A SMARTER, SAFER, STRONGER CODE OF CONDUCT

WORLDWIDE HEAVY TRANSPORTATION AND LIFTING

WWW.ALE-HEAVYLIFT.COM
Our core values of Smarter, Safer, Stronger outline our mission to deliver innovative, safe solutions in heavy lifting and transportation across all ALE operations.

Commitment to a code of conduct supports how all stakeholders contribute to that aim.

- Treat others with respect and act in the best interests of ALE
- Listen openly to others’ points of view and communicate early, honestly and completely to all with a direct interest in the subject
- Reach agreements and keep promises, exercise high levels of professionalism and ethical behaviour
- Ask for and give help freely, share experiences and lessons learnt
- Be an example of this code within the branch, on a project or in private time

Smarter, Safer, Stronger requires that all employees, managers and directors demonstrate these commitments from each operational location.

Commitment from employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors (together ‘counterparties’):
- Provide counterparties with education and information about policy requirements
- Inform management and act where counterparts fall short on ALE’s policies

About this guide
This guide provides an introductory summary to ALE’s policies — not the full policies themselves.
Go to Cofano for detailed policy information and resources to help you.
A SMARTER, SAFER, STRONGER CODE OF CONDUCT

Smarter... the leadership commitment

Leading the way
- Our leadership understands that delivery on our Smarter, Safer, Stronger mission requires operations compliant with this code
- Leaders are accountable for creating a culture of safety and compliance where employees understand their responsibilities and feel comfortable about asking for our help and raising concerns

Be alert
- Setting the example: actions speak louder than words. Leadership by example
- Committing to supply of resources to meet operational and compliance needs
- Creating an open environment for lessons learnt and communication by all employees
- Empowering all employees to stop unsafe operations
- Communicate the importance of honesty and trust in delivering on our agreements at each appropriate opportunity

Detection
- Active leadership in compliance processes
- Periodic reviews with the assistance of business assurance leaders throughout our operations
- Use of active control measures such as ‘dashboards’ and ‘scorecards’ to monitor compliance KPIs

Action
- Escalate any concerns through the appropriate channel
- Take prompt action to address training needs or identified weaknesses
Smarter... the employees’ commitment

Knowledge

- Maintain a working understanding of ALE’s policies and procedures
- Apply all policies relevant to your role
- Safe operations require you to pay particular attention to policies specific to your branch or region, and know to apply them to your work

Be alert

- An innovative environment demands that you keep abreast of changes in policies or developments which may be customer, jurisdiction or market specific
- ALE may monitor and audit information stored on equipment or technology including personally owned devices

Cost of not complying

- Non-compliance with policies will result in disciplinary action and could cause the termination of your contract
- Examples of conduct leading to disciplinary action include:
  - Refusing reasonable work requests
  - Failing to comply with policies
  - Bullying
  - Harassment
  - Theft
  - Fraud
  - Failing to wear PPE
Safer… exacting standards in HSQE

Health, Safety, Quality and Environmental ‘HSQE’ policy

- We keep abreast of the HSQE regulatory requirements applicable to our operations
- We assess and manage risks through robust assessment of activities to provide safe operations for our employees
- Environmental controls help us monitor and maintain our environmental standards
- We develop safe systems of work and engineer safety into our in-house designed equipment to ensure safety within the workplace
- We provide training to continually improve competency within our workforce

Employee behavioural environment

- Understand the expectation at ALE as to how you can conduct yourself safely
- Always follow prescribed safe systems of work
- Understand and comply with all policies and procedures applicable to your employment
- Question unsafe behaviour and practices and ‘stop work’ if necessary without fear of repercussions

Hazard awareness

- Safety awareness starts with the identification of unsafe practices and conditions
- Alert supervisors and safety representatives if you feel there is a hazard to the expected standard
- Your safe return from each operation is our priority

Hazards include:

- Operating cranes or machinery outside of safety limits
- By-passing safety devices
- Broken tools or equipment
- Unsafe driving
- Failure to obtain or comply with required permits
- Deviating away from written safe systems
- Taking shortcuts
- Missing machine guards or faulty protective equipment
Empirical data from our 30+ years’ operations affords insight into the source of risks to our compliance areas. We are committed to maintaining our investment in compliance monitoring and safer operations. We have developed initiatives to adopt safer operations and have key expectations communicated within the business to uphold our Smarter, Safer, Stronger mission.

<table>
<thead>
<tr>
<th>STOP UNSAFE WORK</th>
<th>NO RAMS NO WORK</th>
</tr>
</thead>
<tbody>
<tr>
<td>All employees are empowered to stop an unsafe operation</td>
<td>Integrate safety into your work plans</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>WE ARE ALL SAFETY MANAGERS</th>
<th>SUPERVISORS LEAD THE TEAM... WE ALL LEAD THE SAFETY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety is not only the responsibility of the HSQE team</td>
<td>Accept your role in delivering a safer work environment</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PPE... ONLY WORKS WHEN YOU WEAR IT</th>
<th>TIDY SITE SAFE SITE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comply with policies, it protects you in the workplace</td>
<td>Some safety basics are really important</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SAFETY IS COMMUNICATION AND TEAMWORK</th>
<th>SEE IT SORT IT REPORT IT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Question unsafe behaviour</td>
<td>Report non-compliance within our reporting systems</td>
</tr>
</tbody>
</table>
Our responsibility is to protect our people and our operations

ALE’s policy
- Operational planning is designed to ensure the security of our people and operations across the globe
- Crisis management plans are in place to identify and protect against risks caused by man-made or naturally occurring incidents
- We will communicate effectively about the prevention of risks, emergency arrangements and business continuity

The part you play
- Create and maintain a safe working environment
- Maintain situational awareness
- Help us to protect you, your colleagues, and visitors; know your surroundings
- Challenge individuals entering your work environment without obvious permission
- Understand additional challenges when you are operating outside of your normal working environment (possibly overseas), including outside of working hours
- Plan your travel appropriately—understand local customs, and always be respectful of local traditions and norms

Actively engage
- Involve management if you encounter security concerns (for example, thefts, intimidation, physical threats or data loss)
- Conduct all appropriate Risk Assessments and checks on new project environments and new employees
Our responsibility is to protect our people and our operations

Safe employment
- An employer who treats applicants and employees with dignity and respect
- Offers of employment are made irrespective of race, ethnic origin, gender, marital or parental status, sexual orientation, religion or belief, disability including mental health, age or political belief
- We respect employees’ privacy rights and use, maintain and transfer personal data in accordance with ALE’s Employment Data Protection Standards
- ALE is committed to equal opportunities. We respect human rights everywhere we work or do business
- We create a safe working environment, free from harassment and bullying or unwelcome sexual advances

Actively engage
- ALE has formal grievance procedures through which staff can raise personal and work-related issues
- You have the right to raise a grievance if you feel you have been unfairly discriminated against, bullied or harassed in the workplace
A SMARTER, SAFER, STRONGER CODE OF CONDUCT

Regulatory compliance

Leadership includes

• You and your team having access to subject matter expertise needed to manage regulatory risks within your operations
• Integrating regulatory requirements into our business strategy and processes
• Development of robust processes to anticipate emerging risks including new and changing regulations
• Monitoring our regulatory compliance on an ongoing basis by conducting periodic audits of key processes
• Conducting business honestly and ethically in all locations
• Engaging appropriate supplier controls with relationships based on fair practice
• Maintaining a reputation for honesty, fairness, respect, responsibility, integrity, trust and sound business judgement

The part you play

• Be aware and comply with the laws and regulatory requirements
• Promptly escalate any potential issues that may lead to a regulatory compliance breach
• Engage positively with audit processes
• Coordinate with specialist advice and business experts when working with or responding to requests from regulators
• Disclose commercial interests you may have where relevant and understand the rules on gifts
• Protect company assets, such as buildings, vehicles, equipment, cash and procurement cards
• Use e-mail, internet, IT and telephones appropriately
• Only utilise registered suppliers that have been approved
• Protect ALE’s confidential and proprietary information, including, where appropriate, with a confidentiality agreement
• Safeguard any confidential information or personal data that a supplier provides to ALE
WORLDWIDE HEAVY TRANSPORTATION AND LIFTING