



TITLE:

Code of Ethics

No: **QP 62.02**

Rev: **NC**

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Date: 09/01/16

Owner: President

Approved by: Robert Jusko

- 1.0 **PURPOSE:** To ensure that employees and providers are aware of their specific rights to report any and all ethic issues in a unanimous manner without repercussion.
- 2.0 **SCOPE:** This procedure applies to all J&L employees and providers of products or services.
- 3.0 **DEFINITIONS:** None
- 4.0 **PROCEDURE:**
- 4.1 **Quality & Environmental Health & Safety**
 - 4.1.1 The J&L products shall be designed, produced and delivered with the paramount consideration being the safety and health of its employees and providers.
 - 4.1.2 J&L shall comply with all applicable environmental, health and safety laws, regulations and directives, but also conduct operations in a manner that safeguards the environment, minimizes waste, emissions, energy consumption, and the use of materials of concern. J&L shall assure safe and healthy work environments for its employees and providers.
 - 4.2 **Competition on the Merits and Fair Play**
 - 4.2.1 J&L employees or providers shall not pay a bribe in any amount, for any reason whatsoever, whether on customer's behalf, or on the behalf of others. They shall never offer, promise, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone (including a customer, customer employee, of higher tier provider to forego their duties and provide unfair business advantage to customer, J&L, or others. This includes facilitating payments to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance.



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4.2.2 J&L and its providers shall not engage in any anti-competitive conduct for any reason whatsoever, whether on customer's behalf, J&L's behalf, or on behalf of others. J&L and its providers shall never fix prices, or allocate customers or markets, or exchange customer's or J&L's competitive sensitive information with customer competitors or J&L competitors. J&L and its providers shall refrain from abusing our market power, whether for our benefit or the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.

4.2.3 J & L and its providers shall not engage in other deceptive or unfair market practices, whether on customer's behalf, or J&L's behalf, or on behalf of others. J&L.

4.2.4 Training is provided for (but is not limited to) the following topics, when required:

- Quality Procedures and Requirements
- Drawings and Specifications
- Quality Plan and Production Routers
- Manufacturing and Assembly Techniques
- Tooling
- CNC Programming
- Internal Audit Techniques
- Statistical Process Control
- Inspection, Measuring and Testing
- Part Marking
- Handling and Packaging

4.3 Conflict of Interest

4.3.1 All employees must avoid any conflicts of interest and any such violations must be reported to the customer's member. Actual and apparent conflicts of interest must be submitted, upon detection.



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4.4 International Trade Compliance

4.4.1 J&L shall conduct business in strict compliance with all applicable laws and regulations governing the export, re-export and retransfer of goods, technical data, software and services; import of goods; economic sanctions and embargoes; and U.S. boycott requirements.

4.5 Government Procurement

4.5.1 J&L shall ensure that all government regulations and rules are complied with when contracting with any government agency. J&L shall honor and respect all rules and regulations when dealing with government personnel (e.g. receipt of gifts and employment). Products shall be in compliance with accounting and pricing requirements, claim only costs, ensure the accuracy of data submitted and with all other applicable U.S. government requirements.

4.6 Information Protection

4.6.1 All employees must respect the legitimate rights and intellectual property rights of customers and others. Sensitive information, including confidential, proprietary and personal information must be protected. Information shall be used for business purposes only, unless specific permission is granted.

4.7 Accuracy of Records and Submissions

4.7.1 J&L shall maintain books and records of all transactions related to customer business and each of the too customers, and regulatory authorities and they shall be accurate and complete. Records must never be altered, concealed or destroyed to misrepresent any fact, circumstance or transaction related to customer business.



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4.8 Non-Discrimination

4.8.1 J&L shall treat any existing and prospective employees and business partners fairly, based only on merit and other factors related to the legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.

4.9 Child Labor

4.9.1 J&L shall ensure that child labor is not utilized in performance of work, whether or not related to customer business. This requirement refers to any child under the minimum legal age for employment where the work is performed.

4.10 Human Trafficking

4.10.1 Laws and regulations relating to human trafficking must be obeyed. J&L shall not engage in the use of forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or trafficking in persons.

4.11 Anonymous Reporting and Reporting Misconduct

4.11.1 J&L employees and business partners shall be provided with access to adequate reporting channels to raise legal or ethical issues or concerns, including, without limitation, reports of a violation of the code by J&L or the business partners, without fear of retaliation, including opportunities for anonymous reporting. The avenue for this reporting shall be as follows; via email to qtc@netzero.com or by telephone at 928-821-5456. The receiving party shall then relay the concerns or issues to J&L and/or customer officials without relaying original contact person or address or phone of the sender.



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4.12 Business Partners

4.12.1 J&L shall flow down the principles set forth in this procedure to all business partners for ensuring compliance by the business partners.

4.13 Code Compliance

4.13.1 Customers and its representatives shall be afforded access to J&L compliance in performing work for customers, including on-site inspection of facilities and review of associated books, records and other documentation. J&L shall provide any additional information to customers upon request. J&L shall ensure that the customers have access to business partners as well for these purposes. In the event of any wrong doing, J&L shall cooperate with any customer investigation, to include any related business partners. Any identified nonconformances shall be corrected in a timely manner to the satisfaction of customers.

4.14 Training Records

Training records shall be completed to provide evidence of all employee's awareness of this procedure. Training records are filed in the employee Training Record Log, F18.06.

5.0 RESPONSIBILITIES:

5.1 J & L Machine Management is responsible for providing the required training.

5.2 Respective supervisors are responsible for evaluating the competency of individuals performing tasks for which they are trained.



J&L Machine
COMPANY, INC.

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6.0 **REVISION HISTORY**

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Revision	Date	Change Description
N/C	09/01/16	Original issue