



# **Code of Conduct**

# Letter From Crown's President



Crown's reputation for integrity is built not only on the quality of Crown's products and services but also on Crown's employees' history of honest, ethical and fair relations with its business partners. As Crown continues to expand worldwide, Crown's commitment to integrity remains as strong as ever. Everyone at Crown shares in the credit for making integrity a key component of Crown's culture and in the responsibility for upholding this commitment.

In the Code of Conduct that follows, you will see the values Crown's leadership expects all members of our organization to uphold.

Every Crown leader, employee and representative is expected to adhere to this Code of Conduct. If you suspect any violations of the Code of Conduct or any other Crown policy, you are encouraged to report such activity to your supervisor or department manager or call the "Connect With Crown" line (where available).

Please take a few moments to review this document. If you have questions, please contact your supervisor.

A handwritten signature in black ink that reads "Jim". The signature is written in a cursive, flowing style.

**Jim Dicke III**  
President

# Introduction

This Code of Conduct (the “Code”) describes the standards of conduct required of each officer, director and employee of Crown Equipment Corporation and its networks of subsidiaries, affiliates and branches around the world. The Code sets forth the basic guiding principles and values of Crown and all members of the Crown organization. These general principles are supplemented by Crown’s policies and procedures, which expand upon the objectives in the Code and on your obligations to conduct Crown’s business with integrity.

A copy of the Code is available on Crown’s website at [www.crown.com](http://www.crown.com). Other Crown policies and procedures are available in the employee manual or can be provided by your supervisor.

Any member of the Crown organization who fails to comply with the Code or any Crown policy or procedure will be subject to appropriate discipline, which may include termination of employment or affiliation with Crown. Non-compliance with certain aspects of the Code also may subject the individual offender or Crown to civil or criminal liability.

## **GLOBAL COMPLIANCE POLICY**

As a global company, Crown and its employees must operate in strict compliance with all laws and regulations applicable to the company’s activities around the world. In addition, Crown and its employees must adhere to the moral and ethical standards of the individual countries in which Crown does business.

Unless previously approved by Crown’s Vice President and General Counsel for the country in which you are located, where the Code is more restrictive than local law or practice, Crown employees are required to follow the Code, and where applicable laws are more restrictive than the Code, Crown employees are required to follow applicable laws. Further, where any provision of the Code requires or permits conduct that would be in violation of any applicable law for that area, employees must always comply with all applicable laws.



# People and Safety

## **RESPECT FOR THE INDIVIDUAL**

Crown is committed to developing and maintaining a diverse workforce. Unlawful discrimination in the hiring, promotion, compensation or retention of employees is strictly prohibited. Abusive, harassing or offensive conduct is not permitted, whether verbal or physical. Examples include unwelcome sexual advances and derogatory ethnic or racial comments. Retaliation against any employee for reporting discrimination or harassment will not be tolerated.

## **HEALTH AND SAFETY**

Crown is committed to ensuring its work environments meet the highest standards in protecting the health and safety of Crown's employees, customers, suppliers and guests. Members of the Crown organization must comply with applicable health and safety regulations and Crown's policies, procedures and safety initiatives.

While on the job, employees must be free from the influence of any substance, legal or illegal, that could create an unsafe environment.

## **ENVIRONMENTAL STEWARDSHIP**

Crown takes pride in its industry-leading environmental stewardship and sustainability record, policies and initiatives. Crown is proud to provide an environmentally friendly and safe work environment. For these initiatives to be effective, employees must follow all laws, regulations, policies, and procedures that apply to their respective facilities, including record-keeping and reporting requirements.

## **INTEGRITY AND ANTI-CORRUPTION**

Employees must be cautious about giving or receiving gifts or entertainment from vendors, customers and other third parties. While the exchange of some business courtesies, such as payment for a lunch or dinner in connection with a business meeting, would not normally be an inappropriate gift within the context of this Code, other types of exchanges may go beyond common business courtesy in frequency, kind or value and could create an inappropriate influence on a business decision. Exchanges of gifts or entertainment in business relationships that may create inappropriate influences on business decisions are prohibited. The appropriateness of an exchange will depend on a number of factors, including an employee's role within Crown or job location. When a question about the propriety of an exchange arises, you must review the situation with your supervisor, a Crown Vice President, or Crown's Vice President and General Counsel.

Relationships with government representatives are governed by additional laws and regulations. Unless reviewed and approved in advance by a Crown Vice President for the country in which the gift is to be given, Crown employees shall not provide—directly or indirectly—any payment, gift or entertainment to a government official.

Because of the far-reaching impact of the anti-bribery laws of the countries in which Crown operates, all employees must comply with Crown's anti-corruption policies and procedures applicable to the employee's role and location.

## **AVOIDING CONFLICTS OF INTEREST**

Crown employees must avoid conflicts of interest that may interfere with Crown's business interests or with an employee's obligations to Crown. Situations that may personally benefit the employee, the employee's friends or family or that may potentially interfere with Crown's business interests might be construed as conflicts of interest. It would not be possible to reference every scenario giving rise to a potential conflict, however some examples of situations that could create a conflict of interest include:

- Competing with Crown in another business venture
- Owning or investing in a competitor or supplier of Crown (other than as a passive investor in a publicly traded company)
- Using Crown confidential information or other Crown assets for personal gain

Any activity that may give rise to a conflict of interest must be promptly and fully disclosed to the Crown Vice President for the country in which the activity will occur. It will then be determined whether an actual conflict exists.

## **FAIR DEALING**

All Crown employees must deal fairly and in good faith with Crown's customers, suppliers, competitors, and others. Crown representatives may not take unfair advantage of a business relationship through illegal conduct, deceit or any other unfair practice.

Members of the Crown organization are required to comply with all applicable laws protecting fair competition. Crown employees shall not enter any agreement, written or implied, with a competitor about pricing, costs, terms, markets, production, customers or any other matter that could impact competition. Employees shall not exchange information about prices or production with a competitor. Any agreement with a competitor must be approved by the Law Department.

## **IMPORTING AND EXPORTING**

Import and export controls and sanction laws give countries legal control over the sale, purchase, shipment, electronic transfer or disclosure of information, software, goods and services going across national borders. Before transferring these items into another country, performing services in another country or receiving these items from another country, you must understand and observe the import and export restrictions on those goods or services. In addition, controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and goods, which may restrict the way Crown conducts business. Contact Crown's Trade Compliance Department for additional guidance on these rules.

# Safeguarding Company Information

## **PROTECTION OF CONFIDENTIAL AND PROPRIETARY INFORMATION**

Crown employees have a duty to safeguard Crown's property, including proprietary and confidential information. Proprietary and confidential information that must be protected includes without limitation technical information, information about products, operations, personnel, marketing plans, production plans, customer and supplier data, pricing information, trade secrets and other information Crown uses to conduct its business. This information must not be disclosed to third parties without prior authorization and must not be used for personal gain. The obligation to protect this information continues after employment with Crown ends.

## **COMMUNICATION EQUIPMENT**

Crown's telephones, cellular devices, computers and other communication equipment should be used primarily to conduct company business. Crown allows reasonable and limited personal use of Crown electronic resources by employees. Employee personal use is a privilege and must not unduly burden Crown's resources and systems. Personal use must also comply with all laws and Crown policies, and not interfere with normal business activities or the employee's ability to meet job expectations. Email, voicemail and other forms of communications stored on Crown's equipment are considered records of Crown and may be retrieved and disclosed by Crown as necessary and appropriate for business and legal purposes. Employees should not have an expectation of privacy in connection with personal items or information stored on equipment owned by Crown.

## **RECORD CREATION AND RETENTION**

Crown's books, records, and reports must be complete and accurate. Non-compliance with this policy must be immediately reported. Crown's records must be retained, discarded or destroyed only in accordance with applicable laws, regulations and Crown's policies and procedures.

# Reporting Concerns and Asking Questions 8

To report a concern or suspected violation of the Code, any Crown policy or procedure, or to ask a question about your compliance responsibilities, we encourage you to *Connect with Crown* by contacting your supervisor, your department manager, the Human Resources department or the Law Department. For an additional reporting option, you may call the *Connect With Crown* line (where available).

If you have any questions about the *Connect with Crown* program, contact the Human Resources Department.