

Supplier Code of Conduct

The Timberland Equipment Group (“TEG”), consisting of Timberland Equipment Limited, Hawboldt Industries Ltd. and TSE International, is committed to ethical, sustainable, and socially responsible procurement and we expect the same of all participants in our supply chains. Subcontractors and suppliers (“Suppliers”) are critical to achieving the goals of TEG and its customers.

The purpose of this Supplier Code of Conduct (Code) is to detail TEG’s minimum expectations and non-negotiable requirements in the areas of human rights and labour practices; environmental management; professional conduct; and governance.

Application of this Code

TEG seeks to work with its Suppliers to meet and exceed minimum expectations and mandatory requirements as outlined in this Code and continuously strives to improve the standard of its business practices. By Supplier, TEG means any entity that supplies goods or services (directly or indirectly), including construction works and services, to TEG. Where the Code refers to workers, it includes employees, contractors, agency and temporary staff of the Supplier and its related entities. Where the Code refers to the law it means the laws in the jurisdiction that apply where the goods are procured, or services are performed.

Fundamental to this Code is an expectation that all Suppliers operate in full compliance with all laws, rules and regulations of the jurisdictions in which they do business.

The expectations outlined in the Code are not intended to supersede or alter the Supplier’s regulatory and contractual obligations. TEG expects all existing and new Suppliers to commit to the Code. Suppliers should check their respective contracts, agreements, and purchase orders as they may contain additional obligations or higher standards than those set out in this Code.

TEG expects Suppliers to communicate the Code to their related entities, suppliers and subcontractors who support them in providing goods and services to TEG, so that they are aware of, understand and comply with the Code.

Compliance with the Code

Suppliers are expected to self-assess their compliance with the Code and take timely action to correct any deficiencies or breaches reported or identified by an audit, assessment, inspection, investigation or review. Suppliers are encouraged to raise any concerns, discuss, and seek clarification accordingly to any elements of the Code with TEG. If requested by TEG, Suppliers must provide evidence and confirmation of their compliance with the Code, including the provision of documents and records that support their compliance. Suppliers are expected to support TEG in reviewing compliance with the Code. TEG may cease dealing

with any Supplier who is found to have acted unethically or illegally, or who has persistently failed to comply with the Code.

Reporting breaches

If a Supplier considers or suspects that another party has deviated from or breached their obligations under this Code, the Supplier is encouraged to report their concerns to TEG senior management.

1. Human rights and labour practices

TEG is committed to providing a fair, safe and healthy working environment. Suppliers are expected to provide a fair, safe and healthy workplace, which upholds high standards of human rights and integrates appropriate safety, human rights and labour policies and practices into its business.

Human rights

Suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations.

Workplace health and safety

Safety is our number one priority. Suppliers must comply with all applicable laws relating to workplace health and safety.

Suppliers are expected to:

- manage occupational health and safety hazards; and
- provide workers with job-related training and consult with employees in relation to the provision of information and training.

Anti-harassment

Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimization, and abuse. Suppliers are expected not to bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment. This includes, but is not limited to, abuse and harassment which can be verbal, physical, sexual, or psychological.

Modern slavery

TEG has a zero-tolerance commitment to all forms of slavery, forced or compulsory labour, child labour and human trafficking within its supply chain, including all international elements of the chain.

Suppliers must:

- ensure that all work is undertaken without coercion;
- not use any form of forced, bonded or indentured labour;
- employ only workers who are the applicable minimum legal age;

- use all reasonable endeavours to ensure that third-party recruitment agencies, if used, are compliant with the provisions of this Code and applicable law;
- be responsible for payment of all recruitment-related fees and expenses in recruiting foreign contract workers either directly or through third-party agencies;
- support TEG to identify areas of high-risk modern slavery in supply chains, investigate risks and if applicable, contribute toward and sponsor corrective actions;
- notify TEG as soon as it becomes aware of any instances of modern slavery taking place in its supply chain or in any part of its business;

Forced or Compulsory Labour means all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily, as defined in Article 2 of the ILO Forced Labour Convention (No. 29).

Child Labour means work that is mentally, physically, socially, or morally dangerous and harmful to children (any person under 18 years old); and interferes with their schooling: (i) by depriving them of the opportunity to attend school; (ii) by obliging them to leave school prematurely; or (iii) by requiring them to attempt to combine school attendance with excessively long and heavy work. Child Labour also includes Article 3 of the ILO Worst Forms of Child Labour Convention (No. 182).

Working hours, wages and benefits

Suppliers must:

- follow all applicable laws and regulations with respect to wages, working hours and workers compensation insurance; and
- ensure that all workers receive their legally mandated minimum wages, benefits, superannuation, leave entitlements and time off for legally recognized holidays.

Freedom of association

Suppliers are expected to freely allow workers to associate with others, form and join (or refrain from joining) industrial organizations or associations of their choice and bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation, or harassment.

2. Environmental management

TEG is committed to environmentally responsible and sustainable work practices. Suppliers are expected to minimize the environmental impact of their operations and maintain environmentally responsible policies and practices.

Environmental impacts

Suppliers must comply with all applicable laws and regulations relating to the environment, including any management and reporting obligations. Suppliers are expected to manage the environmental impact of their operations by:

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- ensuring the safe storage, transportation and disposal of hazardous substances including hazardous waste;
 - maintaining policies and practices for the efficient use of energy, water and natural resource consumption; and
 - maintaining policies and practices that reduce the risk of pollution, loss of biodiversity, deforestation, damage to ecosystems and greenhouse gas emissions.

3. Professional conduct

TEG expects high standards of professional conduct and compliance with all applicable laws.

Suppliers are expected to:

- maintain appropriate standards of behaviour, conduct and ethics in their dealings with TEG;
- comply with all anti-bribery, anti-corruption and anti-money laundering laws;
- not engage in, either directly or indirectly, fraudulent, corrupt or collusive activities;
- conduct themselves in a manner that is fair, professional and that will not bring TEG into disrepute; and
- be ethical in their business activities, including relationships, practices, and operations.

Confidentiality

Suppliers must not improperly use any private, confidential, or commercially sensitive information in its possession relating to or in connection with its dealings with TEG.

Conflict of interest

Suppliers must:

- declare to TEG any situation that raises an actual, potential, or perceived conflict of interest related to or in connection with its dealings with TEG; and
- avoid financial, business, or other relationships which may compromise the performance of their duties under their business arrangement with TEG.

Gifts, benefits, and hospitality

TEG personnel must:

- conduct themselves with the highest standards of integrity, impartiality and accountability;
- perform their duties without favouritism, bias or for personal gain; and

Suppliers are expected not to:

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- offer TEG personnel gifts or benefits, either directly or indirectly, and offers of hospitality will be limited to token offers of basic courtesy; or
 - take any action to entice or obtain any unfair or improper advantage.

4. Governance

A commitment to sound management, risk and corrective action systems are key to a reliable supply chain for TEG. Suppliers are therefore expected to maintain sound administration processes and risk management frameworks.

Record keeping

Suppliers are expected to maintain adequate records that accurately record all financial transactions and information regarding their business activities, labour, health and safety, and environmental practices in accordance with applicable laws, policies, and procedures. Disclosure of information is expected to be undertaken without falsification or misrepresentation.

Risk management

Suppliers should develop and maintain a process to identify, manage and control relevant risks associated with its operations. These include supply chain risks and risks relating to human rights and labour practices, the environment, and professional conduct.

Critical incident management

Suppliers should:

- identify and assess potential critical incidents, emergency situations and business continuity risks; and
- develop and implement emergency plans and response procedures that minimize harm to life, environment, and property, while minimizing disruption to business continuity.

Audits and assessments

To ensure compliance with this Code and the applicable laws, Suppliers are expected to:

- perform periodic evaluations of their facilities and operations, and the facilities and operations of their subcontractors;
- evaluate modern slavery risks in their supply chains, assess these risks with their suppliers, document corrective actions; and
- cooperate openly and honestly with any TEG audit, assessment, or review.