



Code of Conduct **Bradken's Guide to Success**

One Bradken.

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Bradken has a proud history and great reputation as an industry-leading global manufacturer and solutions provider. As part of the team you are part of our story and acting in a way that reflects and improves our good name is your daily responsibility.

What we expect of you at work



Bradken is committed to having a workplace where our employees are safety focussed, innovative, ethical and Proud To Belong to our company and the broader Hitachi Construction Machinery Group (HCM).

This Code of Conduct handbook aims to set guidelines for the expected behaviours and should form the basis of everything you say and do at work. How we act is a choice and we want to help you make the right one.

Occasionally you may face an ethical challenge in the course of your work. When this happens, refer to Bradken policies and this handbook. Think about your choices and their possible consequences, because breaches of this Code of Conduct will be taken seriously. Importantly if you see something you believe is wrong have the courage to speak up. You will be listened to.

This handbook should be read in conjunction with Bradken policies and procedures and the HCM Group Codes of Conduct. These are available on the intranet or through your manager or HR business partner. If you have any questions about this Code of Conduct handbook please ask your supervisor/manager or HR business partner.

Working at Bradken requires you to understand and support our corporate values. As a member of HCM, Bradken supports the Kenkijin Spirit – an ethos based on three guiding principles.

This Code of Conduct is based on the same principles of the Kenkijin Spirit:



Challenge



Customer



Communication

We expect our employees to:

- have the courage to take on the spirit of Challenge by always asking how we can improve. What can be done to improve a situation, to innovate our products and services, to develop your skills, and to work better with our customers and our workmates. Readily tackle tough assignments, support others who do the same and champion your ideas
- think about what our Customers truly want, striving to understand their needs better than they do. Identify opportunities that benefit the customer and build and deliver solutions that meet or exceed their expectations
- be open in our Communication, collaborating with others across the organisation to achieve shared objectives, trusting your workmates and acting with the belief that teamwork is the cornerstone to our future success. Bradken is better together

Compliance

For Bradken, compliance is about acting in a way that reduces risk of economic, material, personal or reputational harm to our business, yourself and your workmates. Sticking to the guidelines set out in this Code of Conduct and Bradken policies will help you mitigate these risks and maintain compliance for yourself and the company.



On a day to day basis, following the Code of Conduct will mean making the right choice. That is, acting with courage to deliver the best for Bradken, communicating well with your workmates and demonstrating appropriate behaviours, and being customer focussed to ensure Bradken remains their manufacturer and supplier of choice.

Some examples of this type of behaviour include:

- Do your job safely. Do not participate in unsafe acts. Have the courage to challenge unsafe behaviours. Lead by example. Look out for your workmates
- Abide by the law and all processes and procedures
- Provide honest, efficient and effective responses to our customers
- Protect the confidentiality of all Bradken information made available to you
- Act professionally at all times, never mislead our customers or your workmates or make representations without first checking the underlying facts
- Be honest in all your dealings and never be a part of anti-competitive behaviour
- Look after and do not misuse Bradken assets and resources
- Protect the environment by minimising our impact
- Do not commit fraud or any other forms of corrupt conduct
- Be alert for any real or perceived conflicts of interest and act to deal with it
- Be prepared to demonstrate the reasons behind your decisions
- Protect Bradken's good name at all times

This standard of behaviour is an essential part of our customer's confidence in us and our success as a business.

Failing to comply with these standards, Bradken policies and the Code of Conduct can lead to serious consequences e.g. breaking the law may lead to fines for yourself and the business and in some cases imprisonment. Failing to comply could also negatively impact our company's reputation and your personal reputation. Ultimately this can all distract from our efforts to run a successful business to which we are all Proud To Belong.



Being part of the Bradken family means you must make sure you have a thorough understanding of:

- What your job is
- How your job is to be performed
- The result you need to achieve

You are responsible for your own conduct and behaviour and Bradken is committed to fairly and consistently managing responses to our people's behaviour.

We do this by providing an environment where:

- Everyone knows what is expected of them
- The right workplace behaviours are recognised and reinforced
- The right responses are applied to the wrong behaviours

If after reading this Code of Conduct handbook and the supporting policies you have any questions about what is expected of you, please discuss the matter with your manager/supervisor or your HR business partner.

Safety

Many of us work in or visit potentially hazardous environments.

Take care of yourself and your workmates so we can all go home in the same condition at the end of each day. Arrive safe, leave safe. No task is worth risking your health and safety. Even if your role is office-based, we all have a duty to act safely.

- ✓ Make safety your number one priority
- ✓ Follow all current health and safety rules, policies and procedures
- ✓ Before you act, stop and think about whether this is the safest way to do the task
- ✗ If you don't have the correct licence, accreditation or training to complete a task, do not do it



As a global organisation, you may get the opportunity to travel on behalf of Bradken. Remember that while travelling you are a Bradken representative inside and outside of work hours. You must be conscious of cultural differences, differing laws and customs and regional issues. Any behaviour that may bring our company into disrepute will not be tolerated.

Fair business & our commitment to quality

Without our customers, Bradken fails to exist.

As Bradken employees we must satisfy our customers' needs with safety, product quality and environmental protection at the forefront of our activities. Our goal is for zero product defects so customers can use our products and services with a sense of security.



- ✓ Respond quickly to customer complaints, striving to determine the cause and preventing it from happening again
- ✓ Ensure that our communication with customers is accurate and complete
- ✓ Understand what the customer wants and provide reliable products and services
- ✓ Follow local and international competition and trade laws and enter into contracts only after approved by a qualified person
- ✓ Build good professional partnerships with our customers and suppliers
- ✓ Select suppliers carefully not only based on quality, reliability, cost, management stability, but also their fulfilment of social responsibility, transparent information, observance of laws and social norms, respect of human rights and environmental protection
- ✓ Engineers will follow the Engineering Ethics
- ✗ Do not make false or misleading claims about our products or services verbally or in advertising
- ✗ Don't engage in sales activities that place unreasonable pressure on customers

Environmental protection

Bradken understands that its business activity has a number of environmental impacts. We work to minimise these impacts wherever possible.

Business management and operations will observe environmental laws and regulations and voluntary standards and we will be open with our stakeholders about our environmental performance.

- ✓ **Strive to reduce the environmental burden of our products throughout their life cycle – from procurement of materials, production, distribution, use and appropriate disposal**
- ✓ **Help our work sites, foundries, machine shops, offices to actively pursue the prevention of global warming by minimising the impact of our operations, consider the cyclical use of resources and aim to preserve local ecosystems**
- ✓ **Evaluate the potential for environmental problems and strive to prevent them**
- ✓ **When environmental problems occur, implement measures to minimise their impact**

Use of resources

Bradken's resources are vital to our business and exist solely to help us meet our customers' needs. Your job may require you to use a number of Bradken's resources and assets, such as:

- Tools, materials, computers, phones and mobile devices
- Intellectual property, documents, files, records, data and information systems
- Cash, cheques, credit cards, accounts and securities
- Time and employees

As a general rule company resources can not be used for private purposes, or any purposes other than to fulfil your role at Bradken. Reasonable personal use of phones and computers is allowed.

You must not use Bradken resources to conduct other business, social or political activities or involve Bradken in your personal outside of work activities.

- ✓ **Use Bradken resources responsibly for the sole purpose of completing your work**
- ✗ **Don't use Bradken computers for a secondary employment**
- ✗ **Don't use Bradken tools or resources for personal projects**

Corporate info



Information relating to our commercial activities is an important part of our business success and must be protected.

If you are asked to share commercial information or are unsure about actions that may breach this code you should ask your manager or supervisor.

- ✗ **You must not use information about Bradken, our people, customers or business associates to gain personal advantage for yourself or for others**
- ✓ **Avoid the risk of damaging Bradken, other people or organisations through the misuse of corporate information**
- ✓ **Protect information from or about third parties**

We are all responsible for protecting the privacy of personal information held by Bradken and we must respect privacy law by not disclosing sensitive, personal or privileged information of others.

Public comment

It is not appropriate for you to make public comment about, or on behalf of Bradken. This includes statements to the media and commenting online, including all types of social media.

If you are asked to comment please refer the enquiry to Bradken's Communications team.

Outside working hours if you participate in speaking engagements, express views in letters to

newspapers, talkback radio, on social media, in books or in notices that appear in the public domain you must not comment on behalf of Bradken without prior approval from the Bradken Corporate Communications team.

Wherever you are associated with Bradken, through your clothing, uniform, badges or any other identifier it is important that you see yourself as an ambassador for Bradken and act accordingly.

Inaccurate or unfavourable representations of Bradken can have costly ongoing ramifications for the business.

- ✓ **Refer any request for public comment from members of the media, or government to Bradken's Communications team**
- ✗ **Do not offer any comment or views that could appear to be on behalf of Bradken unless authorised to do so, including on social media and online news sites or forums**

Delegated authority

If your job requires you to make financial decisions on behalf of Bradken, like making a purchase or selling an item, or if you are entrusted with a delegation, you should check that:

- The decision or action is within your role
- It complies with all Bradken's policies and procedures relevant to the decision and any relevant law
- The decision and the evidence it is based upon is documented

The Bradken Authorities Matrix outlines delegations and is available on the intranet. If you do not have access to the intranet, ask your supervisor/manager or HR business partner.

If you're making a decision about a purchase or activity and there's a possibility people might think you are gaining a personal benefit or there may be a perception of conflict of interest, talk to your manager or supervisor before you take any action.

- ✓ **Make sure you have the appropriate delegations in place**
- ✓ **Check with your manager or supervisor**
- ✗ **Don't purchase or sell goods belonging to Bradken if it's not your job to do so**
- ✗ **Don't operate outside of the Bradken Authorities Matrix**

Fraud and corruption

Fraud of any type will not be tolerated.

Fraud could include, but is not limited to:

- Forgery or alteration of documents financial or otherwise, or accounts belonging to Bradken
- Misappropriation of funds, securities, supplies, or assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge
- Disclosure of confidential and proprietary information
- Accepting or seeking anything of material value (for personal gain) from vendors, contractors or suppliers
- Disclosure of securities activities of the company and destruction, removal or inappropriate use of company assets

✓ **Be honest in all your business activities**

As a global organisation we will abide by international standards of behaviour and compliance.

Conflicts of interest

Customers, suppliers and colleagues need to be confident that all decisions made by Bradken are fair and impartial.

You are at risk of having a conflict of interest if there is even a perception that your personal interests (or the interests of people close to you) will impact your ability to impartially perform your work duties.

Some examples include:

- Knowing that you or your friends or relatives stand to benefit (financially or not) from a matter in which Bradken is involved
- Having a personal relationship with a Bradken business contact that goes beyond a normal professional working relationship
- Harboursing personal beliefs or attitudes that influence the impartiality of your advice or actions
- Using business information that you have acquired through your work with Bradken for personal gain
- Having a second job that compromises your integrity or impacts on your ability to perform your employment at Bradken
- Making adverse political comments that relate to Bradken's business

Because an individual employee is often the only person who is aware of the potential for conflict they are responsible for identifying and disclosing any real or perceived conflict of interest.

- ✗ **Making a decision that is not impartial can be considered as corrupt conduct and a breach of compliance**
- ✓ **If you think you have a conflict of interest, you must talk to your manager or supervisor about how the situation can be resolved**

If you would like to discuss any aspect of this information please speak with your manager, supervisor or HR business partner.

Acceptance of gifts and benefits

In line with relevant policies all employees should respond cautiously to offers of entertainment, gifts or benefits from third parties, and report all such offers to their manager or supervisor.

- ✗ You must never solicit or request any gift or benefit for yourself or anyone else in connection with your employment
- ✗ You must not present gifts of money or goods to suppliers, customers, employees of other companies or other third parties to avoid perceptions of conflicts of interest
- ✓ Business entertainment will be managed within the range of common practice
- ✓ You must respectfully decline any offers of entertainment, gifts or benefits which do not serve legitimate purposes or which are lavish or extravagant in nature, may appear to have an influence on your work and are inconsistent with business practices

Gifts received that cannot be refused or returned should be collated at your site for annual dispersion or charity donation. If the gift is something that is not appropriate for donation, ie alcohol, it may be used as a prize in a free entry raffle amongst all employees at the site.



Behaviour towards others

We are all judged by our actions.

Respecting human rights is an essential part of running a modern business. This extends from having a workplace free of bullying, harassment and intimidation to ensuring we and our suppliers do not use child or forced labour.

We will respect all international standards of conduct regarding human rights, respecting each person's character and individuality to eliminate discrimination.

Bullying, harassment and intimidation will not be tolerated and you should make yourself aware of the Bullying and Harassment Policy.

As a Bradken employee you need to:

- ✓ **Treat your workmates, our customers and site visitors with respect**
- ✓ **Provide appropriate assistance to your workmates**
- ✓ **Lead by example and encourage your workmates to act in the same way**
- ✓ **Avoid and prevent any form of bullying, intimidation or harassment toward a fellow employee or any other Bradken stakeholder**

What does inappropriate behaviour look like?

Inappropriate behaviour can take many different forms. Sometimes it is very obvious, but at other times it can appear to be 'just a bit of fun'. If anyone finds your behaviour offensive, it is probably inappropriate.

If you see inappropriate behaviour you must act. Things to look out for include:

- ✗ **Not being sensitive to other people's cultural values**
- ✗ **Excluding and isolating people from conversations or activities such as overtime**
- ✗ **Insensitive jokes or name calling**
- ✗ **Pranks or practical jokes**

Breaches of the code & escalation ladder

Bradken is committed to the principles, standards and behaviours set out in the Code of Conduct. All behaviour has a consequence, positive or negative. Breaches of the code may lead to disciplinary action, including employment termination and criminal proceedings.

We are all responsible for acting honestly and for disclosing any wrongdoing of which you become aware. Our Whistleblower Policy requires you to have the courage to challenge behaviour you deem to be inconsistent with the Code of Conduct, ethical business practises or Bradken policies and communicate anything you feel may be out of line by talking with your manager/supervisor or HR business partner. Individuals who report unlawful or unethical behaviour will be given a guarantee of anonymity, subject to any legal requirements which may require disclosure of the identity of the individual.

1 Speak Up

If you see colleagues behaving in a way that may not fit the Code of Conduct, ask yourself “Who should I raise my concerns with?”

Consider speaking with the person/s involved.

If possible, speak with a trusted colleague to check that your concerns are warranted. If you have concerns about speaking with the person involved or a trusted colleague escalate the issue.

2

Escalate

Raise the issue with your manager/supervisor or the immediate manager/supervisor of the person concerned. If the manager forms the opinion you are making a disclosure about a potential breach of the Code of Conduct they will either:

- Contact a HR business partner in cases of bullying, harassment or people issues
- In cases of alleged corruption or criminal conduct:

Global

Website URL

bradkengroup.ethicspoint.com

Mobile site URL

bradkengrouppmobile.ethicspoint.com

Telephone

Australia - 1800 975 159
Canada - 1 844 745 8317
China - 400 120 5100
India - 022 5097 2599
Malaysia - 1 800 81 0707
Peru - 0800 74885
South Africa - 087 195 1169
United States - 1 844 745 83177

Use the web portal if your country isn't listed.

SPNAM

Website URL

bradken.ethicspoint.com

Mobile site URL

bradkenmobile.ethicspoint.com

Telephone

844 936 2713

If you have concerns with going to a manager or supervisor contact HR directly.

3

Advice

If you have concerns about reporting to Bradken what you have seen or experienced, seek external advice or report to an authority.

If you believe there is a breach of the Code of Conduct you have a responsibility to report it.

Compliance test

If you find yourself struggling to make a decision, consider the following points. Doing so will help you make the right choice and maintain compliance.

- What would your family, workmates or manager/supervisor say about the decision you are about to make?
- How would you feel if this action was reported in the newspapers or on TV?
- Would you be confident explaining your actions to external authorities?
- How might your behaviour be viewed in a few years time?
- Would you be happy if you were treated this way?
- Would the issue cause damage to your own reputation or that of the company?

If after considering these potential circumstances you are still not sure of your decision, speak with your manager/supervisor or HR business partner.

Always remember, your behaviour must comply with Bradken policies and the HCM Group Codes of Conduct. You must be able to justify your actions. Remember that you alone are responsible for your actions and decisions. It is your reputation and integrity that will be judged by your family, friends and community. Making the right choice is always the best choice.

Notes

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Notes

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