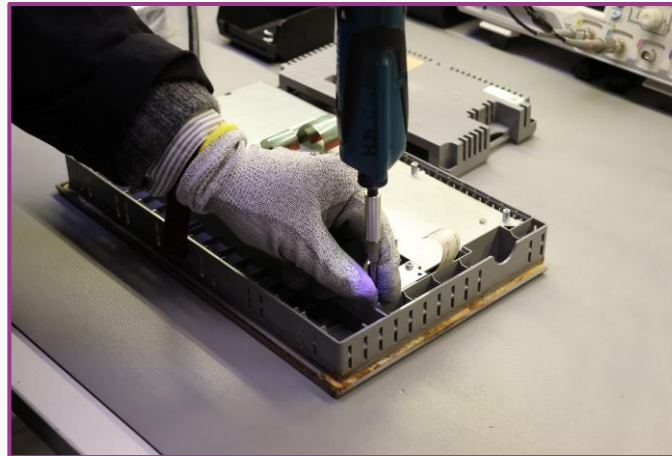


JC-ELECTRONICS 2026

Compliance & Policies report



Our Commitment To A Responsible Business Climate: A Message from the Board of JC-Electronics



“We have always believed that electronics can have a longer life, and by reviving them responsibly, we are committing to a healthy balance of people, planet & profit.”

- Jannes Cruiming en Gerard Katje
Founders JC-Electronics

At JC-Electronics, we are committed to conducting business with integrity, responsibility and transparency. As a leading refurbishment company, we uphold the **highest standards** in quality, environmental sustainability, occupational health and safety and ethical business practices. Our compliance with ISO 9001 (Quality Management), ISO 14001 (Environmental Management) and the RecQ label underscores this commitment.

This **Compliance & Policies Report** outlines our key principles and policies, ensuring transparency for our customers, partners and stakeholders. It highlights our dedication to health and safety, environmental responsibility, ethical labor practices and regulatory adherence.

We recognize that our customers and partners expect not only high-quality refurbished products but also assurance that these products are sourced and processed responsibly.

Transparency, accountability and **continuous improvement** form the foundation of our compliance framework.

Thank you for your trust in JC-Electronics. We invite you to explore this report to learn more about our commitments and how we **strive for excellence** in every aspect of our business.

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Quality Policy

Our **quality policy** is aimed at providing economic value by offering high-quality products and services and by continuously improving our processes. Each year, we identify our risks, implement measures and respond to the opportunities we identify. When our processes do not deliver the intended results, we learn from this and adjust our working methods where necessary.

Because refurbishing electronics is specialized work, we train our own **highly qualified engineers** in-house. Employees are also given the opportunity to broaden their knowledge. In some cases, we make certain modules, toolboxes, or training courses mandatory.

Our refurbished products undergo thorough inspections, repairs and quality checks, after which they receive the **JCertified quality label**. A strong guarantee that stands for quality, reliability, sustainability, circularity and a two-year warranty.

In this way, we strive for **100% customer satisfaction**. We measure this level of satisfaction periodically and initiate improvement actions immediately where possible. We consider it our duty to deliver products and services that meet or exceed customer requirements and expectations.



ISO 9001



JC-Electronics' quality management practices, follow the internationally recognized **ISO 9001 standard**.

Our approach emphasizes:

- Customer satisfaction through consistent performance;
- Process-based management and risk-driven decision-making;
- Continuous improvement and corrective action culture;
- Reliable, long-lasting refurbished products.

Our JCertified refurbished electronics undergo cleaning, repair, replacement of wear-sensitive components and a full end-to-end testing procedure before sale. These products are proven to be as reliable as new, with a structural warranty rate below 2%.

We strive for **100% customer satisfaction**. That's why we continuously measure customer and partner satisfaction and initiate immediate improvement actions where necessary.

We see it as our duty to provide products and services that meet or exceed customer expectations.

The most recent certificate can be found on our website under **ISO 9001 & ISO 14001**.

RecQ-label



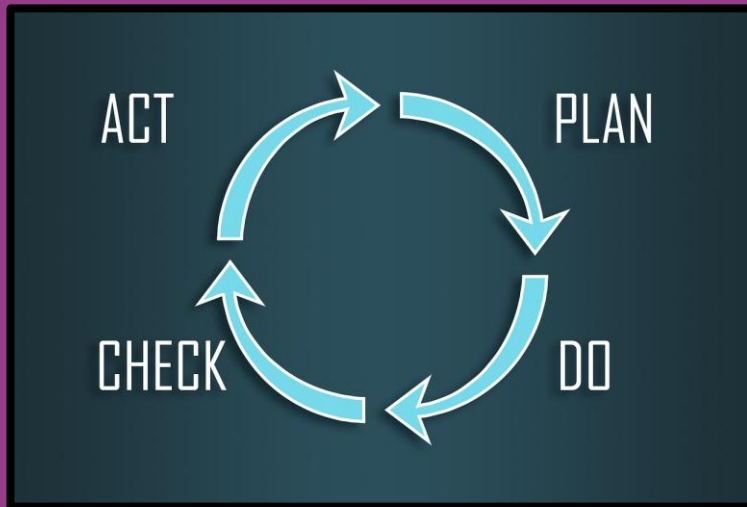
JC-Electronics is recognized as one of the first companies globally to receive the **RecQ label**, a European certification that proves a company follows strict, verified standards for refurbishing electronics.

The RecQ-label guarantees:

- **High-Quality Reconditioning**
The product has undergone a rigorous refurbishment process, including technical checks.
- **Transparency and Traceability**
The process ensures clear information regarding the product's actual condition, origin and the specific operations performed.
- **Data Security**
It validates that all previous user data has been securely and permanently erased.
- **Reliable and responsible sourcing and material use**
Technical Warranty
It guarantees a warranty for a period at least equal to mandatory regulations.
- **Environmental Responsibility**
The process adheres to eco-responsible methods, such as proper waste management.

With this label you can rest assured that the products you purchase from us meet the highest standards.

Continuous Improvement



At JC-Electronics we are committed to **continually improving** our quality, sustainability efforts and corporate responsibility. We regularly assess our operations, processes and products to ensure we are meeting and exceeding sustainability goals and customer expectations.

We monitor our energy use and our CO₂ footprint. From there we set yearly business objectives and targets to reduce energy use, waste and (CO₂) emissions.

By identifying risks, seizing opportunities and learning from past experiences, we enhance our processes, products and services.

Regular **internal audits, data-driven decision-making and employee training** help us maintain our high standards and drive innovation.

By choosing JC-Electronics, you're not just investing in high-quality, cost-effective industrial electronics; **you're contributing to a more sustainable future.**

Our circular approach is more than just a business model — it's a step towards a world where resources are valued, waste is reduced and **sustainability thrives.**

This policy reflects our dedication to a circular economy, demonstrating that sustainability and economic efficiency can go hand in hand. **Together**, we can achieve long-lasting environmental and financial benefits.

Environment and Sustainability Policy

Our **environmental policy** is aimed at having a strong positive impact on the world around us and contributing to the transition toward a **circular economy** in the industrial electronics sector. Reuse of products is our guiding principle. Wherever possible, we repair and refurbish the products we purchase so they can be reused.

If we conclude that a product can no longer be repaired, it is either returned to the customer in consultation or dismantled. Components that can still be used after dismantling are reused.

When it is truly not possible to reuse a product or its components, we ensure they are processed in a **responsible and sustainable manner**. Together with our partners, we continuously seek the best possible ways to reduce and process waste.

Even at the start of the refurbishment process – purchasing the products – we weigh in sustainability and the impact on the environment. This **responsible sourcing**, in combination with other criteria, leads us to make the best possible purchase choices.



ISO 14001



JC-Electronics is ISO **14001:2015 certified**, demonstrating our commitment to structured and measurable environmental performance and continuous improvement.

This certification confirms that we have implemented a robust Environmental Management System, meeting international standards to;

- **manage environmental impact**
- **reduce waste and pollution**
- **use resources efficiently**
- **and comply with laws and legislation.**

The most recent certificate can be found on our website under **ISO 9001 & ISO 14001**.

Circular Economy Leadership



At JC-Electronics, we actively work to reduce environmental impact across every stage of the product lifecycle:

- **Refurbishment instead of replacement**
- **Repair-first philosophy**, enabling customers to postpone costly production line upgrades
- **Waste reduction** and **resource conservation**, including reduced use of rare minerals and freshwater resources
- **Two-year warranties** reinforcing product durability and customer confidence

By extending the life of industrial electronics, we significantly reduce CO₂ emissions, water consumption, e-waste generation and the use of rare materials.

Independent studies show that choosing JCCertified refurbished products results in:

- Up to **80%** reduction in **CO₂ emissions**,
- Up to **86%** reduction in **water use**, and
- Up to **99%** reduction **in raw material use**, compared to purchasing a new unit.

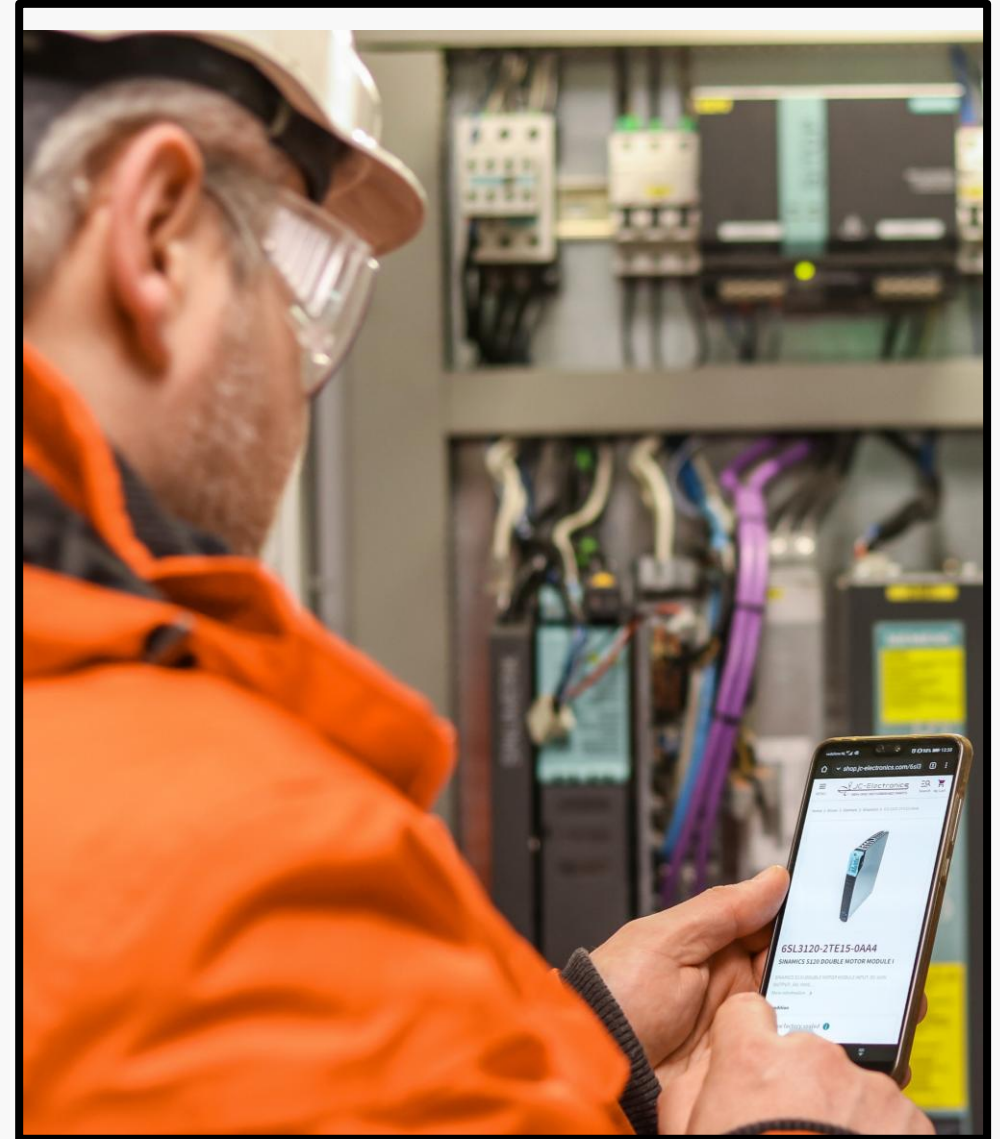
By purchasing refurbished products from JC-Electronics, you actively and confidently work towards meeting your **ESG goals** and **Scope 3 CSRD reporting requirements**.

On top of that, together we can actively work towards the **European Green Deal** in the ambition of becoming the first climate-neutral continent.

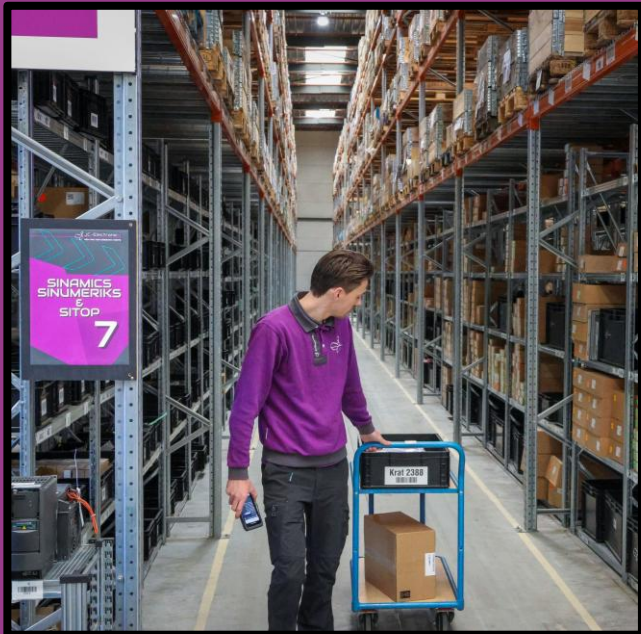
Health and Safety policy

At JC-Electronics, we prioritize the health, safety and well-being of our employees, partners and stakeholders. A safe and healthy work environment is essential for both productivity and job satisfaction, which is why we implement stringent **occupational health and safety policies** that comply with national and international regulations.

After all, a healthy company starts with employees who can perform their work under **safe and healthy conditions**. We therefore strive for optimal working conditions within our organization and continuously invest in ergonomic solutions and safety measures to further improve the workplace environment.



Health and Safety Officers & QHSE Coordinator



A part of our occupational health and safety policy is appointing a QHSE Coordinator and Health and Safety Officers.

Our QHSE team ;

- **Assesses risks;**
- **Develops health and safety policies;**
- **Draws up and implements the RI&E and its plan of action;**
- **Provides employee training and education;**
- **Inspects work sites and reported risks;**
- **Investigates incidents;**
- **Ensures compliance and reporting.**

When needed, the QHSE Coordinator and Health and Safety Officers call upon expert **help from our partners.**

Measures to ensure safe and healthy working conditions derive from the RI&E and its plan of action, **reported risks** from the workplace and **suggested improvement opportunity.**

Risk Inventory & Evaluation



To ensure a safe and healthy work environment we have assessed the risks our employees face during daily work.

In our RI&E our employees can find;

- **The risks they can encounter**, both general risks and risks to specific groups of employees
- Which risks are the **most severe or important**
- **The measures** we have taken to reduce those risks
- How they can **contact** a Health and Safety Officer or an Occupational Health and Safety Expert.

Our Health and Safety Officers are involved in drawing up and implementing the RI&E and the plan of action. When needed, we call upon expert help from our partners.

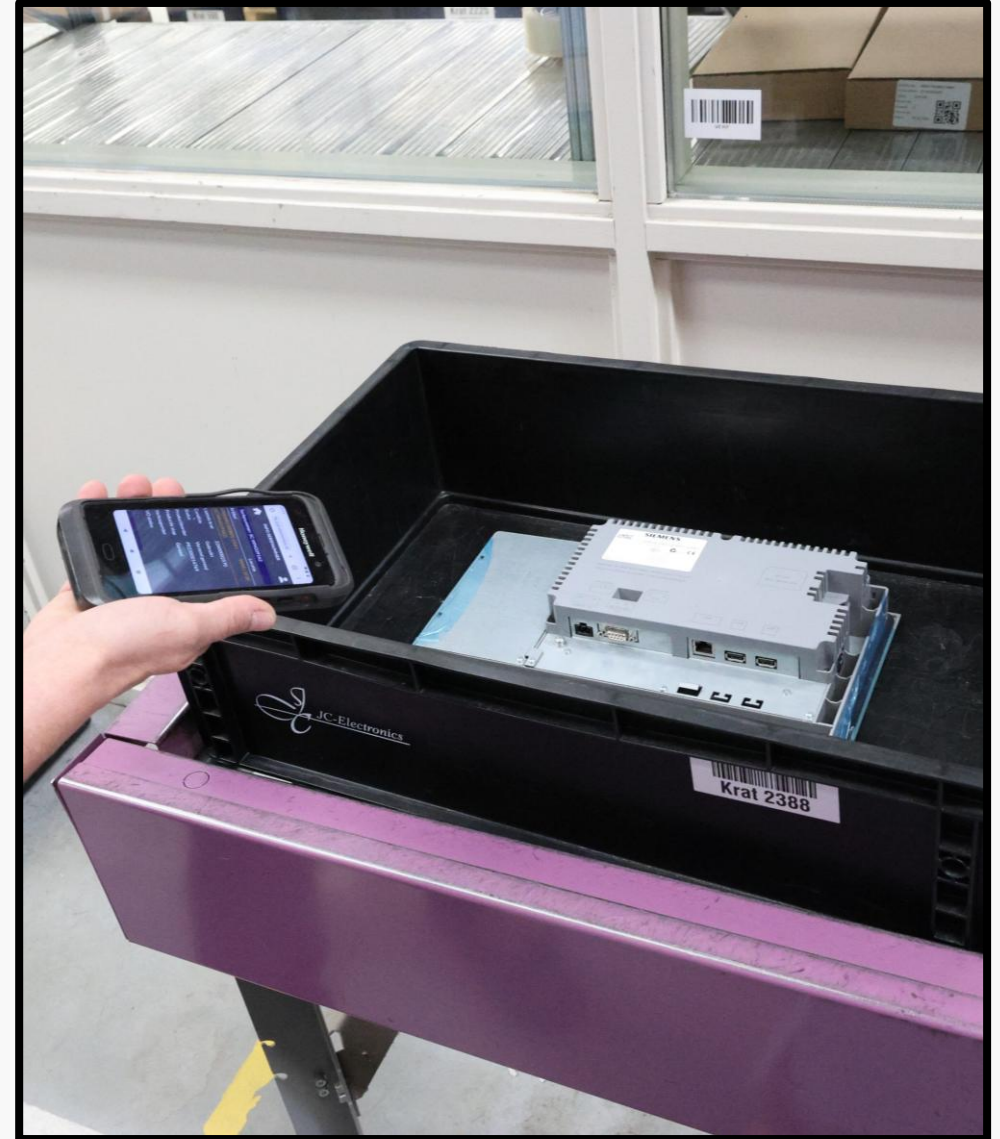


Compliance policy

At JC-Electronics, compliance and continuous improvement are fundamental to our operations. We adhere to all relevant **laws, regulations** and **industry standards**, ensuring that our processes align with the highest quality, environmental and safety requirements.

Our products operate in production lines in more than 100 countries worldwide. As a result, our services are not only subject to Dutch and European legislation but may also be affected by the laws of other countries. We are aware of these laws and have structured our internal processes to comply with them. Where necessary, **we work together** with (international) partners to align our services as effectively as possible with local regulations and **customer requirements**.

Through this ongoing commitment, we not only meet legal and industry expectations but also exceed them, ensuring sustainable growth, customer satisfaction and a **responsible approach to refurbishment and resource efficiency**.



Compliance with Laws and Regulations

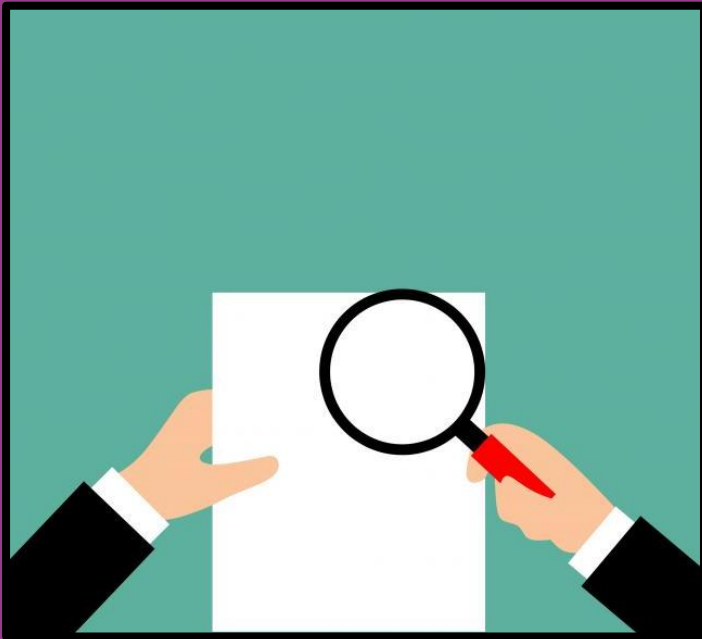


JC-Electronics complies with relevant Dutch, European and international regulations, including but not limited to:

- **Environmental legislation** (e.g., WEEE, RoHS requirements for hazardous substance management)
- **Health & safety requirements**
- **Trade, export and customs regulations**
- **Data protection and Transparency laws and regulations** (e.g. AVG/GDPR)
- **Corporate sustainability and reporting directives** (CSRD) referenced in our supply-chain transparency systems

We continuously monitor regulatory **developments** and update internal processes accordingly.

Auditing



JC-Electronics applies structured systems to maintain and improve the quality and sustainability of our operations:

- **Internal audits**, management reviews and corrective action processes following ISO 9001 and ISO 14001 frameworks.
- **External audits** by accredited bodies confirming RecQ- and ISO-based compliance.
- **Transparent communication**, including public access to environmental and quality policies.
- **Stakeholder engagement**, ensuring our practices support the expectations of clients, regulators and industry bodies.

We go through thorough, periodic surveillance audits over a **three-year cycle** in which we demonstrate our commitment to continual improvement, innovation and responsible growth.

Business Ethics and Governance Policy

As part of JC-Electronics' ESG policy, the Business Ethics and Governance policy contributes to creating a safe and pleasant working environment. It also describes our **responsibility** towards the environment and human rights across our operations and global supply chain.

We strive for integrity, responsibility and fairness, and treat colleagues, customers and suppliers with respect, in a customer-friendly and service-oriented manner.

JC-Electronics' business ethics reflect **international best-practice codes of conduct**. The following themes guide our global business operations.



Fair Employment and Work Environment



Employee well-being, safety and professional development are central to our culture.

We are committed to providing a workplace where all employees feel valued, respected and empowered to contribute. We promote **equal opportunities** in recruitment, training, development and advancement, regardless of ethnicity, gender, age, disability, nationality, religion, sexual orientation, or any other personal characteristic.

In addition to providing **fair employment and working conditions**, we promote a culture in which everything can be discussed, people are allowed to learn from mistakes and there is room for growth and development.

Our in-house technical school enables colleagues to earn vocational **qualifications** while working, strengthening both personal growth and product quality.

That is how we provide a **safe, inclusive, and supportive** workplace—aligned with our ISO-based systems and environmental and quality policies.

Anti-Bribery and Anti-Corruption



We maintain a zero-tolerance policy toward bribery, corruption, facilitation payments and improper financial influence.

Employees and partners must conduct business **transparently** and **ethically**, so that our operations are conducted in alignment with leading (inter)national anti-corruption frameworks.

To ensure internal compliance, we maintain:

- Controls and **segregation of duties** in purchasing, approval workflows and financial authorization.
- **Regular reviews** and continuous improvement cycles tied to ISO 9001's audit and corrective action structure.
- **Documented processes** that support transparency, accountability and ethical decision-making across the organization.

To prevent bribery and corruption risks in the supply chain, JC-Electronics conducts due-diligence procedures of suppliers, which may include:

- **Pre-engagement risk assessments** of suppliers, agents, contractors, logistics providers, and other partners.
- **Screening** for sanctions, conflicts of interest, adverse media, fraud indicators, or unethical practices.
- **Verification** of beneficial ownership to identify politically exposed persons (PEPs) or corruption-linked entities.
- **Ongoing monitoring** of high-risk suppliers, including performance reviews.

Human Rights, Modern Slavery and Human Trafficking



JC-Electronics is firmly committed to respecting human rights throughout its value chain. Our due-diligence process is aligned with international frameworks such as (but not limited to) the UNGPs and OECD.

As we expect the same standards from our suppliers and other partners, we assess them regularly by:

- **Conducting supplier risk screenings**
- **Ongoing monitoring**, and, if potential violations are found
- **Escalation and remediation**

In doing so, we prohibit and reject any forms of:

- **Forced, bonded, or child labor**
- **Modern slavery or human trafficking**
- **Any form of coercion, exploitation, or unethical labor practices**

Data Protection, Cybersecurity and Confidentiality



JC-Electronics is committed to safeguarding all data entrusted to us by customers, employees, partners and suppliers. Our policies combine internationally recognized data-protection standards, cybersecurity best practices in relation to the **European NIS2 Directive**, and mandatory compliance with **GDPR**.

Our internal processes are set up to manage risks related to personal data, network security and third-party access, and include, but are not limited to:

- **Network and access security**
- **Regular pen tests**
- **Endpoint and device security**
- **Data encryption**
- **Email and communication security**
- **Data breach incident response**

As we expect the same standards from our suppliers and other partners, we require them to:

- Implement adequate technical and organizational **security measures**
- Notify us and relevant institutions immediately when a **(data) breach** occurs

And in some cases;

- Present **certifications** or documents that prove compliance

More information about how we process customer data is found in the **[Privacy Statement](#)** on our website.