



# CROWN EQUIPMENT CORPORATION

## SUPPLIER CODE OF CONDUCT

Crown Equipment Corporation's reputation for integrity is built not only on the quality of Crown's products and services but also on Crown's history of honest, ethical and fair relations with all of its business partners. Crown expects that its suppliers will operate with integrity and commit to principles similar to those in Crown's Code of Conduct. For a copy of Crown's Code of Conduct, see [www.crown.com](http://www.crown.com).

This Supplier Code of Conduct sets forth the basic guiding principles and values underlying the business activities of every Crown supplier. These requirements are applicable to all suppliers and their respective subsidiaries and affiliates globally (each, a "Supplier") that supply goods or services to Crown Equipment Corporation or its subsidiaries or affiliates (collectively, "Crown").

This Supplier Code of Conduct supplements but does not supersede any rights or obligations of Supplier in any purchase order terms and conditions or other agreement with Crown.

### 1. COMPLIANCE WITH LAWS, THIS CODE AND OBLIGATIONS TO CROWN

Crown is committed to operating in compliance with all laws and regulations applicable to Crown's activities around the world. Supplier shall strictly comply with all applicable laws, rules and regulations, the requirements set out in this Supplier Code of Conduct, and Supplier's contractual obligations to Crown.

**A. Fair Dealing.** Supplier must adhere to all anti-trust, competition and other laws protecting fair competition and must not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations or any other prohibited conduct that limits free and fair competition.

**B. Anti-Bribery/Corruption Laws.** Supplier must comply with all applicable anti-bribery and corruption, local, federal and international laws and regulations, including, without limitation, the US Foreign Corrupt Practices Act. Supplier must meet or exceed relevant regulations and industry standards on anti-bribery and corruption. In no case may Supplier take any action that would violate or cause Crown to violate any applicable law or regulation.

**C. Anti-Money Laundering Laws.** Crown conducts business only with reputable suppliers involved in legitimate business activities using funds from legitimate sources. Supplier must comply with all applicable laws relating to money laundering.

**D. Avoiding Conflicts of Interest.** It is the policy of Crown to award contracts for all equipment, supplies and services based on merit. All Crown employees having contact with suppliers or potential suppliers must maintain the highest standards of ethics and business practices. Purchasing decisions must not be influenced by a conflict of interest and must not be tainted even by the appearance of a conflict of interest or impropriety. Supplier shall comply with Crown's policies regarding conflicts of interest.

**E. Importing and Exporting.** Supplier must comply with all applicable export and import laws, including all applicable labelling requirements, custom duties, sanctions requirements and all other laws pertaining to its international business.

### 2. PEOPLE AND SAFETY

**A. Diversity.** Supplier shall adhere to the principle of equal employment opportunities for all applicants and employees. Supplier shall not engage in any discrimination or harassment, whether based on gender, race, colour, religion, ethnicity, social background, age, sexual orientation, national origin, disability, political conviction or any additional legally protected characteristics.

**B. Forced or Child Labour.** Supplier shall only employ or engage workers who meet the applicable minimum legal age requirement. Supplier shall comply with Crown's Policy on Child Labour and all applicable laws relating to child labour and slavery, including but not limited to, Australia's Modern Slavery Act 2018. Supplier shall not use or engage in any indentured or forced labour, slavery or servitude, human trafficking or compulsory labour.

**C. Health and Safety.** Supplier must comply with all applicable health and safety laws, rules and regulations and Crown's policies, procedures and safety initiatives. While on-site at Crown facility or at a Crown customer location representing Crown, Supplier will abide by Crown's Environmental, Health and Safety policies and procedures (copy available upon request). Any work performed in Crown facilities by Supplier may be subject to completion of a Safe Plan of Action form (copy available upon request).

**D. Environmental and Sustainability.** Supplier shall comply with all environmental laws, rules and regulations and Crown's environmental policies, procedures and environmental/sustainability initiatives. While, on-site at a Crown facility or at a Crown customer location representing Crown, Supplier shall comply with regulated substance and product content specifications and with applicable laws prohibiting or restricting the use, content or handling of specific substances, including, but not limited to RoHS (EU Restriction of Use of certain Hazardous Substances), WEEE (EU Waste Electrical and Electronic Equipment), the EU Battery Directive (EU Battery Waste), REACH (EU Registration, Evaluation, Authorization and Restriction of Chemicals), conflict mineral regulations, California Prop. 65 and other similar laws and regulations. Crown reserves the right to require Supplier to complete a sustainability questionnaire prior to approval to begin work.

### **3. CONFIDENTIALITY; INTELLECTUAL PROPERTY; DATA PRIVACY**

- A.** Supplier must secure Crown's confidential information provided to Supplier by or on behalf of Crown, use it only as instructed by Crown and safeguard it from unauthorised or unintended disclosure or use.
- B.** Supplier shall comply with all confidentiality and intellectual property obligations to Crown and shall not use Crown's trademarks, images or other intellectual property without Crown's express authorisation.
- C.** Supplier shall follow all applicable privacy laws that govern handling of information and data provided by or on behalf of Crown, which may include private and sensitive information.
- D.** Crown expects Supplier to take prudent safeguards to protect against information technology ("IT") security breaches and business system corruption, and, if requested by Crown, shall complete an IT risk assessment checklist. Those safeguards may include but are not limited to: employee training and periodic testing, IT security assessments by independent firms and the latest techniques in preserving and protecting IT system integrity.

### **4. MONITORING; REPORTING VIOLATIONS**

- A.** Supplier shall take appropriate steps to ensure that its employees, suppliers and subcontractors comply with the provisions of this Supplier Code of Conduct (or substantially equivalent standards of conduct).
- B.** Supplier shall promptly report any suspected breach of this Supplier Code of Conduct to any one of the following:

Vice President — Supply Chain  
Office: +419-629-2220 ext. 13271  
ben.rhinehart@crown.com

Chief Compliance Officer or Director of Compliance  
Office: +419-629-2311  
compliance@crown.com

Justin Newbury  
Director of Commercial Operations & Regional  
Compliance — APAC  
Office: (+61) 2 8788 0454  
justin.newbury@crown.com

Carl-Christian Koeppl  
Compliance Officer, EMEA  
Office: +49-89-93002-411  
carl-christian.koeppl@crown.com

Tonja Rammel  
Director of Corporate Environmental and Manufacturing  
Safety (Mexico — Compliance)  
Office: +419-629-2311  
tonja.rammel@crown.com

Crown's hotline at [www.connectwithcrown.com](http://www.connectwithcrown.com)

- C.** Crown reserves the right to verify Supplier's compliance by auditing or inspecting Supplier's facilities and operations at Crown's cost and expense and upon reasonable notice to Supplier.