

Supplier Code of Conduct Guide



Foreword

Link-Belt Cranes is committed to conducting business in an ethical manner with respect for our employees and the communities in which they live. We believe that this commitment benefits our customers and other stakeholders. Recognizing that Link-Belt Cranes is a portion of an extensive global supply chain, it is our expectation that these standards of business conduct will be practiced by our supply chain members.

This Guide identifies our essential expectations of business conduct for entities within our supply chain. We believe that these standards will advance the performance of our companies to our common benefit. Compliance with Link-Belt Cranes' Supplier Code of Conduct Guide is a mandatory requirement of all Link-Belt Cranes' purchase orders.

We appreciate your thorough review of the standards set forth in this Guide.

Respect for People

We expect every Link-Belt Cranes' supplier to abide by all applicable employment laws. We believe every person should determine whether employment is in their best interests. Children should not be placed in a position of making this determination. Link-Belt Cranes will not allow the use of labor by children under the age of eighteen unless as part of a government authorized job training or apprenticeship program beneficial to participating individuals. We require that our suppliers will not use any involuntary or forced labor in any form, including children, or human trafficking.

Link-Belt Cranes expects its suppliers to provide employee wages and benefits that satisfy basic needs relevant to local conditions. We also expect suppliers to adhere to all applicable laws related to limits on regular and overtime working hours and compensation.

Safe and Inclusive Workplace

We believe that a diverse workforce fosters creativity and enthusiasm. We expect our suppliers to encourage a positive and diverse workplace by not tolerating harassment or discrimination, including that involving race, color, religion, sex (including pregnancy, child birth, or related medical conditions), national origin, age, disability, sexual orientation, gender identity, or any other basis protected by law.

Link-Belt Cranes also expects its suppliers to adhere to all applicable health and safety laws, and provide their employees with a safe and healthy work environment.

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Environmental Protection and Product Content

We expect that our suppliers will abide by all local environmental laws and regulations. In addition, we believe that Link-Belt Cranes' suppliers should work to reduce waste, prevent pollution, and conserve energy. We also encourage our suppliers to seek external environmental performance verification such as ISO 14001 certification. Link-Belt Cranes' suppliers are expected to use materials that conform to all legal and regulatory requirements and which also satisfy Link-Belt Cranes' product content rules identified in our Supplier Quality Manual. Link-Belt Cranes is also committed to adherence with "End of Vehicle Life" and "Registration, Evaluation, Authorization, & Restriction of Chemicals ("REACH") requirements. Link-Belt Cranes' suppliers are expected to cooperate fully with Link-Belt Cranes to satisfy these and other recycling and environmental and health protection initiatives.

Conflict Minerals and Other Product Origin Obligations

Link-Belt Cranes is committed to compliance with U.S. laws related to use of "conflict minerals". Link-Belt Cranes' suppliers are expected to respond to all requests for information related to product origin and content.

Product Safety

It is the obligation of every Link-Belt Cranes' supplier to inform Link-Belt Cranes immediately if a question concerning safety of a product sold to Link-Belt Cranes arises. When requested, you are expected to provide information related to product content and country of origin. Link-Belt Cranes' suppliers are expected to take all reasonable safety measures in connection with the design and manufacture of products it sells to Link-Belt Cranes.

Gifts, Favors and Entertainment

Link-Belt Cranes chooses suppliers based on total value, considering quality, price and services offered. Suppliers should not give gifts, favors, or entertainment greater than nominal value to Link-Belt Cranes' employees, or that is inappropriate or unbecoming to Link-Belt Cranes' employees. Link-Belt Cranes' employees are required to adhere to a policy governing entertainment and gifts. Suppliers must not try to unfairly influence any Link-Belt Cranes' employee through inappropriate gifts. Ask your Link-Belt Cranes' contact if any potential gift or entertainment is permitted under Link-Belt Cranes' policies. If a Link-Belt Cranes' employee solicits you for a gift or a favor you should report that matter to the Link-Belt Cranes Office of Business Conduct.

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Improper Payments

Bribes, kickbacks, or other improper payments may not be offered or paid directly by or on behalf of Link-Belt Cranes anywhere in the world to any officer, agent or employee of any customer, supplier, or competitor, or to a third party. This includes, but is not limited to payments to government officials. You must comply with this policy if you are acting on Link-Belt Cranes' behalf in any capacity. If you are performing services for Link-Belt Cranes, you may be required to certify and provide evidence of your understanding and compliance with this policy.

Negotiating Fairly and Honestly

Information provided to Link-Belt Cranes during the course of negotiations or otherwise must be accurate. You must not attempt to deploy deceptive means to improperly influence negotiations. Laws related to fair competition and trade practices affecting our mutual business must be complied with.

Good Ethics is Good Business

The conformance to the above principles will serve both of our companies well. If you have any questions concerning whether particular conduct related to your supply of goods or services to Link-Belt Cranes is inappropriate, share that concern to the attention of your business contact at Link-Belt Cranes. They will provide assistance or will seek additional guidance as appropriate.

Confidential Information

Proper management of confidential information is critical to the success of both Link-Belt Cranes and suppliers. Suppliers must protect all Link-Belt Cranes' information, electronic data, and intellectual property or Link-Belt Cranes' technologies with appropriate safeguards. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Link-Belt Cranes and its suppliers. Suppliers may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement. Suppliers must comply to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from unauthorized disclosure or misuse. Our suppliers can expect Link-Belt Cranes to similarly protect their confidential information when authorization is provided to Link-Belt Cranes. Suppliers are not permitted to use the Link-Belt Cranes' trademark, images, or other materials to which Link-Belt Cranes owns the copyright, unless explicitly authorized.

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Communication

Supply chain transparency is required to confirm compliance to this code of conduct. To monitor this, Link-Belt Cranes may request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action. This may include, but is not limited to, supporting Link-Belt Cranes' reporting requirements pertaining to restricted substances and Conflict Minerals. Suppliers are expected to assist Link-Belt Cranes in enforcing this Supplier Code of Conduct by communicating its principles to their suppliers, supervisors, and employees.

Questions and Concerns

If you have any questions or concerns related to any of the matters identified in this Guide, please contact your Link-Belt Cranes Purchasing representative or you may contact Link-Belt Cranes' Compliance Manager at compliancemanager@linkbelt.com.