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# JATO Code of Business Conduct

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July 2025

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# Message from Jake Shafran

**JATO is committed to conducting its business honestly, fairly and within the law throughout its global operations.**

The JATO Code of Business Conduct provides clear guidance for JATO team members on the standards expected and the behaviours required whilst working for JATO to ensure that we live our core values of Integrity, People First, Excellence, Collaboration and Innovation. The Code of Business Conduct provides a high-level direction across key areas and operates in alignment with Company policies and governance procedures.

**The JATO Code of Business Conduct applies to all JATO team members worldwide, including all employees, service providers, contractors, agents and short-term contract personnel. Every one of us is expected to read, understand and comply with the Code.** Running our business with passion and integrity is at the very heart of our values and one of the reasons we've been able to establish and maintain trust with our customers, colleagues, suppliers and business partners. The JATO Code of Business Conduct centres on the values we use to guide our behaviour and always keep us on the right course. This is why each year we ask team members to complete training on, and affirm compliance with the Code. This annual process demonstrates JATO's commitment to our core value of integrity and always doing the right thing, and it is designed to facilitate strong relationships with each other and everyone with whom we do business



**Jake Shafran**  
Chief Executive Officer

## Purpose

JATO respects the legal framework of the countries in which we operate and requires all staff to comply with the laws that apply to our business across the globe.

JATO expects everyone in our workforce to act honestly and fairly and to be loyal to JATO in the conduct of their work. We, as JATO team members, should not act in a manner that would damage the company's reputation or create a situation where there is a conflict between individual interests and those of JATO.

The purpose of this Code is to describe the principles by which JATO expects us to conduct ourselves, and to provide us with guidance on the standards expected when conducting business on JATO's behalf. **This JATO Code of Business Conduct (the Code) applies to all JATO activities wherever they take place.**

**The Code is not intended to be a summary of all JATO policies or a list of rules that addresses every situation that you might encounter. JATO team members must always use their independent good judgement and seek guidance when unsure of the right course of action.**

## Scope

This Code applies to all JATO team members worldwide, including all employees, service providers, contractors, agents and short-term contract personnel. We are all required to be familiar with the Code and comply with its provisions. Across all geographies, levels, and functions, everyone is expected to abide by the highest ethical standards, and we do this by adhering to JATO core values

JATO is committed to conducting its business lawfully. While the Code is intended as a foundation to provide guidance and to help team members make the right decisions, it is not intended to cover every possible law, policy or situation. JATO team members are expected to be thoughtful, act in the spirit of all policies, and always use their best judgment when making decisions.

## Breach of the Code

Any breach of this Code may be a disciplinary matter and could result in disciplinary action up to and including dismissal. This means it is very important that everyone reads and understands the Code and seeks guidance if there is a situation where they are unsure of the right thing to do. Additionally, since many provisions of this Code and our policies are based on legal requirements, violations may also subject the individuals involved and JATO to civil sanctions and/or criminal penalties, including fines or jail sentences.

## Supporting Policies

Several of the elements in this Code are or may in future be supported by more detailed policies and procedures to guide team members. For example, the **Against Bribery and Corruption** section and the **Gifts and Hospitality** section of this Code are both supported by JATO's Anti-Bribery Policy.

We are all required to be familiar with and to comply with JATO's policies as well as this Code, and to keep up to date as those policies evolve.

**All JATO Policies and Procedures can be found via the Organisational Effectiveness tab on InSite.**

## Guidance and Speaking Up

**The Principles in this Code are intended to help guide you in the normal course of your work, but they cannot address every possible situation.**

If you find yourself in a situation where you are unsure of the right thing to do, it may be helpful to ask yourself the following questions:

- Is it legal?
- Is it ethical?
- Is it consistent with the Code of Business Conduct and with JATO's policies?
- Would I feel comfortable if it appeared in the news?

JATO's reputation for honesty, integrity and fair dealing has been earned through the efforts of JATO team members over many years and is one of JATO's most valuable assets – It however only takes one misguided or inappropriate action to put that valuable reputation at risk. If you suspect that someone is putting that reputation at risk and/or violating this Code, a JATO policy or the law, you must act. **Please refer to the JATO Policy on Whistleblowing for more details. No one reporting a concern in good faith will face any retaliation, and JATO will not tolerate any discrimination or prejudice against those who speak up.**

## Asking Questions

If you are still unsure about what to do, please speak with one of the following:

- Your Manager in the first instance
- Human Resources Department
- General Counsel

Always feel free to ask questions, raise concerns or seek guidance if you need it. JATO will not tolerate any retaliation against anyone who has reported a concern in good faith.

If you have any concerns about unethical or illegal behaviour or failures to comply with this Code of Conduct, you should speak up in accordance with the JATO Policy on Whistleblowing. If you see something that doesn't look right, say something. If you do not, you risk being complicit in the wrongdoing yourself and involved in any potential subsequent investigation.

If you are unsure whether you should raise a concern, speak to your Manager, the General Counsel or a member of the Human Resources Department. Concerns should be raised with:

- Your Manager (unless you have a reasonable belief that they are involved in the suspected wrongdoing); or
- A Director of the Company (where you suspect that your Manager may be involved, or where you are dissatisfied with your Manager's response).

# Compliance with the Law and Fair Dealing

**JATO's policy is to promote high standards of integrity by conducting its affairs honestly and fairly. We must also comply with the laws that apply to our business.**

JATO is committed to complying with the law as it applies to JATO business around the globe. The laws and regulations that apply to our business are numerous and often complex. If you have any doubt whether your conduct or the conduct of colleagues complies with the law, guidance should be sought from your manager, the Human Resources Department or the General Counsel.

**Everyone at JATO must deal fairly with our customers, suppliers, partners, service providers, competitors, JATO team members and anyone else whom we have contact with while performing our jobs.** We may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

We never use, take, copy or give others the confidential or proprietary information of our competitors. Do not request or accept such confidential information from anyone, including our competitors' past or present employees. Improperly collecting or using such information may subject JATO and the individuals involved to lawsuits or criminal penalties. If you happen to obtain such information, safeguard it and contact our Legal Department immediately.

**JATO respects the intellectual property rights of others.** Intellectual property rights include trademarks, copyrights, patents and trade secrets. Specific examples of information typically covered by intellectual property rights are company logos, names of product offerings, photographs and images, product designs and plans, articles published electronically or in print, books, movies and software. If we want to use intellectual property owned by someone else, generally JATO must either purchase these rights or obtain a license to use the property.

**JATO is against any form of slavery or enforced labour. We have a zero-tolerance approach to slavery or enforced labour in our supply chain and require a commitment against slavery from our suppliers.**

# Health and Safety

**JATO puts safety first and will provide a safe and healthy environment for all personnel and visitors.**

Keeping our working environment safe requires the cooperation of all staff and it is essential that each of us takes responsibility to safeguard our own health and safety and that of others. JATO will provide the necessary training and resources to allow for the safe performance of day-to-day activities. You should report any workplace-related injuries or illness, or near-misses to the Human Resources Department, as well as your Manager, without delay.

For further information, see the **JATO Health and Safety Policy**.



# Inclusion, Diversity and Equal Opportunity Employment

**JATO values its team members and their diversity. We are committed to helping our people develop and to reward them fairly.**

We recognise that to meet JATO's goals, JATO needs to provide a positive, open and welcoming working environment. To achieve this, we are all expected to treat each other with respect and courtesy and help maintain an inclusive workplace in which all employees have the opportunity to demonstrate their full potential.

JATO is committed to providing opportunities to enhance skills and capabilities, helping the entire workforce to develop their skills and maximise their contribution to JATO.

JATO respects the unique attributes and perspectives of every team member. We rely on the diverse perspectives of all team members to help JATO build and improve its relationships with customers and suppliers. JATO provides equal treatment and equal employment opportunity without regard to race, colour, religion, national origin, gender, sexual orientation, gender identity, disability, age, veteran status or any other characteristic protected by law. This applies to all aspects of JATO's employment decisions, including recruitment, hiring, promotions, transfers, demotions, layoffs, or terminations, compensation, benefits, training, company-sponsored education, social and recreational programs or events and all other terms, conditions, and privileges of employment.

We do not tolerate harassment of any kind, including sexual harassment, racial harassment and any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating. Prohibited harassment includes insults, slurs and derogatory jokes or comments that target a certain group (race, gender, religion, etc.); unwanted sexual advances; comments or actions designed to belittle or humiliate subordinates or fellow employees; derogatory and/or sexually-oriented computer graphics, posters, photography or gestures; unwelcome touching; and any other conduct that has the purpose or effect of interfering with anyone's work performance or creates a hostile, intimidating or offensive work environment.

We all have a responsibility to report any incidents of harassment that we witness or experience. If possible, we should attempt to resolve the matter directly, by informing the other person that his or her behaviour was unwelcome or inappropriate. However, if you are uncomfortable with this direct approach, for any reason, or it does not work, you should report the matter to your supervisor or manager, or the Human Resources Department. Supervisors and managers are required to report all incidents of harassment to the Human Resources Department immediately, regardless of whether the JATO team member has asked you not to report it.

If you have a concern that cannot be resolved with your Manager, you should refer to the JATO grievance procedure, which clarifies how to raise a grievance and how any such issue will be handled by JATO. A failure to treat team members properly may be in breach of contracts and service agreements and applicable local legislation and may also be a disciplinary offence.

For further information, please contact the Human Resources Department.

# **Additional Responsibilities of Managers**

**Managers have the additional responsibility of creating and sustaining an ethical work environment.**

## **Managers must:**

- Lead by example
- Communicate the Code and relevant JATO policies to all of their direct reports and other JATO team members and help them understand these requirements.
- Share knowledge and maintain skills important and relevant to stakeholders' needs.
- Ask questions, make suggestions and report wrongdoing.
- Be vigilant to prevent violations of this Code, JATO policies or the law.
- Promptly take any necessary corrective or disciplinary action when instances of wrongdoing are identified.

# Against Bribery and Corruption

**JATO condemns bribery and corruption in all its forms, and we will not tolerate it in our business or in those we do business with.**

You must not, directly, or indirectly, authorise, offer, or promise to pay a bribe, kickback or facilitate payment in any circumstances. You must read and, if necessary, ask questions about the JATO Anti-Bribery Policy.

JATO is committed to observing the standards of conduct set forth in the U.K. Bribery Act of 2010, the United States Foreign Corrupt Practices Act, and the applicable anti-corruption and anti-money laundering laws of all the countries where we may do business. No JATO team member will suffer adverse consequences for refusing to pay or take a bribe or kickback, even if this results in the loss of business to JATO.

**You must never offer, make or accept an improper payment for any reason. Never offer, provide or accept bribes or kickbacks. Making or accepting such payments subjects both the company and the individual(s) involved to possible civil and criminal penalties. If convicted of a bribery offence, JATO might get a significant fine and suffer lasting reputational damage.**

A bribe is defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. A bribe does not need to be paid in money: for example, excessive hospitality could amount to a bribe. A sum does not have to be large to amount to a bribe.

A kickback is a payment, or receipt of a payment, in return for a business benefit such as securing a contract. It is a kind of bribe and should never be offered, paid, solicited, or received.

A facilitating payment is a relatively small payment or gift to an official or government employee made to expedite routine services to which the company is already entitled. It is distinct from official "fast track" processes, is still a bribe despite being small and should not be paid in any circumstances.

If a JATO team member bribes (or attempts to bribe) another person, intending either to obtain or retain business for JATO or to obtain or retain an advantage in the conduct of JATO's business, this will be considered gross misconduct. Similarly, accepting or allowing another person to accept a bribe will be considered gross misconduct. In these circumstances, the JATO team member will be subject to formal investigation under the Company's disciplinary procedures, and disciplinary action up to and including dismissal will be applied.

# Gifts and Hospitality

**No one who this Code applies to should accept or solicit or give any improper gift or hospitality.**

Giving and receiving modest hospitality is an accepted (and enjoyable) part of business life. Similarly, customary gift-giving may be acceptable provided that such gifts are modest and are not tied to any particular favour or benefit.

But giving and receiving gifts and entertainment can raise ethical and legal concerns. You should be mindful that the giving or receipt of gifts, hospitality or favours may give rise to embarrassing situations and may be seen as an improper inducement to give or receive some concession in return.

Giving and receiving gifts and hospitality are governed by JATO's **Anti-Bribery Policy**; it is important that you read the policy for more details. Prior approval is required in accordance with the policy for any gifts or hospitality that exceed certain thresholds.

You must never provide or offer hospitality or gifts with the purpose of securing some specific action or favour. Gifts and hospitality should always be modest and in step with customary local practice. It is never acceptable to offer or accept gifts of money or the equivalent (for example, gift vouchers).

# Conflicts of Interest

**JATO team members must avoid situations where personal interests could conflict or appear to conflict with the interest of JATO, unless such conflicts are authorised in advance by the CEO.**

A conflict of interest occurs when a person's private interests interfere, or even appear to interfere, with the interests of the Company as a whole. For the purposes of deciding whether a conflict of interest occurs, the private interests of close family members are generally viewed as being equivalent to the personal interests of JATO team members.

A conflict of interest can arise when someone has a personal interest that is inconsistent with the interests of JATO, or which create conflicting loyalties in respect of transactions between JATO and third parties. Conflicts of interest also arise when a person receives improper personal benefits because of his or her position in the Company.

You should not be involved in any activity for personal gain that conflicts with JATO's business interests. You must not own shares in or work simultaneously for JATO and for any of JATO's competitors, customers, or suppliers without prior authorisation (although this prohibition does not extend to owning shares in publicly listed companies).

You may not take for yourself personally (or for the benefit of friends or family members) opportunities that are discovered using JATO's assets or information, nor may you use JATO's assets or information for personal gain (including the gain of friends or family members).

The Company knows that in some countries, it is customary to work closely with, trust and rely on, family and friends in business dealings. Examples of this might include renting office premises from a family member; using a friend who is an insurance broker to offer medical insurance benefits to ~~staff~~ team members; awarding a contract to buy office supplies and equipment to someone you know socially or selling data obtained from JATO customers to a family member who runs a market research company.

The important thing to remember is that situations like these could create a potential conflict of interest, and authorisation should be obtained before you make any decision to proceed. The Company will always give fair consideration to authorising any conflict of interest. If you fail to declare a conflict of interest or deliberately avoid declaring any such conflict, this will be regarded as a breach of this Code of Conduct and may well lead to disciplinary action and possible legal action.

If you wish to request authorisation for a conflict of interest, you should approach the Director of Organisational Effectiveness, who will make a recommendation to the CEO. Only the CEO has the authority to authorise a conflict of interest.

Sometimes it is unclear whether a conflict of interest arises. If you have questions about a potential conflict of interest, you should discuss the matter with JATO's General Counsel.

# Protection of our Assets

**We all have a responsibility to protect the Company's assets and ensure their efficient use. Fraud will not be tolerated.**

Fraud, carelessness, and waste have a direct impact on the Company's profitability. All JATO team members must be alert to signs of fraud and report any suspected fraud immediately.

JATO defines fraud as any intentional act committed to secure an unfair or unlawful gain. This includes theft, misappropriation of assets (for example, bogus expense claims, misuse of customer information or of JATO's data), fraudulent financial reporting and concealing a conflict of interest.

Any instance of fraud is a disciplinary matter with consequences up to and including dismissal. JATO will respond to all instances of fraud, seeking to recover losses and involving local law enforcement as appropriate.

Access to confidential information belonging to JATO or relating to JATO's business should be limited to those who reasonably need to know that information to perform their roles. Confidential information belonging to JATO should not be disclosed outside JATO without an appropriate confidentiality agreement.

# Confidentiality of JATO Information

**All non-public information about JATO must be kept confidential.**

JATO operates in highly competitive markets and has an important interest in protecting non-public information. Non-public information includes any information about JATO, its suppliers, its customers or its team members that have not been generally disclosed and might be harmful to them if disclosed, or useful to competitors. Such information includes, among other things, revenue and profit figures, financial reports, new product plans and methodologies, industrial secrets, marketing strategies and information relating to internal operations, future business plans, potential acquisitions, and investments.

JATO invests considerable resources in developing this information which reflects our expertise and is fundamental to the provision of our services. It is crucial to our business and our competitive advantage that it is protected and that we all work hard to do so.

**If you have reason to suspect the security of confidential information or that confidential information (in electronic or paper form) may have been lost, stolen, disclosed, or otherwise accessed by someone without valid authority, contact the Legal department.**

# Proper Use of Digital Technology

**All JATO team members have a responsibility to use digital technologies, including the Internet, email, and social media, responsibly and securely. JATO is committed to complying with data protection rules.**

JATO's business depends on information that is stored and transmitted in electronic form. We must all use digital technologies sensibly and in accordance with relevant policies, including the JATO Acceptable Use Procedure. All JATO security policies are available in the Security section on InSite.

You must only access data that you have a requirement to access as part of your job. Do not assume that if access is available, you are authorised to do so.

No unauthorised or unlicensed software may be introduced into JATO's systems. It is strictly forbidden to knowingly create or proliferate a virus, and all JATO team members should follow guidelines to prevent infection by viruses from outside JATO's systems.

Company email is provided for business use only, and no personal emails are allowed. Always bear in mind that email is not highly secure and that even deleted messages may still be accessible. Never assume that your business email is private or that the Company cannot access your business emails or view your JATO email account. Be careful what you write in emails, and do not write anything which might have adverse consequences for JATO if the email was subsequently made public.

Where the applicable local laws permit, JATO may access your computer or company electronic communications or monitor your social media or other internet usage if necessary for legitimate business purposes. In situations where your privacy is important, do not use company email or company computer systems.

JATO respects the privacy of personal data relating to JATO team members, customers, and suppliers. You must not collect and retain personal data except for legitimate commercial purposes and in compliance with applicable data protection law.



# Relationships with Customers, Suppliers and our Markets

**JATO treats its customers and suppliers fairly and expects the same standards of them as we do our JATO team members. JATO supports vigorous competition in the markets our customers do business in and in the supply of business information services.**

Client-centricity is one of JATO's areas of focus. Our reputation and the loyalty of our customers depend on the integrity of our dealings with customers and suppliers.

All arrangements with third parties must comply with JATO policy and the law. Make sure to conduct all relationships with business partners at arm's length and based on objective criteria, fairness and the best interests of JATO and its customers. Never use a third party to perform any act that you, as a JATO team member, would be prohibited from engaging in directly or that violates The JATO Code of Conduct.

Where confidential information is disclosed to us in confidence, we will respect that confidentiality. We will compete vigorously but fairly and legally and will respect the competition and anti-trust rules.

If you have any doubt about the legality of any business activity, you may contact JATO's General Counsel. We will pay our suppliers, contractors and agents in accordance with the agreed terms.

**We expect our suppliers, contractors and agents to adhere to this Code or to adopt similar ethical standards to our JATO Code of Conduct.**

# About Us

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JATO Dynamics, founded in 1984, now has representation in over 51 countries around the world. We provide precision under pressure, providing the world's most timely, accurate and up-to-date automotive information on vehicle specifications, pricing, sales and registrations for over 40 years. We offer more than just data, as we have watched the world change, and consumer mindsets alter with it we have been able to offer insights that help inform the industry. We are able to react to short-term market movements, plan for long-term developments and ultimately to meet the needs of our clients. Visit JATO at [www.jato.com](http://www.jato.com) for more information.

## Contact

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Visit us on social media:  
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