



Business Conduct and Ethics Policy

This Policy apply to vendors, suppliers, subcontractors, individuals and organisations that provide direct and indirect material and services to the Fraser Uniquip Group of companies (herein referred to collectively as “Fraser Uniquip”) as well as other intermediaries (herein referred to as “Suppliers”) when doing business with Fraser Uniquip.

Suppliers play a critical role in Fraser Uniquip’s core business and contribute to its goal of providing high quality, efficient and competitive solutions in a global economy. Fraser Uniquip expects our Suppliers to comply with all legal requirements relevant to the conduct of their business.

Fraser Uniquip maintains a business culture that is of the highest integrity and these principles prohibit employees from offering or accepting bribes or kickbacks; or accepting or soliciting gifts, entertainment or favours in return for preferred or favourable treatment. We expect our employees and Suppliers to exercise professional, cooperative and objective behavior in business relationships, and avoid impropriety or even the appearance of impropriety, in all business dealings.

Suppliers to Fraser Uniquip should have their own business standards and abide by those standards. Fraser Uniquip as an international company understands that these may vary from country to country, but Fraser Uniquip

expects its Suppliers to abide by the following standards when conducting business with Fraser Uniquip or on behalf of Fraser Uniquip. While Fraser Uniquip does not control the behavior of our Suppliers, we cannot tolerate any violations of the following standards when working with Fraser Uniquip.

Prohibition of Bribes, Kickbacks, Unlawful Payments, and Other Corrupt Practices

While Fraser Uniquip observes local business customs and market practices, we do not allow any corrupt practices. Fraser Uniquip expects its Suppliers to act in a similar manner.

All Suppliers and any agents or other individuals representing Fraser Uniquip must follow the laws of the country in which they operate, company standards, and applicable international laws and must not offer, make, or authorise payment of money or anything of value, directly or indirectly, to:

- Illegally influence the judgement or conduct or ensure a desired outcome or action of any individual, customer, company or company representative.
- Win or retain business or to influence any act or decision of any government official, political party, candidate for political office or official of a public international organization.

Fair Competition Laws

Fraser Uniquip is firmly committed to the ideas of free and competitive enterprise.

Fair Competition laws forbid agreements or activities that restrain trade or limit competition. Fraser Uniquip is committed to vigorous but fair competition in compliance with international laws and the laws of the country in which we are dealing. The Company prohibits not only actual violations of fair competitive laws, but any act that gives the appearance of wrong doing. Communications with competitors regarding commercially sensitive subjects are strictly forbidden. Suppliers and other individuals representing Fraser Uniquip are expected to comply with all the applicable laws and regulations regarding fair competition and antitrust. Fraser Uniquip’s relationship with Suppliers requires us to clearly define requirements, exchange information, and share mutual benefits.

Quality

Fraser Uniquip believes in producing quality for its Clients.

Fraser Uniquip considers that safely meeting Client contractual requirements is of primary importance together with a focus on continual improvement.

We expect that requirements are identified before work starts and that they are



communicated to all concerned. The achievement of a quality product, safely, on time, within budget with no ethical violations is our prime focus. We view our Suppliers as an extension of our own processes. Suppliers must ensure that of agreed upon and that the Suppliers are accountable for the value of the products and the services they provide, as well as the value added in our processes.

Protection of Physical and Intellectual Assets

Fraser Uniquip's assets – both physical and intellectual – are highly valuable and are intended for use only to advance business purposes and goals. These assets must be secured and protected in order to preserve their value. All Suppliers should assist in protecting Fraser Uniquip's assets and ensure their efficient use and should ensure they are used for legitimate Fraser Uniquip business purposes only.

There are many circumstances where our Suppliers are given access to Fraser Uniquip's facilities and assets. In those cases, Suppliers are expected to take care to prevent waste, loss, damage, misuse, theft, misappropriation, or infringement of Fraser Uniquip's assets. Employees should use caution and not any Supplier access to any Fraser Uniquip offices or facilities, unless it is directly associated with

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services provided to Fraser Uniquip and the access is controlled.

Integrity of Records and Accounting Procedures

Record and report facts accurately honestly and objectively

Records must be accurate in all material respects. Suppliers should not hide, fail to record, or make false entries. All financial books and records must conform to generally accepted accounting principles.

Protection of Proprietary Information

Confidential or Proprietary Information includes facts, data and knowledge that have not been disclosed to the public

Disclosure of confidential Company information provided to Suppliers is to be protected and distribution is to be limited to that which is necessary to fulfil contractual requirements. Suppliers shall keep confidential this information and any other information which they may acquire with respect to Fraser Uniquip consents to disclosure, or unless such knowledge and information otherwise become generally available to the public through no fault of the Supplier.

Conflicts of Interest

A conflict of interest arises when personal interest or activities influence or appear to influence the ability to act in the best interests of Fraser Uniquip.

Suppliers should not enter into an arrangement that conflicts with their responsibility to Fraser Uniquip. Suppliers shall not offer material gifts or entertainment to Fraser Uniquip employees or Clients. A conflict of interest situation might also arise when a Fraser Uniquip employee or family member has a direct or indirect personal or financial interest in a Fraser Uniquip Supplier.

Gifts & Entertainment

Fraser Uniquip purchases products and services on the basis of quality, price and reliability. In turn, we expect our Clients to obtain products and services from Fraser Uniquip on the same basis. Gifts and entertainment can give rise to a conflict of interest. Suppliers should be aware of and respect these guidelines.

The following situations are always inappropriate and are expressly prohibited to Fraser Uniquip employees, and its Suppliers:

- Giving a gift, entertainment, or preferred treatment with the intention of trying to influence the decision



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making objectivity of a Fraser Uniquip employee or a Client.

- Offering a gift, entertainment, or preferred treatment intended to influence a purchasing decision
- Offering any gift, entertainment, or preferred treatment while involved in a current purchasing or contracting decision process.
- The gift or entertainment is not permissible under local law
- Offering an opportunity to procurement professionals or any person with influence to purchase products, services, or a financial interest under terms not available to all Fraser Uniquip employees.

All Suppliers and Fraser Uniquip employees are expected to display good judgement and high ethical standards in their business dealings. In some cultures, gifts and entertainments are an integral part of doing business. Fraser Uniquip operates in many different countries with unique local traditions and culture, but giving or receiving gifts or entertainment must relate to Fraser Uniquip legitimate business and generally is permissible only if the gift or entertainment helps improve business or community relationships

Trade Compliance

The laws of some of the countries that Fraser Uniquip conducts business in restrict exports of a wide range of commercial and specialised goods and technologies.

Suppliers, subcontractors and other agents representing Fraser Uniquip are expected to comply with the letter and spirit of all applicable import and export controls and trade compliance laws. Being in compliance means, amongst other things, having a system in place to screen the end use and ensuring that Fraser Uniquip does not cooperate with or agree to cooperate with any illegal activity.

Reporting

At Fraser Uniquip we take pride in maintaining a high ethical culture and expect our stakeholders, employees, Suppliers and Clients to proactively report directly to any member of the Fraser Uniquip Board of Directors, concerns regarding the violation of any of the above company policies.

Fraser Uniquip expects all its employees and Suppliers to comply with our Standards of Business Conduct and ethical expectations, regardless of local business practices or social customs. Violation of any of our company policies or applicable regulations can result in termination of Fraser Uniquip employees and

for Suppliers – termination of any current contracts and disbarment from future contracts with the Fraser Uniquip Group of companies.