

A summary of BrandSafway's  
**CODE OF CONDUCT**  
for craft employees



**BRAND > SAFWAY.**

At Work For You™

## INTRODUCTION

At BrandSafway, we are proud of our global team and our reputation for integrity. BrandSafway is committed to the highest standards of conduct and we need your support in maintaining our culture of compliance.

This summary describes sections of our [Code of Conduct](#) which might be most relevant to the situations craft team members might encounter and provides information on how to report integrity or ethics concerns. This summary is intended to serve only as an educational and supplementary tool and not intended to replace our comprehensive [Code of Conduct](#). All employees, including craft team members, are responsible for reviewing, understanding, and complying with the Code of Conduct. You can access the Code of Conduct by visiting [www.brandsafway.com/integrity](http://www.brandsafway.com/integrity), or request a print copy from Human Resources.



## HEALTH AND SAFETY

Safety is BrandSafway's number one value. Nothing is more important to us than your safety along with the safety of your co-workers and our customers. We are dedicated to maintaining a safe and healthy workplace. We will provide you with safety information such as handbooks, policies and training appropriate for your job. We will also equip you with the materials you need to safely perform your job including appropriate personal protective equipment.

It is your responsibility to follow all health and safety training and policies, including site-specific requirements. If you are uncertain about a procedure or rule, have concerns about your equipment or are aware of any health or safety violations, contact your Safety manager, supervisor or Human Resources Representative. Always remember that you have the authority and responsibility to Stop Work if you observe an unsafe act or condition.

## HUMAN RIGHTS

BrandSafway is committed to supporting fundamental human rights and to maintaining a work environment free of discrimination where employees treat each other with respect.

**Equal Employment Opportunity.** We do not make employment decisions based on discriminating factors such as age, ethnicity, disability, gender, race, religion, national origin, marital status, sexual orientation or any other bases protected by law.

**Anti-Harassment.** We prohibit all forms of harassment including demeaning, insulting, embarrassing or intimidating behavior. We prohibit unwelcome sexual advances, sexual harassment and any form of sexually offensive displays or conduct.

**Workplace Violence.** Workplace violence such as verbal threats of physical violence or actual physical violence such as assaults, fights, bullying or other physically threatening or abusive conduct will not be tolerated.

**Human Trafficking.** BrandSafway has zero-tolerance for any conduct associated with human trafficking or modern slavery. We strictly prohibit any form of forced, imprisoned or indentured labor including illegal child labor.

## ANTI-BRIBERY AND CORRUPTION

BrandSafway expressly prohibits bribery in any business dealing, anywhere in the world. Offering, promising, giving, demanding, or accepting bribes, including so-called facilitation payments, are strictly prohibited.

BrandSafway will never require or ask you to pay a fee or favor in exchange for being considered, hired, promoted, having continued employment or receiving any form of employment-related consideration. It is a violation of the Code of Conduct for anyone to request such a payment for employment consideration.

## FRAUD AND THEFT

We expect our employees to act with honesty and integrity. All forms of theft including theft of BrandSafway assets, employee property and customer or third-party property is prohibited. Similarly prohibited are all forms of fraud such as deception, bribery, forgery, extortion, corruption, embezzlement, misappropriation, false representation, concealment of material facts and collusion. The misuse or theft of company assets, any impropriety or misrepresentation in the handling or reporting of money or Company financial documents or



scheme for personal gain at the expense of BrandSafway or another employee are violations of the Code of Conduct.

### **CONFLICT OF INTEREST**

Employees should ensure that their personal activities or relationships do not conflict with their responsibilities to BrandSafway. Each employee has an obligation to avoid a conflict of interest.

A “conflict of interest” occurs when an individual’s private interests interfere or are inconsistent with the interests of BrandSafway. Possible conflicts of interest may include:

- Representing BrandSafway in business dealings in which you have a personal or financial interest;
- Directing business to a supplier in which you or a close family member have a personal or financial interest;
- Seeking or accepting a gift or personal benefit which may be seen as influencing your business judgment;
- Competing with BrandSafway or working for or on behalf of a competitor even if unpaid;
- Acting on business opportunities of the kind that BrandSafway pursues without first offering the opportunity to BrandSafway; and
- Utilizing assets of BrandSafway for your own personal benefit

### **COMPANY PROPERTY AND INFORMATION**

Taking care of Company property is essential to running a safe, cost-effective business. Employees must use and maintain Company property with care and respect while safeguarding it against waste and abuse.

**Equipment and Resources.** We expect you to protect company equipment and resources. This includes the work equipment used to perform our services including materials, tools, consumables, machinery, computers and vehicles. All property should be properly maintained for safe and effective use. Lock up equipment, supplies and materials to prevent theft.

**Confidential Information.** As part of your job, you might have access to proprietary or confidential information. Confidential information might include non-public

information about products, business transactions or awards. Proprietary information might include trade secrets, pricing or customer information and technical processes. It is your obligation to protect confidential

and proprietary information from unauthorized disclosure.

**Books and Records.** You must record and provide all information, including hours worked, in an accurate, truthful, complete and timely manner. Similarly, all business records, reports and financial documents must be prepared accurately, truthfully and completely, which means employees must report and record all business-related transactions and expenses fully and honestly.

### **PROTECTING EMPLOYEE INFORMATION**

BrandSafway respects your privacy rights and complies with all applicable privacy laws. BrandSafway may need to collect certain information about its employees for legitimate business purposes including, as possible examples, hourly rate information, home address, contact information, date of birth and other personal information. BrandSafway limits access to this information to only those who have a business need to use it, such as Human Resources and Payroll. BrandSafway will not use, sell or share your information for a non-legitimate purpose.

If you are authorized to access employee information, you are expected to keep all information confidential. If you are not authorized, you should not have access nor disseminate employee information.



## REPORTING WITHOUT RETALIATION

You are strongly encouraged to report any integrity concerns or suspected violations of the Code of Conduct or company policies. Our reputation and safety may depend on you speaking up.

BrandSafway absolutely prohibits retaliation against anyone who in good faith reports an integrity issue and/or suspected violation or who cooperates with a company investigation.

Where available, reports can be made anonymously through our ethics hotline, though this might make it more difficult to investigate and communicate with you.

In the course of an investigation, employees are expected to cooperate including truthfully and fully answering investigation questions and providing requested documentation.

Knowingly making false accusations or providing false information during an investigation is a violation of the Code of Conduct.

## HOW TO REPORT A CONCERN:

There are several methods you can use to raise your integrity concerns and to report suspected violations in good faith and confidentially. You should use the channel and language that is most comfortable for you and appropriate for the situation:

- > Your direct supervisor or Human Resources representative;
- > Your supervisor's supervisor (escalating as necessary);
- > BrandSafway's Compliance and [Ethics Hotline](#), online at [www.brandsafway.ethicspoint.com](http://www.brandsafway.ethicspoint.com) or by phone at 1-844-381-9320 if calling from the U.S. (if calling from international, please visit the hotline's website address above, select the country you are calling from and call the phone number designated for your specific country);
- > BrandSafway's [Ethics Hotline](#) is administered by an independent third party system called EthicsPoint. The Hotline is operated 24 hours a day, 7 days a week. Reports through our Hotline can be made in 14 different languages.
- > Our Chief Compliance Officer or other business leaders.

