



CROWN EQUIPMENT CORPORATION SUPPLIER CODE OF CONDUCT

The reputation for integrity of Crown Equipment Corporation and its subsidiaries and affiliates (collectively, “Crown”) 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 every supplier that supplies goods or services to Crown as well as their respective subsidiaries and affiliates globally (each, a “Supplier”) 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, please see www.crown.com.

This Supplier Code of Conduct sets forth the basic guiding principles and values that must underlie the business activities of every Supplier. These requirements are applicable to every Supplier.

This Supplier Code of Conduct supplements but does not supersede the Supplier’s rights and obligations as specified in the terms and conditions of all purchase orders issued by Crown or any other agreement with Crown.

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

Crown is committed to operating in compliance with all laws and regulations that apply to Crown’s activities around the world. The Supplier is also expected to comply without reservation with all applicable laws, rules and regulations, as well as with the provisions of this Supplier Code of Conduct and with the Supplier’s contractual obligations to Crown.

A. Fair dealing. The 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. The Supplier must comply with all relevant anti-bribery and corruption legislation and regulations at local, federal, national and international level, including, without limitation, the US Foreign Corrupt Practices Act and the UK Bribery Act. The Supplier’s compliance must meet or exceed the relevant regulatory and industry standards relating to anti-bribery and corruption. In no case should the Supplier take any action that would violate or cause Crown to violate any applicable law or regulation.

C. Anti-money laundering laws. Crown only conducts business with reputable suppliers involved in legitimate business activities using funds from legitimate sources. The 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 in contact with suppliers or potential suppliers must maintain the highest standards of ethics and business practices. Purchasing decisions must not be influenced by any conflicts of interests or tainted by anything that could be interpreted as a conflict of interest or impropriety. The Supplier must commit to and comply with Crown’s policies regarding conflicts of interest.

E. Importing and exporting. The Supplier must comply with all applicable export and import laws, including, without limitation, all applicable labelling requirements, custom duties, sanctions requirements and all other laws pertaining to its international business.

2. PEOPLE AND SAFETY

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

B. Forced or child labour. Crown is committed to human rights and prohibits all forms of slavery, compulsory and forced labour, human trafficking and child labour in its supply chains. The Supplier must have the proper policies and take adequate measures, including performing appropriate due diligence on all companies within its own supply chain, to prevent the use of child labour or forced labour in products that enter Crown’s operations and supply chains. The Supplier must comply with all applicable federal, state, local and international laws and regulations relating to forced labour, child labour and slavery. The Supplier must not use or engage in any indentured or forced labour, child labour, slavery or servitude, human trafficking or compulsory labour.

C. Health and safety. The 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 a Crown facility or at a Crown customer location representing Crown, the Supplier will abide by Crown’s Environmental, Health and Safety policies and procedures (copy available upon request). Any work performed in Crown facilities by the Supplier may be subject to completion of a Safe Plan of Action form (copy available upon request).

D. Environment and sustainability. The Supplier must 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, the Supplier must 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), EU Battery Directive (EU Battery Waste), REACH (EU Registration, Evaluation, Authorisation and Restriction of Chemicals), conflict mineral

regulations, California Prop 65, and other similar laws and regulations. Crown reserves the right to require the Supplier to complete a sustainability questionnaire prior to approving the commencement of the contracted work.

3. CONFIDENTIALITY, INTELLECTUAL PROPERTY AND DATA PROTECTION

- A.** The Supplier must secure any confidential information provided to the Supplier by or on behalf of Crown, must use such confidential information only as instructed by Crown, and must safeguard it from unauthorised or unintended disclosure or use.
- B.** The Supplier must comply with all confidentiality and intellectual property obligations to Crown and must not use Crown's trademarks, images or other intellectual property without Crown's express authorisation.
- C.** The Supplier will comply with all relevant privacy laws governing the handling of information and data provided to the Supplier by or on behalf of Crown, which may include personal or other sensitive information.
- D.** Crown expects the Supplier to take prudent safeguards to protect against information technology ("IT") security breaches and business system corruption, and, if requested by Crown, will 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 use of the latest techniques in preserving and protecting IT system integrity.

4. MONITORING OF COMPLIANCE AND REPORTING OF VIOLATIONS

- A.** The Supplier must 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.** The Supplier will promptly report any suspected breach of this Supplier Code of Conduct to the Supplier's Purchasing representative at Crown, Crown Compliance at compliance@crowm.com, or Crown's hotline at www.connectwithcrowm.com.
- C.** Crown reserves the right to verify the Supplier's compliance with this Supplier Code of Conduct by auditing or inspecting the Supplier's facilities, operations, books, records, procedures and systems, at Crown's cost and expense and upon reasonable notice to the Supplier. Such audits or inspections may be conducted by Crown or by a third party operating under Crown's direction. The Supplier will promptly respond to any Crown request for documentation related to the Supplier's compliance with this Supplier Code of Conduct and/or applicable federal, state, local and international laws and regulations within the Supplier's operations and supply chain.