


<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	 MOBILE CRANES & METAL RECYCLING
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
<b>Owner:</b> HSQE		


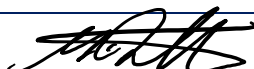



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# Business Ethics Policy


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## 1.0 DOCUMENT APPROVAL

	Signature	Title	Date
<b>Prepared by:</b>	 S J Honeyman	HSQE Manager	26/08/22
<b>Approved by:</b>	 M Rafferty	Managing Director	26/08/22

## 2.0 DOCUMENTATION CHANGE CONTROL HISTORY

Version	Date	DCR No	Reason for Change
01	26/08/21	/	Issue of new document
02	26/08/22		Reviewed without change

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 01		
<b>Owner:</b> HSQE	<b>Company Policy Statement</b>	
<b>Location:</b> Head Office		

## 1.0 BUSINESS ETHICS POLICY STATEMENT

*As Bernard Hunter Crane Hire Ltd continues to grow and successfully expand into new operational sectors, it is more important than ever that we continue to maintain the highest standards of ethical behaviour. This is by no means always easy and it is not always clear how we should react or behave when faced with new challenges and situations. Bernard Hunter Crane Hire Ltd's Business Ethics Policy ('the Ethics Policy') recognises and reinforces the importance of conducting business ethically and legally throughout our organisation. We are expected to uphold high ethical, legal and business standards wherever our business takes us.*

In keeping with our values, our reputation depends on operating with integrity and doing the right thing, and as such we must foster a culture of transparency and responsibility at all times. Regardless of what position we have in the company or where we are in the country, each and every one of us has a part to play in this process as we continue to develop our company and protect its success and reputation.

We also expect those with whom we do business to embrace similar values and standards. We understand that, in some instances, by acting legally and ethically and following the Ethics Policy, we may lose business. However, to develop our business we must rely on the strength of our people and services and not unethical behaviours and practises.

It is important that you take the time to familiarise yourself with this Policy and the other Company policies that relate to it. 'The Right thing, in The Right way' is a core value at Bernard Hunter Crane Hire Ltd, one that we are firmly committed to. If it doesn't feel right or you believe a violation of the Policy has occurred or will occur, it is your responsibility to act. In this instance, please consult with your Line Manager first, however, if not satisfied or concerned, contact the HSQE Advisor via the Ethics Email: [businessethics@bernardhunter.com](mailto:businessethics@bernardhunter.com) as detailed within this Policy or call 0131 663 4661.

Our Policy sets high standards for everyone. Compliance to this Policy is in our best interests as it maintains our reputation as a trustworthy and reliable organisation. You have the assurance of the Senior Management Team that they shall follow the Ethics Policy and all they ask, is for your personal commitment to do the same.

**Signed:**




M Rafferty

**Managing Director**

**Bernard Hunter Crane Hire Ltd UK Ltd**

**Date:**

26/08/21

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
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## 2.0 LIVING OUR VALUES

*Our company's foundation is built on our values, which distinguishes us and guides our actions. This Ethical Policy is an important tool in our diligent efforts for continual improvement and to operate with integrity and live by our core values to:-*

*Move Forward as a Team* - our people are at the core of our success and we will develop our business around a valued and motivated workforce. We recognise and reward achievement and have true confidence and belief in our teams.

*'Be Correct in all Things*- Is how we apply the highest ethical standards to everything we do and we will always strive to do the right thing, wherever our business takes us. No action by Bernard Hunter Crane Hire Ltd will result in harm to any person, the environment or the communities in which we work.

*Inspirational Spirit* - On the part of all our people, which fosters a culture of open communication to encourage innovation? We recognise and reward new ideas, creative thinking and behavioural change.

*We are Serious about the Service that we provide* - Our customers shall recognise us for our service excellence and quality. When a customer buys a service from Bernard Hunter Crane Hire Ltd, they buy a lifetime of competence, knowledge, support, customer service, commitment and expertise.

*Share & Communicate openly* - We aim to be open and transparent in everything that we do and communicate freely with each other, our partners, our clients, our employees and our communities.

## 3.0 WHAT IS THE BUSINESS ETHICS POLICY?

This Policy is designed to guide your decision making and help you handle business situations professionally, fairly and legally.

The Business Ethics Policy has the following objectives:

- ✓ To ensure that Bernard Hunter Crane Hire Ltd management and employees comply with all laws and regulations applicable to their business activities in all sectors in which they operate
- ✓ To ensure that Bernard Hunter Crane Hire Ltd management and employees conduct all their business activities with integrity and in an ethical manner
- ✓ To maintain and protect the reputation for business integrity that Bernard Hunter Crane Hire Ltd management and employees have built with all parties that they deal with.

## 4.0 WHAT DOES THIS POLICY APPLY TO?


This Policy applies to all 'Bernard Hunter Crane Hire Ltd employees' engaged across all UK sites. For clarity Bernard Hunter Crane Hire Ltd is the company under which all employees operate.

The following persons shall be deemed to be Bernard Hunter Crane Hire Ltd employees: -

- Directors and Officers of Bernard Hunter Crane Hire Ltd.
- Employees of Bernard Hunter Crane Hire Ltd.
- Contractors, Consultants and Agents retained by Bernard Hunter Crane Hire Ltd.

## 5.0 WHAT IS EXPECTED OF YOU?

Bernard Hunter Crane Hire Ltd employees are expected to perform and work with honesty and integrity and comply with all applicable laws in the course of their business activities, whether or not specifically covered by this Business Ethics Policy or any other Bernard Hunter Crane Hire Ltd Policy.

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
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As one of Bernard Hunter Crane Hire Ltd’s employees at whatever level, you have a personal responsibility to observe the standards of conduct and other requirements of the Ethics Policy whether or not these standards and requirements are also imposed by law.

In the case of Bernard Hunter Crane Hire Ltd employees, violations or non-compliance with applicable laws or Bernard Hunter Crane Hire Ltd Company Policies will constitute grounds for disciplinary action, including, when appropriate, termination of employment.

For non-employees – such as contractors, consultants or agents conducting business on behalf of Bernard Hunter Crane Hire Ltd – violations or non-compliance with applicable laws or Company Policies will result in the termination of any relationship with Bernard Hunter Crane Hire Ltd.

### 6.0 DIFFERENT LAWS IN DIFFERENT COUNTRIES?

“Bernard Hunter Crane Hire Ltd does business across Scotland and Northern England, and that means everyone may be subject to different laws and regulations for each location. The laws of some Scotland and England, particularly relating to corruption and bribery, transcend national borders giving what is known as an ‘extraterritorial jurisdiction’.

This means you may be prosecuted in Scotland and England, for actions or conduct that took place there. You are responsible for knowing and following the laws that apply where you work. This Policy establishes principles for business conduct applicable throughout Bernard Hunter Crane Hire Ltd, regardless of location. Where differences exist as the result of local laws or regulations you must apply either the Ethical Policy or the local requirements – whichever sets the highest standard of behaviour. Be assured that should you ever have any questions or concerns regarding local or international laws, the company and specifically the HSQE Advisor or your line manager will be pleased to advise and support you in any way possible.

### 7.0 REPORTING SUSPECTED NON-COMPLIANCE

You must report any breaches or potential breaches of the Policy of which you become aware.

Please consult with your supervisor first, however, if not satisfied or concerned, contact us via the ethics email: [business.ethics@bernardhunter.com](mailto:business.ethics@bernardhunter.com)

Reports or questions received via the ethics email address will be dealt with in a professional and confidential manner


### 8 BUSINESS AND PERSONAL INTEGRITY

Bernard Hunter Crane Hire Ltd expressly prohibits improper payments in all business dealings, if working in any country within the UK, with both governments and the private sector. Bernard Hunter Crane Hire Ltd management and employees (including all agents, consultants and contractors) must not make or offer or agree to make any unlawful payment, bribe or other corrupt payment to any client, regulatory authority or Government Official (including their employees, agents and representatives). Bernard Hunter Crane Hire Ltd expressly prohibits the payment of ‘Facilitation Payments’ or other such ‘greasing’ or ‘enabling’ payments – even if that may lead to a delay or loss of business opportunity.

### 9 BRIBERY AND CORRUPTION

It is vital that all agents and consultants who may interact on Bernard Hunter Crane Hire Ltd’s behalf with Government Officials comply with this Business Ethics Policy.

An improper payment to gain advantage in any situation is never acceptable and exposes both Bernard Hunter Crane Hire Ltd management and employees to possible criminal prosecution and large civil fines or penalties. Acts or allegations of bribery can do serious damage to Bernard Hunter Crane Hire Ltd’s reputation. Bernard Hunter Crane Hire Ltd employees who are found to be giving or taking bribes or any other acts of corruption, will be subject to disciplinary action which may ultimately lead to dismissal and, if appropriate, criminal prosecution.

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
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<b>Owner:</b> HSQE		

Bernard Hunter Crane Hire Ltd and individual Bernard Hunter Crane Hire Ltd employees are subject to anti-bribery legislation, such as the UK Bribery Act (“Bribery Act”). The Bribery Act relates to the bribery of both public officials and commercial agents or employees in the public sector. Under the Bribery Act it is an offence to give, promise and/ or offer a bribe, inducement or improper payment to anyone with the intention of obtaining a business advantage. The penalties set out in the Bribery Act apply to companies and all individuals. Companies convicted under the Bribery Act, face unlimited fines. Individuals also face unlimited fines and imprisonment for up to 10 years. Bernard Hunter Crane Hire Ltd Senior Management are required to approve all charitable or political donations, whether suggested by an employee or a Public or Government Official that Bernard Hunter Crane Hire Ltd as a Company is doing business with. In certain circumstances the charitable contribution could be perceived as a bribe. The approval of any such donations shall be in accordance with Company Procedures and the prevailing Bernard Hunter Crane Hire Ltd Delegation of Authority (DOA).

## 10 FACILITATION PAYMENTS

Bernard Hunter Crane Hire Ltd makes no distinction between bribes and so-called ‘facilitation’ or ‘greasing’ or ‘enabling’ payments to expedite or otherwise procure a transaction. Bernard Hunter Crane Hire Ltd employees, agents, contractors and suppliers shall not make bribes or facilitate payments on behalf of Bernard Hunter Crane Hire Ltd as a Company.

The only exception to this would be in circumstances where there is a real and imminent threat to the health, safety, personal security or welfare of any employee or a member of his or her family or a co-worker or loss of Bernard Hunter Crane Hire Ltd company property. An example of this would be where a Government Official makes a demand for payment together with a threat that if payment is not made the person may be detained. If, after initially declining to make a payment, you decide to make the payment due to the threat, then this exceptional circumstance must be immediately reported in writing to Bernard Hunter Crane Hire Ltd Senior Management in accordance with Company Procedures. Bernard Hunter Crane Hire Ltd shall report situations where monies have been extorted from Bernard Hunter Crane Hire Ltd employees to the proper legislative authorities.

Bernard Hunter Crane Hire Ltd employees, agents, contractors and suppliers shall not make bribes or facilitation payments on behalf of Bernard Hunter Crane Hire Ltd.

## 11 AGENTS AND THIRD PARTIES

Business practices or other conditions in certain countries require the use of agents or similar third parties to represent Bernard Hunter Crane Hire Ltd’s interests. In many cases these agents can arrange negotiations and services more efficiently than otherwise might be possible. Agents and representatives must be carefully chosen because their improper conduct could damage Bernard Hunter Crane Hire Ltd’s reputation and expose Bernard Hunter Crane Hire Ltd management and employees to criminal prosecution. Management approval as per Company Procedures is required before finalising agent or similar third party representative arrangements.


All contracts must clearly stipulate that improper or illegal payments are not to be made - this includes any form of facilitating payment. Agents and representatives must be given a copy of this Ethics Policy and related Company Procedures after which they shall be asked to confirm their acceptance and compliance with the terms and conditions that are applied.

## 12 CONFLICTS OF INTEREST

Bernard Hunter Crane Hire Ltd employees must avoid any conflict of interest between their private activities, personal interests and their responsibilities and duties owed to the company.

Any conflict of interest may arise if you or a close family member receives benefits, other than your employment benefits, as a result of your position within Bernard Hunter Crane Hire Ltd. Bernard Hunter Crane Hire Ltd employees must not accept (directly or indirectly) any personal payments, services or loans from a competitor, customer, supplier or contractor of Bernard Hunter Crane Hire Ltd, except in the normal course of individual enterprise such as obtaining a loan from a banking institution that is also a supplier to Bernard Hunter Crane Hire Ltd.



<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
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Bernard Hunter Crane Hire Ltd employees must declare any potential conflicts of interest to their Line Manager or the Finance Department.

### 13 GIFTS, ENTERTAINMENT AND HOSPITALITY

Gifts and/ or entertainment whether given or received by Bernard Hunter Crane Hire Ltd employees must not place the recipient under any obligation and should not be capable of being misconstrued.

Gifts and/ or entertainment – whether given or received by Bernard Hunter Crane Hire Ltd employees must:

- Be nominal;
- Only be given or accepted if within the bounds of recognised business practice;
- Be related to a business purpose;
- Not be intended to influence a business transaction;

Gifts given or received must be approved in writing according to the required Company Procedure.

In general, Bernard Hunter Crane Hire Ltd employees must not offer or accept a gift or entertainment from or to any customer of Bernard Hunter Crane Hire Ltd, or from or to any person or company having current or prospective dealings with Bernard Hunter Crane Hire Ltd, such as a supplier or contractor, if the gift or entertainment is worth more than a nominal value. Nominal value is considered to be £50 (set by our Bernard Hunter Crane Hire Ltd Company Procedures) in relation to non-governmental organisations and defined legislation. When in relation to a Government Official or governmental organisation, all gifts must be pre-approved by the MD, Operations Manager, Logistics Manager or Finance Manager in accordance with Company Procedures.


However, Bernard Hunter Crane Hire Ltd recognises that there may be situations where it is culturally appropriate to receive something from a customer or supplier that exceeds such nominal value – where it is a gift or entertainment (for example golf or other sporting events) with a related business purpose. In such situations you must obtain written permission in accordance with Company Procedures.

Bernard Hunter Crane Hire Ltd (or their Agents or Representatives) must not make any donations intended to procure political influence. Bernard Hunter Crane Hire Ltd company funds and resources may not be used to contribute to any political party or political candidate.

### 14 EXPORT CONTROLS AND ECONOMIC SANCTIONS

Bernard Hunter Crane Hire Ltd must comply with all applicable export control laws and economic sanctions when conducting international business. The UN, the European Union as well as the UK (and other countries) impose restrictions on exports and sanction dealings with certain countries, entities and individuals. For example, the UK Government has put in place a number of Economic Sanctions that would prevent their citizens (including non-UK nationals who work for UK companies or anyone physically located in the UK) from having anything to do with transactions for certain 'embargoed' countries. Serious penalties – fines, revocation of permits to export and even imprisonment – can apply when these laws are broken. The combination of export controls and economic sanctions means that there are frequently restrictions applied on:

- ✓ Exports and re-exports of goods, technology and software to specific countries, entities and individuals, and for certain end-uses
- ✓ Disclosure of certain technology and software source codes to nationals of a prohibited country
- ✓ Involvement of nationals of the country imposing sanctions in any business dealings with the sanctioned country or with persons in the sanctioned country;
- ✓ New investments or other transactions with a sanctioned country, persons in the sanctioned country and sanctioned individuals. If your work involves the sale, shipment, electronic transfer or disclosure of technical information, software, goods or services across national borders between Bernard Hunter Crane Hire Ltd, or with third parties, you are required to keep up-to-date with applicable rules and regulations.

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
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Bernard Hunter Crane Hire Ltd must comply with all applicable export control laws and economic sanctions when conducting international business

## 16 NATIONAL AND INTERNATIONAL TRADE

Bernard Hunter Crane Hire Ltd will not engage in any activity or business practice, which is in breach of any applicable competition and/ or antitrust law to which they may be subject. Bernard Hunter Crane Hire Ltd is committed to conducting its business in an open and competitive fashion. Any activity that undermines this commitment is unacceptable.

## 17 CHILD WELFARE

Employment of Child labour is a crime prosecutable under national and international laws. Nonetheless, enforcement is elusive, particularly in an industry where the supply chain is fragmented and human trafficking and child labour is often hidden. Bernard Hunter Crane Hire Ltd operates within the UK but has suppliers who contract globally and as such they shall have the highest ethical standards with regard to child welfare, ensuring that where possible no underage child shall be employed by the company or any company working for Bernard Hunter Crane Hire Ltd. As part of any review of contractors or suppliers, the question must always be asked of these companies whether they employ child labour and if possible this shall be verified during audits of the companies, especially where these countries are identified as underdeveloped.

Children below the MSLA must not be employed in any industrial undertakings such as factories, construction sites etc. except when on work experience schemes approved by the local authority, or the governing body of an independent school.

Children under 13 years of age are generally prohibited from any form of employment and local authorities have powers to make bylaws on the types of work, and hours of work, children aged between 13 years and the MSLA can do.

Any company employed by Bernard Hunter Crane Hire Ltd that is found to infringe the child labour laws shall be removed from the Assessed Suppliers List and reported to the relevant authorities.

## 18 MODERN SLAVERY/ HUMAN TRAFFICKING


We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This aspect of our Business Ethics Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business and in our supply chains.

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we operate in line with principles of responsible sourcing, including ensuring the payment to employees at the prevailing minimum wage applicable within their relevant county of operations. We have in place a supply chain compliance programme that is maintained by the Purchasing Administrator and HSQE Advisor. This consists of client reviews; audit; and self-certification declarations.

## 19 COMPETITION/ ANTI TRUST REGULATIONS

Competition or antitrust laws apply to every level of business in the countries in which Bernard Hunter Crane Hire Ltd operates. The laws apply not only to Bernard Hunter Crane Hire Ltd but also to our competitors, suppliers and customers. It is important to be aware of the laws – not only to avoid infringement but also to ensure that suppliers or customers are not engaging in anti-competitive activities that could damage Bernard Hunter Crane Hire Ltd's business or reputation. Some competition laws – such as the EU laws – can apply even when the conduct occurs outside the relevant country or countries' borders. Although the laws may differ from country to country, the following examples illustrate some of the most common illegal competition and antitrust law activities:

- ✓ Price fixing and bid rigging
- ✓ Agreements between competitors regarding which suppliers or customers they will not deal with

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
<b>Owner:</b> HSQE		

- ✓ Agreements between competitors to reduce production or output
- ✓ Agreements between competitors not to compete for certain customers or accounts or in certain geographic areas
- ✓ Misrepresentations about the abilities of a competitor's products or services

Bernard Hunter Crane Hire Ltd companies will ensure that management and employees will not suffer retaliation, retribution or victimisation for seeking to invoke or enforce their rights.

## 20 HEALTH, SAFETY AND THE ENVIRONMENT

Bernard Hunter Crane Hire Ltd is firmly committed to the health and safety of its workforce and those affected by our operations. Bernard Hunter Crane Hire Ltd's business activities are governed by stringent HSE principles designed to ensure best practise and compliance across our operations. All Bernard Hunter Crane Hire Ltd employees must conduct their duties and responsibilities in compliance with Bernard Hunter Crane Hire Ltd's policies on Health, Safety and the Environment and all global legislation, which may affect the company's activities. Any workplace accidents, near-misses, unsafe practises and conditions must be reported to the HSE Department.

## 21 EQUAL OPPORTUNITIES

Bernard Hunter Crane Hire Ltd is an equal opportunities employer. Bernard Hunter Crane Hire Ltd shall hire, evaluate and promote employees based on their qualifications, demonstrated skills, achievements, experience and performance.

Bernard Hunter Crane Hire Ltd is committed to ensuring that their employees are able to work in a professional, safe and discrimination-free environment that promotes equal employment opportunities and prohibits discriminatory practices, including any form of discrimination on the basis of gender, race, sexual orientation, disability, religious beliefs, age or any other status protected under applicable law.

Accordingly, all Bernard Hunter Crane Hire Ltd company employment policies will seek to ensure equal employment opportunities for all employees.

## 22 HARASSMENT

Bernard Hunter Crane Hire Ltd will not tolerate any form of abuse or harassment, towards Bernard Hunter Crane Hire Ltd employees or others in any Bernard Hunter Crane Hire Ltd location.

Bernard Hunter Crane Hire Ltd is committed to ensuring that employees are able to work in an environment which is free from harassment, including victimisation and bullying, and in which employees treat each other with mutual respect and dignity. Bernard Hunter Crane Hire Ltd does not tolerate any form of harassment based on gender, race, sexual orientation, disability, religious beliefs, age or any other status protected under applicable legislation.


## 23 SUBSTANCE ABUSE

Bernard Hunter Crane Hire Ltd will provide a safe and productive working environment by ensuring that the workplace is free from any form of substance abuse. Employees should be fit and ready to carry out their duties at all times, while at work or on Bernard Hunter Crane Hire Ltd business. Employees are prohibited from being at work or on Bernard Hunter Crane Hire Ltd business while impaired by drugs or alcohol or with illegal drugs present in their system. The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances is prohibited. Except where authorised by a member of the Senior Management, alcohol consumption is not permitted within a Bernard Hunter Crane Hire Ltd workplace or worksite.

## 24 PROTECTING BERNARD HUNTER CRANE HIRE LTD'S ASSETS

Employees must protect and preserve Bernard Hunter Crane Hire Ltd's assets and resources and assist Bernard Hunter Crane Hire Ltd in its efforts to control costs. The use of Bernard Hunter Crane Hire Ltd assets and resources for personal financial gain is strictly prohibited. The use of Bernard Hunter Crane Hire Ltd assets and resources for anything other than the conduct of Bernard



<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
<b>Owner:</b> HSQE		

Hunter Crane Hire Ltd business requires the express written permission from a Director within the Senior Management Team.

## 25 ACCOUNTING SYSTEMS AND PROCEDURES

Each Bernard Hunter Crane Hire Ltd company will maintain accounting systems and procedures which enable it and all other relevant parties to obtain a true and fair view of its assets and liabilities, profit and loss and cash flow at all times. All Bernard Hunter Crane Hire Ltd company accounts and records must be recorded in a manner that clearly identifies and describes the true nature of business transactions, assets or liabilities, and properly and promptly classifies and records entries in conformity with generally accepted accounting principles and standards, and specifically IFRS (international financial reporting standards) for company reporting. Accounting records must be retained for as long as required by law or generally accepted practice.

## 26 FRAUD

Bernard Hunter Crane Hire Ltd will not tolerate fraud and has established procedures to prevent, detect, report and investigate suspected frauds. Fraud generally involves some form of deceit, theft, trickery, or making of false statements, breach of trust and guilty intention with the object of obtaining money or other benefit.

A fraudulent act can have significant consequences for Bernard Hunter Crane Hire Ltd and the individuals involved, including loss of sales and access to financing, withdrawal of licences, litigation and damaged reputation.

Fraud includes, but is not limited to:

- ✓ Dishonesty or fraudulent act;
- ✓ Embezzlement;
- ✓ Forgery or alteration of business documents;
- ✓ Misappropriation of Bernard Hunter Crane Hire Ltd, customer, supplier or contractor assets;
- ✓ Conversion to personal use of cash, supplies or any Bernard Hunter Crane Hire Ltd asset;
- ✓ Unauthorised handling or reporting of Bernard Hunter Crane Hire Ltd business transactions;
- ✓ Falsification of Bernard Hunter Crane Hire Ltd Company records or financial statements;
- ✓ Misrepresentations about Bernard Hunter Crane Hire Ltd services;
- ✓ Failure to disclose information when there is a legal duty to do so.


If you suspect that fraudulent activity may have occurred you must immediately report such suspicion to a member of the Senior Management Team.

## 27 MONEY LAUNDERING

Bernard Hunter Crane Hire Ltd will not condone, facilitate or support money laundering. Bernard Hunter Crane Hire Ltd will comply with all relevant national and international laws and regulations covering money laundering. Money laundering is a generic term used to describe the process by which individuals or companies try to conceal illicit or illegal funds (including the proceeds of crime) within their business in order to make these funds look legitimate. Money laundering legislation is designed to assist and protect legitimate businesses from being used by criminals for such a purpose. Many of the areas in which Bernard Hunter Crane Hire Ltd operates have some form of anti-money laundering legislation. The legislation may place criminal Company liability on Bernard Hunter Crane Hire Ltd as well as criminal personal liability on any Bernard Hunter Crane Hire Ltd employees involved. You must contact the Senior Management Team and report any suspicious transactions, activity or incidents of money laundering.

Examples of suspicious transactions could include (but are not limited to):

- ✓ Any transaction where you don't know or cannot verify the parties to the transaction;

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
<b>Owner:</b> HSQE		

- ✓ A willingness by one party to pay above market price;
- ✓ Payments made in currencies other than specified in the invoice;
- ✓ Payments made by someone not a party to the contract (unless approved);
- ✓ Payments to/from an account other than the normal business relationship account;
- ✓ Requests to make an overpayment;
- ✓ Requests for payments to an overseas jurisdiction unconnected with the transaction or requesting party.

## 28 CONFIDENTIALITY

Bernard Hunter Crane Hire Ltd employees must protect confidential information, proprietary information and trade secrets in their possession from unauthorised use or disclosure, including any confidential information relating to customers, suppliers, contractors, employees and other third parties. Bernard Hunter Crane Hire Ltd will comply with the provisions of confidentiality undertakings which they enter into, including those relating to potential acquisition targets, divestments, joint ventures, collaboration arrangements or other potential business opportunities.

Confidential information can be broadly defined as technical information concerning services, and development process information, engineering designs, drawings and layouts, software code, know-how, pending patent applications, invention disclosure statements and the like. Confidential information would also include non-public business information such as non-public financial information, employee information (including e-mail lists), analyses, forecasts, customer and supplier lists, strategic and operating plans, Company organisation plans, audit materials or reports, legal opinions and advice, information regarding litigation or potential litigation, proposed transactions and the like.


The release (intentional or inadvertent) of any confidential information to third parties without appropriate controls and/ or protection can damage Bernard Hunter Crane Hire Ltd's reputation and in some cases violate the law. Bernard Hunter Crane Hire Ltd employees must not disclose to third parties any non-public material. If your work requires you to discuss such information with outsiders (for example in negotiating a transaction), such discussions must only occur with the protection of a written confidentiality or non-disclosure agreement (available from the Bernard Hunter Crane Hire Ltd HR Representative).

Bernard Hunter Crane Hire Ltd will also have obligations with respect to the confidential information of customers, suppliers and other third parties with whom they have a business relationship. Improper handling of sensitive business, financial, or technical information, or of original ideas provided to a Bernard Hunter Crane Hire Ltd Company by customers, suppliers and other third parties can lead to a loss of trust and also legal claims against Bernard Hunter Crane Hire Ltd for damages.

## 29 INTELLECTUAL PROPERTY (IP)

Intellectual property rights including patent rights, copyright, design rights, database rights, trademarks and service marks in all inventions, documents, logos, designs and computer programs created, devised or undertaken by Bernard Hunter Crane Hire Ltd employees belong to Bernard Hunter Crane Hire Ltd. Bernard Hunter Crane Hire Ltd will own the copyright (or other IP rights) in all of the work that Bernard Hunter Crane Hire Ltd employees create on behalf of Bernard Hunter Crane Hire Ltd. Bernard Hunter Crane Hire Ltd will respect the valid intellectual property rights of third parties and will not knowingly infringe such rights. The management of Bernard Hunter Crane Hire Ltd as a limited company are under a general duty to ensure that all relevant contracts of employment or contracts for services provide for the ownership of relevant intellectual property rights by Bernard Hunter Crane Hire Ltd. Unauthorised use of others' intellectual property can expose Bernard Hunter Crane Hire Ltd and Bernard Hunter Crane Hire Ltd employees to legal claims and damages.

Bernard Hunter Crane Hire Ltd will own the copyright (or other IP rights) in all of the work that Bernard Hunter Crane Hire Ltd employees create on behalf of the company.

<b>Doc Ref:</b> CPS 524	<b>Business Ethics Policy</b>	
<b>Rev:</b> 02		
<b>Status:</b> Approved	<b>Company Policy Statement</b>	
<b>Owner:</b> HSQE		

### **30 DATA PRIVACY**

Bernard Hunter Crane Hire Ltd shall comply with relevant data protection legislation affecting the acquisition, maintenance and use of personal data, whether such information is held electronically or otherwise based strictly on written agreement and confidentiality. Bernard Hunter Crane Hire Ltd employees who have access to personal data, shall only use it for the purpose for which it was collected and must adhere to high levels of confidentiality when using it.

### **31 IMPROPER USE OF IT SYSTEMS**

Computer hardware, and software plus information stored on Bernard Hunter Crane Hire Ltd's IT systems are Bernard Hunter Crane Hire Ltd property. You must use Bernard Hunter Crane Hire Ltd's IT systems responsibly and primarily for the business purposes for which they are intended. Bernard Hunter Crane Hire Ltd employees using IT systems for personal reasons must apply high ethical standards, comply with applicable laws and regulations and support Bernard Hunter Crane Hire Ltd's information security requirements. The use of Bernard Hunter Crane Hire Ltd IT systems may be monitored for the purposes of information security, operational management, maintenance, business needs and to ensure that all use is compliant with all laws, regulations and Bernard Hunter Crane Hire Ltd policies. By using Bernard Hunter Crane Hire Ltd's IT systems, you accept that unless prohibited by Law, Bernard Hunter Crane Hire Ltd reserves the right to access and disclose all information contained on our IT applications and devices, including all computers, mobile phones, USB drives and other electronic media.

### **32 INTRANET, SOCIAL MEDIA & THIRD PARTY WEBSITES**

The materials provided on Bernard Hunter Crane Hire Ltd's intranet are potentially sensitive and of a highly confidential nature. It is the responsibility of all Bernard Hunter Crane Hire Ltd employees to prevent others from gaining unauthorised access. All Bernard Hunter Crane Hire Ltd employees are expected to adhere to the guidelines outlined in Bernard Hunter Crane Hire Ltd's Intranet Policy. Bernard Hunter Crane Hire Ltd generally views personal and social forum websites and weblogs positively, and it respects the right of employees to use them as a medium for self-expression. However, employees are not authorised to represent the company on such platforms. All our external communications require careful consideration and a unique understanding of legal and media issues. The Bernard Hunter Crane Hire Ltd brand is best reflected by its people, and what you publish may reflect on us all.

Social networking sites should not be used for personal communications on non-work related activities during office hours.