

JBT Marel

Supplier Code of Conduct

Last Updated: June 19, 2025

JBT Marel Corporation and its subsidiaries (JBT Marel) strive to conduct business in an ethical and honest manner, in compliance with applicable law, and expect our suppliers (including contractors, suppliers, and other business partners) to do the same. This Supplier Code of Conduct sets forth the base principles that we expect JBT Marel suppliers to follow during our business relationship. As one of those suppliers, we urge you to familiarize yourself with this Code.

This Supplier Code of Conduct applies to all JBT Marel suppliers and is incorporated, by reference, into general purchase order terms and conditions with JBT Marel, or in any other agreement JBT Marel may have with its suppliers. The Code supplements, but does not supersede, any rights or obligations contained in those agreements. This Code does not create any legal rights for any suppliers.

Ethical Conduct and Business Integrity

Compliance with Law

JBT Marel complies with applicable laws wherever we conduct business. We expect suppliers to JBT Marel to also conduct their business in full compliance with all applicable laws, rules, and regulations when doing business with, or on behalf of, JBT Marel.

Ethical Business

JBT Marel is committed to honest and ethical business practices in the operation of our business. We expect suppliers to JBT Marel to share this commitment. This means that we expect suppliers to conduct business ethically, and to have controls in place to detect the misuse of company assets, corruption, bribery, improper gifts, extortion, and embezzlement. All supplier business dealings should be legal and honest.

Fair Competition

JBT Marel strictly adheres to “competition” laws in many countries and “antitrust” laws in the United States. JBT Marel expects its suppliers to comply with all applicable competition and antitrust laws and to never seek to gain a competitive advantage through unethical business practices.

Data Privacy

Suppliers must comply with all applicable data protection laws, such as, but not limited to, the General Data Protection Regulation in the European Union and the California Consumer Privacy Act in the United States. Suppliers are expected to ensure the confidentiality, integrity, and availability of personal data, to timely report any personal data breaches to JBT Marel, and to provide JBT Marel reasonable support in meeting its own data privacy obligations.

Anti-bribery, Corruption and Money Laundering

JBT Marel expects its suppliers to uphold the highest standards of integrity and transparency in all business dealings. Suppliers must not offer, give, solicit, or accept any form of bribe or other improper incentives in their interactions with, or on behalf of, JBT Marel. Suppliers are expected to comply with all applicable anti-corruption laws and regulations, as well as ensure compliance with all relevant anti-money laundering laws.

Foreign Trade Laws

JBT Marel is dedicated to conducting business in full compliance with all applicable trade regulations. Suppliers to JBT Marel involved in the import and export of products must adhere to all relevant laws, including those related to economic embargoes, trade regulations, import and export controls, and measures against terrorist financing.

If applicable, suppliers are required to provide complete and accurate data for sourced goods, including but not limited to:

- Weights and dimensions
- Harmonized Tariff System (HTS) code
- Country of origin information
- Mill Test Certificates (MTC)
- Country of melt and pour for articles subject to U.S. Section 232 tariffs
- Detailed goods description
- Composition, including percentage of metal content and application
- Export Control Classification Number (ECCN) code
- Embedded CO2 emissions for the purposes of the Carbon Border Adjustment Mechanism (CBAM)
- Amount in kilos of any single-use plastics used in packaging solutions

This information is essential to ensure compliance and facilitate efficient and responsible trade operations.

Suppliers must issue valid certificates of origin for all originating contents eligible for Free Trade Agreements (FTAs) and provide corresponding detailed commercial invoices for each international shipment. This ensures compliance with trade regulations and facilitates seamless cross-border transactions.

Additionally, suppliers are required to:

1. Participate in regular training and awareness programs to stay informed about customs and trade compliance requirements.
2. Maintain accurate records subject to potential customs audits.
3. Ensure open communication channels for reporting compliance concerns.
4. Acknowledge the consequences of non-compliance, which may include the termination of the supplier relationship.

Information Security

JBT Marel suppliers who have access to JBT Marel information (such as engineering and technical designs and product specifications, the identity of JBT Marel customers and suppliers, production and supply costs, and JBT Marel's technologies and processes) must maintain the confidentiality, integrity and availability of that information. JBT Marel confidential information must be deleted, destroyed, or returned to JBT Marel on request or at the termination of any agreement. Suppliers of JBT Marel must also recognize the importance of information security and comply with all relevant information and cybersecurity laws [e.g. Network and Information Security Directive (NIS2), Cyber Resilience Act (CRA), U.S. Securities and Exchange Commission (SEC) Cyber Security Rules). Suppliers are required to implement risk based, robust information security management systems (ISMS) to ensure JBT Marel information is accurately maintained, appropriately available, sufficiently recoverable, and protected against unauthorized access, use, destruction, disclosure or modification. Appropriate cryptographic measures should be implemented in accordance with international standards such as the National Institute of Standards and Technology (NIST).

JBT Marel expects suppliers to ensure their employees are appropriately screened and trained in information security protocols and that they are aware of the importance of protecting sensitive data. Suppliers must implement strict access control measures, both physical and technical, to ensure only authorized personnel have access to sensitive information. Suppliers should also implement appropriate cyber security tools.

Suppliers must have clear procedures for responding to security incidents, including timely reporting if a supplier to JBT Marel becomes aware of an actual or possible unauthorized disclosure of JBT Marel confidential information, it must be immediately reported to JBT Marel.

Third-Party Risk Management

Suppliers should manage risks associated with their own third-party vendors, ensuring they also comply with information security standards and the principles of the JBT Marel Supplier Code of Conduct. All third party suppliers engaged by the supplier must be subject to contracts which mirror the contractual obligations between the supplier and JBT Marel.

Business Continuity and Disaster Recovery

Suppliers are required to maintain comprehensive business continuity and disaster recovery plans that ensure the resilience of their operations. Additionally, suppliers must implement robust backup procedures and data retention policies to safeguard all critical information.

Conflicts of Interest

JBT Marel recognizes that our suppliers are crucial to our success. JBT Marel expects suppliers to uphold the highest standards of integrity and transparency in their dealings with, or on behalf of, JBT Marel. Suppliers are expected to disclose any potential conflicts of interest such as having friends or relatives working for JBT Marel, a customer, or a competitor that are in a position that could compromise the fairness and objectivity of the supplier relationship. Additionally, suppliers should disclose to a JBT Marel manager, representative, or online at [JBT Marel Hotline](#) personal investments that could lead to a conflict, such as significant ownership or other financial interests in a competitor, customer, or JBT Marel itself.

Entertainment and Gifts

Although it is customary in many companies to entertain customers and to exchange gifts, such entertainment and gift exchanges can be interpreted as a conflict of interest. JBT Marel employees and their immediate families may not accept gifts of cash or cash equivalents from suppliers, including gift certificates and gift cards, and other gifts may need to be reported or returned pursuant to JBT Marel's Guide to Ethical Conduct.

Workforce Welfare and Social Responsibility

Employee Health and Safety

JBT Marel expects suppliers to operate in a manner that complies with all applicable safety laws, regulations, and standards, and to make continuous efforts to achieve a workplace that is free from work-related injuries and illnesses. Suppliers are encouraged to foster a culture of safety, promoting open communication and the reporting of safety concerns without fear of retaliation. Additionally, suppliers should provide regular training and education to ensure their employees are knowledgeable about safety protocols and best practices.

Human Rights and Forced Labor

JBT Marel supports internationally recognized human rights and expects its suppliers to uphold human rights in every jurisdiction in which they do business. JBT Marel also expects that suppliers will not use any type of involuntary, child, or forced labor, including indentured, bonded, prison, slave, or human trafficked labor. All labor must be voluntary, and employees must be free to end their labor or their employment relationship at any time.

Nondiscrimination

Harassment in any form—whether through physical actions, spoken or written remarks, symbols, videos, or pictures—can adversely impact individual work performance and the overall workplace environment. JBT Marel expects suppliers to ensure their employees are not subjected to harassment and are treated with dignity and respect.

JBT Marel expects suppliers to uphold standards that support and maintain a workplace free from unlawful discrimination. This includes, but is not limited to, discrimination based on race, gender, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious belief, or any other factors protected by applicable law.

Freedom of Association

JBT Marel expects its suppliers to equally support and respect the right to freedom of association and collective bargaining, ensuring that all employees can exercise their freedoms without fear of retaliation or discrimination. Suppliers must adhere to applicable laws regarding the right to affiliate with lawful organizations without interference.

Wages and Benefits

Suppliers must ensure employees receive fair wages and benefits in accordance with applicable laws and regulations. JBT Marel expects suppliers to have a reliable system in place to verify and accurately record payroll, deductions, and the hours worked by legally authorized employees. It is imperative that suppliers comply with all applicable labor laws governing regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits.

Environmental Responsibility and Stewardship

Resource Efficiency and Continuous Improvement

Suppliers to JBT Marel are expected to commit to responsible management and care for the environment and natural resources. This commitment includes obtaining and maintaining all necessary environmental permits and adhering to their operational requirements.

Additionally, suppliers should:

- Participate in recycling, reusing, and protecting natural resources, such as energy and water.
- Encourage efficient use of resources in their value chain to promote a positive environmental impact and environmental protection.
- Continuously develop new methods for minimizing waste.
- Optimize the use of resources and consider environmental aspects throughout the entire production and distribution chain.
- Provide information on health and the environment regarding the potential impacts of hazardous substances to anyone who may work with or around them.
- Strive to fully eliminate the use of hazardous substances possible.
- Develop and maintain greenhouse gasses inventory of products and services.
- Actively work to reduce emissions into the air, soil, and waterways from their operations and those of their customers.

Suppliers are also expected to cooperate with JBT Marel on carbon reporting and environmental compliance, including setting and reporting on emission reduction targets.

Conflict Minerals

The mining and trade of minerals such as tin, tantalum, tungsten, gold (collectively referred to as 3TG), cobalt, and mica can be used to finance armed groups and fuel forced labor, child labor, and other serious human rights violations. These activities may also contribute to instability in politically unstable regions and support corruption.

Like many companies, JBT Marel does not directly source conflict minerals from mines, smelters or refiners, and is many levels removed from these market participants. We therefore require the cooperation of our suppliers in the implementation of the [JBT Marel Conflict Minerals Policy](#) and in enabling JBT Marel to meet its compliance obligations. We expect our suppliers to:

- Put in place procedures for the traceability of Conflict Minerals in their supply chain;
- Cooperate with our Conflict Minerals due diligence process, which includes providing us, from time to time, with written certifications and other information concerning the origin of Conflict Minerals included in products and/or components supplied to JBT Marel;
- Maintain reviewable business records supporting the source of Conflict Minerals and supply such records upon request;
- Adopt policies and procedures with respect to Conflict Minerals consistent with the policy and practices set forth herein and the Organization for Economic Co-Operation and Development (OECD) Guidance, including the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel, direct suppliers and indirect suppliers; and

- Require their direct and indirect suppliers to adopt policies and procedures that are consistent with our Conflict Minerals Policy.

Suppliers should contact the teams with whom they regularly conduct business if they have questions concerning these expectations.

Compliance and Reporting of Violations

Third Party Sustainability Rating

JBT Marel collaborates with a third-party organization to assess the sustainability performance of a select group of suppliers. This sustainability rating methodology aims to enhance supply chain transparency and foster continuous improvement in areas such as environmental practices, labor and human rights, ethics, and social stewardship. JBT Marel encourages its suppliers to engage in this rating process and share their scorecards with stakeholders, including JBT Marel.

Audits and Assessments

Suppliers are required to conduct regular audits or engage an independent third party to perform them. Audit reports must be made available to JBT Marel upon request. Suppliers are responsible for addressing any critical vulnerabilities and deficiencies identified in the audit reports.

JBT Marel reserves the right to audit suppliers, and where possible or practical supplier's subcontractors, for compliance with this policy and with corrective actions required for any violations identified. Failure to address violations might impact the continuity of the business relationship with JBT Marel, up to and including the termination of a business relationship in the event of severe violations.

Reporting of Violations

All observed conflicts of interest or violations of this Code must be reported to JBT Marel so that appropriate action can be taken. Please report any violations to a JBT Marel manager or representative or online at [JBT Marel Hotline](#).

JBT Marel will not tolerate retaliation against any supplier who, in good faith, reports a potential violation of our Supplier Code of Conduct or the law. However, if a report is made in "bad faith," it may impact the continuity of the business relationship with JBT Marel. A report is made in bad faith if it is false or misleading or if it is made with the deliberate intent to cause trouble for a person, location, business division, or similar entity through a false report.