

THE CODE OF CONDUCT

1. Labour and Human Rights

[ILO C8; C182; C29; C105; C95, Universal declaration of human rights, UN Global Compact principles #1, 2]

Certex Lifting LTD to AxInter must uphold the human rights of workers, to treat them with dignity and respect as understood by the international community.

1.1 Forced Labour and Freedom of Movement

[ILO 29; 105]

The supplier must not participate in, or benefit from, any form of forced labour including bonded labour, forced prison labour, slavery, or human trafficking, in accordance with the ILO-conventions. Workers must have the freedom of movement during the course of their employment.

Forced, bonded or compulsory labour is defined as forcing people to work against their will or under pressure from a threat or punishment.

1.2 Retention of monetary and/or material goods

[ILO 95]

The supplier must not withhold any part of any person's salary, benefits, property or documents (e.g. identity cards and travel documents) in order to force such personnel to continue working for them.

1.3 Disciplinary measures

The supplier shall treat all personnel with dignity and respect. The supplier shall not engage in or tolerate the use of corporal punishment, mental or physical coercion and verbal abuse of personnel.

2. Child Labour and Young Workers

[ILO 138; 182, UN Convention on the rights of the child, UN Global Compact principle #5]

2.1 Minimum Age Requirements

The supplier shall not engage in, or benefit from, the use of child labour. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case,

shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception).

2.2 Educational Remediation Program

If the supplier becomes aware that it is employing children of school age according to above established requirements, it shall ensure that the children are enrolled in a remediation program, rather than being summarily terminated from employment. The program shall include access to education and financial support and shall be decided in consultation with the child and family or next of kin.

2.3 Apprenticeship Programs

Apprenticeship programs for young workers (below 18 years of age) must be remunerated and clearly aimed at training.

2.4 Hazardous and Harmful Work

The supplier shall refrain from hiring young workers (below 18 years of age) to perform any type of work, which is likely to jeopardize their health, safety or morals.

3. Discrimination

3.1 Discrimination in Employment-related Decisions

[ILO C100; C111, C1183, UN Global Compact principle #6]

The supplier shall not engage in or support discrimination on the basis of race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, pregnancy, family responsibilities, age, and disability or other distinguishing characteristics. Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement or any other employment-related decisions shall be based on relevant and objective criteria.

4. Freedom of Association

[ILO C87; C98, C135, C154, UN Global Compact principle #3]

4.1 The Right to Freedom of Association and Collective Bargaining

The supplier must not interfere with the workers' rights to form and join unions or other associations of their own choosing, and to bargain collectively. Nor shall the supplier discourage membership of unions. Workers' representatives shall not be subject to discrimination and shall be given access to employees at the workplace. The supplier must recognize elected workers'

representatives and bargain in good faith with them regarding all important concerns at the workplace.

4.2 **Alternative Measures in Case of State Prohibition on Unions**

If trade unions are not allowed in the area of operation, or only state authorized organizations are allowed, then the supplier shall facilitate, and not prevent, alternative measures to allow employees to gather independently to discuss work-related matters and a forum to present work-related concerns to management.

5. **Workplace Health and Safety**

[ILO C148; C155, C161; R164]

Certex Lifting LTD must be committed to creating safe working conditions and a healthy work environment for all of their workers.

5.1 **Health and Safety Standards**

The supplier shall ensure that its workers are offered a safe and healthy working environment with adequate protection from fire, accidents and toxic substances. This includes but is not limited to preventive actions such as evacuation procedures, emergency training and drills, appropriate first-aid supplies, appropriate fire detection and suppression equipment and well-marked exit facilities. Adequate health and safety policies and procedures must be established, communicated and followed.

5.2 **Training and Protective Gear**

The supplier shall provide its employees with the protective equipment and training necessary to perform their tasks safely.

5.3 **Occupational Safety**

Certex Lifting LTD shall comply with all the applicable health and safety related laws and regulations. Workers shall never be disciplined for raising safety concerns and for refusing working in an unsafe environment. Clear procedures shall be in place to identify, manage, record and report occupational injuries and illnesses appropriately. Furthermore, **Certex Lifting LTD** shall implement corrective actions to eliminate the root causes of injuries and illnesses. Where hazardous substances are used, relevant supervision, controls and emergency plans shall be provided. **Certex Lifting LTD** shall ensure washing facilities near acids and other corrosive substances. Electrical equipment and wires shall be safely insulated, equipped with safety fuses and regularly inspected and repaired.

5.4 **Physically Demanding Tasks and Ergonomics** **Certex Lifting LTD** shall identify physically demanding tasks, and evaluate and control worker exposure to these tasks. Examples of these tasks

include heavy lifting and heavy material handling, prolonged standing and highly repetitive tasks. **Certex Lifting LTD** shall ensure that workers are not subject to unnecessarily poor work ergonomics, and this applies especially to physically demanding tasks.

5.5 Sanitary Infrastructure

The supplier must provide a suitable, clean and sanitary infrastructure, including access to toilets and potable water, which conforms to the needs and numbers of its employees. Accommodation, if provided by the supplier, shall conform to the same requirements, including the general provisions on health and safety standards listed above.

6. Conditions of Employment and Work

[ILO C1; C14; C131]

6.1 Workplace Violence, including Assault, Harassment and Threats

The supplier shall protect workers from acts of physical, verbal, sexual, or psychological harassment, abuse, or threats in the workplace, whether committed by managers or fellow workers including determining and implementing disciplinary measures.

6.2 Remuneration

The supplier shall comply with legal minimum standards or industry benchmark standards concerning wages and benefits, whichever is higher. In any case, the supplier shall always provide a 'living wage', which means that workers should be able to meet the basic needs of themselves and their dependents, as well as provide some extra income left for spending after necessities like shelter and food are paid for.

Overtime shall be remunerated and clearly specified.

Vacation, including time off, sick leave, holidays and parental leave shall be remunerated according to national law. Wages shall be paid directly to the employee or someone elected by the employee, and on a regular basis. Deductions from wages shall be transparent and must never be used as a disciplinary measure.

6.3 Established Working Relationship

All workers shall be provided with a written, understandable, and legally binding labour contract. The supplier shall not rely on part-time, short-term or casual labourers, trainees or false apprenticeships to pay lower wages and/or reduced benefits.

6.4 Leave

The supplier shall grant employees holiday and sick leave each year according to national laws. Women or men, who take parental leave, must not face dismissal or threat of dismissal, and shall be able to return to work in their former employment or equal at the same rate of pay and benefits.

6.5 **Hours of Work, Rest Periods and Breaks**

The supplier shall ensure that the work-week is limited to 48 hours, and under no circumstances exceed 60 hours including overtime. Overtime shall be voluntary and infrequent. Employees are entitled to at least one day off per week, and shall be given reasonable breaks while working and sufficient rest periods between shifts.

7. **Ethics**

7.1 **Bribery and corruption**

[UN Convention against Corruption, UN Global Compact principle #10]

AxInter has a zero tolerance policy on bribery and corruption. This applies to all of AxInter business and transactions in all the countries in which we and our supplier's business operate. Following Nations Convention against Corruption (UNCAC), we strive to fight corruption and bribery through increased transparency and governance downstream in our supply chain, alongside implementing internal anti-corruption policies.

Our zero tolerance policy effectively means that the supplier shall not, directly or indirectly through agents or consultants, participate in or endorse any corrupt practices, such as bribing or any other method, to unjustly influence public officials, the judiciary and/or private parties to gain improper advantage.

8. **Disclosure of information**

Our business commitment is dependent upon co-operation, mutual trust and respect between our suppliers and AxInter. All observations, discussions and written information received from AxInter are to be treated confidentially by the supplier, its employees and any third party organizations appointed by either side.

9. **Intellectual property**

Suppliers must respect intellectual property rights and recognize the value of intellectual property such as patents, designs, pictures, trademarks, trade secrets and copyrights. Transfer of technology and know-how must be done in a manner that protects intellectual property rights.

10. **Environment**

[ILO C170, UN Global Compact principles #7-9, UN Environmental Programme]

At AxInter, environmental responsibility are an integral part of our business practices. Acknowledging the UN Global Compact principle #7-9 and UNEP's guidelines to make an impact, we promote **Suppliers** who are committed to reducing their environmental impact.

The supplier shall work towards reducing its environmental impact through an active and responsible leadership. The most commonly prioritized aspects of environmental impact are; exploitation of natural resources, energy, fresh water, emissions to air and water, noise and dust, risks

to cause soil pollution, waste disposal and product related aspects such as design, packaging and transportation.

We encourage our **Suppliers** to have a documented Environmental Management System (EMS) in place in order

to manage the organization's procedures and production processes in a comprehensive and documented manner, specifically adhering to environmental regulations.

10.1 Hazardous Substance Management and regulations

The supplier must comply with all national laws and regulations prohibiting or restricting specific substances. **Suppliers** shall for example comply with material restrictions (e.g.

REACH) and continuously maintain records of relevant raw material declarations such as Material Data Sheets (MDS) or similar. In terms of documentation, **Suppliers** must have appropriate management systems and routines in place in order to monitor:

- The handling of any chemicals in its operations in an environmentally safe way;
- The handling of any Conflict minerals* (see appendix for list) shall follow international rules to implement reporting and disclosure requirements regarding conflict minerals.
- The handling, storing and disposing of hazardous waste in an environmentally safe manner;
- Routines to avoid pollution;
- Emergency routines to prevent and minimize the effects on health and environment in the event of an emergency situation or an accident;
- How development and diffusion of environmentally friendly technologies and/or materials are addressed and encouraged where applicable.

10.2 Wastewater and solid waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities must be monitored, controlled and treated as required by applicable laws and regulations before discharge and disposal. In any case, AxInter requires its **Suppliers** to characterize, monitor, control and treat waste water and any solid waste in a responsible manner. Records and evidence of treatment procedures should be provided upon request.

10.3 Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particles, ozone depleting chemicals and combustion by-products generated from operations must be characterized, monitored, controlled and treated as required by applicable laws and regulations before discharge. Regardless of applicable national regulations, AxInter requires its **Suppliers** to characterize, monitor, control and treat air emissions in a responsible manner. Records and evidence of treatment procedures should be provided upon request. Pollution prevention and resource reduction

Suppliers must endeavour to reduce or eliminate waste of all types, including water and energy, by implementing appropriate conservation measures in its facilities and throughout its production processes. Furthermore, we expect our **Suppliers**, as a natural part of their own commitment to environmental policies, to consider reusing, recycling or substituting materials with improved environmental properties where applicable. Consideration of environmentally friendly technologies should also be addressed and encouraged where applicable.

11 Environmental permits and reporting

Suppliers must obtain, maintain and keep all required environmental permits and registrations and follow the operations and reporting requirements of such permits.