

JW Energy: Company Governance, Ethics, and Compliance Policy

1. Introduction

JW Energy is committed to maintaining the highest standards of corporate governance, ethics, and compliance. As an organization, we recognize that our success depends not only on financial performance but also on the trust and confidence we earn from our stakeholders, including employees, customers, investors, suppliers, and the communities in which we operate.

This policy document provides a framework to guide JW Energy's operations in an ethical, transparent, and responsible manner. Our governance structures, ethical principles, and compliance programs are designed to ensure that we meet the legal and regulatory requirements applicable to our industry while fostering a culture of integrity and respect.

2. Governance Principles

2.1. Leadership and Organizational Structure

- **Board of Directors:** The ultimate responsibility for governance rests with the Board of Directors of JW Energy. The Board is tasked with defining the company's strategy, overseeing its management, and ensuring that operations are conducted in accordance with legal and regulatory standards.
- **Board Committees:** The Board has established several committees, including an Audit Committee, Compensation Committee, and Governance and Nominations Committee, to focus on specific areas of oversight and decision-making. Each committee operates under a formal charter and reports regularly to the Board.
- **Executive Leadership:** The CEO, together with the senior leadership team, is responsible for the day-to-day management of the company. This includes executing strategies and policies set by the Board, managing risks, and ensuring the overall operational success of the company.

2.2. Accountability and Transparency

- **Regular Reporting:** JW Energy provides transparent, timely, and accurate reporting to its stakeholders, including shareholders, regulators, and the general public. This includes quarterly and annual financial reports, sustainability reports, and other disclosures required by law.
- **Open Communication:** The company encourages open and honest communication within all levels of the organization. Stakeholders are encouraged to ask questions, express concerns, and participate in the governance process.

2.3. Internal Controls and Risk Management

- **Financial Controls:** JW Energy has implemented robust financial controls to safeguard assets, ensure the integrity of financial statements, and prevent fraud. Internal and external auditors evaluate the effectiveness of these controls on an ongoing basis.
- **Risk Management Framework:** The company employs a comprehensive risk management framework to identify, assess, and mitigate potential risks. This framework covers financial, operational, regulatory, environmental, and reputational risks, and is reviewed periodically by the Board.

2.4. Ethical Business Practices

- **Commitment to Ethics:** At JW Energy, we uphold the highest standards of integrity and fairness. All employees, officers, and directors are expected to act ethically in their dealings with stakeholders, including customers, suppliers, investors, and colleagues.
- **Culture of Respect:** We foster a work environment that values diversity, inclusivity, and mutual respect. Every individual is encouraged to speak up, act responsibly, and make decisions that reflect our core values of honesty and respect.

3. Ethical Conduct and Corporate Responsibility

3.1. Code of Ethics and Conduct

- **Overview:** JW Energy's Code of Ethics and Conduct is a guiding document that sets forth the ethical standards and expectations for all employees, directors, and officers. The Code covers key areas such as conflict of interest, confidentiality, financial integrity, and the treatment of colleagues and stakeholders.
- **Personal Responsibility:** Every employee is expected to understand, respect, and comply with the Code of Ethics. Managers are tasked with leading by example, ensuring that ethical conduct is embedded in daily activities, and providing guidance to their teams when ethical dilemmas arise.

3.2. Conflict of Interest

- **Identifying Conflicts:** A conflict of interest occurs when an individual's personal interests interfere with their duties to the company. Employees and directors must avoid situations where personal relationships or financial interests conflict with their responsibilities to JW Energy.
- **Disclosure and Resolution:** If any conflict of interest arises, employees and directors are required to disclose the situation to management or the Board. The company will take appropriate steps to resolve conflicts and ensure that all actions taken are in the best interests of JW Energy.

3.3. Fair Treatment and Equal Opportunity

- **Non-Discrimination:** JW Energy is committed to providing a workplace that is free from discrimination, harassment, and retaliation. We believe that diverse perspectives and backgrounds contribute to innovation and success.
- **Equal Employment Opportunity:** We provide equal employment opportunities to all individuals, regardless of race, color, religion, gender, gender identity, sexual orientation, age, disability, or national origin. Our recruitment and promotion practices are designed to attract and retain top talent while promoting diversity and inclusion.

3.4. Anti-Harassment and Anti-Retaliation

- **Harassment-Free Workplace:** JW Energy has a zero-tolerance policy for harassment in any form. Employees are prohibited from engaging in any behavior that creates a hostile or intimidating work environment. This includes harassment based on gender, race, ethnicity, disability, or any other protected characteristic.
- **Protection Against Retaliation:** Employees who report unethical conduct, harassment, or violations of company policies will not face retaliation. We are committed to ensuring that all employees feel safe and supported when raising concerns.

4. Compliance with Laws and Regulations

4.1. Legal Compliance and Regulatory Adherence

- **Compliance with Laws:** JW Energy is committed to complying with all relevant laws, regulations, and industry standards in the jurisdictions where we operate. This includes regulations related to corporate governance, environmental protection, labor practices, and financial reporting.
- **Global Compliance:** As JW Energy operates across multiple regions, we ensure that our operations comply with local laws and international regulations, including anti-corruption, trade restrictions, and environmental legislation.

4.2. Anti-Bribery and Corruption

- **Zero-Tolerance Policy:** JW Energy has a strict anti-bribery and anti-corruption policy. The company does not tolerate bribery or corrupt practices in any form. Employees and third parties acting on behalf of JW Energy must not offer, solicit, or accept bribes, kickbacks, or other improper payments.
- **Third-Party Due Diligence:** We require our third-party contractors, suppliers, and agents to adhere to the same anti-bribery and anti-corruption standards. We conduct thorough due diligence to ensure compliance with our policies before entering into business relationships.

4.3. Data Privacy and Protection

- **Commitment to Privacy:** JW Energy respects the privacy and confidentiality of the personal data entrusted to us. We are committed to protecting data in accordance with applicable data protection laws, such as the General Data Protection Regulation (GDPR) in Europe and other relevant privacy laws.
- **Data Security:** We have implemented security measures to safeguard the personal and sensitive data we process. Employees are trained on data protection practices and are required to handle all personal data in compliance with company policies.

4.4. Environmental Stewardship

- **Environmental Responsibility:** As a company engaged in the energy industry, JW Energy is committed to minimizing the environmental impact of its operations. We adhere to environmental regulations and take proactive steps to reduce emissions, waste, and resource consumption.
- **Sustainability Initiatives:** We are dedicated to supporting sustainable energy practices and exploring renewable energy solutions. JW Energy continuously seeks ways to improve the environmental footprint of its operations while meeting the energy needs of our customers.

5. Compliance Program and Enforcement

5.1. Compliance Officer and Oversight

- **Role of the Compliance Officer:** The Compliance Officer is responsible for overseeing the implementation and effectiveness of the company's governance, ethics, and compliance policies. The officer ensures that all employees and business partners are aware of and adhere to the company's ethical standards and legal obligations.
- **Oversight by the Board:** The Board of Directors is responsible for the overall oversight of compliance activities. The Compliance Officer reports regularly to the

Board, ensuring that governance and compliance issues are addressed in a timely and effective manner.

5.2. Training and Education

- **Regular Training Programs:** JW Energy provides regular training programs to educate employees about legal requirements, company policies, and ethical behavior. Training covers topics such as anti-corruption, data privacy, workplace conduct, and safety regulations.
- **Continuous Learning:** Employees are encouraged to continue their education on governance and compliance matters through workshops, seminars, and online resources.

5.3. Whistleblower Protection and Reporting Channels

- **Reporting Mechanisms:** JW Energy maintains multiple channels for employees and third parties to report concerns related to unethical conduct, legal violations, or breaches of company policies. These channels are confidential and accessible to all employees.
- **Protection Against Retaliation:** Employees who report violations in good faith will not face retaliation. We are committed to creating an environment where employees feel comfortable speaking up and reporting any concerns without fear of negative consequences.

5.4. Investigation and Enforcement

- **Investigation Process:** Any reported violations of company policies or legal requirements will be investigated promptly and thoroughly. The company will take appropriate actions to resolve the situation, including disciplinary measures when necessary.
- **Disciplinary Actions:** Employees found to be in violation of company policies may face disciplinary actions, including suspension, termination of employment, and legal action, depending on the severity of the violation.

6. Conclusion

JW Energy is committed to conducting business with the highest levels of integrity, transparency, and ethical standards. We are dedicated to adhering to the legal and regulatory requirements that govern our operations, while maintaining a culture of respect and responsibility. By following the principles outlined in this policy, we ensure that our actions align with the values of our company and meet the expectations of our stakeholders.

This policy will be reviewed periodically and updated as necessary to reflect changes in laws, regulations, or business practices.