we operate.

### What does this mean for me?

We expect you to:

- Familiarise yourself with relevant environmental laws, regulations and policies.
- Reduce your waste wherever possible.
- Use recycling facilities wherever possible.
- Avoid unnecessary travel – use conference call facilities or video conferencing where possible.
- Walk or use public transport where you can. Consider car-sharing with a colleague if you need a car.
- Always consider the environment when making purchasing decisions.

## 7. Being an ethical company

### Competition laws

We believe in free and fair competition. Most markets where we operate have laws designed to protect free and fair competition. These laws forbid arrangements with competitors that affect trading in the market and can apply both to JT and other organisations.

You should never seek, accept or discuss confidential information with competitors. Anti-competitive practices can damage our business. You should never encourage customers, suppliers or former employees of competitors to provide information that they should keep confidential.

### What does this mean for me?

To ensure that JT Group complies fully with competition laws and that we can identify any potential breaches, please follow the three steps below:

#### Step 1

Have a basic knowledge of how the competition rules apply to you. Here are some examples of anti-competitive practices:

- Sharing sensitive information with competitors (such as prices, costs and sales volumes).
- Agreeing with competitors to fix the price of products or services, including discounts, rebates and commissions.
- Agreeing with competitors to divide certain accounts, regions and markets between us.
- Agreeing with resellers and distributors to fix the minimum resale price of products or services.

#### Step 2

Always be vigilant in your business dealings with third parties. In particular, remember that:

- Anti-competitive practices include informal agreements and sharing of information with competitors, as well as formal contracts.
- It is not always obvious who our competitors are. Some of our suppliers, customers and business partners compete with us in certain markets.
- In particular, some of our distributors could be direct competitors of our own retail channels.

#### Step 3

If in doubt, only gather and use competitors' information from the public domain or consult the Legal Team.

**Q: My colleague sent me an email containing information about a competitor which could easily be misinterpreted. What should I do?**

**A: You should advise your colleague that he/she should not write anything that can be misinterpreted. Anything we write (or say) can be used as legal evidence. In fact, emails are the most common form of legal evidence.**



**Q: While at a conference, a sales director from another company started talking to me about the economic outlook in the Channel Islands and what this meant for our data pricing plans for the future. What should I do?**

**A:** Stop the conversation and walk away. You should not discuss any of our pricing or confidential commercial information with any of our competitors.

**Q: Someone has just joined the company from a competitor and I know that they had access to confidential information that could help us. Can I ask them to share what they know?**

**A:** No. It's illegal and you'll be compromising both JT and your colleague by trying to obtain competitor's confidential information.

## Protecting our brand and other assets

We have one of the Channel Island's most valuable brands. We must protect this valuable asset by using it consistently. You can help protect the JT brand by following our brand guidelines. This will help ensure that our brand is well managed, protected and builds trust, loyalty and admiration.

### What does this mean for me?

**We expect you to:**

- Comply with our brand guidelines which can be found on the Marketing & Brand JT XChange site.
- Report any suspected misuse of trade marks, logos or other JT Group's intellectual property including counterfeit goods.
- Not allow any third parties to use the JT brand or logo without discussing it first with the Marketing or Legal team.

**Q: Sometimes I see products bearing the JT logo and I think they are counterfeit. Do I need to let someone know?**

**A:** Yes. You should report your concerns to the Brand and Legal team. It is important that we protect our brand and reputation. You may be asked to purchase an example of the item to help the investigation.

## Intellectual Property Rights (IPR)

Our IPR is a valuable asset which differentiates us from our competitors. If we fail to protect and record this IPR, we lose the asset. We obtain patents to protect our ideas including technological advances, new products and services.

Each of us is responsible for ensuring we manage our IPR and prevent its unauthorised use. It is equally important that we respect the IPR of others. It is a further responsibility that we put in place the correct legal frameworks with our partners and suppliers that support our business objectives and effectively manage the benefits and risks.

### What does this mean for me?

**We expect you to:**

- When creating or commissioning products or services, ensure new ideas are protected with the appropriate copyright or patents.
- Not disclose new ideas or projects externally before protecting the relevant IPR.
- Immediately pass all IPR related queries to the Legal Team or refer to the Invention Disclosure policy.

**Q: I'm not sure whether an idea I've had might be worth something. Can I discuss it with our suppliers to get their views?**

**A:** No. You should initially discuss the idea with your team. If you want further input, please contact the Legal Team or refer to the Invention Disclosure policy.

## Communication and public policy

We voice our opinions on government proposals and other matters that may affect JT group and our stakeholders. We do not make gifts or donations to political parties or intervene in party political matters. These rules also apply to our business associates when acting on our behalf of or representing us.

We build JT's reputation through proactive engagement with government policy makers and other stakeholders such as the media, non-government organisations, industry analysts and local institutions.

JT's leaders voice their opinions on important industry matters that affect our business. Our Corporate Affairs team provide a co-ordinated response to relevant new government proposals. All public statements to the media, industry analysts, regulators and our shareholder must be clear and consistent and only made by authorised personnel.

### What does this mean for me?

**We expect you to:**

- Not make any comments on behalf of JT unless you have prior approval from the Corporate Affairs team.
- Never to use your position in JT to try to influence any other person (inside or outside of JT) to make political contributions or provide support to any political parties or politicians.
- Not make any contributions or incur expenses using a JT account for any political campaign, political party, political candidate or any of their affiliated organisations.
- Not to use your position to allow others to use resources such as work time, telephones, communications, services or meeting rooms to support any political campaign, political party, political candidate or any of their affiliated organisations.

## Using social media

We want to empower all of our employees to be good ambassadors for our brand. However, we don't want you to say anything that could have unintended consequences.

### What does this mean for me?

**We expect you to:**

- Ensure your internal and external communications are professional, timely and, when necessary, approved.
- Act professionally when representing JT, particularly when wearing JT branded clothing, using one of our vehicles or attending events on our behalf.

- Make no statements that could have a negative impact on JT's reputation or brand.
- Make no personal comments that could be interpreted, even mistakenly, as a comment or endorsement made by JT.
- Keep confidential information confidential.
- Release no financial information or information about new products or services without approval – leaked, incorrect or misleading messages can seriously affect the success of a product or service.

**Q: A local reporter has contacted me through a mutual friend to ask me about this year's annual report. Can I comment?**

A: No. You should explain that you are not allowed to comment publicly on JT's business. Instead, offer to put the reporter in touch with the Corporate Affairs team.

**Q: A public official or government agency has contacted me with a request to provide information in connection with a government or regulatory agency enquiry or investigation. How do I respond?**

A: JT Group will always cooperate with government investigations, providing truthful and accurate information and does not refuse, conceal, manipulate or delay submission of information legitimately requested by government authorities. If you are contacted by a public official or government agency to provide information you must immediately contact your line manager and the Legal team for further advice.

**Q: Can I make comments about JT on social media sites?**

A: You must be careful in your use of social media, especially when mentioning work or work-related matters. As a general guideline; 'Be yourself', 'Use common sense' and 'Respect the law'.

## 8. Safeguarding our customers

### Privacy Commitments

Privacy is central to earning and sustaining trust with JT, and being a responsible and ethical corporate citizen.

We always consider the impact our decisions have on the privacy of our customers and employees. Whenever we design products, launch campaigns, sign up vendors, collect information and share such information with our partners and others, we observe and adhere to JT's Privacy Commitments, which are as follows:

### Respect

We value privacy because of its value to people. It's about more than legal compliance – it's about building a culture that respects privacy and justifies the trust placed in us.

### Openness and honesty

We communicate clearly about actions we take that may impact privacy; we ensure our actions reflect our words; and we are open to feedback about our actions.

### Choice

We give people the ability to make simple and meaningful choices about their privacy.

### Privacy by design

Respect for privacy is a key component in the design, development and delivery of our products and services.

### Balance

When we are required to balance the right to privacy against other obligations necessary to a free and secure society, we work to minimise privacy impacts.

### Laws and standards

We comply with privacy laws, and we will work with governments, regulators, policy makers and opinion formers for better and more meaningful privacy laws and standards.

### Accountability

We are accountable for living up to these ethics throughout JT Group, including when working with our partners and suppliers.

## What does this mean for me?

We must all live up to JT's Privacy Commitments. Depending on your role, some commitments may be particularly important for you. For example:

- If you are involved in marketing, base management or business development, look at: Openness, Honesty and Choice.
- If you are involved in product development, technology and engineering, look at: Openness & Honesty, Choice and Privacy by Design.
- If your role involves working with governments, regulators, policy makers and law enforcement, look at: Balance and Laws & Standards.

Everyone should pay particular attention to the first and last of our commitments; Respect and Accountability. They are especially relevant to ExCo who are responsible for making sure JT is run in accordance with our Privacy Commitments.

**Q: I'm working on a project involving a use of customer information that is not covered by law. Do I still have to think about privacy?**

A: Yes. Our first commitment is to respect customers' privacy. Regardless of whether there is a law or not, everything we do should be consistent with our Privacy Commitments.

**Q: I've been contacted by the law enforcement authorities with a request for access to personal information. What do I do?**

A: While we may be required by law to respond to a Government or law enforcement request for information, there are other requirements to consider. Please contact the Legal Team in the first instance who will provide further guidance.

**Q: I'm building a JT application that will use personal information. How do I make sure privacy is protected – can I simply add a privacy policy to the app?**

A: No. Our privacy by design commitment means we make sure privacy is built into our applications and services, not just added on. If in doubt, talk to the Legal team.

## Security of our people, property and information

JT handles vast amounts of information every day. The systems and networks which hold our customers' and employees' data must be secure. The information we use (whether written or spoken, digital or physical) needs to be protected so that we can be sure of its:

**Confidentiality:** our information is not disclosed to unauthorised people.

**Integrity:** our information is accurate, complete and authentic.

**Availability:** our information is accessible when we need it.

Follow these simple steps to safeguard and protect the information provided to us:

**We must all live up to JT's Privacy Commitments. Depending on your role, some commitments may be particularly important for you. For example:**

### 1. Clear your desk and lock your screen

- Lock your screen if you leave your computer unattended and ensure classified information is securely stored if you leave your desk.
- Switch off your computer at the end of the day and lock laptops away.
- Clear your desk when you leave for the day.
- Store classified information correctly and dispose of it securely when it is no longer needed.

### 2. Protect your password

- Do not share your password with anyone or write it down.
- Do not let your computer 'remember' your passwords.
- Choose passwords that contain at least eight characters with a mixture of upper and lower case letters, numbers and special characters.

### 3. Think before you click

- Be careful when opening attachments from unknown addresses.
- Only use authorised software.
- Do not click links which may take you to unsafe websites.
- Do not use our systems for anything obscene, indecent, offensive, defamatory, illegal or otherwise inappropriate for the workplace.

### 4. Protect data at all times

- Always display your ID pass when you are on JT Group premises.
- Always look after laptops and other work equipment when you are not in the office.
- Avoid leaving original documents in printers or photocopiers.
- Use 'secure printing'.

**Q: A colleague is covering my role while I am on holiday and needs access to the systems I use. It's a lot of hassle to get them a log-in and password, can I just give them mine?**

**A:** No. You should never give your login details to other people. We need to keep accurate records of who has access to our systems. Everyone who has access to our systems must be authorised.

**Q: I'm working from home and I'm having problems accessing the JT network. Can I ask my colleague to send me the information I need to my personal email account?**

**A:** No. Information sent to personal email accounts is not protected in the same way as the information on the JT network. You should never send information to a personal account or upload it onto a personal computer or other device.

**Q: Can I allow my visitor to make his/her own way out of the building?**

**A:** No. Any visitors that you invite onto JT Group premises are your responsibility. Supervise your visitors at all times and do not share or loan your access card.

# Together

we are JT





JTsocial JTHelp



JT Group Limited



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JTsocial

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